



## MDFC Policy

### **Anti-Fraud, Anti- bribery, and Anti-corruption Policy**



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# Anti-Fraud, Anti-bribery, and Anti-corruption Policy

## Policy document

It is the MDFC policy to conduct all business in an honest and comprehensive manner; we commit zero tolerance to fraud, bribery, and corruption. We advocate that every community has shall be free of corruption, institutions shall take all measures and terms necessary to end fraud, bribery and most importantly, where necessary to implement penalties to the affected individuals

Medical Doctors for choice as the catalyst for change with vision to enhancing the capacity of service provision, our focus aim to be a body that promotes transparency and accountability, and this policy emphasize and guide in implementing these values .

### 1. About this policy

The Purpose of this policy is to:

- To help all MDFC staff members and all personnel working for us to identify when actual fraud, bribery and corruption arises and to act accordingly
- To set out responsibilities for our members and those working on our behalf , a better stand in cases of fraud, bribery and corruption
- To provide information and adequate guidance to those working for and with us on how to recognize and deal with fraud, bribery and corruption

Revision of this policy shall be done on need basis

### 2. Definition

**A Fraud** is defined as a willful or an intentional act intended to secure unfair or unlawful personal gain through misappropriation of assets, abuse of position, false presentation or unethical acts

**Bribery** is the act of offering someone an advantage, whether financial or otherwise, to influence someone to act improperly contrary to their usual functions or agreements in order to reward them for their improper acts. It is still bribery if the person acting improperly is not the same person to whom the bribe was offered, given, or promised.

An **Advantage** includes money, gifts, loans, hospitality, services, discounts, the award of contract, or anything valued given in exchange for improper acts.

A person acts **improperly** when they act illegally, unethically, contrary to an expectation of good faith, or abuse a position of trust. The improper act may be in relation to any business or

professional activities, public functions, acts in the course of employment, or other activities by or on behalf of the organization of any kind.

**Corruption** is the misuse of a position or power for personal advantage. this policy prohibits any corruption by MDFC personnel or third parties acting on MDFC' s behalf

**Coercion** is an intimidation tactic sometimes used to make a person(s) cooperate during an act of fraud, bribery, or corruption.

**Collusion** is a covert agreement involving person(s) within the organization intended to help gain an unfair advantage.

### **3. General principles:**

- Fraud and corruption, in whatever form, are against the MDFC's core values and can seriously affect the organization and the individual who commits it.
- As a result, MDFC has zero tolerance for inaction and is extremely cautious when it comes to fraud and corruption in its activities and operations.
- Where fraud , bribery and corruption are found to occur , MDFC will take timely actions.

### **4. Who must comply with this policy ?**

This policy apply to all persons working for Medical Doctors For Choice, including members of staff, volunteers, hosted staff, and its members . It also applied to individuals or organizations working with or on MDFC's behalf in any capacity including; agency staff, second staff, consultants, and vendors, wherever they may be located.

### **5. What one Must not Do?**

It is not acceptable for a member of staff (or someone on his/her behalf) to;

- a) Give, authorize, and promise to give or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received.
- b) Receive payments, gifts, or other favors from outsiders like grants, contractors, consultants, or other service providers. if such is offered or received, kindly treat the matter in accordance with the Conflict of Interest Policy.
- c) Offer or receive an advantage from public officials, governmental representatives, or political parties.
- d) Threatening any individual due to their unwillingness to commit fraud, bribery or who has raised concern under this policy.

- e) Engage in conduct inconsistent with the organizational procurement or tendering process.
- f) Falsify or manipulate the organization's financial records, reports, and systems.
- g) Improper influence for personal gain on service providers.
- h) Involvement of any act that may lead to breach of this policy.

## **6. Facilitation payments and kickbacks**

We do not make or accept facilitation payments or "kickbacks" of any kind. Facilitation payments, also known as "back-hinders" or "grease payments", are unofficial payments made to ensure access to or expedite a routine or necessary action. Kickbacks are typically payments made in return for a business favor or advantage. You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on MDFC's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, raise them with line management, or the executive director, or internal audit officer.

## **7. Dealing with third parties**

- MDFC could be held liable for the acts of people or organizations that we provide funds to or act on our behalf. This includes consultants, s, and intermediaries.
- MDFC will make sure that the third party knows our commitments and responsibilities under this policy and their duties to comply with it (we will achieve this with s and consultants by having contracts that have clause(s) on this policy).
- To avoid the risk of engaging or continuously engaging with parties that may be involved in acts of commission or omission that contravene this policy, kindly undertake appropriate due diligence checks. The appropriate level of due diligence will vary depending on the circumstances of the engagement. If there are any concerns arising from the checks, these should be raised with line management, the executive director, or the internal audit officer.

## **8. Responsibilities**

- The overall responsibility for this policy lies with the executive director and is delegated to various leads within the organization.
- The prevention, detection, and reporting of fraud, bribery, and corruption are the responsibilities of all those working for and with the MDFC.

- Alert the Executive director or MDFC internal audit officer as soon as possible if you believe or suspect that a conflict with this policy has occurred or have any clue or tangible reason that it may happen in the future.
- Making allegations of fraud, bribery, or corruption that the individual knows to be false or is done with intent to mis-inform is violation of this policy and will be followed up for appropriate action.
- Please see the Whistleblowing policy for guidance on how to report suspected incidents.

## **9. Non-Retaliation for reporting fraud or Refusal to pay Bribes**

MDFC supports its staff to take a firm stand against fraud, bribery, and corruption and shall ensure that staff will not suffer retribution through negative performance assessment, adverse employment related consequences, or retaliation for reporting suspicions of fraud and/or corruption or refusing to pay bribes. For bribery, this applies in all cases, including where such a refusal to pay bribes has some negative implications for MDFC's programming delivery. The long term imperative for promoting integrity in decision -making outweighs short-term tactical programming hurdles. Indeed, the payment of bribes itself perpetuates the risks and culture of corruption.

The safety and security of all MDFC staff remain paramount.

## **10. Duress**

Circumstances may arise in which payments are made to protect against an imminent threat to the life, health, safety, or liberty of staff or those around them. Staff doing this under such extreme duress must report the incidence and shall not be subject to sanction.

## **11. Due process**

- Reported cases of suspected fraud, bribery, or corruption will be dealt with in the appropriate manner as described in the Whistle blowing Policy of MDFC.
- All parties' rights shall be respected, dignity maintained, and due process followed during actions taken in compliance with this policy. Relevant information may be shared with each party from time to time.

## **12. Training and communication**

Training on this policy will be conducted for all the individuals who work for or with MDFC and regular training will be provided as needed on regular basis

Our zero-tolerance approach to fraud, bribery, and corruption must be communicated to all staff, interns, consultants, volunteers, hosted staff, seconded staff, and service providers at the outset of our relationship with them and as appropriate thereafter

### **13. Breach of this policy**

Any member of the class of persons noted above who breaches this policy will be subjected to organization actions outlined in other relevant policies or manuals and provisions in contractual agreements and applicable laws.

### **10. Related Policies and Manuals;**

Whistle blowing Policy

Conflict of Interest Policy

Code of conduct policy

Local legislations