

FEDERAL NEUROPSYCHIATRIC HOSPITAL, ENUGU

WHISTLE-BLOWERS POLICY

All directors and employers of Federal Neuropsychiatric Hospital, Enugu must comply with this policy and Management should ensure that each employee is made aware of the contents and requirements of this policy.

1. BACKGROUND

Federal Neuropsychiatry Hospital, Enugu is a mental health care provider under the Federal Ministry of Health.

Federal Neuropsychiatric hospital is committed to achieving the highest possible standards of service to its employees, patients and other stakeholders in accordance with laid down rules.

The Board and management should encourage the reporting of any behaviour, conduct or affairs that are inconsistent with the **PUBLIC SERVICE RULES. (PSR)**

2. POLICY PURPOSE

The purpose of this policy is to:

- Promote a culture of responsibility in reporting improper conduct within the staffs.
- Explain how to make a report about improper conducts.
- Outline the protections available for those who make a report.
- Outline the hospitals processes for responding to the reports made.
- Promote a work place environment in which everyone feels safe, supported and encouraged to report improper conduct

3. DEFINITIONS

F.N.H.E.: means Federal Neuropsychiatric hospital, Enugu

Improper conduct: means any suspected or actual misconduct or improper state of affairs or circumstances in relation to the discharge of duty.

Example of improper conduct include but not limited to the following:

- Breaches of laws or regulation
- Ill-treatment of a patient

- a breach of FNHE's Statement of Delegated Authorities;
- a breach of FNHE's policies including the Code of Conduct for Employees, Human Rights and Labour policy and global and domestic Anti-Bribery and Corruption policies;
- Dishonest or unethical behaviour;
- Acting on a conflict of interest, for example showing undue favour over a contractual matter or to an applicant for employment where the person is a family member or friend;
- Conduct endangering health and safety, or causing actual or likely damage to the environment;
- Financial fraud or mismanagement;
- Victimisation or harassment;
- Conduct likely to damage FNHE's financial position or reputation
- Conduct that represents a danger to the public or financial system;
- Modern slavery in the F.N.H.E operations or supply chains; and
- Deliberate concealment of any of the above.

Improper Conduct does not generally cover personal work related grievance. Personal work-related grievances mean grievance to an individual's employment that have implication for the individual personally (e.g., disagreement between two employees or a promotion outcome decision). Generally, personal work-related grievances are more effectively addressed by contacting your relevant manager or Human Resources contact.

4. SCOPE OF APPLICATION

This policy applies to all current and former directors, officers, employees of the hospital. It also cover spouses, relatives or dependants of such persons.

Others, including employees or indirect suppliers, can also use the reporting channels in this policy to raise concern in relation to modern slavery or breaches of FNHE's Human Rights and Labour policy.

5. POLICY STATEMENT

Anyone with information about improper conduct encouraged to report that information to a recipient. F.N.H.E. will not tolerate anyone being discourage from reporting improper conduct or being subject to

detriment because they want to report improper conduct or they have done so. Disciplinary action , up to and including termination of employment or engagement , will be imposed on anyone shown to have caused detriment to a person because they want to or have , made a report.

6. REPORTING IMPROPER CONDUCT

What should be reported?

You are encouraged to report any improper conduct. If you are unsure whether a particular conduct meets the definition of improper conduct, you still report it under this policy.

You should provide as much information as possible when reporting improper conduct , including details of the improper conduct, people involved , dates , locations, any if any more evidence may exist.

When making a report you will be expected to have reasonable grounds to believe the information you are reporting is true, but you will not be penalized even if the information turns out to be incorrect obviously, you must not make a report that is known to be untrue or misleading.

Where it is found that a person has knowingly made a false report, this will be considered a serious matter and will result in disciplinary action.

Who should I speak to?

F.N.H.E. encourages individuals to make a report to one of the following recipients:

- Head of units
- Head of department
- ACTU desk officer / compliance officer
- Medical Director
- Chairman of the board (if the concern relates to a member of the management.)

You can make report through email, telephone or in person

Email:

Telephone:

Person: ACTU Chairperson

Deciding whether to make an anonymous report

F.N.H.E. encourages the report of improper conduct, however we appreciate that making a report can be difficult, you can make an anonymous report if you do not want to reveal your identity, and you will still be eligible for protections under this policy and applicable laws. However, you are encouraged to provide your name as it will make it easier for F. N.H.E. to investigate and address your report.

If you do not provide your name and investigation will be conducted as best as possible in the circumstances. However an investigation may not be possible unless sufficient information is provided, and it may make it difficult to offer you the same level of practical support if F.N.H.E. does not know your identity.

You are encouraged to maintain communication after your initial report using your preferred reporting channel, this will allow F.N.H.E. to ask follow up questions if needed and better understand and investigate your concerns.

7. RESPONDING TO REPORT:

Federal Neuropsychiatric Hospital, Enugu response to a report vary depending on the nature of the report and the amount of information provided. Your report may be addressed and resolved informally (such as assisting employees to change their behaviour) or through formal investigation. In all cases, reports will be treated sensitively, seriously and objectively.

Making a report does not guarantee a formal investigation, all reports will be formally assessed and considered by F.N.H.E. and a decision made as to whether they should be investigated.

If an investigation is undertaken, all employees and contractors must cooperate fully with any investigation. F.N.H.E. will treat the person to whom the report relates fairly and any findings will be made on reliable evidence.

The person being investigated will be provided with details of the report that involves them when appropriate to the extent permitted by law and given an opportunity to respond. However, should patients' care or staff safety be compromised, it's likely that the person against whom

the allegation is made will proceed on suspension pending the investigation.

8. PROTECTION FOR PEOPLE WHO REPORT UNDER THIS POLICY:

Protecting the identity of reporters

Federal Neuropsychiatric Hospital, will look to protect the identity of people who report improper conduct .The identity of the whistle-blower will not be disclosed except if such disclosure is required by law or consented to by the whistle-blower.

Protecting reporters from detriment

No person may cause detriment to someone else or threaten to do so because of a belief that the person has or will make a report under this policy .Examples of detriment include but not limited to varying an employee's role or duties, discrimination or harassment.

All incidents of detriment should be reported to the Recipient and such incidents will be treated seriously by F. N. H. E.

Any person involve in any detrimental conduct will be subject to disciplinary action, in some circumstances such behaviour may also be criminal offence punishable by imprisonment.

Federal Neuropsychiatric Hospital is committed to making sure the reporters are treated fairly and do not suffer detriment because they report improper conduct further provides the following additional protection measures;

- Monitoring and managing the behaviour of other employees
- Relocating employees (which may include the people alleged to have been involved in the improper conduct) to a different departments, units, office etc. This applies only to employees and not no-employees.
- Offering reporters leave of absence or flexible workplace arrangement while the matter is been investigated.
- Rectifying any detriment that the reporter has suffered.

Compliance with this policy will be strictly monitored by the ACTTU desk officer