

KAIRUKI UNIVERSITY



WHISTLEBLOWER POLICY

SEPTEMBER 2025

DEFINITION OF TERMS:

In this Whistleblower Policy unless the context otherwise requires:

“Designated office”- means an independent office mandated by the Vice Chancellor to implement this policy and carry out any other functions under this policy.

“The University” means Kairuki University.

“University community” means the Council, academic, administrative and support staff, students, contractors or any agents of the University.

“Whistle-blower” means a person who reports in good faith and on reasonable grounds to the Designated Offices facts of any malpractice at the University in accordance with this policy.

1.0 WHISTLE-BLOWER POLICY

Whistleblowing means the disclosure in good faith by a person to the designated office which the person reasonably believes, is evidence of corruption or malpractice and in accordance with this Policy.

The malpractice may include but not be limited to fraud, financial irregularities, or serious administrative issues arising from the deliberate commission of improper conduct, unethical activities that may be of criminal nature and dangerous acts or omissions which create a risk to the University, financial malpractice or impropriety, fraud, bribery, stealing or corruption, irregularities in the hiring or promotion of staff, academic and examination malpractices such as the production, citation, or other use of fraudulent research data, breach of intellectual property, plagiarism, cheating in examination and impersonation, professional malpractice, practicing of nepotism, tribalism, clannism, inversion and distortion of social values including soliciting for and giving sexual and assorted favours, obstruction or frustration of academic freedom, irregular procurement of goods and services, or in violation of University policies.

1.1 Policy Statement

The University takes each wrongdoing very serious whether it is committed by employees, students or other key stakeholders in the value chain. The University believes on open-door policy and urges individuals to report any suspected financial or accounting impropriety or illegal or unethical business behaviour without fear of retribution.

1.2 General Principles

- i. This policy presumes that whistle-blowers shall act in good faith and shall not make false accusations when reporting a wrongdoing. A whistle-blower who knowingly or recklessly makes statements or disclosures that are not in good faith may be subjected to disciplinary actions and or prosecution. The implementation of this policy shall base and adhere to the following principles: -
 - a. All concerns raised shall be treated fairly and properly.
 - b. The University shall not tolerate harassment or victimization of anyone raising a genuine concern.

- c. Any individual making a disclosure shall retain his/her anonymity unless he/she agrees otherwise.
 - d. The University shall ensure that any individual raising a concern is aware of the contact person.
 - e. The University shall ensure that no one shall be at risk of suffering some form of retribution as a result of raising a concern, even if he/she is mistaken.
 - f. The University does not, however, extend this assurance to someone that maliciously raises a matter that is known to be untrue.
- ii. Whistleblowers making disclosures under this policy are encouraged to reveal their identity. Anonymous disclosures may prove difficult to investigate but will be considered at the discretion of the University. In exercising this discretion, the **Designated Offices** will consider the following:
 - a) Seriousness of the issues raised.
 - b) Credibility of the information disclosed; and
 - c) Likelihood of confirming the information from other sources.
 - iii. A Whistle-blower shall not be applicable to matters related to grievances such as dissatisfaction with a Supervisor, complaints about the work environment, salary, benefits etc. Such matters shall be handled in line with the existing Grievance procedure or shall be referred to the appropriate authority.
 - iv. All reported matters that are worth investigation will be done under strict confidentiality for appropriate corrective action. An individual that makes malicious or vexatious allegations, disciplinary action may be taken against the individual.

2.0 PROTECTION FOR WHISTLEBLOWERS

2.1 Staff member

If a member of staff makes a disclosure in conformity with this Policy, the member may not:

- a) Be dismissed from employment.
- b) Have salary increases or employment related benefits withheld.
- c) Be transferred or reassigned.
- d) Be denied a promotion that the employee otherwise would have received.
- e) Be demoted.
- f) Be denied any other wish or privileges that would ordinarily be availed.

2.2 Student

If a student makes a disclosure in conformity with this Policy, the student may not:

- a) Be suspended or expelled from the University.
- b) Have financial aid or other benefits withheld.
- c) Be harassed by lecturers, employees or other students.
- d) Be denied enrolment in classes.
- e) Have their grades reduced.
- f) Be subject to any other form of discrimination.

2.3 Other member of the University community

The policy covers disclosures made by members of the University community. If any other member outside of the University community makes a disclosure in conformity with this policy, the University will not subject them to detrimental action.

Any member of the University community who takes the above detrimental action against a whistleblower will be subject to disciplinary action up to and including termination of services or expulsion from the university as appropriate.

In the interest of natural justice, the suspect will be presumed innocent and will be accorded the right to be heard. The suspect will be taken through a fair due process.

3.0 PROCEDURES FOR MAKING COMPLAINTS AND DESIGNATED OFFICE

- i. In addition to any other avenue available to a whistle-blower, any whistle-blower may report concerns through email, letter, phone, or in person to the Designated Offices.
- ii. In the event that the act of malpractice concerns any member of the Risk Management Committee and is not addressed within thirty days from the date reported, the matter should be escalated to the **Vice Chancellor** or **Board of Directors**.

3.1 Information Required for Assessment and Investigation

To assist in assessing or investigating the concerns, the Whistle-blower should provide as much detail as possible such as:

- i. Date(s) of the incident(s)
- ii. Type of incident
- iii. Description of the incident(s)/details of concerns
- iv. Location of the incident
- v. Individuals involved
- vi. Name (optional)

3.2 Action Following Disclosure

Upon receipt of a disclosure, the Designated Office shall:

- i. Acknowledge receipt of the reported violation or suspected violation within 24 hours.
Assess whether the disclosure falls within the scope of this policy and determine whether:
 - a) Investigations are necessary, and if so, the form of investigation to be undertaken.
 - b) Investigate the matter.
 - c) The matter should be referred to another university body under appropriate policies.
 - d) The matter should be referred to the Police.
 - e) The matter should be closed.
- ii. Notify the whistle-blower about the action taken within 30 days.
- iii. Deliver the report to the **Vice Chancellor** and/or other relevant agencies within three months of the date the investigation begins.

3.3 Designated Offices and Reporting Mechanisms

The following offices and channels are designated to receive whistle-blower complaints. The university provides multiple avenues for reporting concerns, ensuring accessibility and confidentiality:

- a. **Risk Management Committee**
Kairuki University, P.O. Box 65300, Dar Es Salaam
dvcpfa@ku.ac.tz
Reporting Methods: Email, Letter, Phone and in person
- b. **Dean of Students**
Kairuki University, P.O. Box 65300, Dar Es Salaam
whistleblower@ku.ac.tz
Reporting Methods: Email, Letter, Phone and in person
- c. **Chairman of the KHEN Board of Directors**
Kairuki University, P.O. Box 65300, Dar Es Salaam
khen@ku.ac.tz
Reporting Methods: Email, Letter, Phone and in person
- d. **Online Reporting System**
An anonymous, secure platform accessible through the university's website allows whistle-blowers to report concerns without revealing their identity.

3.4 University Commitment

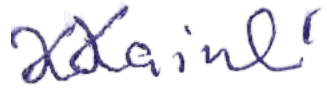
- The University will:
- a) Ensure that the principles of natural justice apply to all investigations of matters covered under the Policy to ensure fairness for both the discloser and the person who is subject to the disclosure.
 - b) Ensure that the rights of the whistleblower who is the subject of, or is in some way associated with, a disclosure is safeguarded.
 - c) Ensure interests of the whistleblower are protected to ensure there will be no reprisals or retaliatory action against the whistleblower.
 - d) Promote an environment of openness and accountability; and
 - e) Sensitize the University community on this policy.

4.0 LEGAL FRAMEWORK

This policy will be guided by the relevant legal and policy frameworks, which include:

- a) Employment and Labour Relations Act, 2004
- b) Whistle Blower and Witness Protection Act, 2015.
- c) The Constitution of The United Republic of Tanzania 1977, (Cap. 2)

This Policy was approved by the Board of Kairuki Health and Education Network at its meeting held on 3rd September 2025. The Policy shall come into effect on 4th September 2025 and Management is responsible for its implementation and periodic review in accordance with University governance requirements.

A handwritten signature in blue ink, appearing to read 'Kokushubila Kairuki'.

*Kokushubila Kairuki
KHEN Chairperson*