



MAHOLA

A local health care system

Ethics & Compliance Policy

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1. INTRODUCTION

The purpose of this policy is to provide guidelines and direction regarding Ethics & Compliance aspects throughout the Mahola project, and the entire life cycle of the local health care system that the Mahola project aims to develop.

This ‘Mahola’ system is a complex and integrated system in the sense that it contains multiple system elements such as People (e.g. ambulance drivers, nurses and/or mid-wives, first aiders and cleaners), Hardware (e.g. ambulance vehicle and buildings), Processes (e.g. how to deal with a patient from an administrative viewpoint), Information (e.g. policies such as an environmental protection policy and a child protection and safeguarding policy, procedures, job descriptions, templates for checklists and contracts), as well as the related Equipment and Supplies to operate and maintain the system over time (see Figure 1).

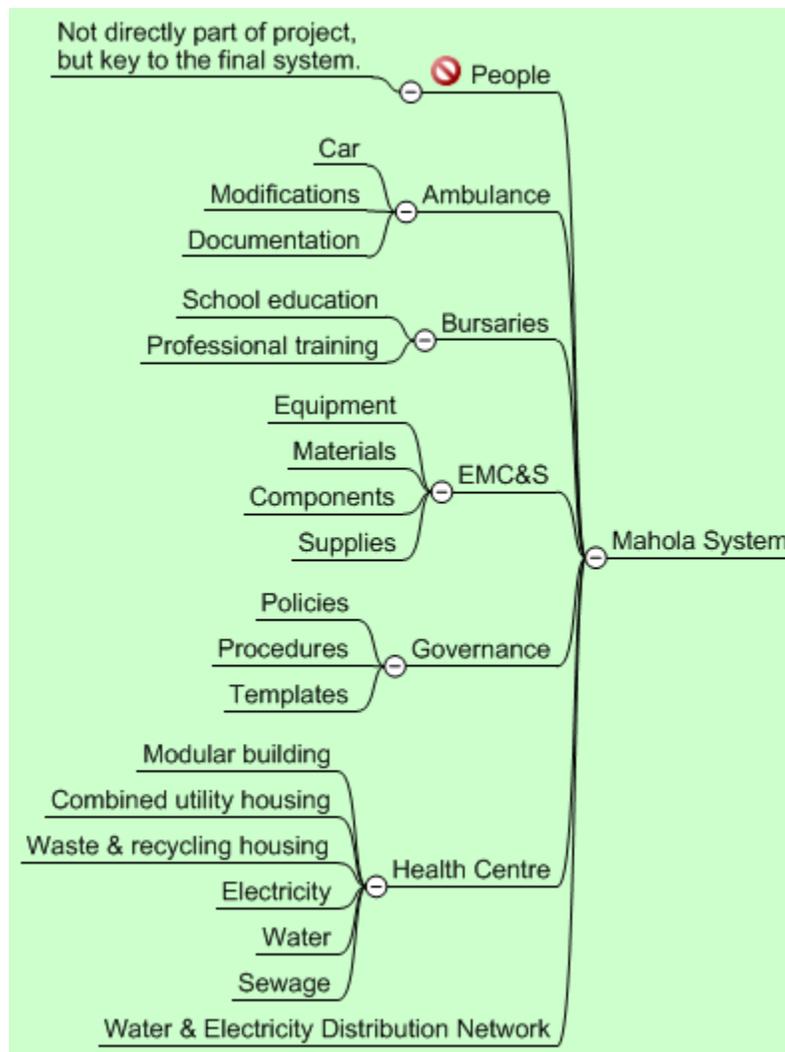


Figure 1: Elements of the local health care system

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Therefore, questions regarding Ethics & Compliance aspects during all life cycle phases, i.e. the system development; the operation and maintenance of the local health care system; as well as in case of the disposal of certain components thereof, have to be anticipated, investigated and answered in order to ensure Ethics & Compliance; both directly (e.g. when recruiting employees of the Mahola system) and indirectly (e.g. via increased awareness among the local population in general).

The Mahola Project acknowledges a responsibility to patients, their families, staff members, volunteers and the general public, and we express our commitment towards implementing operations that will be ethical and compliant with the applicable norms and standards, regulations and laws. The Mahola Project will consistently strive to raise awareness in the community, encourage participation and educate all concerned, even those who live locally but are not formally involved in Ethics & Compliance matters.

This policy governs the management of the Ethics & Compliance aspects of our project and the resulting health care system, with focus on the promotion of equal opportunities, compliance with the national laws and regulations of Cameroon, and the fight against bribery and corruption [1]. It includes continuous improvement not only during the project itself, but throughout the entire life cycle of the healthcare system. The policy will be reviewed and updated regularly by a nominated Ethics & Compliance Officer and validated by the local Steering Committee.

2. SYSTEM DEVELOPMENT

During the development of the local health care system from the system specification via the concept and detailed design, right to the implementation and integration of the system, decisions have to be guided by relevant Ethics & Compliance objectives.

The main Ethics & Compliance objectives during the system development are the following:

- Identification of the relevant applicable laws and regulations in Cameroon and all relevant countries of the European Union, in particular Germany, France, Spain, Italy, Ireland and the UK, as well as the United States of America;
- Awareness of the relevant applicable laws and regulations among all members of the Mahola project team;
- Implementation of all necessary steps to ensure compliance with the relevant applicable laws and regulations;
- Assurance that all job descriptions and advertisements be based on the required skills and experience, providing equal opportunities to all suitable candidates without discrimination;
- Assurance that the recruitment process and its outcomes be clear and transparent, providing equal opportunities without discrimination;
- Elimination of discrimination on the basis of age, gender, religion, education, wealth, tribe, culture, marital status, pregnancy, sexual orientation, political views, race, origin, nationality, physical appearance, physical and/or mental disabilities;

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- Reduction of the risks of bribery regarding recruitment, bursaries and procurement related decisions;
- Establishment of clear guidance and rules about dealing with business partners, accepting gifts, hospitality and/or donations;
- Elimination of conflicts of interest of all members of the Mahola system, including the local Steering Committee;
- Clear and transparent bidding process in case of outsourcing work or when purchasing needed Equipment, Materials, Components & Supplies;
- Transparent decision-making process and publication of outcomes regarding major procurement decisions.

3. SYSTEM OPERATION & MAINTENANCE

During the operation and maintenance of the local health care system, and throughout its entire life cycle, decisions have to be guided by relevant Ethics & Compliance objectives.

The main Ethics & Compliance objectives during the system operation and maintenance are the following:

- Identification of the relevant applicable laws and regulations in Cameroon;
- Awareness of the relevant applicable laws and regulations in Cameroon among all members of the Mahola system;
- Implementation of all necessary steps to ensure compliance with the relevant applicable laws and regulations;
- Assurance that all job descriptions and advertisements be based on the required skills and experience, providing equal opportunities to all suitable candidates without discrimination;
- Assurance that the recruitment process and its outcomes be clear and transparent, providing equal opportunities without discrimination;
- Elimination of discrimination on the basis of age, gender, religion, education, wealth, tribe, culture, marital status, pregnancy, sexual orientation, political views, race, origin, nationality, physical appearance, physical and/or mental disabilities;
- Reduction of the risks of bribery regarding recruitment, bursaries and procurement related decisions;
- Establishment of clear guidance and rules about dealing with business partners, accepting gifts, hospitality and/or donations;
- Elimination of conflicts of interest of all members of the Mahola system, including the local Steering Committee;
- Clear and transparent bidding process in case of outsourcing work or when purchasing needed Equipment, Materials, Components & Supplies;
- Transparent decision-making process and publication of outcomes regarding major procurement decisions.

4. DISPOSAL OF SYSTEM COMPONENTS

During the disposal of system components of the local health care system throughout its operational life, and at the end of the system life cycle, decisions have to be guided by relevant Ethics & Compliance objectives.

The main Ethics & Compliance objectives during the disposal of system components are the following:

- Identification of the relevant applicable laws and regulations in Cameroon;
- Awareness of the relevant applicable laws and regulations in Cameroon among all people involved in the disposal of system components;
- Implementation of all necessary steps to ensure compliance with the relevant applicable laws and regulations.

5. ETHICS & COMPLIANCE OFFICER

The local Steering Committee will nominate a responsible Ethics & Compliance Officer. This office can be held in parallel with any other positions in the local health care system. The nominated focal point for ethics and compliance matters will drive the continuous improvement efforts to ensure the highest possible standards in terms of Ethics & Compliance of the system.

In particular he/she will:

- Identify, implement as appropriate, and monitor changes of all relevant and applicable standards and specific laws that directly concern the Mahola system;
- Make local pupils and their families aware of the importance and proven approaches to be ethical and compliant;
- Regularly review the local practice;
- Initiate related improvement actions and/or projects;
- Regularly review and update this policy as needed;
- Regularly report to the Steering Committee on all Ethics & Compliance matters;
- Support the Administrator by providing inputs for regular reporting;
- Support the Trainer by providing inputs for and actively participating in delivering related training and awareness sessions.

6. REFERENCES

- [1] BBA, Anti-Bribery and Corruption Guidelines – Practical guidance for the banking sector, https://www.bba.org.uk/wp-content/uploads/2014/05/ABC_guidelines_designed-final.pdf, 2014.