

Fakeeh College for Medical Sciences	Policy Number: GLM-31	
Policy Title: Anti Bribery and Corruption Policy	<input checked="" type="checkbox"/> New	<input type="checkbox"/> Revised
	Version-1 was Prepared on: 11-9-2023	
Applicable to: FCMS	Version-1 was Approved on: 19-9-2023	
	To be Reviewed on: 19-9-2028	

1. Statement of the purpose:

- 1.1** To observe and minimize the provisions of any bribery act offences, in all Fakeeh College for Medical Sciences' (FCMS) services, practices, and operations, and to ensure that the legal and ethical standards of conduct are followed at FCMS, without the use of bribery or corrupt practices in order to gain an unfair advantage.
- 1.2** To protect FCMS's reputation and public trust and ensure compliance with national laws and international standards.
- 1.3** To provide mechanisms to report unethical conduct, and to help foster a culture of honesty and accountability.

2. Definitions:

- 2.1 Bribe:** an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage which is illegal, unethical, a breach of trust, or the improper performance of a contract.
- 2.2 Corruption:** the misuse of entrusted power for personal or private gain.
- 2.3 Conflict of interest:** A situation in which an individual's financial, professional, or other personal considerations may directly or indirectly affect, or have the appearance of affecting, his or her professional judgment in exercising any College duty or responsibility.
- 2.4 Facilitation Payments:** Unofficial payments made to speed up routine processes.

3. Policy:

- 3.1** FCMS has a zero tolerance policy towards bribery, corruption, fraud, facilitation payments, and any unethical financial or non-financial inducements and is

committed to conducting all academic, clinical, research, administrative, and financial activities at the highest level of openness, integrity, and accountability.

3.2 FCMS considers any of the following as an offence

3.2.1 Promise or offer a bribe, or to give an advantage (“active” bribery)

3.2.2 Request, agree to receive or accept a bribe, or accept an advantage (“passive” bribery)

3.3 Bribery occurs when anyone offers, solicits, gives, receives, or accepts anything of value in exchange for favorable treatment by a Company, government authority, or official. It also occurs when a company secures an unfair advantage over its competitors through secret and corrupt dealings with prospective customers.

3.4 All FCMS staff and faculty shall not accept gifts or personal benefits of any value from external parties if it could be perceived that this could compromise or influence any of the college staff and faculty's decisions. Additionally, no gift shall be accepted from a supplier, vendor, contractor, or student unless the gift has insubstantial value and a refusal to accept it would be discourteous or otherwise harmful to FCMS.

3.5 Acceptance of normal business entertainment such as lunch, dinner, an event, and the like, generally is appropriate if it is of a reasonable nature and is in the course of a meeting or another occasion. The purpose of which is to hold genuine business discussions or to foster better business relations. All College staff and faculty are to report any such entertainment. As such, all executive management, managers, and employees are to report any such entertainment (in advance, if practical) to their direct supervisors.

3.6 All FCMS staff and faculty are prohibited from engaging in any freelance activity or employment that adversely affects the quality or quantity of work performed; competes with FCMS activities; implies sponsorship or support by FCMS of the outside employment or organization; or adversely affects FCMS reputation; or makes use of or interferes with FCMS time, facilities, resources or supplies.

- 3.7** It is a potential conflict of interest for all FCMS staff and faculty or their spouses or any other immediate family members (jointly referred to as “family members”) to directly or indirectly have a financial interest (e.g., as an investor, lender or Board Member) in a competitor, or in a customer or supplier with whom that FCMS staff and faculty or their subordinates deal in the course of their job within FCMS. Accordingly, employees must promptly disclose any such interests to their supervisor.
- 3.8** FCMS also reserves the right to refer such matters to public authorities for possible criminal prosecution.
- 3.9** All FCMS employees, faculty staff members, students, contractors, vendors, and partners must comply with this policy and with all applicable national and international anti-corruption laws and regulations.
- 3.10** Bribery is illegal, and any FCMS staff and faculty who elicit, participate in, or condone a bribe, kickback, or other unlawful payment or attempt to participate in any such activity will be subject to strict disciplinary action, up to and including termination.

4. Procedure:

Procedure steps	Responsibility
4.1 Disclosure	
4.1.1 Human Resource (HR) Manager has to ensure that all staff members are familiar with college policies and procedures related to bribery and corruption through the orientation program, and ensure proper risk assessment for any potential bribery act identified.	HR Manager
4.1.2 All staff members should complete and promptly submit a disclosure form to the HR Manager upon hire and during periodic	Staff members

<p>disclosures of conflicts of interest or gifts and hospitality register. Upon employment and thereafter at any point, if staff have discovered or suspect that an actual, potential, or perceived bribery act exists or could arise from a situation or activity, they must report this to the department director.</p>	
<p>4.1.3 Upon receipt of a complete disclosure, the department director will forward the case to the department council/college council for decision.</p> <p>4.1.4 Staff Member can expect disposition within a reasonable time frame (normally 15 calendar days).</p>	<p>Department Council/ College council</p>
<p>4.1.5 In the case of the college Dean, the Chair of the Board of Trustees shall act in the place of the College Council.</p>	<p>Chair of the Board of Trustees</p>
<p>4.1.6 If any employee breaches the rules and regulations issued by the College shall be subject to disciplinary actions. Disciplinary actions that may be imposed on an employee are:</p> <p>4.1.6.1 Draw attention (Reprimand)</p> <p>4.1.6.2 First Warning</p> <p>4.1.6.3 Second Warning</p> <p>4.1.6.4 Deduction from salary</p> <p>4.1.6.5 Suspension without salary</p> <p>4.1.6.6 Demotion</p> <p>4.1.6.7 Dismissal</p>	<p>Disciplinary Committee</p>

<p>4.1.7 All FCMS employees have to refrain from the following activities according to our regulation:</p> <p>4.1.7.1 Paying or receiving money to influence grades, exams, or admissions.</p> <p>4.1.7.2 Manipulating research data for funding or publication.</p> <p>4.1.7.3 Favoritism or accepting payments for clinical placement allocation.</p> <p>4.1.7.4 Kickbacks from suppliers.</p> <p>4.1.7.5 Inflated invoices or false billing.</p> <p>4.1.7.6 Undisclosed financial relationships with vendors.</p> <p>4.1.7.7 Misuse of grant funds.</p> <p>4.1.7.8 Undue personal gain from College funds or resources.</p> <p>4.1.7.9 Excessive or unauthorized use of College time or resources for professional, charitable or community activities.</p> <p>4.1.7.10 Exploitation of students for private gain.</p> <p>4.1.7.11 Compromise of College priorities due to personal financial considerations.</p> <p>4.1.7.12 Unfair access by an outside party to College programs, services, information or technology.</p> <p>4.1.7.13 Selection of an entity as a College vendor by an individual who has a personal or economic interest in that</p>	<p>Staff members</p>
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entity; this includes engaging a relative as an independent contractor, subcontractor or consultant.

4.1.7.14 Situations in which a faculty or staff directly dealing with students who are an immediate family member of the faculty or staff.

4.1.7.15 Favors of any value should be recognized for their potential influence on the objectivity of judgment with respect to the provider and the recipient of the favor. Faculty and Staff shall not solicit a gift or accept a significant gift when such solicitation or acceptance may influence, or have the appearance of influencing, the performance of the duties.

4.1.7.16 The FCMS employees shall refrain from using college name and logo and any of the college means of communication in activities or businesses not related to the college.

4.1.7.17 All FCMS administrators and employees have to report to the direct supervisor any acceptance of normal business entertainment such as lunch, dinner and the like to foster better business relation.


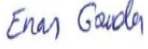

<p>4.1.8 Students/Staff are requested to report any suspicions together with evidence of bribery to the Director of Administration and Finance (DAF) in a sealed envelope marked “Strictly Confidential”. Failure to report to the DAF despite knowledge or reasonable suspicion of offensive practice will be regarded with the same seriousness as committing the practice itself.</p>	<p>Students/Staff</p>
<p>4.1.9 DAF will forward the concerns to the Internal Audit Director and the Finance Unit (FU) Manager for an investigation of the possible bribery or corruption.</p>	<p>DAF</p>
<p>4.1.10 The Internal Audit Director and the FU Manager team led by the DAF will conduct an investigation and will provide their report to the Dean.</p>	<p>DAF</p>
<p>4.1.11 A decision will be taken by the Dean, based on the findings of the team to refer the case to the civil authorities if need be.</p>	<p>Dean</p>
<p>4.1.12 If the investigated bribery act cannot be proved, the team will, within one week, submit its report to the Dean.</p>	<p>DAF</p>
<p>4.1.13 If the investigated bribery act is found valid, disciplinary action that might include dismissal, prosecution, or civil legal action will be taken against all those involved in such a practice, as per the labor law.</p>	<p>Dean</p>

4.1.14 No student or staff member will be penalized for reporting a bribery, unless it is proved that such an act was done knowing that there was no reason to suspect such a practice.	Dean
4.1.15 Students or staff who are found guilty of malicious intent to harm another person through such false reporting of bribery will be dealt with in accordance with the law.	Student or staff
4.1.16 Identity of the student or staff who reports a bribery act will not be disclosed.	DAF

5. Forms/attachments: N/A

6. References: N/A

7. Approval:

	Name	Job title	Signature	Date
Prepared by	Dr. Wesam Abduljabbar	Director-Administration and Finance		11-9-2023
Reviewed by	Dr. Enas Gouda	Director-Quality and Accreditation Unit		14-9-2023
Approved by	Prof. MSM Ardawi	FCMS Dean		19-9-2023