

Training Health Researchers into Vocational Excellence in East Africa (THRiVE)



WHISTLE BLOWER GUIDELINES

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1.0 Policy Statement

1.1 THRiVE's mission is *"to empower African Institutions to become Research Engines for Health Innovations and Evidence-based Healthcare Practices"* and vision is to *"be a leading Network of Excellence in building Health Research Capacity in Africa"*. THRiVE's values are transparency and accountability. Our objectives:

- a. To implement high-quality scientific research training aimed at producing research leaders in East Africa through joint North – South and South – South supervision and mentorship
- b. Conduct high impact scientific research that addresses African health research priorities through equitable (North-South) collaborative research that conforms to international standards and guidelines
- c. To Implement public engagement programs in Kenya, Tanzania and Uganda that promote understanding the value and use of science among the lay public, policy makers, civil society and secondary school students
- d. To cultivate professional environments to manage and support scientific research

THRiVE needs to comply with all applicable treaties conventions, laws and regulations and use the highest standards of personal, scientific and organizational ethics in implementing its mission in regards to:

- a. its research capacity building, including communication
- b. its research activities
- c. its administrative management
- d. its finance management
- e. its partner management including dealing with, contractors, job applicants and others seeking to obtain resources or work with THRiVE
- f. its engagement with the public, the media, civil society and policy makers in the THRiVE partner countries
- g. its personnel management
- h. Its resources including equipment and but not limited to those mentioned above

1.2 THRiVE is committed to operating within the highest standards of openness, integrity and accountability and in compliance with all applicable laws, rules and regulations for staff, and prohibits fraudulent practices by any of its governance committee members, employees, fellows, students or volunteers, who are required to observe high standards of professional ethics and practice honesty and integrity in the conduct of their duties and responsibilities.

1.3 THRiVE endeavors to promote a culture of professionalism and integrity through setting and communicating standards of expected integrity; applying the same policies and standards to all, and monitoring and evaluating its policies and practices in those areas continuously and to take remedial action as needed. Research protocols, specific provisions in the Human Resource Manual, the Anti-fraud and Anti-Corruption Policy or the Procurement Policy, and the Conflict of Interest Policy are

illustrations of this continuous effort.

- 1.4 The Policy is designed to encourage and enable governance and operational committees, officers, employees, fellows, volunteers and any other THRiVE stakeholders to raise and report serious concerns about violations or suspected violations of laws, rules, regulations and policies that govern THRiVE's operations internally and externally without fear of reprisal; so that the THRiVE can address and correct them.

2.0 Scope of the Policy

2.1 Policy Outline

The Policy outlines a procedure for reporting actions that are reasonably believed to be unprofessional and in violation of the applicable laws, rules, regulations and policies or that constitutes fraudulent accounting or other illegal practices. It applies to any matter which is related to THRiVE's business and does not relate to private acts of an individual not connected to the business of THRiVE. It covers concerns raised in the interest of the THRiVE's stakeholders that may be initially investigated, but may then lead to invocation of other procedures such as disciplinary sanctions. These concerns include:

- a. Non-compliance with the laws, rules, regulations, and policies governing THRiVE
- b. Non-compliance with the operations systems and procedures of THRiVE
- c. Financial mismanagement or fraud
- d. Perpetrating of criminal activity
- e. Threats to health and safety to persons, property and the environment
- f. Improper conduct or unethical behavior
- g. Attempts to conceal any of the above

2.2 Who should report

The general public regardless of their level, type of employment or location and all THRiVE stakeholders including funders, supervisors and mentors, are required to report concerns or complaints regarding misconduct by any person associated to THRiVE Consortium including committee member, THRiVE fellow, Director, co-applicants, other staff or members of the public which they feel:

- a. Is against or circumvents THRiVE's governing rules, policies, procedures and established standards and codes of conduct
- b. Is improper, unethical and unlawful
- c. Is inconsistent with the standard they believe THRiVE subscribes to
- d. Is, or will result in, a waste of THRiVE's resources
- e. Poses a risk to THRiVE's reputation and/or integrity
- f. Represents scientific fraud or ethical violation
- g. Are dangerous practices likely to cause harm or physical damage to a person, animals

- or property
- h. Is an abuse of power or authority for any unauthorized or ultimate purpose
 - i. Is unfair discrimination
 - j. Represents a conflict of interest
 - k. Is an attempt to cover up any of these types of action or
 - l. Is already known but not being diligently reviewed and acted upon by THRiVE Director or co-applicants.

2.3 Entities/individuals covered by this policy:

1. All officials and staff (directors, members, managers or equivalent, regular, temporary, casual, and including visiting scientists)
2. fellows (postdoc, PhD, career development awardees, masters, interns)
3. supervisors and mentors
4. Volunteers
5. Partners and collaborators
6. Contractors, external consultants and temporally workers employed through service vendors
7. Official visitors
8. Any other Stakeholders.
- 9.

3.0 Facilitating implementation of the policy

3.1 Communication Channels

The effectiveness of these whistleblowing efforts rests with the leadership of THRiVE, leadership of partner institutions and all categories of people mentioned in section 2.2. It is therefore important that communication channels exist by which all the identified entities can report their concerns about actual or suspected breaches that they may feel, are not being adequately identified or addressed within the organization. This will enable THRiVE to investigate the possible misconduct and take appropriate action.

3.2 Conflict Resolution

Where a staff member feels that he/she has not received the treatment or obtained the satisfaction he/she was expecting, either from THRiVE or from a supervisor or manager or equivalent, the conflict resolution policy that is detailed in the Human Resource Manual applies. The matters will be more generally reviewed in accordance with the provisions of the Human Resource Manual.

4.0 Responsibility and Mandate

- 4.1 The steering committee (SC) will appoint one of its members to be owner/sponsor responsible for receiving, reviewing, auctioning findings' recommendations and compiling reports from the whistleblower for consideration by the SC. All matters reported shall be investigated.

- 4.2 The SC member so appointed, acting on behalf and in consultation of the SC will make decisions on who would be the most suitable office either internally or externally to be involved in the investigation process of the various reports received by them.
- 4.3 The identified investigation team shall carry out their investigations and report their findings to the SC.
- 4.4 Where breaches of duty are confirmed to have occurred, the SC shall make its decisions based on the findings and inform the THRiVE management and or partner institution leadership and the whistle blower on the outcome. Action will be taken to correct the failure and avoid similar events in the future, as well as to address any confirmed omission and misconduct.
- 4.5 The whistle blowing procedure has been set out in detail under Annexure 1 of this Document.

5. Preservation of Anonymity

- 5.1 The identity of the persons who are the subject of reports provided under this policy shall, at all times from when the report is first made, be protected by those making the reports and by those receiving and investigating the reports. Breaches in this regard will be treated as serious violations subject to disciplinary action.
- 5.2 It is important to afford any alleged perpetrator/s appropriate opportunity to present their argument and to assume that individuals are innocent until proven guilty. It is therefore incumbent on all those making allegations about staff or any other person to similarly maintain confidentiality regarding the issues raised, until the completion of investigations.
- 5.3 THRiVE will respect and protect the confidentiality of the identity of the person that makes such reports in good faith, and ensure that there is no retaliation against them. Breaches in this regard will be treated as serious violations subject to disciplinary action where possible.

6. Other important considerations

- 6.1 When a breach of duty has been confirmed upon the conclusion of an investigation, that confidentiality as it relates to the breach (but never the identity of the whistleblower), may be lifted by the SC.
- 6.2 Breach of employment agreements, unlawful acquisition, stealing of documents and use of confidential communication channels to make reports in bad faith, i.e. without any basis in fact for the deliberate purpose of victimizing someone or disrupt the operations of THRiVE will not be tolerated. Breaches in this regard will be treated as serious violations subject to disciplinary action. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

6.3 If the whistleblower has any personal interest in the matter, s/he must make this clear at the time the alleged misconduct is reported. The act of whistleblowing will not shield whistleblowers from the reasonable consequences flowing from any involvement in misconduct, even if admission may be a mitigating factor when disciplinary action is being considered.

7.0 Annexure

Annexure 1- Steps of Whistle blowing Reporting Process

1. The following channels will be used to report matters covered under this Policy:
 - a. Telephone hotline;
 - b. Email address;
 - c. Web based portal.
 - d. Anonymous letter to THRiVE leadership
 - e. Suggestion box

THRiVE shall outsource to an independent service provider, the system (e.g. web based) for depositing allegations for exclusive access by the SC contact member and enabling to and from communication by email or voice. The service provider will provide a pre-numbered listing of allegations received and these shall be tracked through the procedures below using the assigned number.

2. The following procedure shall be followed:
 - i. At the initial phase of reporting, the whistleblower shall submit a report or incident through any of the above channels to be received by the identified Member of the SC.
 - ii. The whistleblower will have the option of anonymously maintaining dialog with the sponsor SC Member to allow for follow-up on the reported incident.
 - iii. The SC Member will acknowledge receipt of the concern or the complaint and take timely follow up action to review the information provided.
 - iv. The SC member will identify the most suitable office either internally or externally to be involved in the investigation process of the various reports received.
 - v. An initial assessment shall be carried out to determine the nature, extent and timing of the required investigation. The SC may opt to further outsource some of the whistleblower work involved in acknowledging receipt, collating the allegations, preliminary reviews and identification of investigators.
 - vi. If urgent action is required, this may be taken before the investigation is started.

The investigation shall be carried out promptly by the identified investigation team and appropriate corrective action taken if warranted by the investigation and findings submitted to the SC. Below is a summary of important steps in the order in which they shall occur:

Timeline	Action
Week 1	After allegations received at service provider, representative of the SC receives allegations.
Week 2	SC member responsible shares with other members. Preliminary decisions and action taken. Agree and assemble investigation team.
Week 3 to 6	Information Gathering- Documentation of evidence by the and completion of report and its circulation
Week 7	Review of report by SC and final decision.
Week 8	Report to stakeholders and feedback to the whistleblower.

- vii. In case of a staff member raising an issue feels that s/he is either victimized or disadvantaged or that appropriate objective action was not taken following the report and subsequent investigation by the investigation team, the staff member may raise the issue with the institutional leadership as the next level.
- viii. Should the matter raised be with reference to the Chair of SC, or any Member of the SC, then the affected member shall be disqualified from any oversight role on investigations and on decisions of action to be taken. If the remaining members of the committee feel that the matter should be handled by a separate independent committee then the matter should be referred to the host institutional leadership.
- ix. All matters shall be reported to relevant stakeholders in line with THRiVE's core values of being transparent and accountable and in fulfillment of prevailing contractual obligations.
- x. Once a decision has been made, the whistleblower will be informed of the outcome of the investigations by the SC. Feedback shall be made to staff of allegations made, the findings of investigations and any action taken.

8.0 Acknowledgement

In developing this policy document, reference was made to the International Centre of Insect Physiology and Ecology (icipe) whistleblower policy document



14th August

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Chairman, THRiVE Steering Committee

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Date