

UNIVERSITY OF DAR ES SALAAM



SCHOOL OF ECONOMICS
CENTRE FOR BEHAVIOURAL STUDIES (CBS)

WHISTLE BLOWING POLICY



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SCHOOL OF ECONOMICS
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Whistle Blowing Policy

Whistleblowing policy

Policy Reference No.	CBS/POL/No.2
Policy Title	Whistle blowing Policy
Purpose and Description	Encourage and enable Centre for Behavioral Studies (CBS)'s employees, partners and other stakeholders to raise serious concerns within the organization that are in the public interest rather than overlooking matters of concerns
Applicability	To all activities conducted by CBS staff, research fellows, downstream partners or any person directly or indirectly engaged in any activity implemented by the Centre, within and outside Tanzania.
Effective Date	August 2019
Revision Date	July 2019

1. Introduction

Whistle-blowing refers to a situation where a whistle blower relays or discloses information regarding wrongdoing. Whistle blower is a person who informs on another or makes public disclosure of corrupt or wrong doing. In our policy a whistle blower can be an employee, partner or any other stakeholder.

Whistle-blowing policy encourages and enables employees, partners and other stakeholders to raise serious concerns within the organisation rather than overlooking a problem or 'blowing the whistle' outside. This Whistle blowing policy set the framework for dealing with allegations of illegal and improper conduct.

The Centre for Behavioural Studies (CBS) is committed to the highest standards of transparency, probity, integrity and accountability.

This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action known. Disclosures under this policy will be treated with utmost confidentiality and anonymity, protecting those disclosing and reporting wrong doing in the public interest from being victimised, discriminated against or disadvantaged.

This procedure does not replace other policies and procedures such as the safeguarding policy, anti-sexual harassment, risk management and other specifically laid down statutory reporting procedures. However, it provides a complementary platform to better implement some of the related policies.

This procedure is intended to ensure that the CBS has the right controls and assurances while complying with all other regulations and procedure from the University of Dar es Salaam (UDSM), the Department for International Development (DFID) and government of Tanzania.



2. Scope

This procedure applies to all CBS employees, including Associates and contractors.

When reporting a concern it should be put in mind that most day to day concerns are likely to be reported or dealt with by other internal mechanisms. However, if those concerns have not been dealt with or cannot be dealt with by other mechanisms then individuals have the right to raise concerns through the whistle blowing policy channels.

This procedure applies to, but is not limited to, allegations about any of the following:

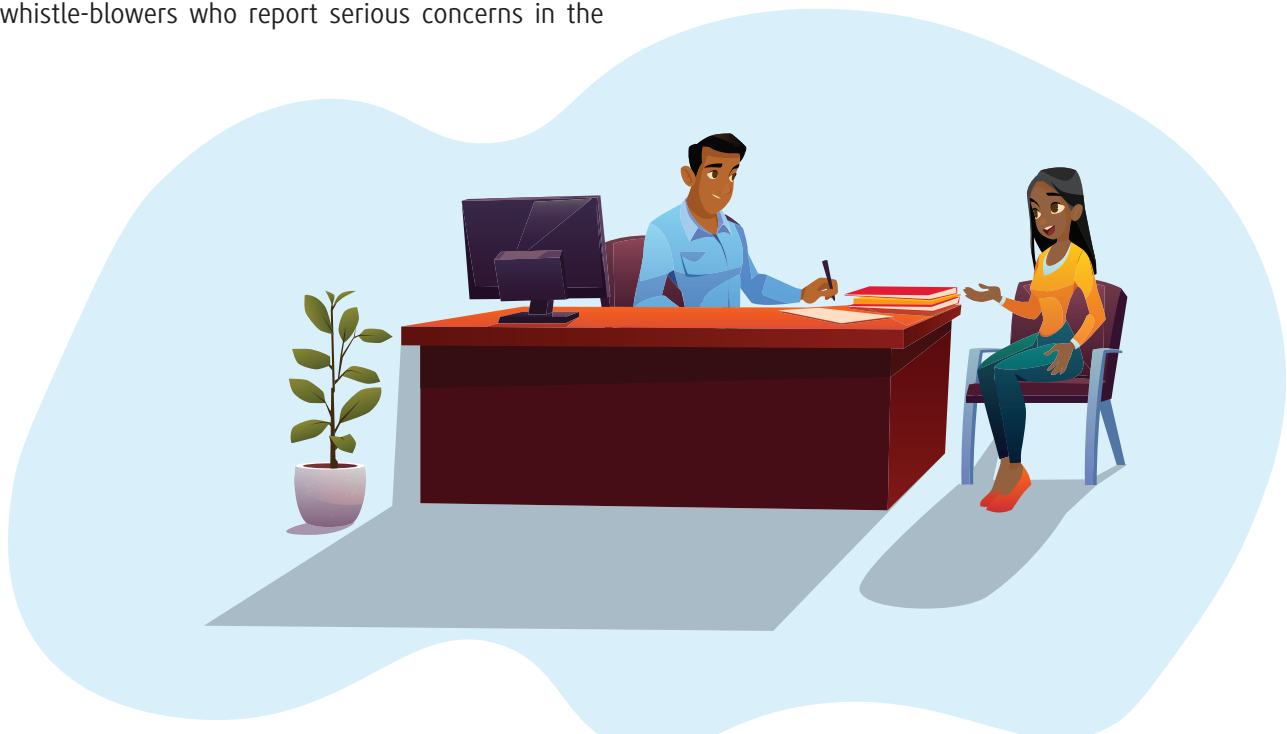
- Conduct that is offensive or breach of the law
- Alleged miscarriage of justice
- Serious health and safety risks
- The unauthorised use of CBS funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees customers or service users
- Abuse of power and authority
- Any other unethical conduct

3. Reporting

CBS always shall have a whistle blowing focal person (as identified in the whistle blowing form). Claims can be directed to the focal person's office or can be sent via focal person's email as well as cbs@udsm.ac.tz.

The CBS recognises that the decision to make an allegation can be a difficult one to make. However, whistle-blowers who report serious concerns in the

reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to the CBS and/or to those for whom the CBS serves. The CBS pledges to uphold whistle blower's confidentiality and anonymity and will take appropriate action to protect him/her from any reprisals, harassment or victimisation.



4. Confidentiality

All claims will be treated in confidence and every effort will be made not to reveal a whistle-blower's identity unless the whistle-blower otherwise requests. However, if the matter is subsequently dealt with through other CBS procedures such as the Disciplinary Procedure, then the allegation may already be known to the public.

Similarly, if the allegation results in court proceedings then the whistle-blower's identity protection will follow suit per that particular court procedure, regulations and mechanism of handling such matters. The CBS will not, without the whistle-blower's consent, disclose the identity of a whistle-blower to anyone other than the person involved in the investigation of the allegation.



5. Anonymous Allegations

This procedure encourages whistle-blowers not to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Notwithstanding, allegations made anonymously will be considered at the discretion of the CBS and UDSM management.

In exercising discretion to accept an anonymous allegation the factors to be considered are the following:

- The seriousness of the issue raised;
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

6. Untrue Allegations

No disciplinary or other action will be taken against a whistle-blower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistle-blower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

7. Procedure for Making an Allegation

It is preferable for allegations to be made to the CBS's whistle blowing focal person. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistle-blower believes that the focal person is involved it would be inappropriate to raise it directly with him/her. The whistle-blower may then make an allegation direct to the following:

- The Head of Department of Economics

If any of the above receive an allegation they would consider the allegation and may discuss with either the Department, College or University management depending on the level at which the allegation was reported. The line management, after consideration, would discuss with the whistle-blower and if they wish to proceed, the allegation would be investigated.

8. Allegation

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove any allegations, they will need to provide information to the

person they have reported it to, to establish the reasonable grounds for the allegation.

Another person of their choice may accompany someone making an allegation during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.



9. Action on receipt of an Allegation

The focal person (or whoever is applicable as stated above) will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation;
- The acknowledgement of the claim's receipt;
- Any documents supplied by the whistle-blower

The focal person will ask the whistle-blower for his/her preferred means of communication and contact details and use these for all communications with the whistle-blower in order to preserve confidentiality. If the allegation relates to fraud, potential fraud or

other financial irregularity the Head of Department of Economics (i.e. the chief accounting officer to the CBS fund) will be informed within 5 working days of receipt of the allegation. The head of department will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence it will immediately be reported to the University administration and CBS Advisory Board, and a decision will be made as to whether to inform the relevant law governing bodies or not. If the allegation concerns suspected harm to children the appropriate authorities will be informed immediately.

10. Timetable

CBS will acknowledge receipt of the allegation in writing within 5 working days with:

- An indication of how the CBS would propose to deal with the matter
- An estimate of how long it would take to provide a final response
- An indication of whether any initial enquiries were made
- Information on whistle-blower support mechanisms
- Indication whether further investigations would take place and if not, why.

Where the allegation is made internally and anonymously, the CBS would be unable to communicate what actions had been taken

11. Support

The CBS will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistle-blower is required to give evidence in criminal or disciplinary proceedings the University's corporate council office (UCC) would be contacted to arrange for them to receive advice on the procedure and advice on the support mechanisms available.

The CBS accepts that whistle-blowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations would be informed of the outcome of any investigation.



12. Responsibility for the Procedure

The CBS coordinators, Head of Department of Economics and the advisory board have overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

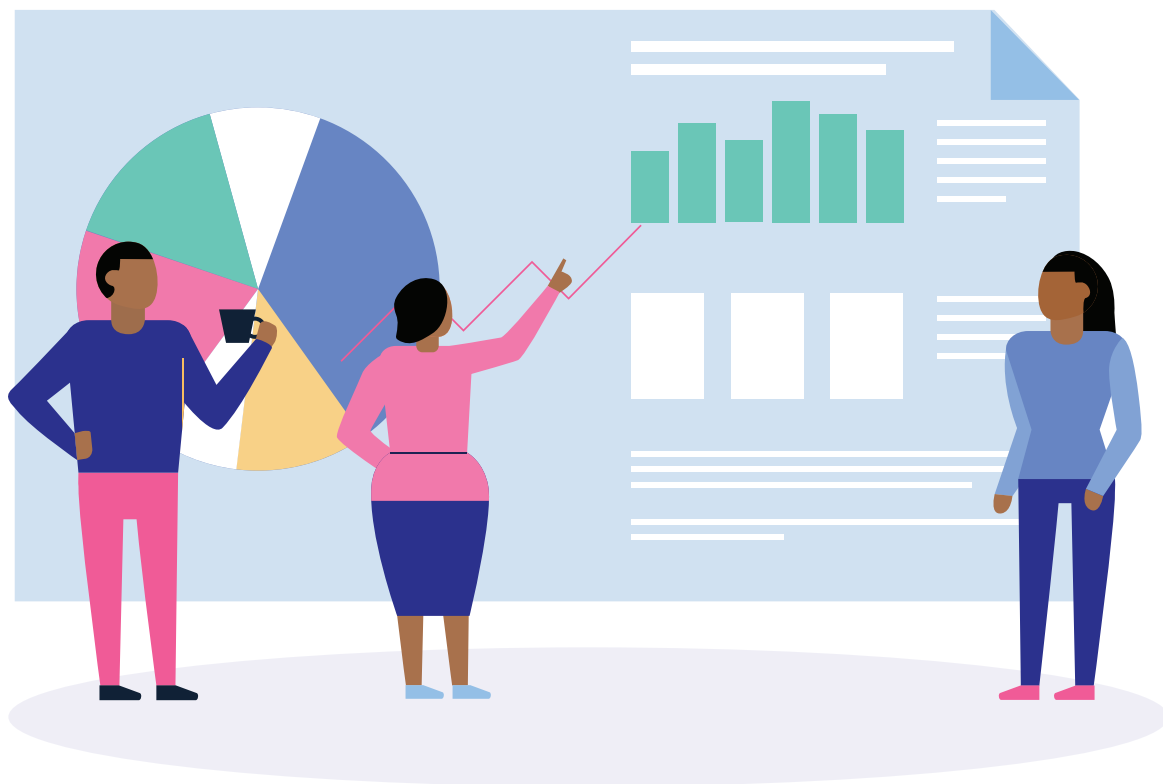
13. Monitoring

A register will record the following details:

- The name and status (e.g. employee) of the whistle-blower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The register will be confidential and only available for inspection by the Head of Department of Economics or CBS Advisory Board.

The Coordinator will report annually to the Advisory Board on the operation of the Procedure and on the whistle blowing allegations made during the period covered by the report. The report will not reveal the identity of the whistle-blowers.



Appendix:

The standard form of whistle blowing Allegations

CBS is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees and others that we deal with who have concerns about any aspect of CBS's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis. If you wish to make a report, please use this form.

1. Background and history of the concern (giving as much detail as possible):

2. The reasons why you are particularly concerned about the situation.

3. Please set out how you would like to see the issue dealt with?

(Please attach additional sheets if necessary)

You are encouraged to write your name, as concerns expressed anonymously may often be difficult to substantiate/ prove. CBS will consider all reports as far as is possible, but we encourage you to give your name and details below;

I confirm that I believe the above to be a qualifying disclosure and this information is disclosed in the public interest.

Name:

Office and job title:.....

Contact Details (Tel / Email):.....

Signature:

Date:.....

PLEASE SEND THIS FORM TO

Innocent Pantaleo,

CBS Whistle Blowing Focal Person,

University of Dar as Salaam,

Department of Economics,

COSS Tower, 2nd Floor, Room 201.

Or email to: innopanta@gmail.com copying it to cbs@udsm.ac.tz

