

"ANTI CORRUPTION POLICY"

Honesty is the fastest way to prevent a mistake ...

.....from turning into a failure



**INTERNATIONAL INSTITUTE OF HEALTH MANAGEMENT RESEARCH,
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The Anti-Corruption Policy is to outline the Institute's approach, as well as defining roles and responsibilities, for dealing with the threat of fraud and corruption, both internally and externally. IHMR is committed to protecting the public funds with which it has been entrusted. To ensure resources are used for their intended purpose of providing higher education, it is essential that losses due to fraud and corruption are minimised.

The public is entitled to expect IHMR to conduct its affairs with integrity, honesty and openness and demand the highest standards of conduct from all faculty and staff.

Definition of Fraud

For all practical purposes, fraud may be defined as the use of deception with the intention of:

- gaining an advantage, personally and for family or friends; or
- avoiding an obligation; or
- causing a financial loss to the University or one of its subsidiary companies.

The term fraud is also used to describe such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Fraud may occur not necessarily on financial matters but also include reputational, employment and students.

Definition of bribery

Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe. All forms of bribery are strictly prohibited.

The irregularities include

- Theft – This may include the removal or misuse of funds, assets or cash
- False accounting – dishonestly destroying, defacing, concealing or falsifying any account, record or document required for any accounting purpose, with a view to personal gain or gain for another, or with the intent to cause loss to the University or furnishing information which is or may be misleading, false or deceptive
- Abuse of position – abusing authorities and misusing Institutional resources or information for personal gain or causing loss to the Institution

Steps taken to check corrupt practices

In order to check any activities related to fraudulent practices, the following are supposed to be followed:

- Measures are put in place to provide effective leadership, auditing, employee screening and student recruitment.
- Standard operating procedures (SOPs) are in place for recruitment of faculty and staff, purchase and procurement, code of conduct for students. The interview or selection panel are selected keeping any conflict of interest in mind
- An orientation and induction program is conducted for staff at the time of recruitment

- An orientation program is conducted for students wherein they are apprised of their roles and responsibilities
- The Financial Regulations ensure financial management in accordance with the highest standards
- The financial documents are reviewed through an annual audit program (internal and external) to prevent and detect fraud and guide the department for continuous improvement
- The standards of the organization are maintained through independent Academic Advisory Council and Governing Board empowered to oversee all activities and detect any fraudulent activities
- The SOPs are communicated to all staffs. In case of any amendments, those are communicated to all.
- The Institute has established systems and processes with efficient internal controls

Steps taken in case of detection of any corrupt activities

- Suspicion of fraud or irregularity may be captured through a number of means- from any valid documents or records, audit reports
- All actual or suspected incidents are reported without delay to the Head of the Institution who should assess the situation and direct it to the appropriate committee/s for subsequent investigation with 48 hours of receiving the complaint.
- Once an investigation has been completed, and subject to privacy and other legal obligations, the Director (or the President) will notify the reporting individual with the results of the investigation. The same report will be shared with the Trustee Secretary of IIHMR Society
- In case it does not come under the purview of any committee, a committee will be set up under the direction of Trustee Secretary of IIHMR Society and it would be taken forward.
- If a complaint indicates that illegal activity has occurred, the Director (or the President) may bring the complaint directly to the Trustee Secretary, as appropriate.
- The above procedure and any investigation carried out is intended to be flexible in order to respond to the specific circumstances at issue. The intent is that a complaint of a fraud or corruption concern will be managed by a person or committee of people within IIHMR who are not personally involved or otherwise in a conflict of interest with respect to the matter. IIHMR however reserves the right to engage in a different procedure as deemed appropriate in any given circumstance.

Action taken:

Any corruption committed by any member of staff, non-staff personnel, individual consultant or contractor, or partner organization and institution constitutes misconduct for which a disciplinary measure may be imposed, in accordance with IIHMR policies and contractual terms, up to and including:

- For staff, disciplinary and/or administrative actions
- For non-staff personnel, non-renewal or termination of contract or other actions
- For faculty members, research staff, consultants and partner organizations and institutions, termination of the contract and exclusion from future dealings with IIHMR
- Referral to the national authorities for investigation
- Recovery of financial loss and/or assets suffered by IIHMR and to return funds recovered to the respective funding sources.