



# TEACHERS' FUND (TF) WHISTLEBLOWING POLICY AND PROCEDURES MANUAL

OCTOBER 2020

This document details the Whistleblowing Policies and Procedures for the Teachers' Fund. It is to be used, along with other related internal policies for the enterprise-wide application of operational guidelines for the Fund. It is the property of Teachers' Fund **and should under no circumstances be copied, sold or reproduced for private or commercial use or given to a third party** without the express **permission** of the **General Manager** of TF, or his/ her designated representative

## I. Document Control

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Authorizing Signatories			
Name	Title	Signature	Date
Foster Buabeng	General Manager		
Michael Korletey	Ag. Chairman, Audit, Risk & Finance Committee		
David Kattah	Chairman, Board of Trustees		

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## **1. Introduction**

Teachers' Fund of GNAT is committed to conducting its business and operations with honesty and integrity and in an ethical, moral and legal manner at all times and expect all staff to maintain high standards in accordance with its policies and procedures.

All organizations face the risk of things going wrong from time to time. So, if at any time, this commitment of the Fund to espouse high ethical standard is not respected or appears to be in question, the Fund will endeavor to identify and remedy the situation through all possible and practicable means.

In line with this commitment, the Fund has put in place the Whistleblowing Policy and Procedures (WPPM) to provide an avenue for all trustees, senior managers, staff, interns, consultants, contractors, vendors, suppliers, and/or customers (members) to disclose any illegal, unethical, questionable practices and improper conducts committed or about to be committed by any related person within the Fund. Conversely, when a person has reasonable grounds to believe that an employee, senior managers, trustee or any other person (third parties) related to the Fund has committed or is about to commit an offence, that could harm the Funds' business or reputation, the person denounces and reports the wrongdoer(s) in question.

## **2. Objectives**

The whistleblowing policy has been put in place to:

- 2.1 Encourage employees, trustees, managers and other related third parties to disclose wrongdoing or unethical behavior.
- 2.2 Protect the whistleblowers from reprisals /victimization as a result of the disclosure.
- 2.3 Treat all parties both the whistleblowers and offenders in a fair and equitable manner.
- 2.4 Ensure confidentiality of the whistleblowers and the concerns reported as much as possible.
- 2.5 Take corrective and disciplinary action if wrongdoing is discovered.
- 2.6 Provide whistleblowers with guidance as to how to raise those concerns.

## **3. Scope**

This policy applies to all employees, trustees and management of Teachers' Fund as well as Fund members and third parties doing business with the Fund.

#### **4. Duty to report misconduct**

This policy requires employees, senior managers, trustees, Fund members and third parties to report in good faith any wrongdoing discovered during the course of their work or in doing business with and/or at the Fund through any of the communication channels defined in the policy document. These wrongdoing may generally be a breach of legal and statutory laws, fraudulent, unethical and immoral behavior.

This may include but not limited to:

- 4.1 Fraud or Dishonesty
- 4.2 Breaches of Policies, Procedures and applicable Laws and Regulations
- 4.3 Bribery and corruption
- 4.4 Abuse of Power
- 4.5 Conflict of interest
- 4.6 Insider Trading
- 4.7 Misuse of Fund's Property and Information
- 4.8 Sexual Harassments and other forms of Harassments
- 4.9 Intimidation
- 4.10 Unauthorized alteration or manipulation of computer and physical files
- 4.11 Unethical business conduct that violates the Fund's business practices.
- 4.12 Actions that cause danger to health, safety, well-being of employees and general public.
- 4.13 Misuse of authority or neglect in the performance of an official duty.
- 4.14 A miscarriage of justice to an individual, including discrimination.
- 4.15 Authorizing or receiving compensation for goods not received or services not performed.
- 4.16 Authorizing or receiving compensation for hours not worked.
- 4.17 Gross misconduct.
- 4.18 Complaints involving questionable internal controls relating to auditing matters.
- 4.19 Providing false or misleading information or withholding material information on the Funds' financial statements.
- 4.20 Deviation from full and fair reporting of consolidated financial statements.
- 4.21 Deliberate error, misstatement or questionable accounting treatment in the preparation, evaluation, review of any financial statements of the Fund or its subsidiaries.

## **5. Acting in Good Faith**

- 5.1 Any person who files a complaint alleging misconduct must act in good faith and have reasonable grounds to believe that the information disclosed indicated wrongdoing.
- 5.2 No whistleblower who make a denunciation in good faith will be subject to penalization. The whistleblower will not be dismissed, demoted, suspended, threatened, harassed, discriminated against or revealed because of the communication of a genuine concern.
- 5.3 Any employee, senior manager, trustee or related third party who retaliates against a person who has made a report in good faith will be subject to the Fund's disciplinary action mechanism, the decrees of the Trustee's Code of Conduct or the law enforcement agency as the case may be.
- 5.4 However, any whistleblower making allegations against a person that are deemed unfounded and malicious or knowingly false may also result in the application of a disciplinary mechanism per the reporter type.

## **6. Reporting Procedure**

Any employee, senior manager, trustee, member and third party may report concerns, complaints or breaches to the Board Chairman, GNAT General Secretary (a trustee), the General Manager and/or the Head of Internal Audit of the Fund in person and/or in writing through the whistleblowing hotline, email and web-based.

### **6.1 Whistleblowing Hotline**

- 6.1.1 Teachers' Fund whistleblowing hotline is a confidential resource made available to whistle blowers to report potential breaches or unethical conducts.
- 6.1.2 The hotline can be accessed 24 hours per day, seven days a week.
- 6.1.3 All calls to the hotline will automatically go to voice mail and callers will be asked to leave their complaints after the voice prompt.
- 6.1.4 Individuals who call the whistleblowing hotline do not need to identify themselves.
- 6.1.5 All messages received on the hotline will automatically be forwarded to the recipients to be accessed by them.

### **6.2 Email**

The Whistleblower can send a direct e-mail from his/her address to the recipient address; **TFALERT @teachersfund.org.gh** if he/she wants to be identified.

### **6.3 Web-based Reporting**

6.3.1 There is also a facility for web-based reporting if the whistleblower wishes to remain unidentified.

6.3.2 Reports can be made by using the Teachers' Fund website; [www.teachersfund.com.gh](http://www.teachersfund.com.gh) by the following steps:

- Click on the whistleblower quick link on the homepage
- Type in the complaint in the message box that appears
- Click on the attached button to attach any relevant documents
- Click on the submit button to submit the complaint

### **6.4 General guidelines for reporting via email or web**

6.4.1 All written statements to the email address and web-based reports must include the following information

- Description of offence
- Date on which the complainant became aware of the offence
- Name of the person suspected of the offence
- Action taken before filing a complaint or allegations (if any)
- Further comments (if any)

6.4.2 The complainant will immediately receive a confirmation of submission of the complaint automatically after submission of complaint(s).

6.4.3 A person is not required to prove the truth of the allegation but is required to act in good faith and provide sufficient evidence to the person contacted to demonstrate that there is sufficient ground for concern.

### **6.5 Other Reporting Channels**

The whistleblower may also lodge a report with the police or any other law enforcement agency as defined under Ghana's Whistleblower Act, 2006, Act 720 and forward a copy of the said report to the Fund to enable the Fund to conduct its own internal investigations through the whistleblowing email address ; [TFALERT@teachersfund.org.gh](mailto:TFALERT@teachersfund.org.gh)

## **7. Confidentiality and Anonymity**

All complaints will be treated in confidential and sensitive manner. In addition, the complainant must be able to remain anonymous except in cases where it is necessary to disclose the complainant identity. In such cases, all reasonable measures must be taken to protect the complainant from any prejudices resulting from a disclosure.

## **8. Withdrawal of Disclosure**

If an identified whistleblower wishes to withdraw his/her disclosure, he/she is required to send an email to the address [TFALERT@teachersfund.org.gh](mailto:TFALERT@teachersfund.org.gh) together with giving reasons for the withdrawal. Notwithstanding such withdrawal, the Fund reserves the right to proceed with investigations on the matters arising from the disclosure.

## **9. Investigation**

All relevant cases including suspicious but unproven cases will be reviewed and analyzed by either the Head of Internal Audit of the Fund or competent person or investigation committee designated by the Board or Management of the of the Fund. All investigations will be kept strictly confidential.

### **9.1 Corrective Actions**

Appropriate corrective action will be determined based upon the facts, circumstances of the breach, type of offender and results of the investigation.

9.1.1 Corrective actions for employees could be extracted and implemented as stated in the Fund's Human resource policy manual.

9.1.2 The trustees code of conduct would provide guidelines for corrective action against trustees.

9.1.3 Members could be blacklisted, exited or handed over to the appropriate law enforcement agencies as the case may when they are found culpable of the offence(s) stated in the policy.

9.1.4 Third parties could be blacklisted or handed over to the appropriate law enforcement agencies as the case may be when they are found culpable of the offence(s) stated in policy.

### **9.2 Investigation Feedback**

At the conclusion of the investigation and as appropriate to the circumstances, either authorised person(s) on the Board or Management of the Fund may engage with the individual who reported the concern to help determine whether the matter was dealt with reasonably, fairly and appropriately.

## **10. Reward for the whistleblower**

10.1 The whistleblower would be rewarded especially when the breach or concern reported involve a financial loss to the Fund that had been prevented or recovered.

10.2 The Board and/or Management of the Fund however, reserves the right to reward the whistleblower in monetary or other forms of consideration if they deem appropriate.



## 11. Appendices

### 11.1 Definition

Word	Meaning
Whistleblowing	Disclosure of information which relates to suspected wrongdoing
Wrongdoing	Could be improper, unethical, illegal or negligent behavior by anyone in the workplace.
Confidentiality	Non-disclosure of complainant information to another unless legally required
Good faith	Providing all the information you know and believe to be true
Investigation	A process designed to gather and analyze information, to determine whether a complaint incident report is substantiated, or if any dishonest or unethical acts have occurred

### 11.2 Related Policies and Guidelines

The Whistleblowing policy and procedure manual should be read in conjunction with other relevant existing policies of the Fund.

### 11.3 Process Flow

