

# **MEDICAL DOCTORS FOR CHOICE**

**(MDFC)**



## **WHISTLEBLOWING POLICY**

**20 TH DECEMBER 2023**

## **WHISTLEBLOWING PROCEDURES**

To blow the whistle is to alert a third party, in good faith, of a concern, allegation, or piece of information indicating that a prohibited act or omission is occurring or has occurred.

### **1. Purpose and scope**

All organizations face the risk of fraud, bribery, corruption, criminal offence, and non-compliance with a legal duty and in order to enhance the culture of anti-fraud, anti-bribery, anti-corruption, criminal offence, and non-compliance with a legal duty, MDFC believes it is its duty to identify such situations and be able to take necessary measures. By doing so, MDFC encourages a culture of being open so that It may reduce their incidence

Person(s) may be worried that by reporting such issues they may be exposing themselves to victimization, detriment, or risking job security; that is quite understandable. However, all enjoy protection if they raise concerns in the right manner, as provided for in these procedures, and in good faith. These procedures are designed to provide that opportunity and protection. Provided one is acting in good faith; it does not matter if one is mistaken. There is no question of a whistleblower having to prove that an act of fraud, bribery, corruption, criminal offence, or non-compliance with a legal duty was committed.

### **2. How to raise your concern internally**

#### **2.1 Tell immediate supervisor**

**MDFC** Staff concerned about issues of fraud, bribery, and corruption should report them to the immediate supervisor/line management. It can be done according to his/her preferred form of communication, either oral or written. If the staff can not communicate it to the immediate supervisor for any reason, he/she shall contact the MDFC Executive Director through email, telephone or face to face meeting .

#### **2.2 If staff still have concerns,**

If employees have voiced concerns within MDFC and are still concerned, or if the situation is so serious that they feel they cannot discuss it with the Executive Director or their immediate supervisor/line management, they should bring it up with the MDFC officer of Internal Audit, preferably in writing or verbally. For a list of contacts, please refer to the protocol.

#### **2.3 Suppliers, consultants and other parties**

All parties and /Or people who are not employees of MDFC, including but not limited to MDFC employees, partners, consultants, and vendors. Such parties ought to inform MDFC, its executive

director, and the officer in charge of internal audit at MDFC about any type of potential fraud, bribery, or corruption.

### **3. How to respond**

The recipient of such information will determine how to react in accordance with these processes in a responsible and appropriate manner. Furthermore, compliance with the MDFC Fraud Protocol will be required. Data will be handled carefully, and appropriate confidentiality will be upheld.

### **4. Raising concern externally (Exceptional cases )**

The main goal of this approach is to provide MDFC employees with the chance and protection they need to voice concerns internally. Though they should think about bringing the issue up with the relevant regulator if they honestly and reasonably believe the information and claims are real, for whatever reason they feel they can't raise issues internally. Depending on the nature of the issue, the competent regulator will be one of those listed under the relevant local legislation.

### **5. Anonymous whistleblowing**

Despite the fact that anonymous whistleblowing is not recommended due to the challenges it poses, opportunities still exist for individuals to make such reports. It is possible for someone to report something anonymously by choosing a preferable way of communication, such as email or telephone, and sending the report to the key contact person, such as MDFC's internal audit officer or the Executive Director.

However, the whistleblower is urged to provide enough information required since there might be no chance to refer back, making it essential to facilitate easier follow-up based on the information provided.

### **6. Details to include in the whistleblower's communication**

The person who is reporting a suspected case of fraud, bribery, corruption, criminal offence, or non-compliance with a legal duty would be requested to provide the following information so as to inform the subsequent procedures;

- a) Describe the what, how, when, where and by who;
- b) Share available relevant documentation.
- c) Give the names of any other person(s) who may be knowledgeable about the situation or the location of any further pertinent information; and

d) Identify your personal contact information and chosen means of communication (if the whistleblower is not anonymous).

## **7. What happens when a suspected matter is reported?**

Step1:

Receipt of the whistleblower's information will be acknowledged

Step 2:

To determine whether the situation falls under the scope of this policy, the recipient(s) of the information will review the information at their disposal. The MDFC fraud protocols will be started if the information in the whistleblower complaint is compliant with this policy.

This includes contacting relevant roles/offices within MDFC.

Step 3:

Wherever possible, the whistleblower may be contacted to request to provide additional information. The Executive Director of MDFC or the officer in charge of Internal Audit at MDFC shall choose the strategy and plan for each investigation. This depends on a number of variables, including but not limited to: the nature of the allegation, the location, the accessibility of the parties involved, the information at hand, and the technological characteristics of the situation.

Where necessary, outside professional assistance might be requested.

Step 4:

Reported matters may be subject to either an investigation/inquiry or no further action preferred. After an investigation/inquiry by a team of selected appropriate individuals a confidential report is to be prepared and shared among relevant persons within MDFC. The report would ordinarily contain description of the matter, outcome of the investigation/inquiry, impact and recommendations. Where no further action on a reported matter is preferred the maker(s) of such a conclusion will communicate to relevant persons within MDFC of the decision and reason(s) thereof.

Step 5:

In both instances above, appropriate action to be taken, will be determined based on the content of the report or communication of no further action and in compliance with other applicable policies.

## **8. Recovery**

- The MDFC will use all available means, including legal action when needed, to try to recover MDFC resources and property that have been lost as a result of these policy violations.

## **9. Available whistleblowing facilities**

The following are key contacts that a whistleblower may use:

MDFC Executive Director: board@medicaldoctorsforchoice.org

MDFC internal Audit officer: mrkysnjose@gmail.com

MDFC website : <https://www.medicaldoctorsforchoice.org/>

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

[Anti-Fraud, Anti- bribery, and Anti-corruption Policy](#)

[Conflict of Interest Policy](#)

[Code of conduct policy](#)

[Local legislations](#)

**ANNEX** – “Red flags,” which may be indicators of fraud, bribery, and /or corruption

1. A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
2. A third party may request an unexpected additional fee or commission to ‘ facilitate ‘ a service or access to certain area/route
3. A staff member or MDFC member learns that a third party is using illegal organizational methods or has been accused of using them.
4. A staff member becomes aware that a third party is accessing certain areas/ routes which the staff knows or suspects are only accessible on payment of bribes.
5. A staff member claims excessive expenses and/or is unable to document their expenses.
6. A staff member’s lifestyle is inconsistent with their legitimate sources of income.