

WHISTLE BLOWING POLICY

1. Policy Statement

The University

- (a) is committed to the highest standards of openness, probity, accountability and high ethical behavior by helping to foster and maintain an environment where staff and other stakeholders can act appropriately, without fear of reprisal. To maintain these standards, the University encourages staff and relevant stakeholders who have material concerns about suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the University to come forward and report same through appropriate channels without fear of retribution or unfair treatment.
- (b) recognizes that the best systems of control may not provide absolute safeguards against irregularities or always detect and prevent misconducts. This Policy is, therefore, intended to promote alternative channels of intelligence gathering through good faith sharing of information that could prevent such misconducts in the system.
- (c) notes that this Policy and the procedures for its implementation are intended to encourage staff and other relevant stakeholders to report perceived unethical or unlawful conduct of staff of the University whether academic or non-academic and Management of the University to appropriate authorities in a confidential manner, without any fear of victimization or reprisal, harassment, intimidation, by anyone for reporting the said conduct.
- (d) emphasizes that reporting under the Policy should not be based on mere speculation, rumors and gossips but on knowledge of facts that can be investigated in order to correct the underlying misconduct.
- (e) assures that reporting under this Policy shall be treated in strict confidence.

2. Definition

“Relevant Stakeholders” means students, parent or guardian of students, alumni of the University, contractors with the University where the complaints relate to performance of their contracts, and other members of the public who can demonstrate genuine interest in bringing to the knowledge of the University authorities the perpetration of a misconduct under this Policy;

“Suspect” means a person against whom a misconduct is reported;

“Whistleblowing” means the act of reporting perceived misconduct of staff and management by any staff or other relevant stakeholders to appropriate authorities in a confidential manner;

“Whistleblower” means any person involved in whistleblowing

3. Objective of the Policy

Objective of this Policy are to:

- (a) ensure that staff and relevant stakeholders feel supported in speaking up in relation to matters they suspect may involve improper, unethical or inappropriate conduct within the University.
- (b) encourage identification and challenge of all improper, unethical or inappropriate behavior at all levels in the University system.
- (c) provide clear procedures for reporting and handling such behaviours;
- (d) proactively prevent and deter misconducts that could damage the University’s reputation, finances, integrity of examinations and scores and other examination records, and safety and reliability of records;
- (e) provide assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form; and
- (f) help promote and develop a culture of openness, accountability and integrity.

4. Scope of the Policy

Reportable misconduct under this Policy include, but not limited to:

- (a) all forms of financial malpractices or impropriety such as fraud, corruption, bribery, theft and concealment;
- (b) demand for financial or other favours in order to confer unjustifiable benefits on another;
- (c) failure to comply with legal obligations, statutes, and regulatory directives;
- (d) actions detrimental to health and safety or the work environment;
- (e) any form of criminal activity;
- (f) formation and operation of unlawful associations on campus or the carrying on of cult activities;
- (g) improper conduct or unethical behavior that undermines core ethical values, such as integrity, respect, honesty, accountability and fairness;
- (h) compromise by staff of the integrity of examinations, scores, and allied records;
- (i) tampering with University’s records;
- (k) non-disclosure of interest, where it is appropriate and desirable to disclose in order to avoid conflict of interest.
- (l) sexual or physical abuse of staff and students or of any other person on campus;
- (m) collusion among staff to conceal any unethical or unlawful conduct;
- (n) unethical conduct by any staff in relation to admission of students and allied processes.

5. Designation of Investigation and Provision of Reporting Channels

Designation of Investigation

- (a) The Vice-Chancellor shall appoint investigator for each of the reports made under this Policy and, in doing so, take into account the nature of the complaint and competencies required to effectively investigate the misconduct reported;
- (b) Where the report made is against the Vice-Chancellor, the Pro-Chancellor shall designate the investigator(s) and result of the investigation shall be submitted to the Pro-Chancellor.

Reporting Channels

- (c) Management of the University shall consider and designate appropriate reporting channels for whistleblowing and create sufficient awareness of the channels in order to facilitate the operation of this Policy;
- (d) Management shall also identify the recipient of all whistleblowing reports made, and to whom reports received from each of the designated channels must be forwarded immediately for notification of the office of the Vice-Chancellor
- (e) There shall be a reporting channels in the office of the Pro-Chancellor in relation to reports against the Vice-Chancellor. On receipt of any whistleblowing report in this regard, the report shall be forwarded immediately to the Pro-Chancellor. In this regard, the Pro-Chancellor shall be given the option to determine the reporting channel taking into account the person against whom the report is made and the likely seriousness and sensitivity of any such report.

6. Malicious Report

- (a) Whistleblowers recognize that unfounded report against a staff can damage the staff's reputation;
- (b) Whistleblowers recognize that this Policy is not meant to provide opportunity for mischief makers to damage the hard-earned reputation of persons against whom reports are made simply to settle personal scores;
- (c) Disciplinary action shall be taken against any whistleblower who makes a report against a staff out of malice, or whose report is utterly baseless that no reasonable person acting in good faith and prompted by a genuine desire to prevent a misconduct or unethical behaviour would make such report.
- (d) Inability of the investigator to return a verdict of misconduct against a suspect does not necessarily amount to malice on the part of the whistleblower, so long as there is sufficient basis to justify investigation of the matter complained about.

7. Protection of Whistleblower

- (a) The University shall protect whistleblowing who alert it of a reportable misconduct under this Policy, provided report of such misconduct is made:

- (i) in the reasonable belief that it is intended to expose malpractice or impropriety;
 - (ii) to an appropriate person or authority; and
 - (i) in good faith without malice or mischief;
 - (ii) to the prescribed channels.
- (b) Any retaliation, including, but not limited to, any act of discrimination, reprisal, harassment, suspension, dismissal, demotion, vengeance or any other occupational detriment, direct or indirect, recommended, threatened or taken against a whistleblower because he or she has reported a reportable misconduct in accordance with this Policy will be treated as a misconduct and dealt with accordingly.
- (c) Where a whistleblower makes report outside of the prescribed channels (e.g. media-print or electronic) the report may not be protected.
- (d) Any staff or student-whistleblower that feels victimized may report his/her grievance(s) to the Vice-Chancellor, who shall direct appropriate action to address the concern;

8. Roles and Responsibilities

The following are the roles and responsibilities to key parties in the whistleblowing process:

S/N	Responsible Office	Responsibilities
1.	Whistleblower	Whistleblowers are expected to act in good faith and should refrain from making false accusations when reporting a possible misconduct, and should endeavour to provide such evidence in his or her possession that can aid proper investigation of the misconduct reported.
2.	Suspect	A suspect has a duty to cooperate with investigators during the period of investigation, including provision relevant information, documents, or other materials as may be required by the investigator
3.	Investigator	<ul style="list-style-type: none"> (i) Investigator is expected to handle all matters promptly, with high professionalism and confidentially. S/he shall be impartial and/or unbiased in carrying out the investigation; (ii) Submit result of investigation to the Vice-Chancellor (iii) Refrain from disclosing or discussing matters under investigation

4.	Vice-Chancellor	<ul style="list-style-type: none"> (i) The Vice-Chancellor shall forward all results of investigation under this Policy to Management for deliberations and appropriate actions; (ii) Appoint investigators in relation to whistleblowing complaints forwarded to him.
5.	Management of the University	<ul style="list-style-type: none"> (i) Management shall consider results of investigations which forwarded to it by the Vice-Chancellor and shall deliberate on the results and take appropriate actions as the circumstance of the cases require; (ii) Designate appropriate reporting channels; (iii) Appoint recipient of whistle blowing reports.
6.	Pro-Chancellor	<ul style="list-style-type: none"> (i) Appoint investigator in relation to complaints against the Vice-Chancellor ; (ii) Consider result of any investigation of reports made to his office and decide on the appropriate steps to be taken in relation to the result
7.	Recipient/the Person to whom a whistleblowing report is forwarded	<ul style="list-style-type: none"> (i) Receive and document all whistleblowing reports made and received by him or her; (ii) Forward the report to the person designated by Management as the appropriate authority to whom a recipient shall forward the report; (iii) Prepare a quarterly summary of whistleblowing report received which shall be submitted to the office of the Vice-Chancellor; (iv) The person to whom a recipient has forwarded a whistleblowing report shall ensure that the report is forwarded to the Vice-Chancellor without delay.

9. Whistleblowing Procedure

Whistleblowing procedure involves steps that should be taken by the whistleblower in reporting misconduct, and steps required for the investigation of the reported misconduct. The following procedures shall guide the whistleblowing process.

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