



**EDCTP**

European & Developing Countries  
Clinical Trials Partnership

## **Whistle-blowing Policy**

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**Approved:**

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- 1 Purpose of the policy .....3
- 2 Scope of policy .....3
- 3 Procedures for raising a concern.....3
  - 3.1 Addressee.....3
  - 3.2 Method .....4
- 4 Making reports .....4
- 5 Protecting the whistle-blower .....5
- 6 Process for dealing with whistleblowing disclosures .....5

# 1 Purpose of the policy

Whistle-blowing, in the context used in this manual, means the confidential disclosure, in good faith by an individual, of a concern or information which he/she believes is an indication that serious malpractices have occurred or are occurring at one of the EDCTP Secretariat offices (The Hague or Cape Town) or in any of the EDCTP funded projects.

EDCTP is committed to the highest standards of conduct, accountability and transparency in the management of funds entrusted to it by its funding agencies (European Commission, Participating States and other third parties). One important aspect of this objective is to put in place a whistle-blowing policy and procedures that encourage all EDCTP stakeholders, particularly members of staff, General Assembly members, Board members, Scientific Advisory Committee (SAC) members, Audit Committee members, project coordinators and other staff of EDCTP beneficiaries to promptly report in a consistent and proper manner when they discover information which they genuinely believe is an indication of wrongdoing in any of the EDCTP funded activities and operations.

The main objectives of preparing this whistle-blowing policy include:

- To provide guidance to EDCTP staff and other stakeholders, who genuinely believed that they have discovered malpractice or other irregularities, on the procedures to follow in reporting such malpractices; other unlawful conducts; or breaches of regulations or policies so that appropriate actions can be taken
- Whistle blowers can raise concerns without fear of retribution
- To help EDCTP achieve its strategic objectives by safeguarding the resources under its custody and to prevent behaviours by EDCTP staff and other stakeholders that are not consistent with its established rules and regulations
- To encourage stakeholders to report any concerns relating malpractices or other unlawful conducts
- To provide a mechanism for promptly taking corrective actions to address genuine concerns raised.

## 2 Scope of policy

The policy applies to EDCTP employees (internal whistle-blowers), and to other EDCTP stakeholders, including members of staff, General Assembly members, Board members, SAC members, project coordinators and other staff of EDCTP beneficiaries (external whistle blowers). This policy covers all situations where an individual raises a concern or information which they believe is an indication that serious malpractice has occurred or is occurring in EDCTP funded operations.

## 3 Procedures for raising a concern

EDCTP encourages employees and other stakeholders to report known or suspected malpractices and other irregularities, but it is important for an individual raising a concern to bear in mind that making a false report is a serious issue and can have serious implications on EDCTP, those accused of wrongdoing, and the whistle-blower.

### 3.1 Addressee

Notification can be made to any of the following:

- Dr Michael Makanga, Executive Director ([makanga@edctp.org](mailto:makanga@edctp.org))
- Mr Abdoulie Barry, Director of Finance and Administration ([barry@edctp.org](mailto:barry@edctp.org))
- Professor Moses Bockarie, Director of South-South Cooperation and Head of Africa Office ([bockarie@edctp.org](mailto:bockarie@edctp.org))
- Dr Ole Olesen, Director of North-North Cooperation ([olesen@edctp.org](mailto:olesen@edctp.org)).

If the allegations concern an EDCTP director, the notification should be sent to Dr Mark Palmer, Chair of EDCTP General Assembly (Mark.Palmer@headoffice.mrc.ac.uk).

Letters must be sent to the address below: Anna van Saksenlaan 51  
2593 HW The Hague, The Netherlands

All notifications must then be submitted to EDCTP Senior Management Team (SMT) for discussion and for agreeing the best way forward. Notifications may be made anonymously.

Anyone submitting a notification must act in good faith and have reasonable grounds for believing the concerns raised are genuine. Where practical, notifications must be in writing. Individuals should make their concerns as sufficiently detailed as possible to help EDCTP's senior management in their investigation. Where possible, it should include the following details:

- A clear description of the malpractice they are reporting, including if possible, when, how and where it happened
- Name of the alleged culprits
- When possible and lawful, supporting documents to corroborate the allegations
- Any suggestions on how EDCTP should approach the investigation.

### **3.2 Method**

If an individual has a concern about malpractice, he/she should send an email, letter, make a telephone call or send a fax to the Executive Director or any member of the EDCTP Senior Management Team. The individual should specify in the email whether he/she wishes to be anonymous or if he/she wishes to provide their contact information. Whistle blowers can also request for their identity not to be disclosed to the accused wrongdoers. Appropriate arrangements must be made by DFA to protect their identity.

## **4 Making reports**

All EDCTP stakeholders, particularly members of staff, General Assembly members, Board members, SAC members and project coordinators, have a duty to report any malpractices and serious departures from EDCTP policies and procedures they have discovered or reasonably suspected to be occurring or have occurred at the EDCTP Secretariat offices (The Hague or Cape Town) or in any of the EDCTP funded projects. Any of the circumstances listed below must be reported:

- Intentional manipulation, falsification or alteration of financial or other records/supporting documents
- Intentional misapplication of rules and policies
- Misrepresentation (or omission) of events or transactions from the financial and technical reports
- Deliberate non-compliance with established EDCTP policies. These include: financial guidelines; SOPs; staff regulations; procurement guidelines; and accounting policies and procedures
- Theft or use of EDCTP funds for unintended purposes, including embezzlement of EDCTP funds
- Stealing of assets
- General malpractice, including illegal or unethical conduct
- Potential infringements of EDCTP policies and Grant Agreements
- Conflict of interest
- Breaches of contractual obligations and other violations of the law.

## **5 Protecting the whistle-blower**

EDCTP is committed to doing everything possible to prevent a whistle-blower from being harassed or victimised. If a whistle-blower requests that their identity be protected, all possible steps will be taken to hide their identity. If the situation arises that makes it difficult to proceed with the matter, for example if a court case is necessary and will involve disclosing the identity of the individual, this will first be discussed with the individual with the objective of agreeing the best way forward. These include ensuring a whistle-blower will not lose his/her job or is disadvantaged in any form. EDCTP is committed to ensuring that whistle-blowers, acting in good faith, are protected even if they are mistaken. However, disciplinary proceedings or legal actions may be brought against an individual who is found to be maliciously raising a matter that he/she knew to be untrue.

## **6 Process for dealing with whistleblowing disclosures**

Every concern received will be examined by the Senior Management Team (SMT) with the objective of determining the appropriate actions to take. The whistle-blower will be told who is handling the investigation, and how he/she will be contacted.

The DFA is responsible for recording all reported concerns received in the Whistle Blower Register. The SMT will assess the seriousness of the allegations and the extent to which the allegations can be corroborated. The Executive Director will ensure all reports by whistle-blowers are reviewed and properly followed up.