

Public Interest Disclosure (Whistleblowing) Policy

Purpose

In accordance with the Public Interest complaints Act 2017, that establishes a framework for protecting employees against harm or dismissal in connection with "blowing the whistle" on unlawful workplace practices, the purpose of this policy is to provide such a mechanism within the university.

Scope

The policy applies to overall Iqra University's employees, workers and associated people, which may include; senior administration, faculty and staff.

Definition of Whistleblowing

Whistleblowing is the act of "blowing the whistle" on alleged wrongdoing at a place of employment. This may include information relating to; criminal activity, miscarriages of justice, danger to health or safety, damage to the environment, failure to comply with any legal obligation or regulatory requirements, breach of the Charter and Statute, bribery, fraud, administrative malpractice (financial or non-financial), academic or professional malpractice (including, for instance, violation of intellectual property rights or failure of integrity in research), improper conduct or unethical behavior, unauthorized disclosure of confidential information, and suppression or concealment of any of the above matters.

Introduction

The University's framework of policies and procedures fosters a culture characterized by openness, transparency, accountability, and risk awareness. Our collective achievements hinge on adhering to the ethical standards outlined in the Code Book and collaborating to ensure responsible conduct in all business matters, in line with the stipulations of the governing body and senior management. This policy also aims to guide employees on how to raise such concerns

and to encourage employees to report suspected wrongdoing as soon as possible, knowing that their concerns will be taken seriously, looked into as necessary, and their confidentiality will be respected.

This policy is meant to support people who think they have found misconduct at the university. It cannot be used to revisit any issues that have already been addressed or should be under other institutional processes, such as the Student Complaints Procedure and Grievance and Disciplinary Procedures. It is not intended to be used to challenge financial, business, or academic policy decisions made by the institution, with the exception of cases where a qualifying disclosure under the Public Interest complaints Act 2017 is related to such a decision. The University anticipates that any issues falling under the purview of this Policy will first be brought up via the procedure outlined below.

Policy Principles

Policy Statements

- The University takes complaints of malpractice seriously and will make an effort to address any issues that are brought forward, whether through their reporting manager or the policy.
- If an employee comes across evidence that they believe demonstrates malpractice or misconduct within the University, they should share it without fear of retaliation. Employees may raise issues independently of their reporting manager if they are concerned that line management will not take their problem seriously or may be engaged in malpractice.
- The University will take all relevant measures to keep the identity of the whistleblower confidential, unless they waive their right to anonymity or unless the investigator believes that anonymity will affect the fair & transparent disciplinary proceeding. The whistleblower shall be informed in either case.
- All complaints made in accordance with this policy will be investigated thoroughly, confidentially and without any unreasonable delay.
- The University will provide training to all employees on the provisions of this policy and the procedures for making a report. The training will also cover the importance of protecting the confidentiality of the person making the report and the information provided.

Protection Against Adverse Action

The University is obligated to ensure that a complainant will not suffer any negative consequences or be victimized in any other way because they provided information or aid during an investigation in accordance with the policy. A person is deemed to have been victimized if the

individual has been (i) fired, (ii) suspended, (iii) denied promotion, (iv) demoted, (v) made redundant, (vi) harassed, (vii) intimidated, (viii) threatened with any of the things mentioned in to, and (ix) subjected to a discriminatory or other adverse measure by the employer or a coworker.

Any person can reach out to the Office of the Registrar, Director Human Resources and Director Finance for redressal if they believe they are being victimized or are likely to be victimized as a result of filing a complaint, disclosing information, or providing assistance in an investigation as required by the policy. The Competent Authority will then take the appropriate action and may provide the concerned Personnel or Organisation with the necessary instructions to prevent the victimization or avoid it.

Complaint Lodging Procedure

Complaints must be lodged formally, in writing, by the individual making the complaint. The complaint should include the complainant's full name, their role or position within Iqra University and contact details. The complaints can be submitted by any of the following secure and dedicated complaint methods as illustrated in **Policy for Lodging Complaints** that directly reach out to a member of the Disciplinary Committee responsible for the ethical compliance of the University.

Via email at:

<u>complain.employee@iqra.edu.pk</u> - (For Employees of Iqra University) <u>complain.students@iqra.edu.pk</u> - (For Students of Iqra University)

Or via call at dedicated Helpline: 02138734088

Anonymous Complaints

Any complaint made by an individual must include their identity. Anonymous concerns may be given less weight, however the University may nonetheless take them into consideration.

The following considerations will be made when exercising this discretion:

- the seriousness of the concerns presented;
- the veracity of the issues; and
- the possibility that other reliable sources will confirm the claim.

Investigation Procedure

- All reported complaints are reviewed initially to ascertain the following:
 - The significance and urgency of the matter;
 - Whether sufficient information is presented to start a review; and

- Allocation of the matter to the best suitable office appropriate to handle the concern given the nature and subject matter of the complaint.
- After the initial review, if investigation is warranted, a Disciplinary Committee is formulated as prescribed in Academic Policy to conduct and/or coordinate the investigation of the complaint.
- The investigation process follows the same procedure as mentioned in the Academic Policy.
- In case the member of the Disciplinary Committee determines that the matter does not concern the policy and/or information or evidence related to the complaint is insufficient, the case will be documented and closed until such time that further information surfaces that suggests otherwise. The complainant will be informed in the due course in such a case. However, if the complainant feels the judgment of the decision is incorrect or unfair processing of the case, they could raise their concern(s) in writing to the Vice Chancellor.

Disciplinary Committee

The IU Disciplinary Committee is responsible for all ethical compliance within the campus, along with complaints handling and disciplinary action related to; but not limited to disclosure, misconduct, harassment, bullying, and discrimination. The disciplinary committee(s) are formulated on a case by case basis as illustrated in the **Academic Policy**.

Confidentiality

All such complaints will be handled sensitively and confidentially by the University. The person's name shall be kept private, if at all feasible, and as long as doing so won't obstruct or jeopardize any investigations. The disclosure maker may be required to provide a statement as part of the evidence needed, either as part of the University's investigations or any subsequent external investigations (for instance, if the disclosure prompts criminal investigations). The investigation process may reveal the source of the information.

Wrongful Allegation

Any University employee who makes an unsubstantiated allegation while acting in the public interest requires a reasonable belief that the information disclosed demonstrates one of the potential concerns described in the Policy's Scope. If this is the case, no action will be taken against the employee.

If someone is found to have made malicious or vexatious accusations in a particular situation, disciplinary action may be taken against them in line with the relevant Disciplinary Procedure of University.

Record Keeping

Reports on all complaints and investigations will be maintained through the dedicated, secure mechanism of the Office of the Registrar for a duration of three years. All concerns expressed and responses to complaints will be documented.

Policy Review

This policy will be reviewed periodically to ensure its effectiveness and to make necessary updates as required.

Approval and Amendment

This policy is approved by Iqra University's governing body. Amendments to this policy can only be made with the approval of the governing body.

Document Control

This document is controlled by Iqra University's governing body. The latest version of the document will always be available from Iqra University's official website or upon request.

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Associated Policies	Academic Policy (Page No. 26) Policy for Lodging Complaint Anti-Fraud, Corruption & Bribery Policy