



Whistleblowing Policy

Policy Title	Whistleblowing policy
Policy Type	Corporate Governance
Policy Owner	President's Advisor
Policy Number	Corporate Governance/2
Pertinent Dates	Drafted on: Approved on: Revised on:

1. Purpose:

The aim of this policy is to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate; It provides guidance as to how to raise those concerns and reassures staff and that they can raise genuine concerns without fear of reprisal even if they turn out to be mistaken.

2. Definitions:

Whistleblowing: This term has no legal definition; however, it is used in this policy to describe incidents where an individual discloses a suspected/claimed wrongdoing within the University under this policy.

Whistleblower: This term is used to describe an individual who raises a concern.

3. Scope:

3.1 Who is responsible for the policy?

- The President's Advisor has overall responsibility for this policy and for reviewing its effectiveness. He has day to day operational responsibility for this policy.
- Managers and other staff who may deal with whistleblowing concerns or investigations may take advice from the President's Advisor who may issue guidance from time to time and may arrange to provide appropriate training.
- The Office of Policies and Procedures in conjunction with the President's Advisor office will review this policy from time to time.
- All staff are responsible for the success of this policy. Staff are invited to comment on this policy at any time and suggest ways in which it might be improved. Comments and suggestions should be addressed to the office of Policies & Procedures.

3.2 What concerns may be raised

- The policy may be used to deal with specific concerns which are in the public interest and specifically where a staff member has a reasonable belief that one of the following has occurred or is likely to occur:
 - A criminal offence.
 - Failure to comply with legal obligations.
 - Financial or non-financial maladministration or malpractice/abuse or impropriety /misconduct or fraud.
 - Academic or professional malpractice.
 - A risk to the health or safety of any individual.
 - Environmental damage.
 - A miscarriage of justice /Injustice
 - Attempts to suppress or conceal any information relating to any of the above.
- If, in the course of investigation of any concern raised in relation to the above, the matter appears to the investigator to relate more appropriately to a grievance, bullying or harassment, or discipline procedure, those procedure(s) will be applied where appropriate, instead of or in addition to this procedure.

3.3 Who may raise a whistleblowing concern?

Any staff member who has a reasonable belief that there is serious malpractice relating to any of the protected matters specified above may raise a concern. The issues raised may relate to another staff member or a group of staff. The individual must reasonably believe that the relevant failure or malpractice has occurred or is likely to occur and that the matter is in the public interest. Complaints that are not of public interest will be dealt with by other procedures of the University.

4. Standards and procedures:

- The University will ensure that any staff member who makes a disclosure **will not be penalized or suffer any adverse treatment**. However, a staff member who makes an allegation without having reasonable grounds for believing that the relevant failure or malpractice has occurred or is likely to occur and that the matter is in the public interest may be subject to disciplinary proceedings.
- In view of the protection afforded to a staff member raising concern about matters they reasonably believe to be in the public interest, it is expected that any staff member will

feel able to put his/her name to any disclosure. The identity of the person raising the matter will be kept confidential, if so requested, for as long as possible provided that this is compatible with a proper investigation. Proper investigation may be more difficult or impossible if further information cannot be obtained from the person raising the complaint. It is also more difficult to establish whether any allegations are credible.

- As this policy assures protection for those declaring a genuine concern, anonymous disclosures are discouraged/ will not be considered, as this makes it harder to fully investigate and follow up on the issues raised.
- Concerns which are expressed anonymously will be considered at the discretion/decision of the University according to:
 - The seriousness/urgency of the issues concerned.
 - The likelihood of confirming the allegation from alternative credible sources.
- If it is considered strictly necessary to reveal the identity of the individual making the disclosure, this will be discussed with the individual who will be advised prior to the release of their identity.
- In many cases it will be appropriate for the staff member to raise any concerns informally with their line manager in the first instance, or the next more senior manager if it concerns the line manager, either in person or in writing. It may be possible to agree a way of resolving the concern quickly and effectively. In some cases, the line manager may feel that the concern should be referred to the President's Advisor, if so, the line manager will discuss this with the whistleblower before making the referral.
- However, where the matter is more serious, or the staff member feels that the line manager has not addressed the concern, or if s/he prefers not to raise it with the line manager for any reason, the staff member may choose to raise the matter by contacting the President's Advisor office directly.
- Once the Whistleblowing concern has been raised, the President's Advisor will carry out an initial assessment to determine the scope of investigation. The whistleblower may be required to attend additional meetings to provide further information to assist in making the initial assessment.
- The President's Advisor office will decide whether the matter should be dealt with under this procedure. If s/he considers that the matter should be dealt with under a different University procedure, s/he will advise the whistleblower as to the appropriate steps that should be taken.

- Any investigation will be conducted sensitively and promptly. The staff member will be notified of the intended timetable for the investigation. The President’s Advisor may authorize an initial investigation to establish the relevant facts. The investigator will report his or her findings to the President’s Advisor, who will then decide if there is a case to answer and what steps, if any, should be taken. This may include setting up a special internal independent investigation or reference to some external authority for further investigation, such as the legal department. The decision may be that the matter would be more appropriately handled under existing procedures for grievance, bullying and harassment, or discipline.
- Where a disclosure, is made any person or persons potentially implicated in wrongdoing will be told at an early stage of it and of the evidence supporting the disclosure, and they will be allowed to respond.
- Should an investigation lead the appropriate University authority to conclude there has been a breach/violation of University discipline, the staff member responsible may, in addition to any civil/criminal proceedings, be subject to disciplinary action in accordance with the appropriate disciplinary procedures for the relevant category of staff.
- If a staff member is not happy with the way in which their concern has been handled or the outcome, they may raise this with the President’s Advisor or the Internal audit office.
- Great care must be taken in the investigation of actual or suspected fraud/malpractice so as to avoid mistaken accusations. Under no circumstance should any individual, other than authorized parties stated earlier, personally attempt to conduct an investigation, interview, confrontation or interrogation of the alleged wrongdoers or further discussion related to any actual or suspected fraud.
- Investigation results will not be disclosed or discussed with anyone other than those who have legitimate need to know. This is important in order to avoid damaging the reputation of suspected parties but subsequently found innocent and to protect the organization from potential civil legal liability. Violators of confidentiality terms stated in this policy will be subject to disciplinary actions as per the Egyptian Labor Law.
- The President’s Advisor is the only entitled entity to have the final say whether any case constitutes a Fraud/malpractice behavior or not.

Contact information

Office Name: The President’s Advisor
Extension: 1041
Email: m.ismail@bue.edu.eg