



**NATIONAL HEALTH INSURANCE**

**CONTROLLED**

**NHIF WHISTLE BLOWING POLICY**

**MAY 2018**

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## 1.0 INTRODUCTION

In taking up good governance on the Fund day to day affairs, **the Fund is committed to the highest standards of openness, integrity and accountability.** Toward this commitment, the Fund expects her employees and others business partners to come forward voluntarily and air their voices for any misconduct observed through the use proper communication procedures set by the Fund.

In addition, in exercising good governance, accountability and transparency while undertaking affairs of the Fund, the need to put in place proper and effective communication procedures is inevitable.

## 2.0 RATIONAL OF THE POLICY

Like any other institution, the National Health Insurance Fund (NHIF) desires honesty from and among its employees. This Policy therefore defines and **outlines standard operating procedures for managing reported cases.**

In this regard, the Policy aims to;

- Promote transparent structure and effective clear communication procedures;
- Encourage employees to air their legitimate concerns on wrong doings of their fellow employees and other culprits who jeopardize the Fund;
- Assure confidence to employees or Whistleblower wishing to present their legitimate concerns regarding any misconducts that affect the Fund;
- Promote best practices on institutional governance.

## 3.0 SCOPE AND APPLICATION OF THE POLICY

A Whistleblower or Complainant is any person or party who conveys or is proven to be about to convey a concern, allegation or any information indicating that fraud, violation, corruption, process ineffectiveness or any other

misconducts is occurring or has occurred in the Fund; with knowledge of good faith belief that the concern, allegation or information is true. Such persons or parties, without limitation, **include employee of the Fund, beneficiaries and third parties or any other entity or person.**

In this regard, the Policy shall apply to **all staff members** including without limitation to all Junior and Senior employees, **Members of the Management and Board of Directors** of the Fund. In addition, the Policy shall be applicable to **field students, interns, volunteers** and any **other stakeholder doing business or partnership with the Fund from time to time.**

#### **4.0 POLICY STATEMENT**

The National Health Insurance Fund (NHIF) intends **to promote a sound corporate culture of the highest standards of legal and ethical conduct.** The Fund is committed to provide **an environment that promotes highest ethical standards from recruitment to the time when staff members exit employment.** The **highest ethical standards** shall be exhibited **in all business processes, management oversight and controls.**

In addition, the Fund shall nurture an environment in which violations, circumventions or bypassing of these standards, are **without fear reported** for investigation and for corrective action.

#### **5.0 SCOPE OF ALLEGATIONS COVERED BY THE POLICY**

This Policy intends to address matters of a serious concern and nature relating to misconduct of employees or its related parties. It is designed to enable employees of the Fund and other interested parties to raise their concerns and

disclose information which the individual believes shows malpractice or impropriety. This includes but not limited to:-

- (i) Failure to comply with a legal obligation or statutes;
- (ii) Criminal activity;
- (iii) Improper conduct or unethical behavior as quoted in the Fund's Code of Ethics and Standards of Business Practice;
- (iv) Conduct which is an offence or a breach of law;
- (v) Disclosures related to miscarriages of justice;
- (vi) Unauthorized use of the Fund's finances and assets;
- (vii) Fraud and corruption and;
- (viii) Attempts to conceal any of the above.

This Policy shall exclude all matters related to grievances such as dissatisfaction with a Supervisor, Manager or Director, complaints about the work environment, salary, and staff fringe benefits etc.

## **6.0 PROCEDURES FOR REPORTING AN ALLEGATION**

The procedures for whistle blowing and complaints shall depend on whether or not the allegation, complaint or information is being made or disclosed by **employee of the Fund** or **by any other interested party**.

- 6.1 Employee shall report allegations or concerns through the whistle blowing reporting channel depending on employee' choice or through an immediate supervisor. If an employee for some good reasons consider that reporting an allegation to immediate supervisor will not be appropriate given the circumstance of the allegations, then case may be report to the higher level supervisor.

- 6.2 Interested or external parties of the Fund shall be free to use whistle blowing channel to register complaints and make allegations in strictly confidence.
- 6.3 All allegations received whether through the designated channel or other channel provided in the Policy from employee or external party shall be lodged or registered and screened by appointed team. Once registered the allegation shall be evaluated by the team to determine its credibility, materiality and verifiability. The appointed team shall comprise various disciplines depending on the nature of the matter reported.
- 6.4 On receipt of an allegation from an employee, the team shall register the allegation and where the identity of an employee is known, acknowledge receipt of allegation soonest possible and where appropriate to the nature of information or allegation explains the subsequent action to be taken and give an indication of when such actions are to be taken. An employee making a disclosure shall be informed within one week.
- 6.5 A preliminary evaluation shall be done to determine whether there are grounds for more detailed investigations. Where the preliminary evaluation reveals tangible and credible information that support the existence of conditions identified by this policy, a full investigation shall be done. The part or parties subject of investigation shall be informed unless such investigation is, in the view of the team interfere with the investigation or related investigation within its jurisdiction.
- 6.6 Upon receipt of a complaint of retaliation, the "Team", shall initiate an investigation as appropriate interim relief to the Whistleblower and take such interim remedial action to cure the underlying circumstances.

- 6.7 The interim relief and actions to protect and adjudicate the rights of the Whistleblower shall be separate process from the investigation of related underlying issues within the jurisdiction of the Team.
- 6.8 The Fund shall establish special hotline for reporting alerts on fraud or wrong doing. The hotline shall be accessible free of charge and shall be communicated to the general public accordingly.
- 6.9 Allegations may be reported by way of telephone, e-mail, text message, in person or any other way that may be found convenient to the Whistle blower.
- 6.10 Where it is too risk for the Whistleblower to disclose his or her identity, he or she may opt not to disclose the name and the recipient shall not force to know the identity of the informer.

## **7.0 CONTENTS OF ALLEGATIONS TO BE REPORTED**

All allegations or observed misconduct incidences shall contain as much specific factual information as possible, including but not limited to:-

- Facts describing the alleged event, issue, or matter;
- Names of persons involved;
- Dates, times, and locations;
- Urgency needed for action to be taken;
- Available evidence to support such allegation.

## **8.0 WHISTLEBLOWER SAFEGUARDS**

### **8.1 Protection**

This policy is designed to offer protection to Whistleblowers who disclose such concerns provided the disclosure is made:

- In good faith;
- In the reasonable belief of the individual making the disclosure that it intends to point malpractice or misconduct;
- It is important to note that no protection from internal disciplinary procedures is offered to those who do not follow the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

### **8.2 Confidentiality**

The Fund shall treat all such disclosures in a strictly confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of information and individual making the disclosure may need to provide a statement as part of the evidence required. Identity of source of information should be revealed with consensus of the person.

Each employee of the Fund shall be responsible to safeguards and maintain confidentiality of reported cases before and during investigation until when such case is publicly reported by the Management or the Board of Directors. Thus, any staff member who shall fail to adhere to this Policy, stern disciplinary measures shall be instituted accordingly.

### **8.3 False Allegations**

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action shall be taken against that individual. In making a disclosure, the individual should exercise due care to ensure the

accuracy of the information. If, however, an individual makes malicious allegations and particularly if he or she persists with such groundless allegations, disciplinary action shall be taken against that individual.

#### **8.4 Protection from Retaliation**

The Fund shall take pre-cautionary measures to ensure that Whistleblowers are protected from revenge by persons who have been implicated in reported incidences. Where threat for retaliation is evident, the Fund shall take appropriate disciplinary measures including termination from employment for any employee wanting to take retaliatory action against the Whistleblower.

### **9.0 RECOGNITION OF WHISTLEBLOWERS**

The Management recognizes that at times Whistleblowers are likely to put themselves at risk of retaliation by those implicated in unethical acts. To encourage Whistleblowers in reporting acts that are against the Fund's interest, the Management will, depending on the impact/ would-be- impact or seriousness of the matter reported, determine appropriate recognition modality from time to time.

### **10.0 ROLES AND RESPONSIBILITIES OF HEAD OF ANT-FRAUD UNIT**

In order ensure that, the operation of this Policy is well-coordinated during its implementation, the Head of Anti-Fraud Unit shall be responsible for:-

- i) Coordination of Whistleblower reported cases;
- ii) Preparation of periodic reports on the status of reported cases and the progress of each case;
- iii) Ensuring and maintaining confidentiality of all reported cases;
- iv) Coordinate and monitor effectiveness of this Policy within the Fund.

## 11.0 POLICY MONITORING AND EVALUATION

All staff shall be sensitized before the policy is put in use. In addition, other stakeholders will also be sensitized through various programs. There shall be a mechanism to ensure that implementation of the Policy is monitored and evaluated accordingly.

## 12.0 POLICY REVIEW

The policy shall be reviewed periodically from time to time as and when needed and the Board of Directors shall be notified accordingly.

## 13.0 APPROVAL OF POLICY

This policy shall be approved by the Board of Directors of the National Health Insurance Fund.

DATE.



Hon. Anne S. Makinda

**CHAIRPERSON OF THE BOARD  
NATIONAL HEALTH INSURANCE FUND**

DATE.....17/05/2018.....



Bernard H. Konga

**DIRECTOR GENERAL  
NATIONAL HEALTH INSURANCE FUND**

DATE.....17/5/2018.....