



**UNIVERSITY
OF GHANA**



NOGUCHI
Memorial Institute for Medical Research
University of Ghana

Noguchi Memorial Institute for Medical Research Institutional Policy

Number : Mgt-068-1.0

Title : Whistleblower Policy

Department : All Departments

**This policy supersedes: None or older versions
Draft, Photocopied, and Obsolete versions of this document are not to be used.**

EFFECTIVE: 14th June 2024

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1. Introduction

- a. In maintaining the highest ethical standards in the conduct of research consistent with international best practices, the Noguchi Memorial Institute for Medical Research (NMIMR, UG) outlines its Whistleblower policy.
- b. This policy supplements and does not replace the University of Ghana's policy related to harassment and discrimination and/or any other complaint resolution/grievance policy or procedures required by law, regulation, or funding source requirements.

2. Definitions

No definitions provided

3. Purpose

- a. The purpose of the policy is to:
 - i. encourage staff to report in good faith, suspected wrongdoing occurring in their departments/units.
 - ii. discourage staff from engaging in fraudulent or dishonest activities, including the use of resources, that negatively affects the image and operations of the Institute.
 - iii. Create awareness among staff and stakeholders about acts that are deemed dishonest, and to provide relevant education and guidance on how such acts should be reported.
 - iv. Protect the confidentiality of Whistleblowers who in good faith, report dishonest acts within their departments/units.
 - v. Provide a guide on how violations of this policy will be investigated.
- b. Management, employees, contractors, volunteers and other stakeholders are encouraged to report all suspected wrongdoing pursuant to the procedures set forth below.

4. Reporting

- a. If the suspected misconduct or lawlessness concerns a Senior Member, the report should be made in writing to the Head of Department or the Director.
- b. If the suspected wrongdoing concerns a Senior or Junior Staff, the report should be made

in writing to the Head of Department (for Research Staff) or the Institute Administrator (for Administrative Support staff)

- c. The Whistleblower shall provide as much detailed information as possible so that the report can be fully investigated. These details should include:
 - i. Date, time and location of the alleged misconduct
 - ii. Names of person(s) involved in the alleged misconduct and their role(s) or designation in the Institute.
 - iii. Relationship with the person(s) involved.
 - iv. How you became aware of the issue.
 - v. Names of possible witness(es)
 - vi. Any other information or evidence to support the report

5. Good Faith

- a. A person reporting concerns under this policy must act in good faith and have reasonable grounds for believing that the information reported indicates that a suspected wrongdoing or misconduct has occurred.
- b. A person who makes an allegation maliciously or without good reason to believe that the allegation was false shall be subjected to disciplinary action (see the University of Ghana Disciplinary Boards Rules).

6. Anonymous Reporting

The NMIMR, UG encourages anyone reporting suspected misconduct or wrongdoing to identify himself or herself when making a report to facilitate the investigation of the suspected wrongdoing. However, reports may be submitted anonymously by mailing a written statement to:

The Director
Noguchi Memorial Institute for Medical Research
University of Ghana
P.O. Box LG 581
Legon, Accra

7. Confidentiality

Reports of misconduct shall be kept confidential to the extent possible, but confidentiality cannot be guaranteed if there is the need to conduct adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement.

8. Investigation

Reports of suspected wrongdoing or misconduct will be promptly reviewed and investigated by the Director. Appropriate corrective action(s) will be taken if warranted by the investigation, and findings may be communicated to the Whistleblower, to the extent reasonably possible and consistent with any privacy and confidentiality limitation. However, any alleged misconduct that warrants disciplinary actions shall be subjected to the University's disciplinary board rules.

9. No Retaliation

- a. No employee, contractor, volunteer, client, or community member who in good faith reports suspected wrongdoing, or who cooperates in the investigation of suspected wrongdoing, shall suffer harassment, retaliation, or adverse employment or other consequences. Any such retaliation should be reported, and the NMIMR, UG will promptly investigate the report, consistent with the procedures contained in this policy.
- b. Anyone within the NMIMR, UG who retaliates against another individual for reporting suspected wrongdoing or cooperating with an investigation of suspected wrongdoing is subject to discipline.

10. Attachments

N/A

11. Related documents

- Risk Management policy
- Information Security policy
- Research Ethics policy
- Scientific misconduct policy
- Communications policy

- Personnel management process

12. References

N/A

13. Policy Revision History

N/A

14. Approval Page

Approved by Director

Name: Prof. Dorothy Yeboah-Manu

Signature:  _____

Date: 10th June 2024

15. Policy Revision History

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Revised: