WHISTLEBLOWING POLICY
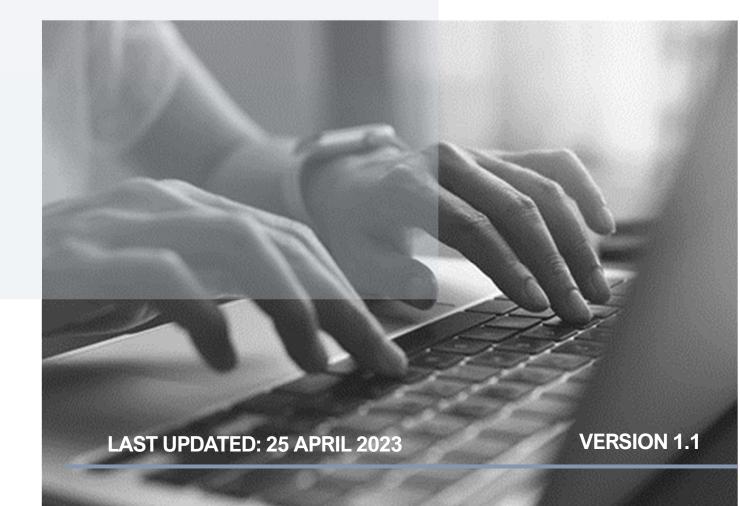
NIHR GLOBAL HEALTH RESEARCH GROUP ON PROMOTING CHILDREN'S AND ADOLESCENT'S MENTAL WELBEING IN SUB-SAHARAN AFRICA

LAST UPDATED: 25 APRIL 2023

VERSION 1.1

About the Project

Summary

The World Health Organisation (WHO) recommends preventative mental health interventions in schools. When children and adolescents focus on being mindful, they slow down, take their time, and focus on something in a way that is both relaxing and stress-free. Practising mindfulness makes children and adolescents happier. It improves their attention span, helps them manage stress, increases their sense of well-being, and improves their communication skills. It also improves their school performance. We do not know if mindfulness improves the well-being of children and adolescents in Sub-Saharan Africa. There is a need to know if it does so and if it would be a good use of government resources. We have designed a project which will help answer these questions.

We will deliver the project in Ethiopia and Rwanda between 2022 and 2026. Rwanda and Ethiopia are two of the poorest countries in the world. The wellbeing of children is poor in both countries, and school attainment is low. We will research ways of providing an affordable and acceptable mindfulness intervention that improves children's and adolescents' well-being. We will work with parents and policymakers to agree on delivering and testing it. Teacher-educators working with primary school teachers will develop an appropriate mindfulness intervention. Teachers involved in developing the intervention will train other teachers in their schools. Teachers will deliver the intervention as part of the primary school curriculum so that it reaches all children.

Further information is available at www.abdn.ac.uk/nihr-camw

Whistleblowing Policy

Last updated: 25th April 2023

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Section 1: Introduction

The purpose of this policy is to act as guidance to ensure that individuals can confidentially or anonymously report a concern.

We are committed to ensuring that everyone on the project adheres to the highest standards of openness, research integrity, and accountability across all activities. At the same time, we need to ensure that we meet all legislative and ethical obligations to support research integrity, minimise the risk of harm and comply with the funder's (the National Institute for Health and Social Care Research) requirements.

The NIHR requires that all organisations in receipt of NIHR funding adhere to the *NIHR Policy on Preventing Harm in Research*, and *The Concordat to Support Research Integrity* of which the NIHR is a signatory.

This policy should be read in conjunction with section 14.2.e (Compliance with Laws and Policy), Part 4 of the Schedule (Safeguarding Policy) and Part 6 of the Schedule (Whistleblowing Policy) of the Collaboration Agreement (CA), the *NIHR Policy on Preventing Harm in Research*, and your own institution's whistleblowing guidance.

The CA, your institution's guidance and NIHR guidance take precedence where there is a disagreement between them and this Policy.

For University of Aberdeen staff, students, and stakeholders, and for whistleblowing concerns raised to the University of Aberdeen, this policy should be read in conjunction with section 4.2.2 and 4.3 of the *Research Governance Handbook* and the *Policy and Procedure on Public Interest Disclosure (Whistleblowing)*.

For Addis Ababa University, there is no specific policy on whistleblowing, but the Ethics and Anti-Corruption Directorate are responsible for '*ensuring that no employee is pressured as a result of exposing corruption and ethical infraction'.* Thus, this policy should be read in conjunction with the *Ethics and Anti-Corruption policy*.

For University of Rwanda staff, students, and stakeholders, and for whistleblowing concerns raised to University of Rwanda, this policy should be read in conjunction with the *Whistleblowing Policy*.

Section 2: Aims and Scope of the Policy

2.1. Aims of the Policy

The main objective of this policy is to provide guidance on how to raise whistleblowing concerns in line with NIHR guidance and other legal requirements.

The aims of the policy are to ensure that:

1. The project provides a safe route for whistleblowing concerns to be raised, in line with NIHR guidelines;
2. Guidance on how to raise a whistleblowing concern is shared with all relevant staff, partners, participants, and stakeholders.

2.2. Scope of the Policy
1. The policy applies to staff employed to work on the project including J-Ls, co-Is, PDRs, PhD students, technical and administrative support staff, and external intervention staff.
2. All project partners, participants, community members, and other stakeholders can report a concern or disclosure (the definition of which is outlined in section 3) through the Whistleblowing procedures identified in this policy, addressing the reality that some individuals may not have the access, ability, or confidence to raise a whistleblowing concern through the formal institutional mechanisms.

Section 3: Definitions

Whistleblowing is the confidential or anonymous raising of a concern or disclosure about wrongdoing, in this case, within a research project. This includes (but is not limited to) a criminal offence, activities that are putting individuals or the environmental at risk or actual harm, corruption, covering up wrongdoing, or a safeguarding concern as set out in the project's Research in Safeguarding Policy.

It is a route to raise a concern that cannot be addressed through other complaints procedures or policies, such as the reporter wishing to remain anonymous, the scope of the concern or the need to bypass normal routes. It is not a route to rehear matters addressed through another complaint or policy (such as a disciplinary procedure).

Section 4: Roles and Responsibilities
1. Everyone working on the project (including J-Ls, co-Is, PDRs, PhD students, technical and administrative support staff, and external intervention staff) have a responsibility to report any allegation of unacceptable research conduct.
2. The Project Director (J-L at the University of Aberdeen) (p.abbott@abdn.ac.uk) is responsible for compliance with this policy in accordance with relevant University policies, legislation, and funder terms and conditions.
3. The Research Project Manager (isabel.stanley@abdn.ac.uk) is responsible for maintaining a record of all whistleblowing concerns and investigations related to the project.

Section 5: Confidentiality and Anonymity

All whistleblowing submissions will be treated in a confidential and sensitive manner. The identity of the individual making a submission will be kept confidential, insofar as this is compatible with an effective and fair investigation, and with rights under the data protection legislation signatories to the Collaboration Agreement must adhere to, as outlined in section 14.2 of the Collaboration Agreement.

No detrimental or retaliatory action will be taken against an employee who raises a concern through this policy, provided they do so without malice and reasonably believing it to be true. The employees raising a concern will be supported and protected from reprisal action resulting from their whistleblowing action, in line with the relevant institutional and legal guidance.

As much as possible, research participants, teachers, parents of children and adolescents, and bystanders will be protected from reprisals when making a complaint they reasonably believe to be true, whilst acknowledging there are contextual factors for these stakeholders that we do not control. No reprisals for a complaint reasonably believed to be true will be instigated or encouraged, implicitly or explicitly, by staff or students employed on the project.

5.1. Confidentiality of children and adolescents
If a child or adolescent makes a disclosure, parents or carers should normally be informed (unless this would put the child or adolescent at greater risk of harm). It is the decision of the in-country lead to decide on whether a parent or carer should be notified, as outlined in the project's Risk of Harm Protocol.

There may be limits to confidentiality where there is a disclosure relating to exploitation, abuse, or harm. This may involve informing the Police or the Social Services department (or equivalent), a health professional, or the District Director of Education, if there is a significant risk of harm or a concern that a crime may have been committed.

5.2. Anonymous disclosures
An aim of this policy is to encourage openness and transparency and address the fear of reprisals. However, an individual can choose to raise an anonymous whistleblowing concern. To the extent that it is feasible, anonymous disclosures will be handled using the same procedures as un-anonymised disclosures.

Section 6: Raising a whistleblowing concern
6.1: Who should a whistleblowing concern be raised with?
6.1.1. University of Aberdeen
Whistleblowing concerns in the UK should be raised with the University of Aberdeen, referring to the process outlined in the *Policy and Procedure on Public Interest Disclosure (Whistleblowing) Policy* and sections 4.2.2 and 4.3 of the *Research Governance Handbook*.

The Whistleblowing email address is: whistleblowing@abdn.ac.uk. Alternative individuals who can receive a whistleblowing submission are outlined in section 6 of the *Policy and Procedure on Public Interest Disclosure (Whistleblowing) Policy.*

6.1.2. University of Rwanda
Whistleblowing concerns in Rwanda should be raised to the University of Rwanda, referring to the *Whistleblowing Policy*.

The Anti-Corruption Committee contact details are available online here and are listed below:

Email: anti-corruption@ur.ac.rw

Phone: +250 788786376

6.1.3. Addis Ababa University

Whistleblowing concerns in Ethiopia should be raised to Addis Ababa University, referring to the process outlined in the *Ethics and Anti-Corruption policy*.

The Ethics and Anti-Corruption Directorate contact details are available online here and are listed below:

Email: ethics.anticorruption@aau.edu.et

Phone: +251-111- 23 97 03 or 0911457544

Address: AAU, Sidist Kilo Main Campus, Administration Building, Ground floor Room No. 002/008

P.O. Box: 1176

6.1.4. Alternative

Alternatively, whistleblowing concerns can be raised directly with the Research Project Manager at the University of Aberdeen (isabel.stanley@abdn.ac.uk) who will then take it forward in accordance with this policy.

If the above options are not appropriate, a whistleblowing concern can also be raised through the NIHR by contacting the designated programme manager (Jo Lunn at nihrglobalhealth@nihr.ac.uk, citing NIHR133712) or through the Contact Us page.

6.2: How should a whistleblowing concern be raised by participants, parents, and community members in Rwanda or Ethiopia?

This Policy recognises that community members, parents, children, and adolescents participating in the project may not have the access, ability, or confidence to raise a whistleblowing concern through the formal mechanisms of this Policy or the relevant policies of the institutions.

The Participant Information Sheet given to each research participant will identify two Designated Safeguarding Contacts (DSCs). These will be a lead co-investigator in that country and an independent member of that institution's ethics committee (or equivalent). The DSC who receives this report is then responsible for responding in line the relevant institutional guidance related to complaints or whistleblowing.

Alternatively, research participants will be encouraged to raise any concerns with a leader or teacher, who can then raise a concern with a DSC.

Section 7: Notifying the Management Group

Whilst complying with institutional and legal guidance, it is important that the project's Management Group is notified of any whistleblowing submission and/or investigation so a decision on appropriate action whilst an investigation is ongoing can be made.

The exception to this is if a member(s) of the Management Group is implicated in the submission. In this case, an alternative member of the Management Group (where appropriate) should be notified, or the nominated independent individual at the University of

Aberdeen. This is the Director of Research for the School of Education (matthew.clarke@abdn.ac.uk).

If a member of the Management Group is notified of a whistleblowing concern, they are responsible for informing the rest of the Management Group promptly, and within five working days of being informed.

Section 8: Disseminating whistleblowing guidance

The Research Project Manager is responsible for sharing this policy with everyone employed on the project (including J-Ls, co-Is, PDRs, PhD students and technical and administrative support staff).

It should also be stored on the agreed file-storing platform (at the time of writing, Microsoft SharePoint) for future reference.

In-country leads are responsible for sharing a copy of this guidance with external intervention staff, participants, and community stakeholders. Where literacy barriers or other factors would impact comprehensive understanding of this policy (for example, the age of the child participants) they should be notified in a clear and appropriate way of persons they can confidentially raise any concerns with (as outlined in section 6.3).

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