

UGANDA MARTYRS UNIVERSITY



Whistle blowing Policy

February 2025

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Definitions of Terms

Good faith: Means the honest intent to act without taking an unfair advantage over another person and includes honesty, fairness, lawfulness of purpose and absence of any intent to defraud.

Harass: Means a systematic, persistent or continual unwanted and annoying pestering that may include threats or demands.

Harassment by law and in this document, is unwelcome or uninvited behavior that degrades, threatens or offends the victim, creating a hostile environment. Harassing behavior can include but not limited to nick-names, insulting comments or slurs, and randy propositions. For details refer to UMU Gender and exclusivity policy, 2025, Policy principle (i)

Whistle blowing within this policy means the reporting by stakeholders of suspected misconduct, illegal acts or failure to act within the University's rules and regulations. Whistle-blowing refers to a situation where a whistle blower relays or discloses information regarding wrongdoing. Ideally, the disclosed information must have evidence.

Whistle blower is a person, having some evidence who informs or makes public disclosure of corrupt or wrong doing. In our policy a whistle blower can be an employee, students, partner or any other stakeholder.

Abbreviations/Acronyms

DHR	Director Human Resources
DOS	Dean of Students
DVC	Deputy Vice Chancellor
TOR	Terms of Reference
UMU	Uganda Martyrs University

1.0 Introduction

Uganda Martyrs University is committed to the highest standards of ethical conduct and integrity in all its operations. We recognize that individuals may have concerns about the ethical, legal, or financial conduct of others within the University. These concerns may include, but are not limited to:

- a) Financial misconduct: Fraud, theft, embezzlement, misuse of university funds.
- b) Research misconduct: Falsification of data, plagiarism, inappropriate research practices.
- c) Academic misconduct: Cheating, plagiarism, tampering with grades and others.
- d) Health and safety violations: Hazardous working conditions, environmental violations.
- e) Conflicts of interest: Personal or financial interests that may compromise University interests.
- f) Discrimination and harassment: Based on race, gender, religion, sexual orientation, disability, or other protected characteristics.
- g) Retaliation: Against individuals who report wrongdoing in good faith.

2.0 Purpose of the policy

The purpose of the whistle blowing policy is to:

- a) Encourage and enable students, staff and other stakeholders to raise concerns within the University rather than overlooking a problem or 'blowing the whistle' outside. The purpose is to set out a framework for dealing with allegations of illegal and improper conduct.
- b) Provide a means of making allegations about standards, conduct, financial irregularity or possible unlawful action known and acted upon.
- c) Disclosures under this policy shall be treated with utmost confidentiality and anonymity, protecting those disclosing and reporting wrong doing in the public interest from being victimized, discriminated against or disadvantaged.

3.0 Rationale of the policy

This policy protects Umu as an institution, and the public from harm caused by unethical or illegal actions within the organizations. There are things that might not be covered by the institution frameworks yet employees can identify them and report to the authority. This policy therefore seeks to provide an avenue for bringing such concerns to the attention of Management and Council for action.

4.0 Objectives of the policy

- a) To encourage stakeholders to feel confident in raising concerns at the earliest opportunity and to question and act upon concerns about practices.
- b) To provide avenues for stakeholders to raise those concerns and receive feedback on any action taken.
- c) To ensure that response is received about concerns and that there is awareness of how to pursue them if one is not satisfied.
- d) To reassure whistle blowers that they will be protected from possible revenge if the act of disclosure was made in good faith.
- e) To encourage employees and the third parties who interact with us or our programmes to raise concerns of malpractice at the earliest opportunity.
- f) To inform our employees and third parties of the avenues of raising concerns and what to expect after they raise their concerns.
- g) To provide for a culture of zero tolerance towards fraud, corruption, bribery and any malpractice or wrongdoing.
- h) To explain what qualifies as a whistle-blow and provides guidelines on how to report a concern.
- i) To encourage stakeholders to bring out information helpful in enforcing good corporate governance practices.

5.0 Scope of the policy

This policy applies to all University employees, students, service providers, alumni and other stakeholders who conduct business with or on behalf of UMU.

6.0 Policy Statement

Uganda Martyrs University is committed to creating an open and transparent workplace culture where concerns can be raised with management and where staff/student and other stakeholders who raise concerns are protected. This policy is intended to inform staff, students, partners, service providers, alumni and other stakeholders of that commitment to encourage report of violation at the earliest opportunity and to lay out procedures for reporting and investigating complaints and the protections accorded to the whistle blowers. UMU is committed to investigating all reports of wrongdoing thoroughly and impartially. Individuals who make reports in good faith will be protected from retaliation.

7.0 Principles guiding the implementation of this policy

The UMU Philosophy, Vision, Mission, Values and Objectives shall be used to interpret the Whistle blowing Policy. Protection of the whistle blower through the following:

7.1 Legal Rights

This policy has been written to take account of the Public Interest Disclosure Act (1998), which protects workers making disclosures about certain matters of concern, when those disclosures are made per the Act's provisions and in the public interest.

The Act makes it unlawful for the University to dismiss, suspend, demote, discriminate anyone or allow them to be victimized in any way on the basis that they have made an appropriate lawful disclosure by the Act. A whistleblower who honestly and reasonably believes that he/she has been victimized as a result of his or her disclosure may make a complaint to the higher authority. However, any whistleblower whose allegations are found to be frivolous, malicious or for personal gain, appropriate action that could include disciplinary action, shall be taken. The details of the sanctions are in the Human Resources Operational Manual (2022).

7.2 Combating Harassment or Victimization

UMU recognizes that the decision to report a concern can be a difficult one to make. If one honestly and reasonably believe what they are saying is true, they shall have nothing to fear because they shall be performing their duty towards the employer and other stakeholders of the university.

The University shall not tolerate any harassment or victimization of a whistle blower (including informal pressures) and shall take appropriate action to protect the whistle blower when they raise a concern in good faith and shall treat this as a serious disciplinary offence that shall be dealt with under the disciplinary rules and procedures.

7.3 Confidentiality

All concerns shall be treated in confidence and every effort shall be made not to reveal the identity of the whistle blower if they so wish. If disciplinary or other proceedings follow the investigation, and the whistle blower is needed s/he shall come to testify.

7.4 Anonymous Whistle blower

Any whistle blower who wishes to remain anonymous shall provide evidence to back up their reports. This policy encourages the whistle blower to put their name on the allegation whenever possible. If this is not done it shall be difficult to protect the position of the whistle blower or to give them feedback. This policy does not encourage anonymous allegations.

Concerns expressed anonymously are much less powerful but they may be considered at the discretion of UMU Management. In exercising this discretion, the factors to be taken into account shall include:

- i. the seriousness of the issue raised,
- ii. the credibility of the concern, and,
- iii. the likelihood of confirming the allegation from other sources.

7.5 Raising a Concern

These concerns shall be raised with:

- i. The Chair of the Staff Committee of Council (If concerning a member of Management)
- ii. The Vice Chancellor
- iii. The Deputy Vice Chancellor
- iv. The Line Supervisor
- v. In exceptional conditions, if the concern is about the Line Supervisor the concern shall be raised with the Vice Chancellor or the DVC who shall decide how the investigation shall proceed. This shall include external investigation.

7.5.1 Information needed in a raised concern

The following information shall be provided.

- i. the nature of concern and why it is believed to be true
- ii. the background and history of the concern (giving relevant dates)

7.5.2 Action on receipt of an allegation

The focal person (or whoever is appointed by the DVC) shall record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- i. The record of the allegation,

- ii. The acknowledgement of the claim's receipt;
- iii. Any documents supplied by the whistle blower.

The focal person shall ask the whistle blower for the preferred means of communication and contact details and use these for all communications with the whistle blower in order to preserve confidentiality. The investigation process shall start with strict confidentiality.

7.6 Rewards and Sanctions

The implementing Committee shall design a reward and sanctions mechanisms for the malicious whistle blower and a genuine whistle blower if proved. Reference shall also be made to the offences and penalties in the Whistleblowers Protection Act 2010.

7.7 Whistle blower Policy Implementation Committees

The implementation will depend on the category of the staff.

Disciplinary Committee - Human Resource Manual, 2022

Staff Committee of Council (Employees concerns)

Executive Committee of Council (Management members)

University Council

Justice and Reconciliation Commission (For student's affairs)

8.0 Legal framework and other complimentary policies

This policy works in sync with other university policies including;

- a) UMU Human Resource Manual 2022
- b) Institutional Safeguarding Policy 2025
- c) Gender and Inclusivity Policy 2025

The policy also works in line with National policies such as;

- a) Whistleblowers Protection Act 2010
- b) Employment Act 2006

9.0 Accounting Officer

The Accounting officer for this policy shall be the Vice Chancellor.

10.0 Responsible Officer

The Deputy Vice Chancellor or any other person appointed by Management shall have the overall responsibility for the maintenance and operation of this policy.

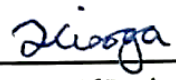
11.0 Review of the Policy

This policy was approved by the **101st University Council meeting** that sat on **8th February 2025**.

After every five (5) years, this policy shall be reviewed in tandem with the University practice on review of policies. Once the senate adopts the proposed amendments, they shall be sent to the University Council for approval.



Most Rev. Raphael p'Mony Wokorach, MCCJ
Chairperson, UMU Council



Rev. Dr. Josef Buchana Kisoga
Secretary, UMU Council