



International  
Confederation  
of Midwives

Strengthening Midwifery Globally

# ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY

15 NOVEMBER 2023

## PRINCIPLES

ICM is committed to the prevention of fraud, corruption, bribery and any other forms of dishonesty and will promote an anti-fraud, corruption and bribery culture. It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to fraud, bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing, and enforcing effective systems to counter fraud, corruption and bribery.

## POLICY STATEMENT

This Policy applies to the conduct of all staff, the ICM Board (Board), Council and committees. It also applies to volunteers, consultants, associates or agents of the ICM and any third party acting on its behalf, which includes fixed term staff, contractors, trainees, seconded staff, homeworkers, casual workers, agency staff, sponsors, or any other person associated with ICM, wherever they may be located (collectively referred to as 'Staff' in this Policy).

ICM will investigate all suspicions of fraud, corruption and bribery committed by Staff, suppliers and other third parties. ICM requires all Staff to act honestly and with integrity at all times; and to report all suspicions of fraud, corruption and bribery.

We will uphold all laws relevant to countering fraud, corruption and bribery in all the jurisdictions in which we operate. However, we remain bound by the laws of the Netherlands including the Dutch Criminal Code Article 177 (bribery of public officials) and Article 328ter (private commercial bribery), in respect of our conduct at home and abroad. We take our legal responsibilities very seriously.

## DEFINITIONS

- **Fraud** - A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by a Staff or supplier of ICM.
- **Bribery** - Is the offering, promising, giving, accepting or soliciting an advantage as an inducement for action that is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- **Corruption** - Is an act of dishonesty or criminal offence committed by a person or organisation entrusted with a position of authority, to acquire illicit benefit or abuse power for private gain. Corruption may include many activities including bribery and embezzlement, though it may also involve practices that are legal in many countries.
- **Theft** - Dishonestly acquiring, using or disposing of physical or intellectual property belonging to ICM or its beneficiaries.
- **Facilitation of payments** - Small bribes paid to speed up a service are sometimes called facilitation payments. Some organisations work in areas where such payments are the norm in the local culture, often where charitable need is extreme. Notwithstanding the small amounts usually involved, they are still bribery payments. Therefore, an unacceptable use of ICM funds. The one exception is when a local supplier does not have a bank account, and payment in cash is unavoidable. In this instance, Staff must follow the ICM Cash Procedure before making payment.

## RESPONSIBILITIES

In relation to the prevention of fraud, theft and abuse of position, specific responsibilities are as follows:

- Ultimate responsibility for this Policy rests with the ICM Board to whom all enquiries may be directed. The Board is responsible for periodically reviewing this Policy as required. In producing this Policy due regard has been given to the provisions of the European Convention on Human Rights and this Policy complies with those provisions.
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for ICM or under its control. All Staff or agents of ICM are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- Any Staff of ICM who breach this Policy will face disciplinary action, which could result in dismissal for gross misconduct. ICM may also pursue criminal prosecution. ICM reserves the right to terminate any contractual relationship with consultants, associates, agents or contractors if they breach this Policy.
- The responsibility for the initial training and on-going staff monitoring in relation to this Policy lies with the Chief Executive (CE) of ICM and Project Managers with staff responsibilities. They are responsible for establishing and maintaining a sound system of internal control that supports the achievement of ICM's policies, aims and objectives.
- The system of internal control is designed to respond to and manage the whole range of risks that ICM faces. The system of internal control is based on a continuous process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. This includes:
  - Establishing appropriate mechanisms for reporting fraud risk issues and significant incidents of fraud to the Board;
  - Making sure that all employed staff are aware of ICM's Anti-Fraud, Bribery and Corruption and know what their responsibilities are in relation to combating fraud;
  - Ensuring that appropriate anti-fraud training is made available to the Board and Staff, as required;
  - Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

## REPORTING SUSPICIONS

It is often through the alertness of Staff and the general public who raise suspicions to the possibility of fraud, bribery and financial irregularity. The process for Staff raising concerns and how they will be dealt with is outlined separately in the ICM **Anti-Fraud, Bribery and Corruption Procedure**.

All concerns must be reported immediately to the CE. The ICM President must be notified immediately by the CE of all financial or accounting irregularities, or of any circumstances that may suggest the possibility of irregularities.

If a member of the public has suspicions or evidence of fraud, bribery or corruption; please let us know by contacting us:

By email: [info@internationalmidwives.org](mailto:info@internationalmidwives.org)

By post: Koninginnegracht 60, 2514 AE ZH, The Netherlands

If you do not want to contact us directly, you can report independently to the **Dutch National Anti-fraud Hotline**.

By phone: 088 7867372 or +31 88 7867372 if you are calling from outside the Netherlands

By post: Fraud Help Desk, P.O. Box 963, 7301 BE Apeldoorn

Online: <https://www.fraudehelpdesk.nl/fraude-melden/>

## RESPONSE PLAN

The ICM President will:

- Facilitate a proper investigation by experienced staff and ensure the consistent treatment of information regarding fraud and corruption, whilst having regard to the requirements of Data Protection legislation.
- When so notified, instigate an investigation by appointing a designated officer, auditor or other adviser.
- Work closely with senior managers of ICM and other agencies, such as the Police and Courts to ensure that all issues are properly investigated and reported.
- Ensure maximum recoveries are made on behalf of ICM.
- Ensure malicious accusations are considered for disciplinary action.

## REVIEW


This Policy will be reviewed every two years by the Board, which will ensure it reflects any changes in best practice and legislation.

## OTHER RELATED DOCUMENTS

- ICM Anti-Fraud, Bribery and Corruption Procedure
- ICM Disciplinary Procedure
- ICM Cash Procedure
- Anti-Money Laundering Policy and Procedure

Approved at the Board meeting held on 15 November 2023.

Signature:



Sandra Oyarzo Torres, ICM President