



**UNIVERSITY WHISTLE-BLOWING POLICY CONFIDENTIAL/ANONYMOUS
REPORTING AND ACTIONABLE INTELLIGENCE**

FEDERAL UNIVERSITY OF TECHNOLOGY, MINNA, NIGERIA

Effective From_____

Table of Contents

Table of Contents	2
FORWARD	3
1.0 INTRODUCTION	4
1.1 Brief Background of the University.....	4
1.2 Vision and Mission of the University	4
1.3 Aims of the policy.....	4
1.4 Scope of the Policy	5
2.0 SUPPORT FOR THE WHISTLE-BLOWER	6
2.1 Qualifying Disclosures	6
2.2 Protection of Whistleblower.....	7
3.0 REPORTING PROCESS AND PROCEDURES	8
3.1 Making a Report	8
3.2 Types of Reporting.	8
3.3 Receipt of Report.....	8
3.4 Review of Report.....	9
3.5 Preliminary Investigation	10
3.6 Action on the Report of Preliminary Investigation	11
3.7 Possible Outcomes of the Investigation	12
4.0 OTHER PRINCIPLES GUIDING THE PROCESS AND PROCEDURE UNDER THIS POLICY	12
4.1 Using the Media and Social Media	12
4.2 Record Keeping and Retention	12
4.3 Precautionary Suspension and Seizure of Evidence.....	13
4.4 Confidentiality	13
4.5 Anonymous Reporting	13
4.6 Untrue/False Allegations	14
5.0 POLICY ADMINISTRATION	14
5.1 Institutional Framework	14
5.2 Policy Review.....	15
5.3 Breach of the Provisions of this Policy	15
5.4 Entry into Force of this Policy	15
6.0 Sources of Information	16

FORWARD

1.0

INTRODUCTION

1.1 Brief Background of the University

- 1.1.1 The Federal University of Technology, Minna (FUT, Minna), Nigeria, was established on 1st February 1983. The objective for its establishment was to give effect to the nation's drive for the much needed self-reliance in science, engineering and technology.
- 1.1.2 The University presently currently comprises nine Schools: School of Agriculture and Agricultural Technology, School of Electrical Engineering and Technology, School of Entrepreneurship and Management Technology, School of Environmental Technology, School of Information and Communication Technology; School of Infrastructure, Process Engineering and Technology; School of Life Sciences; School of Physical Sciences; School of Science and Technology Education; and the School of Postgraduate Studies.
- 1.1.3 There are currently six research centres, namely: West African Science Service Centre on Climate Change and Adapted Land Use (WASCAL); Centre for Human Settlements and Urban Development (CHSUD); Centre for Disaster Risk Management and Development Studies (CDRM&DS); Centre for Genetic Engineering and Biotechnology (CGEB); Centre for Open Distance and e-Learning (CODeL); and Africa Centre of Excellence for Mycotoxin and Food Safety (ACEMFS).

1.2 Vision and Mission of the University

- 1.2.1 The vision of the Federal University of Technology, Minna, is to become world class and Nigeria's leading University recognised for its excellence in capacity building and service delivery
- 1.2.2 The University's mission is to train a skilled and innovative workforce that would transform Nigeria's natural resources into goods and services, driven by entrepreneurship and information and communication technologies, to positively affect the economy and thus the quality of life of her people.

1.3 Aims of the policy

- 1.3.1 The aims of the University whistle-blowing Policy are:

- i. To promote the reporting of suspected wrongdoings as soon as possible in the knowledge that the concerns raised will be taken seriously and investigated appropriately;
- ii. To provide guiding policies and procedures for members of the University community for raising concerns or reporting suspected wrongdoings and for investigating and acting upon the concerns raised;
- iii. To protect the confidentiality of members of the University community raising concerns or reporting suspected wrongdoings;
- iv. To protect members of the University raising concerns or reporting suspected wrongdoings from direct, indirect and/or soft retaliation;
- v. To deter the perpetration of misconduct in the University; and
- vi. To strengthen the confidence of staff, students, alumni, parents, partners, donors, government agencies and other stakeholders in the University's culture of integrity and the highest standards.

1.4 Scope of the Policy

1.4.1 This policy applies to:

- i. All staff of the University including staff groups, associations and/or unions;
- ii. All students of the University including student groups, associations and/or unions;
- iii. All external persons in collaborative or partnership relationships with the University or its staff; provided that where issues raised come under the responsibilities of external partners, the matter may be transferred to the external partner for consideration. Such transfer will depend on the nature of the disclosure and will always be with the discloser or whistle-blower's consent;
- iv. Former employees and alumni of the University;
- v. Interns, National Youth Service Corp Members and others on Industrial attachment with the University; and
- vi. Contractors, Consultants, Vendors, Visitors to the University, all others in commercial relationship with the University and/or members of the public.

1.4.2 The University, however, reserves the right to limit its response to members of the public although they are strongly encouraged to use their policy.

2.0

SUPPORT FOR THE WHISTLE-BLOWER

2.1 Qualifying Disclosures

2.1.1 Wrongdoings, misconducts and/or malpractices covered by this policy include but are not limited to the following:

- i. A criminal offence;
- ii. A miscarriage of justice;
- iii. Non-compliance with legal or statutory obligations;
- iv. Non-compliance with University policies and procedures;
- v. Conduct likely to damage the University's reputation or wellbeing;
- vi. Unauthorised disclosure of confidential information;
- vii. Negligence;
- viii. Offences under the Independent Corrupt Practices Commission Act;
- ix. Offences under Conditions of Service for Staff of the University;
- x. Endangering health and safety of persons;
- xi. Cases of maladministration, dishonesty, embezzlement, misappropriation, fraud, malpractice, mismanagement, corruption or abuse of authority in student's associations;
- xii. Damage to the environment;
- xiii. Dishonesty, Forgery and uttering or use of forged document;
- xiv. Financial or non-financial maladministration, malpractice or fraud;
- xv. Nepotism or Favouritism;
- xvi. Obstruction or Frustration of Academic Freedom;
- xvii. Evidence of Academic or Professional Malpractice;
- xviii. Blackmail or Victimisation;
- xix. Failure to disclose serious conflict of interest;
- xx. Abuse or misuse of University Property;
- xxi. Irregularities relating to student administration;
- xxii. Improper or Unethical behaviour;
- xxiii. Research Misconduct; and
- xxiv. Attempt to suppress or conceal information relating to any of the aforementioned offences.

2.1.2 This Policy cannot be used:

- i. as a means to challenge academic freedom;
- ii. to publicly challenge or question financial or business decisions taken by the University;
- iii. to obtain a rehearsing of matters which have already been addressed under other University laws, policies, procedures and/or processes; and
- iv. to respond to grievances that are of very personal nature.

2.2 Protection of Whistleblower

2.2.1 The whistle-blower is protected under this policy in raising concerns or reporting offences under section 2.1 if they;

- i. Reasonably believe that the malpractice, wrongdoing or offence is being committed, has been committed in the past or is likely to be committed in the future; and
- ii. Follow the reporting procedures provided by the policy.

2.2.2 The University shall not accept any form of retaliation or victimisation against any person (including staff and students) who have raised concerns or reported suspected or actual wrongdoings, malpractices or misconduct in good faith.

2.2.3 Any such proven retaliation or victimisation shall attract disciplinary actions and shall be treated as gross misconduct under the University's Condition of Service for staff and may lead to expulsion for students.

2.2.4 A whistle-blower who feels that he/she is being victimised or subjected to victimisation should immediately report to the University Whistle-blowing Officer, the University Whistle-blowing Committee or the Anti-Corruption and Transparency Unit

2.2.5 The Whistle-blower can report to the Vice-Chancellor where the University Whistle-blowing Officer, the University Whistle-blowing Committee or the Anti-Corruption and Transparency Unit fail to satisfactorily remedy the situation.

2.2.6 The protection for whistle-blowers offered by this policy does not amount to immunity from consequences of wrongdoing where the whistle-blower is involved in the matter being reported or where the Whistle-blower is made to suffer the legal consequences of the offences committed after whistle-blowing.

3.0

REPORTING PROCESS AND PROCEDURES

3.1 Making a Report

- 3.1.1 Submission under this policy may be made orally but should preferably be in writing.
- 3.1.2 Submission can be directly made to the University Whistle-blowing Officer, The University Whistle-blowing Committee or its members and/or the Anti-corruption and Transparency Unit of the University.
- 3.1.3 Submission can be sent to the dedicated University email address; whistle-blowing@futminna.edu.ng
- 3.1.4 Submission can also be made by dialling designated whistle-blowing hotlines to be provided by the University.

3.2 Types of Reporting.

- 3.2.1 **Full Disclosure:** This is the most preferred by the University. Here the Whistle-blower allows full information relevant to the matter (such as name, role and location) to be disclosed to all parties involved. This process has no limitation.
- 3.2.1 **Limited Disclosure:** This report provides some information such as role or location for disclosure but only the person to whom the information is being disclosed knows the name of the discloser. Action can only be taken under this report where there is a clear case provided by the whistle-blower that:
 - a) warrants an investigation; and
 - b) can provide evidence that excludes or can be made to exclude personal information identifying the whistle-blower.
- 3.2.2 **No Disclosure:** in this report no disclosure of the whistle-blower (e.g, name, role, location etc.) is shared. Only the person to whom the disclosure is made knows the identity of the whistle-blower. This is treated like the Limited Disclosure report.
- 3.2.3 **Full Anonymity:** No one knows the identity of the whistle-blower. The University will act on this report only if there is a compelling reason to do so.

3.3 Receipt of Report

- 3.3.1 Upon the receipt of a report form a whistle-blower, the University will where possible;
 - i. Acknowledge the receipt of the report (that is where the identity or contact details of the whistle-blower are known);

- ii. Enter the report in the Federal University of Technology, Minna Whistle-blowing Register hereby established under this policy; and
- iii. Within 14 days of receipt of the report, undertake a Review of the Report.

3.4 Review of Report

3.4.1 The University shall review the materials submitted and the allegations contained therein in order to decide whether or not to consider the whistle-blower's report.

3.4.2 For a whistle-blower's report to be considered, it must;

- i. Be or relate to something for which the university is responsible or upon which it has considerable influence or authority;
- ii. Be something defined or contemplated under Section 2.1 of this policy;
- iii. Be clearly supported by evidence provided or to be provided. Where evidence is to be provided, an indication as to possibility of sourcing the evidence and an identification of where the evidence would be sourced from must exist;
- iv. Be an issue which is best considered through the process under this policy;
- v. Be an issue that has not already been considered and is not currently being considered under any other process, policy or procedure or by any person, panel or office in the University.

3.4.3 There are Three (3) possible outcomes of the Review of (Allegations contained in the whistle-blower's) Report;

- a. No Further Action can be taken: The University will, where possible, acknowledge the disclosure, provide reasons as to why no further action can be taken on the issue and transfer the materials submitted to the Vice-Chancellor's Office for retention.
- b. Further Action to be taken through an Alternative Process: The University will, where possible, acknowledge the disclosure, provide reasons as to why the case cannot be considered by the process under this policy, provide details of the alternative process available/alternative process suitable for the consideration of the matter and awaits the whistle-blower's consent to transfer the report and materials submitted to the alternative process. Where the whistle-blower, within fourteen (14) days, fails or refuses to consent to the transfer of the case to an alternative process, the reports and materials submitted shall be transferred to the Vice-Chancellor's Office for retention

- c. Further Action to be taken through the Process under this Policy: The University will, where possible, acknowledge the disclosure and confirm under which of the four reporting types the whistle-blower wishes the case to proceed.

3.5 Preliminary Investigation

- 3.5.1 After the Review of the Report, the University whistle-blowing Committee will conduct the Preliminary Investigation.
- 3.5.2 The Preliminary Investigation should be expeditious, be as much as possible completed within twenty-eight (28) days of the date of disclosure and should protect the anonymity of the whistle-blower.
- 3.5.3 Where for good reasons, the preliminary investigations require a longer timeframe, the whistle-blower should be informed.
- 3.5.4 Where the preliminary investigation requires the University Whistle-blowing Committee to invite and interact with the whistle-blower or discloser, the whistle-blower is allowed to appear before the Committee with any of his/her staff or student Union member of his choice provided that the person accompanying him/her is a staff of the University and agrees to respect the confidentiality of the process.
- 3.5.5 A written record of all meetings of the University Whistle-blowing Committee must be kept in both hard and soft copies.
- 3.5.6 Where in the course of the Preliminary Investigation, the University Whistle-blowing Committee has reasonable grounds to suspect that a staff or student possesses significant risk to the process or to the University, the Committee shall write to inform the Vice-Chancellor. The University shall then determine what action that is best required to address the risk identified.
- 3.5.7 The University Whistle-blowing Committee will complete the preliminary investigation and produce a report which contains, among others, the followings:
 - a) Facts of the case;
 - b) Relevant evidence(s); and
 - c) Recommendations for the Vice-Chancellor.
- 3.5.8 Recommendations referred to in Section 3.5.7 above may include but not limited to the following:
 - i. No further action to be taken;

- ii. Adjustment to practices with no further formal actions to be taken;
- iii. Policy reforms with or without further formal actions;
- iv. A formal investigation by a Committee to be setup by the Vice-Chancellor for that purpose;
- v. A formal investigation and the reporting of the matter to external bodies or persons; and
- vi. Reporting the matter to relevant law enforcement agencies.

3.6 Action on the Report of Preliminary Investigation

- 3.6.1 Where no further action is recommended the whistle-blower will be so informed
- 3.6.2 Where the Vice-Chancellor decides to setup a Committee to conduct formal investigation of the matter, the process will maintain the anonymity of the whistle-blower or discloser except the law requires or the whistle-blower intends otherwise.
- 3.6.3 The formal investigation should aim to conclude within twenty-eight (28) days after the submission of the report of Preliminary Investigation.
- 3.6.4 The formal Investigation Committee shall maintain a recording of its meetings, interviews and evidence gathered.
- 3.6.5 The whistle-blower if not anonymous, may be invited to provide information to the Investigation.
- 3.6.6 The whistle-blower is not entitled to receive evidential materials gathered from the review, the preliminary investigation, formal investigation or any other process under the policy.
- 3.6.7 The Vice-Chancellor's formal Investigation Committee shall conclude its task and produce a report with facts of the case, evidence gathered and recommendations to the Vice-Chancellor.
- 3.6.8 The recommendations of the formal investigation Committee setup by the Vice-Chancellor may include but not limited to the following:
 - i. No further action to be taken except to provide information and feedback to those involved;
 - ii. To recommend sanction(s) for identified and proven wrongdoing under the University's conditions of service or other laws, policies or procedures in force in the University;
 - iii. To recommend individuals for other appropriate actions within existing University laws, regulations, policies and procedures;

- iv. To make recommendations on systemic issues for the consideration of the University;
- v. To make recommendation to arrest policy or institutional failures;
- vi. To make recommendations to forestall future reoccurrences;
- vii. To report the matter to external bodies; and
- viii. To report matter to relevant law enforcement agencies.

3.6.9 The Vice-Chancellor's decision on the recommendation of the formal investigation shall be final.

3.6.10 The whistle-blower or discloser shall have the right to apply to the Vice-Chancellor for a review of the process only on the ground that the procedure under this policy has not been compiled with. The Vice-Chancellor's decision on such Application for Review shall be final.

3.7 Possible Outcomes of the Investigation

3.7.1 Unless for good reason or where the whistle-blower or discloser is wholly anonymous, whistle-blower will be told if;

- i. The investigation led to actions being taken; and
- ii. The actions taken including if action taken is corrective action, disciplinary action or referral to external bodies or law enforcement agencies.

4.0 OTHER PRINCIPLES GUIDING THE PROCESS AND PROCEDURE UNDER THIS POLICY

4.1 Using the Media and Social Media

4.1.1 The University shall recognise no valid reason why a person should disclose through the media or social media without first having given the University the opportunity to address the issue through its internal process.

4.1.2 The University reserves the right, particularly if the allegations prove to be false, to consider the matter under its disciplinary rules as an attempt to bring the University into disrepute.

4.2 Record Keeping and Retention

4.2.1 Records of disclosure, the process and outcome will be kept in the Vice-Chancellor's Office.

- 4.2.2 Records will be retained after investigation or disciplinary process is completed.
- 4.2.3 Records will be retained for five (5) years after the end of the process.
- 4.2.4 Except for normal correspondences between the University staff or students, Whistle-blowing records shall usually not be kept in Staff or Students' files

4.3 Precautionary Suspension and Seizure of Evidence

- 4.3.1 Where the review of report, preliminary investigation or formal investigation shows the involvement of staff in a material irregularity or where a significant risk of loss or destruction of forensic evidence exist, the University may:
 - i. Place the suspected staff on precautionary suspension; and
 - ii. Seize relevant University computers, documents or other materials at risk in a very timely and confidential manner.

4.4 Confidentiality

- 4.4.1 The University will treat the following in a sensitive and confidential manner:
 - i. Submissions, reports or Complaints made under this policy;
 - ii. The identity of the person making submission, reports and complaints subject to the provisions of this policy; and
 - iii. Personal details of the investigating team.
- 4.4.2 The investigation process may however, inadvertently locate the source of relevant information and statements made by protected persons under this policy may be required as evidence. No persons may, however, be compelled to give evidence under this policy.
- 4.4.3 No person shall supply information concerning alleged irregularities, wrongdoings or misconduct reported under this policy to the media or external parties without the written consent of the Vice-Chancellor.

4.5 Anonymous Reporting

- 4.5.1 The University does not encourage anonymous reporting because the anonymous allegations are difficult to investigate.
- 4.5.2 Whistle-blowers are advised to put their names on allegations made by them or alternatively provide an anonymous email or other details through which they may be contacted without revealing their personal identity if further information is required during investigation.

- 4.5.3 The discretion by the University to consider anonymous reports may be exercised taking into consideration:
- i. The power of the University over the matter alleged;
 - ii. The seriousness of the matter alleged;
 - iii. The credibility of the allegation; and
 - iv. The likelihood of confirming the allegation.

4.6 Untrue/False Allegations

- 4.6.1 The University discourages the making of allegations that are false, fabricated, malicious and/or injurious.
- 4.6.2 Persons who make allegations that are proven to be false, malicious and injurious shall be subjected to firm disciplinary actions under extant University laws, regulations and policies.
- 4.6.3 A whistle-blower is however not expected to prove the truth of his allegations. He is only expected to demonstrate that there are sufficient grounds for concern.

5.0 POLICY ADMINISTRATION

5.1 Institutional Framework

5.1.1 The University Whistle-blowing Officer

5.1.1.1 The Vice-Chancellor shall appoint a University whistle-blowing Officer who shall:

- i. Be the Director of the University's Anti-Corruption and Transparency Unit;
- ii. Chair and Coordinate the University whistle-blowing Committee;
- iii. Implement and enforce this policy; and
- iv. Perform any other duty as may be assigned by the Vice-Chancellor.

5.1.1 The University Whistle-blowing Committee

5.1.1.1 The Committee shall be chaired by the University's Whistle-blowing Officer.

5.1.1.2 The Secretary of the University's Anti-Corruption and Transparency Unit shall serve as the Secretary of the University's Whistle-blowing Committee.

5.1.1.3 The Committee's membership shall also include one (1) other representative of the Anti-Corruption and Transparency Unit, the Focal Officer of SERVICOM, a representative of

the University Security Service Division trained in and responsible for intelligence, a legal practitioner and a Vic-Chancellor's nominee.

5.1.1.4 The Committee shall be responsible for:

- i. Achieving the aims set-out in section 1.3 of this policy;
- ii. Implementation and administration of this policy;
- iii. Enforcement of this policy;
- iv. Through effective programmes and guidelines, promotion of confidential reporting and submissions under this policy;
- v. Establishment and maintenance of the University Whistle-blowing Register under this policy;
- vi. Establishing dedicated emails, hotlines and other avenues for the submission of complaints under this policy;
- vii. Carrying out reviews and preliminary investigations of Whistle-blower's reports;
- viii. Provision of guidance, assistance and support for Whistle-blowers;
- ix. Provision of Quarterly Report of Compliance and Activities of the Committee to the Vice-Chancellor;
- x. Recommendation of impactful Whistle-blowers for reward and/or recognition by the University;
- xi. Performance of other duties that may be assigned by the Vice-Chancellor; and
- xii. Performing of all duties and exercising of all powers reasonably expected for the implementation of this policy.

5.2 Policy Review

5.2.1 This policy may be reviewed at intervals not exceeding five (5) years in order to take account of new legal, policy or institutional development.

5.2.2 The Vice-Chancellor shall constitute a Committee to review the policy when the need arises.

5.3 Breach of the Provisions of this Policy

5.3.1 Breach of the Provisions of this policy shall amount to misconduct and shall be dealt with under the normal disciplinary procedures of the University for both Staff and Students.

5.4 Entry into Force of this Policy

5.4.1 The Policy shall come into force on approval by the University's Governing Council.

6.0 Sources of Information

6.6.1 The following policies and documents were taken into account to significant degree during the development of this policy:

- i. Whistle-blowing Policy Guide for ACTUs by the Independent and Corrupt Practices Commission
- ii. Whistle-blowing and Anti-Fraud Policy of the University of Pretoria
- iii. Lancaster University’s Policy on Raising Serious Concerns and Disclosing Public Interest Matters (Whistle-blowing)
- iv. The Whistle-blowing Policy of the University of Salford, Manchester University of Aberdeen’s Policy and Procedure on Public Interest Disclosure (Whistle-blowing)
- v. University of the West of England’s Policy and Procedure for Disclosure (Whistle-blowing)
- vi. De Montfort University, Leicester’s Whistle-blowing Policy for Students
- vii. Public Interest Disclosure (Whistle-blowing) Policy of the University of Lincoln
- viii. Whistle-blowing Policy of the University of Portsmouth
- ix. Public Interest Disclosure (Whistle-blowing) Policy of the University of Liverpool
- x. Whistle-blowing Policy of Keele University.

MEMBERS OF COMMITTEE

NAME	SIGNATURE
Prof. K. U. Isah
Mr. Shabaan Aliyu Usman
Barr. K. S. Agbonika.