

BNU Whistleblowing Policy

Aim

Beaconhouse National University (BNU) is Pakistan's first not-for-profit Liberal Arts University rooted in the values of participative leadership, inclusiveness, comprehensive academic freedom and a merit-driven and need-based recruitment and admission policy.

BNU intends to maintain the highest standards of honesty, integrity, transparency and accountability in its regular business dealings with all internal and external stakeholders. In line with these commitments, it is an expectation that anyone having a serious concern about any aspect of university's business operations must come forward and voice the concern promptly.

Purpose

The purpose of this policy is to provide guidelines to establish an objective and impartial procedure for prevention, detection and correction of reported instances and events of unethical behavior, nepotism, corruption and fraud that is damaging to university's business interests, assets and/or reputation. The implementation of the policy would ensure a virtuous and dynamic professional environment free of prejudice, deception and mala fide.

Scope

The policy applies to all stakeholders and extends to individuals associated with the university on the business side including employees, contractors, suppliers, vendors, consultants etc. They are encouraged to participate without fear of reprisal or repercussions, in confidentiality, under defined reporting channels to report wrongdoings, irregularities, delinquencies and malpractice to the university management.

Exceptions

The Whistleblowing Policy does not apply to academic matters of students including grading, suspension, rustication etc. and/or employee matters related to service such as hiring, promotions, transfers etc., and/or issues pertaining to workplace discipline and harassment for which separate complaint-recourse procedures exist.

Under the Policy, anonymous concerns shall not be taken into consideration.

Issues Covered

The types of issues which can be reported under this policy include but are not limited to:

- A breach of the Code of Conduct;
- Corruption and bribery;
- Nepotism;
- Misappropriation of funds;
- Misuse of university's assets;

- Violation of applicable laws and regulations;
- Actions raising safety, security, and environmental concerns; and
- Damage to university's assets, reputation or business.

Protection

BNU believes that raising of ethical issues does not imply betrayal from colleagues, subordinates or supervisor; rather it is a valuable contribution towards them and the university which would prevent a detrimental trend of deceit, illegitimacy and unscrupulous handling of business and financial matters.

All complaints should be lodged or concerns should be raised in good faith yet in complete confidentiality. However, if it is found at any stage that the complainant made a false accusation or brought up frivolous charges out of a personal grievance or malicious intent, then disciplinary action may be taken against the complainant.

No hardship, loss, or penalty may be imposed on an employee in response to:

- Filing or responding to a bonafide complaint.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

Retaliation, intimidation, disciplinary action, harassment, suspension, dismissal etc. of colleagues or subordinates in response to lodging a complaint would be in contravention of this policy. Any person found engaging in these tactics shall be subject to sanctions up to and including termination of employment.

It is further important to take note of the following:

- All information regarding a pending complaint and ongoing investigation is classified information and must be treated as such.
- It is expected from the complainant(s), witness(es) and investigator(s) that while wholeheartedly cooperating with authorities at all stages without any fear for retribution, they keep information and details regarding complaint(s) strictly confidential.
- The complainant, witness or investigator must abstain from acts that may constitute slander against concerned party(ies) prior to, during and after conclusion of the investigation.
- The complainant, witness or investigator must, at all times, avoid divulging details regarding the complaint or the investigation to any third party(ies) on their own unless such information is declassified by the university management.
- A failure to comply with the above would constitute a breach of the Code of Conduct and shall be subject to sanctions and disciplinary action.

Complaint Reporting & Investigation Procedure

Any employee, contractor or stakeholder, who is aware of any activity which is not in the best interests of the university or breaches the Code of Conduct or law, should immediately report the issue.

Confidentiality of all complaints would be ensured and appropriate corrective action would be taken upon thorough investigation of essential facts and ancillary details.

Whistle blower complaints can be raised through below mentioned communication means.

For communication of complaints, the following modes would be used which would be directly communicated to a Member of the Board of Governors assigned by the Board for such purpose:

- Via email: whistle@bnu.edu.pk
- Via postal mail at the address: _____

Upon receipt of a complaint, a committee to investigate into the matter will be constituted as follows:

- In case a complaint is tendered against the Vice Chancellor, the assignee Member of the Board of Governors shall constitute a three member committee comprising two Members of the Board of Governors and the Registrar (in the capacity of Secretary to the Board of Governors).
- In case a complaint is tendered against any member of the university staff, the assignee Member of the Board of Governors may delegate the matter to the Vice Chancellor. The Vice Chancellor shall, thereby, constitute a three member committee under her/his chairpersonship comprising a Dean of a BNU school and the Head of Human Resource/Finance Departments (as may be deemed appropriate by the Vice Chancellor depending on the nature of the complaint).

Upon primary examination of facts, if the committee determines that the complaint does constitute a breach of the Code of Conduct or law or malpractice, it will carry out a detailed investigation with high level of objectivity, impartiality and fairness.

After comprehensive assessment and verification, the committee shall a) submit its findings to the Board of Governors in case the complaint has been tendered against the Vice Chancellor or b) recommend an appropriate course of action to the Vice Chancellor in the case of others.

The recommendations may also initiate corrective changes to evolve existing policies and procedures should any need for improvement comes to light during the course of the investigation.

No action will be taken against anyone accused of wrongdoing before an accusation has been duly investigated. However, the university management may suspend those activities which could result in any further financial or reputational loss while the investigation is ongoing.