



WHISTLEBLOWING

Policy and Guideline

ABSTRACT

The Whistleblowing policy aims to set out scope, purpose and process to encourage a culture of transparency and accountability for institutional improvement.

DHROD

Contents

Whistleblowing Policy	2
1. Definition of Whistleblowing	2
2. Purpose.....	2
3. When This Policy Should Be Applied	2
4. Scope	2
5. Reporting Mechanism	3
6. Confidentiality & Anonymity.....	3
7. Protection Against Retaliation	3
8. Investigation Process & Timelines	3
9. Responsibilities	4
10. False and Malicious Reporting	4
11. Policy Review	5
12. Sources	5

Whistleblowing Policy

1. Definition of Whistleblowing

Whistleblowing at The Millennium Universal College (TMUC) refers to the act of reporting any unethical, illegal, or improper activities within the institution by students, faculty, staff, or other stakeholders who have knowledge of such misconduct. This includes disclosures related to academic dishonesty, financial fraud, discrimination, harassment, or violations of institutional policies and legal obligations. Whistleblowing serves to uphold academic integrity, institutional accountability, and ethical conduct while ensuring protection for those who report concerns in good faith. Whistleblowing is the act of reporting unethical, illegal, or improper activities within an organization by an individual who has knowledge of such misconduct. It typically involves disclosing violations of laws, regulations, or ethical standards to internal authorities or external regulatory bodies. Whistleblowing aims to promote transparency, accountability, and integrity while protecting the whistleblower from retaliation.

2. Purpose

TMUC is committed to upholding the highest standards of integrity, accountability, and ethical conduct. This Whistleblowing Policy provides a mechanism for employees, students, and other stakeholders to report concerns about unethical, illegal, or improper activities without fear of retaliation.

3. When This Policy Should Be Applied

This policy should be applied whenever a student, faculty member, staff member, or any stakeholder of TMUC becomes aware of unethical, illegal, or improper activities within the institution. It should be used in situations where:

- there is a reasonable belief that misconduct has occurred or is likely to occur;
- internal reporting through regular channels has failed or is inappropriate due to conflicts of interest; and/ or
- the concern involves serious violations of institutional policies, academic integrity, or legal obligations.

4. Scope

This policy applies to all employees, students, contractors, vendors, and any individuals associated with TMUC. It covers concerns related to, but not limited to:

- Fraud, corruption, or financial misconduct
- Academic dishonesty or malpractice

- Discrimination, harassment, or bullying
- Health and safety violations
- Breaches of legal or regulatory obligations
- Any activity that threatens the integrity and reputation of TMUC

5. Reporting Mechanism

Whistleblowers can report concerns through the following secure channels:

- **Dedicated Email:** dhrod@tmuc.edu.pk; quality.assurance@tmuc.edu.pk
- **Online Portal:** <https://tmuc.edu.pk/qa/>
- **In-Person Reporting:** To a designated a designated staff member appointed by the Board of Governors (BOG)

All reports should include sufficient details to facilitate an effective investigation.

6. Confidentiality & Anonymity

TMUC ensures that:

- The identity of the whistleblower will be kept confidential unless legally required to be disclosed.
- Anonymous reports will be accepted and investigated based on the available information.
- Information shared will be restricted to individuals directly involved in the investigation.

7. Protection Against Retaliation

TMUC strictly prohibits any form of retaliation against whistleblowers. Retaliatory acts, such as dismissal, harassment, or discrimination, will result in disciplinary action, up to and including termination.

8. Investigation Process & Timelines

Upon receiving a report:

1. The designated staff member appointed by the Board of Governors (BOG) or an independent committee will review the concern within **5 working days**.
2. A preliminary assessment will be conducted to determine credibility within **10 working days**.

3. If necessary, a formal investigation will be initiated, which should be concluded within **30 working days**, depending on the complexity of the case.
4. Findings and recommended actions will be communicated to relevant stakeholders within **5 working days** after the conclusion of the investigation.
5. Corrective actions will be implemented as required, with periodic follow-ups to ensure compliance and resolution. Upon receiving a report:
6. The a designated staff member appointed by the Board of Governors (BOG) or an independent committee will review the concern.
7. A preliminary assessment will be conducted to determine credibility.
8. A formal investigation will be initiated if necessary.
9. Findings and recommended actions will be communicated to relevant stakeholders.
10. Corrective actions will be implemented as required.

9. Responsibilities

- **Management:** Ensures the integrity of the whistleblowing process and promotes a culture of openness.
- **a designated staff member appointed by the Board of Governors (BOG):** Oversees investigations and maintains confidentiality.
- **Employees & Students:** Report concerns honestly and responsibly.

10. False and Malicious Reporting

Whistleblowers are encouraged to report concerns in good faith. However, deliberate false or malicious reports will be subject to disciplinary action.

Definition of False and Malicious Reporting

- **False Reporting:** Providing information that is knowingly untrue, misleading, or fabricated with no basis in fact.
- **Malicious Reporting:** Submitting a report with the intent to harm, harass, or retaliate against an individual or the institution without any factual basis.

Possible Disciplinary Actions

Individuals found guilty of false or malicious reporting may face one or more of the following actions:

- Formal warning or reprimand

- Suspension from academic or professional duties
- Termination of employment or student status
- Legal action if the report causes reputational or financial damage to the institution or individuals

11. Policy Review

This policy will be reviewed annually to ensure its effectiveness and alignment with international best practices.

12. Sources

This policy has been informed by the following sources:

- Academy to Innovate HR (AIHR)
- ISO 37002:2021 – Whistleblowing Management Systems Guidelines
- OECD Guidelines for Whistleblower Protection
- UK Public Interest Disclosure Act (PIDA) 1998
- UN Convention Against Corruption (UNCAC) Best Practices

For any concerns or questions regarding this policy, please contact:
dhrod@tmuc.edu.pk; quality.assurance@tmuc.edu.pk.