1 Introduction

QUAMED is committed to maintain high legal, ethical and moral standards, to adhere to the principles of integrity, objectivity and honesty and wishes to be seen as opposed to fraud and corruption in the way that it conducts its business. All members of staff are expected to share this commitment. The objective of this policy is to promote a culture which deters fraudulent activity and to facilitate the prevention and detection of fraud and the development of procedures which will aid in the investigation of fraud and related offences, and which will ensure that such cases are dealt with timely and appropriately.

This policy applies to all activities and operations of QUAMED and all services that QUAMED provides to other organisations and the management of our consultant contracts and service agreements.

This Policy aims to prevent, detect and address acts of fraud and corruption involving:

Staff members, non-staff personnel, including volunteers, vendors, implementing partners and responsible parties engaged or contracted by QUAMED and all QUAMED contracted experts.

The term fraud is commonly used to describe a wide range of misconducts including theft, corruption, embezzlement, bribery, forgery, misrepresentation, collusion, money laundering...
and concealment of material facts. It often involves the use of deception to make a personal gain for oneself, a connected person or a third party, or a loss for another – intention is the key element that distinguishes fraud from irregularity.

Fraud does not just have a potential financial impact, but it can cause damage to the reputation of an organisation responsible for managing funds effectively and efficiently.

Corruption is the abuse of power for private gain.

Conflict of interests exists where the impartial and objective exercise of the official functions of a person are compromised for reasons involving family, emotional life, political or national affinity, economic interest, or any other shared interest. QUAMED has Conflict of Interest declarations that are signed by its staff, board members and all contracted experts.

Examples of fraud and corruption include, but are not limited to, the following actions:

1. Forging documents, preparing false entries in QUAMED systems or making false statements to obtain a financial or other benefit for oneself or another/others;
2. Collusion or other anti-competitive scheme between suppliers during a procurement process;
3. Providing information in relation to a medical insurance claim or another entitlement that the claimant knows to be false;
4. Forging the signature of a QUAMED staff member or forging a document purporting to be from QUAMED to induce a party outside QUAMED to act;
5. Using another’s IT identity or password, or creating false identities/passwords, without consent or authority to manipulate QUAMED processes or cause the approval or denial of actions;
6. Accepting hospitality such as meals or entertainment from a vendor;
7. Misrepresenting QUAMED employment status to obtain a benefit from a government or private sector entity;
8. Failing to disclose a financial or familial interest in a business or outside party while participating in the award/management of a contract to the benefit of that business or outside party;
9. Processing the cost of personal travel as part of an official travel;
10. Making misrepresentations, including educational credentials or professional qualifications, on a personal history form in the context of a job application; and
11. Falsifying documents, making false statements, preparing false entries in QUAMED systems or other deceptive acts to the detriment of those someone seeks to disfavor, or to discredit a person, program or the organization.
2 Responsibilities

- Within QUAMED, the overall responsibility for managing the risk of fraud and corruption has been delegated to the Executive Director who has the responsibility for
  - Undertaking a regular review, with the help of a board member, of the fraud risk. This is done as part of the risk register review.
  - Establishing an effective anti-fraud policy and fraud response plan;
  - Ensuring that QUAMED refers investigations to competent investigation bodies when they occur with the board of directors as the first choice of investigative body.

- All QUAMED staff and contracted experts are responsible for the day-to-day management of fraud risks and particularly for
  - Preventing and detecting fraud;
  - Ensuring due diligence and implementing precautionary actions in case of suspicion of fraud

3 Reporting Fraud

QUAMED has procedures in place for reporting fraud.

- To ensure that beneficiaries of QUAMED’s services are aware of the code of conduct we include it in the agreements or contracts that we sign with the beneficiaries. We also publish our code of conduct on our website (www.quamed.org).

- In case an allegation of sexual exploitation and abuse is suspected or detected, the director will be informed. The director will report this to the chair of the board within 48 hours of having been informed. The chair will constitute a three-person confidential investigative board committee. In case the director is involved, the technical coordinator will report to the chair. In case the chair of the board is involved, the secretary or the treasurer will be informed.

- In case of non-sexual allegations (discrimination, corruption, fraud, integrity, financial, etc.), the director will inform the chair and will investigate. A report will be presented to the chair within 7 working days. The chair will decide the follow-up. The report and the chair’s decision will be part of the agenda in the next board meeting.

All reports will be dealt with in the strictest of confidence. Staff reporting irregularities or suspected frauds are protected from reprisals.
4 Conclusion

Fraud can manifest itself in many different ways. QUAMED has a zero-tolerance policy to fraud and corruption and has in place a control system that is designed to prevent and detect, as far as is practicable, acts of fraud and correct their impact, should they occur.

This policy and relevant procedures are supported by the board of directors of QUAMED who will review and update them on a regular basis.
Agreement completed.

2023-01-13 - 8:32:11 PM GMT