

Uganda Christian University

The Whistleblower Policy

Objective:

Uganda Christian University is committed to high standards of ethical, moral and legal conduct. In line with this commitment, and the University's commitment to open communication, this Policy aims to provide an avenue for employees to raise concerns, and gives reassurance that they will be protected from reprisals or victimisation for whistle blowing. This Policy is intended to cover protections for anyone who raises impropriety concerns regarding Uganda Christian University, such as:

- Incorrect financial reporting;
- Unlawful activity;
- Activities that are not in line with the University Charter, Instruments of Identity, Statutes, Codes of Conduct and Policies of the University; or
- Any activities, which otherwise amount to serious improper conduct.

The main purpose of a Whistleblower Policy is to open up the channels of transparency so that decision makers will be promptly informed about fraud and immoral practices without jeopardising the confidentiality of the informer. It is assumed that the information given is in good faith, can be verified and is reliable for better management of the University.

This Policy tries to identify who the "Whistleblower" is, when it is done, how it is done, the need for evidence from the Whistleblower, protection of the Whistleblower, who is responsible and how it is administered.

Principles Governing this Policy

1. Acts of fraud, any dealings in contradiction of the University's Instruments of identity and breaches of UCU governance documents (all these acts hereinafter collectively referred to as "impropriety") of the University shall be infractions reportable under the provisions of this Policy.
2. The Whistleblowers Policy shall not be interpreted to replace the normal channels of administration of the University.
3. All employees or students are expected to be potential Whistleblowers.
4. External Whistleblowers shall also be welcome to submit their observations.
5. It is intended to protect honesty and ethical conduct of University business, and/or personal compliance with the University's Instruments of Identity in all conduct.
6. The Policy shall not be an avenue for slight, vilification or personal vendetta.
7. The informer's identity must be protected, and he/she shall be protected from potential retaliation.
8. Every staff member shall be subject to the Whistleblower's Policy; this means both supervisors and those supervised.

Whistleblower

A whistleblower for the purpose of this Policy means any person who makes a disclosure of impropriety under and in accordance with this Policy.

Action Procedures

In so far as is possible, the information given needs to be verifiable.

1. It is important that there is a written and signed report of the information received. Anonymous information shall not be entertained.
2. Information may be investigated without the knowledge of the person concerned. Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith.

3. The immediate Supervisor of the subject will be informed by the Vice Chancellor if it is judged that doing so will not jeopardize or compromise the investigations into the matter.
4. The subject shall be given opportunity to hear and be heard about the information received about him/her.
5. The primary office responsible for implementing the Whistleblower's Policy shall be the Internal Auditor's office under the jurisdiction of the Vice Chancellor.
6. When the matter to be reported touches on the Internal Audit office, the Whistleblower may bring the matter to either the Vice Chancellor directly or to the Chairman of Council.
7. The Vice Chancellor may commission a committee to investigate the matter at hand with a well defined mandate.
8. The University may also identify and contract an external entity with a hotline for purposes of whistle blowing.

Levels of Protection

1. Under no circumstances shall the identity of the informer be revealed to the subject even when the information is found to be erroneous.
2. If it can be proved beyond reasonable doubt that the Whistleblower did so to slander an officer or staff member, the University's disciplinary procedures may be invoked.
3. The identity of the Whistleblower shall be protected where he or she:-
 - i) Makes the disclosure in good faith;
 - ii) Makes the disclosure to the authorised officer and/or office;
 - iii) Maintains the confidentiality of his or her identity as the informer/whistleblower and takes reasonable steps to avoid its discovery; and
 - iv) Maintains the confidentiality of the information contained in the disclosure.

Procedures for Disclosure

1. A disclosure of impropriety shall be made orally or in writing.
2. The disclosure shall contain in as far as practicable-
 - i) The full name and employment position of the Whistleblower;
 - ii) The nature of the impropriety in respect of which the disclosure is made;
 - iii) The name and particulars of the person alleged to have committed, who is committing or is about to commit the impropriety;
 - iv) The time and place where the alleged impropriety is taking place, took place or is likely to take place;
 - v) The full name, address and description of a person who witnessed the commission of the impropriety; and
 - vi) Whether the Whistleblower has made a disclosure of the same to somebody else and who that person is.
3. Where a Whistleblower makes a disclosure orally to the authorised officer, the officer shall cause the disclosure to be reduced into writing containing the same particulars as specified in (2) above.
4. The writing required to be made in (3) above shall be read over, interpreted and explained to the Whistleblower in a language the Whistleblower understands and the Whistleblower shall certify that the information contained in the statement is true and correct before making a mark on it.

Action on receipt of Disclosure of Impropriety

1. Where the disclosure of impropriety is made to the office responsible for implementing this Policy, the office shall investigate or cause an investigation into the matter and take appropriate action in line with the University Charter, the relevant University Statutes and other governance documents of the University.

2. Any investigations undertaken in respect of the disclosure of impropriety shall be carried out expeditiously.

Protection from Victimization

1. A person shall not be subjected to any victimisation by any other person on account, or partly on account, of having made a protected disclosure.
2. Save for justifiable disciplinary action with respect to deliberate vilification of another, a Whistleblower shall be considered victimised on account of making a protected disclosure where the Whistleblower is-
 - i) Dismissed;
 - ii) Suspended;
 - iii) Denied promotion;
 - iv) Demoted;
 - v) Made redundant;
 - vi) Harassed;
 - vii) Intimidated;
 - viii) Threatened with any of the matters set out in (i) to (vii) above
 - ix) Subjected to a discriminatory or other adverse measure by his or her fellow employees.
3. A Whistleblower who honestly and reasonable believes that he or she has been victimised as a result of his or her disclosure may make a complaint to the Vice Chancellor.
4. A whistleblower shall not be considered victimised if the person against whom the complaint of victimisation is directed has the right within the University Charter and any relevant University Statute to take the action complained of; or the action is demonstrably unrelated to the disclosure made.

May 30, 2011

Recognition

1. Management under the direction of the Vice Chancellor shall determine an appropriate form of appreciation of the Whistleblower subsequent to recovery of the money or damning proof of the subject, based on that disclosure.
2. A Whistleblower shall be appreciated within six months following successful conclusion of the matter as in #1.

Passed May 30th, 2011