

Nakasero Hospital's Whistleblowing Service – Guidelines

1. About the whistleblowing service

Nakasero Hospital aims to combat corruption and other serious irregularities. An important part of that work consists of providing suitable reporting channels through which employees and other stakeholders can report suspected irregularities in a safe manner. They can do this, for example, by contacting an immediate supervisor, but sometimes this type of reporting channel is not enough.

The company has set up a special whistleblowing service in order to make it easier to report serious irregularities. The service, which is available through Nakasero Hospital's website – www.aar-healthcare.com – is an encrypted web solution which leads to a closed system provided by a third party, TripleB AB, which also goes by the secondary name, Whistleblowing Centre ("WhistleB").

We do not intend the whistleblowing service to replace internal information and reporting channels, but only to complement these channels. We therefore encourage individuals to use the service when it is reasonably necessary to avoid the usual reporting channels. For example, when the report is about someone who is in a position to prevent management from administering the report in a proper way.

2. How individuals can file a report and how its status can be checked

The whistleblowing service has a form in which the whistle-blower can anonymously file a report, which describes what has happened. When filing the report, the system generates an ID and password, which the whistle-blower should note down somewhere. These credentials will enable him/her to subsequently log on to the service and read any follow-up questions and replies completely anonymously.

3. Who can file a report?

All the stakeholders of Nakasero Hospital may use the whistleblowing service. For instance, employees, suppliers, customers, etc.

4. What should individuals report?

We encourage employees and other stakeholders to use the whistleblowing service to file a report regarding any irregularity they deem serious e.g. fraud, bribery, corruption, threat to a person's life, etc.

5. Whom should individuals report?

A whistle-blower should report any employee, director, customer, supplier and other company stakeholders as far as the irregularity committed directly or indirectly affects Nakasero Hospital.

6. What information should individuals report?

We have provided a few standard questions in the whistleblowing service's reporting form to assist the whistle-blower report a serious irregularity.

However, the whistle-blower may opt to make a report without using these questions. At the bottom of the form, we have provided a space where individuals can provide additional information after answering the standard questions or they can directly make their report in full at this section.

Additionally, should an individual wish to attach any form of evidence, we have provided the platform in this section.

We encourage whistle-blowers to uphold high ethical standards and avoid bias or malice in reporting. Individuals can report a mere suspicion but we discourage reporting information about ethnic origin, political views, religious or philosophical convictions or membership in a labour organisation, as well as information relating to a person's health or sex life.

7. How the company handles information reported

The company has appointed specific staffs as the case management team of all reported issues. A few board members are part of the team to ensure no sabotage of reported information.

The company shall further investigate reported information, internally corroborating or gathering additional evidence. The company shall only act on the information reported after confirming it is accurate and valid.

In the investigation stage, the whistle-blower may be requested to provide additional evidence if need be. The interactions between the whistle-blower and the company shall always remain anonymous. This is why whistle-blowers should note down the ID and password the system generates at the reporting stage. They will use these credentials to log onto the service for follow-ups and interactions with the company on the specific irregularity reported.

8. How are the interests of the person filing the report protected?

All data in the whistleblowing service is encrypted and password-protected and only specific persons at Nakasero Hospital can access the information. When administering reports, the case management team at the company considers the need of preventing unauthorised access.

The company does not carry out investigation regarding the identity of the person making the report. Furthermore, it does not take steps against the person making the report simply because he or she has filed the report; unless the law prescribes that, the company carries out such investigation or takes such steps.

9. What information does the company provide to the person covered by the report?

The company will inform the person covered by the report that a whistle-blower has filed a report and that the company is processing his or her personal data in the whistleblowing service.

The main rule is that the company will inform the person covered by the report shortly after receiving the report. If it is not possible to provide the information immediately, e.g. because it would threaten the continued investigation, the information may be withheld until the threat no longer exists. However, the company must inform the person as soon as possible and not later than at the time at which the company uses information to take measures against him or her.

10. Processing of personal data

The whistleblowing service includes the processing of personal data, which the company uses to evaluate the reports filed in the service and to investigate whether the persons covered by the reports have been involved in serious irregularities. The company processes personal data in accordance with the Kenyan law.