UN GLOBAL COMPACT

Network India

BREAK THE CORRUPTION CHAIN

BEST PRACTICES
COMPENDIUM
ON ANTI-CORRUPTION

STRENGTHENING, TRANSPARENCY,
ACCOUNTABILITY AND VALUE - BASED
HEALTHCARE IN INDIA

ANTI-CORRUPTION   # Uniting Business for Better world

ACKNOWLEDGMENT

DISCLAIMER

ABBREVIATIONS

ABAC	Anti-Bribery and Anti-Corruption
ABDM	Ayushman Bharat Digital Mission
ABHA	Ayushman Bharat Health Account
AIRS	Automated Incident Reporting System
AQP	Apollo Quality Programme
AI	Artificial Intelligence
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CSR	Corporate Social Responsibility
Dr. Reddy's	Dr. Reddy's Laboratories Limited
FCPA	Foreign Corrupt Practices Act
GCNI	Global Compact Network India
GoI	Government of India
IGD	Institute for Global Development
IPSG	International Patient Safety Goals
MERCK	Merck KGaA Darmstadt Germany
MoHFW	Ministry of Health & Family Welfare
NHSRC	National Institute of Health and Family Welfare
RCA	Root Cause Analysis
SAS	Severity Assessment Scoring
SEBI	Securities and Exchange Board of India
SII	Siemens Integrity Initiative
TNMSC	Tamil Nadu Medical Services Corporation
UHI	Unified Health Interface
UPSI	Unpublished Sensitive Information
UN	United Nations
UNAP	United Nations Academic Impact
UNGC	United Nations General Assembly
UNGC	United Nations Global Compact
UPSI	Un-Published Sensitive Information
QC	Quality Control
QRC	Quick Response Code

FOREWORD

Ratnesh Jha, Executive Director, GCNI

Globally, the World Economic Forum has estimated that the cost of corruption is about US$2.6 trillion a year. The impacts of corruption disproportionately affect the most vulnerable people in society. Widespread corruption deters investment, weakens economic growth, and undermines the rule of law.

Addressing the shortcomings of India's labyrinthine healthcare system will, of course, require more comprehensive reform, one that tackles a slew of interconnected problems—including not only issues of low quality, limited access, and inequality, but also corruption and conflict of interest. These issues cannot be solved in isolation. Without a concerted effort to curb corruption in both the public and private sectors, merely increasing access to healthcare for the country's neediest will fail to solve many of the fundamental problems that plague the system, from wasteful and unethical prescribing practices to higher-than-necessary costs and astronomical levels of institutional distrust.

Corruption retards the pace of development and impedes development activities. It not only surpasses economic growth by driving up costs but also undermines sustainable management of the environment and natural resources and results in criminal activity, malfunctioning, and weak governance in healthcare and other organizations/companies.

With the evolution of economies, the mandate of business has moved from being profit-making entities to socially responsible organizations. Over the past few years, clean business has emerged as one of the primary objectives of the organizations. One of the most effective recommendations for business practices to tackle corruption has been found within the ambit of Collective Action. The Idea is simple –Get diverse stakeholders (Organizations & companies) working together to create decisions that are driven by ethical practices, not by corruption.

Global Compact Network India (GCNI), in furthering the UNGC's 10th principle on Anti-Corruption implemented an Anti-Corruption Collective Action Project (Scaling up AC CA within the Global Compact Local Networks) supported by UN Global Compact (UNGC) and Siemens Integrity Initiative (SII) to Strengthen Transparency, Accountability and Value-based Healthcare in India, Since April 2020, GCNI has been making tremendous efforts to promote transparency and accountability to ensure value-based healthcare in India.

This "Best Practices Compendium on Anti-Corruption: "Strengthening Transparency, Accountability and Value-based Healthcare in India" will act as a guide for the healthcare stakeholders (Ecosystem) to promote ethical business practices within their organizations/companies by addressing corruption challenges at different levels.

EXECUTIVE SUMMARY

Corruption is a major impediment to development, peace, and security. From health to employment, education to the environment, business to sports, gender equality to access to justice, and more – corruption undermines all areas of society's development.

Corruption, conflict, and instability are meanwhile profoundly intertwined. Corruption not only follows conflict but is also frequently one of its root causes. It fuels conflict and inhibits peace processes by undermining the rule of law, worsening poverty, and facilitating the illicit use of resources. Promoting transparency and strengthening institutions are therefore critical for sustaining peace.

Each sector contributes sufficiently to the GDP (Gross Domestic Product) of the country, yet, a large number of corruption incidents is noticed across the sectors and its supply chains. Therefore, a robust compliance and strong anti-corruption mechanism can help each sector in mitigating corruption challenges, so all the sectors/industries keep on contributing to eradicating corruption within their companies/organizations and the nation as a whole.

Public, Private, and Academia sectors including other potential sectors like Health organizations and CSOs in India have started taking a more proactive and conscious role in dealing with corruption within and outside their organizations. Bribery and corruption have become key concerns for them, especially for those engaging in business locally and globally.

Preventing corruption is crucial if the targets foreseen in the Sustainable Development Goals are to be met. These 17 Goals – a "shared blueprint for peace and prosperity for people and the planet, now and into the future" – offer a way to help protect our environment, create jobs, achieve gender equality, and secure wider access to essential services such as healthcare and education.

In India, corruption is the second biggest problem for long-term prosperity, and hence public health is demanding more decisive action. Widespread discontent with corrupt practices in many forms has increased in the healthcare eco-system, arguably reaching a tipping point across the country and contributing to negatively affecting the service providers, users, and decision-makers (Public and private) that have to deal with corruption at different levels.

To strengthen the healthcare ecosystem in the country by devising different Anti-Corruption strategies/ mechanisms, not only the Govt but also the sectors like healthcare organizations, pharmaceuticals, patients' organizations, Corporate/CSR, etc. have been contributing positively; yet, these strategies have limited impact.

This Best practice compendium on Anti-Corruption for Healthcare developed by GCNI includes challenges in the Healthcare sector in India (Pricing, Procurement, Recruitment, Service delivery, Value-based Healthcare, etc.) and the solutions to tackle those challenges. Besides this, the Compendium comprises recommendations by business leaders from across the sectors including the Government to mitigate corruption challenges successfully.

This Best Practice Compendium has emerged from a grounded process (In-depth Interviews, Focus Group Discussions, Meetings, and Roundtable, etc.) of five months and its pilot testing and review by Healthcare and Anti-Corruption experts. The "Best Practices Compendium on Anti-Corruption for Healthcare of GCNI, if used/adopted, will help the entire healthcare ecosystem to be a transparent, ethical, and responsible business which will further enhance value-based healthcare in India.

The Compendium comprises 11 case studies focusing on best practices in fighting corruption. The case studies were developed using a set of structured questions relating to governance, integrity, service delivery, ethics, compliance, and other related issues in the healthcare sector. The data/information was analyzed, verified, and edited by experts in the field. The case studies show great momentum towards collective action in ensuring transparency and accountability for fighting corruption. This is indeed a great motivation for all who are committed to creating a better world through fighting corruption.

Dr. Somnath Singh,
Deputy Director & Head
Anti-Corruption, GCNI

TABLE OF CONTENTS

INTRODUCTION

Global Compact Network India (GCNI) has been functioning as the India Local arm of the United Nations Global Compact (UNGC), New York since 2003. Besides implementing 17 Sustainable Development Goals (SDGs) and UNGC's Ten Principles in the areas of Human Rights, Labour, Environment, and Anti-Corruption, GCNI provides a robust platform for Indian businesses, academic institutions, Healthcare organizations, and Civil Society Organizations (CSO), etc. for strengthening responsible business practices through promoting transparency and integrity.

The objective of GCNI for spreading good business practices is to bring together diverse stakeholders on a common platform to exchange their best practices, deliberate upon the existing challenges, and make policy recommendations to promote responsible business standards, transparency, and ethics in general.

In India, non-transparency and unethical practices are the root causes of unwanted challenges in the healthcare sector which not only degrade the healthcare services but also get healthcare providers /professionals into unwanted challenges which can sometimes lead to legal action against them even after their good and committed work for the society.

To strengthen the healthcare ecosystem in the country, devising different mechanisms and good governance strategies, which are not only limited to the government but also relevant sectors like healthcare organizations and hospitals, pharmaceuticals, patients' organizations, Corporate/CSR, etc. is essential.

In this regard, GCNI has developed this "Best Practice Compendium with a focus on strengthening transparency, accountability, and value-based healthcare in India". This Best Practice Compendium will act as a guide for healthcare providers/organizations to promote ethical business practices within their organizations by addressing unforeseen /unwanted healthcare challenges at different levels.

Best practices in the health sector involve transparent communication, ethical conduct, and a shift toward value-based healthcare. Transparency ensures open disclosure of information, Integrity prevents corruption, while value-based healthcare focuses on delivering high-quality, patient-centered care while controlling costs. This integrated approach builds trust, fosters accountability, and strives for optimal health outcomes.

The healthcare sector has numerous players working across different industries and each is playing a significant role. We have divided the compendium into multiple sections focusing on different industries within the healthcare sector. The purpose of this document is to highlight the contribution made by each player in their respective industry, that can influence positive change within the entire healthcare ecosystem. Following are the various industries covered in the compendium: -

- Pharmaceutical and Bio-pharmaceutical industry
- Hospitals.
- Government agencies.

- Central and State Governments.
- Civil Society Organisations.
- Academic and health research institutions.

We curated a list of leading players in the Healthcare industry who were approached with the assistance of GCNI and the personal contacts of the Consultant. An industry-specific questionnaire was then prepared for all the players and circulated, to understand the approach adopted by them to combat the issue of corruption and maintain integrity and transparency within the organization. These case studies shared by GCNI's prominent stakeholders will serve as a guiding path for other organizations in the healthcare industry, to adopt practices to discourage corruption and maintain integrity and transparency within the organization/company.

The Case Study shared by….

- Dr. Reddy's Laboratories Limited
- MERCK KGaA Darmstadt Germany
- Biocon Limited
- Apollo Hospitals Enterprises Limited
- Tamil Nadu Medical Services Corporation Limited["TNMSC"]
- Ministry of Health and Family Welfare, Government of India [QR Coding]
- Government of India, [Ayushman Bharat Digital Mission]
- Government of Odisha [Vision 5T]
- Institute For Global Development (IGD)
- Youth For Social Development (YSD)
- Atmiya University

PHARMACEUTICAL AND BIO-PHARMACEUTICAL SECTOR

CASE STUDY-1

DR. REDDY'S LABORATORIES LIMITED

Dr. Reddy's has successfully implemented multiple policies to ensure strict adherence to the principles of good governance and also has an action plan in place to prevent/ discourage any form of corrupt activities brewing within the organization. Some of the important policies have been briefly discussed below.

I.   Corporate Governance Policy

In today's fast-paced and highly competitive business world, the significance of governance cannot be emphasized enough. It serves as the foundation for business practices building trust among shareholders and maximizing term corporate value. Dr. Reddy's Laboratories Limited, a player in the pharmaceutical industry exemplifies the importance of governance in its operations. This article delves into how Dr. Reddy's Laboratories has incorporated the principles of governance into its framework to reinforce its commitment to transparency, ethics, and shareholder protection.

The Pillars of Corporate Governance at Dr. Reddy's Laboratories:

1. **Board Composition, Diversity, and Expertise:** Dr. Reddy's Laboratories recognizes that a strong board is crucial for success. They prioritize having a balanced board with diverse backgrounds and expertise. Each director brings skills to the table ensuring a comprehensive and knowledgeable leadership team. This diversity aids in making decisions assessing risks effectively and planning.

2. **Timely Dissemination of Information:** In the realm of governance providing accurate information is vital, for making well-informed decisions. Dr. Reddy's Laboratories promotes a culture of openness by ensuring that board members and committees have access, to information. This proactive sharing of information allows the board to fulfill its responsibilities effectively thereby contributing to the company's long-term prosperity.

3. **Ethical Business behaviour:** At Dr. Reddy's Laboratories, ethical business behaviour is established protocol. The greatest ethical standards are expected of the board, management, and staff. This dedication advances stakeholder trust while also enhancing the company's reputation. The company's operations are all guided by an ethical business philosophy that goes beyond a policy.

4. **Strong Internal Controls and Risk Management**: Internal controls and risk management are emphasized for Dr. Reddy's Laboratories. The company's well-developed systems protect the integrity of its operations in a sector where compliance and quality are crucial. This helps the accuracy of financial reporting while simultaneously protecting against risks, and boosting investor trust.

5. Disclosure through Transparency: Dr. Reddy's Laboratories is a firm believer in the virtues of transparency. It is dedicated to providing stakeholders with complete, accurate, and timely information. This involves providing access to every relevant operational and financial data. Such openness not only guarantees adherence to legal obligations but also fosters confidence among shareholders and the general public.

II. Leading Ethics and Integrity through Anti-Bribery and Anti-Corruption Policy

The pursuit of excellence in today's globalized business environment goes beyond material gain. Companies are becoming more well-known for their dedication to moral principles and integrity in all facets of their operations. Along with its affiliates and joint ventures, Dr. Reddy's Laboratories Limited is a shining example of a company committed to the highest moral, legal, and ethical standards. The Anti-Bribery and Anti-Corruption Policy (ABAC Policy), which regulates the behaviour of the organisation and its stakeholders, serves as an example of this dedication. The significance of Dr. Reddy's ABAC Policy, its compliance with international anti-corruption laws, and its influence on promoting an ethical and open culture are all covered in this.

The cornerstone of Dr. Reddy's business philosophy is upholding ethical standards.

A dedication to moral behaviour has always been the driving force behind Dr. Reddy's Laboratories. Honesty, integrity, and responsibility serve as the cornerstones of the organization's ethical framework. Its acceptance of the Code of Business Conduct and Ethics, which directs staff personnel, officers, and board members in their actions and decisions, demonstrates its steadfast commitment to these values.

However, the fight against bribery and corruption requires a targeted and all-encompassing strategy in the complicated and interconnected world of today. The ABAC Policy, which establishes explicit norms and expectations about anti-bribery and anti-corruption laws, was developed by Dr. Reddy's to solve this difficulty. This policy is a potent instrument for reinforcing the business' dedication to morality and ethics.

The Importance of Anti-Corruption and Anti-Bribery Policies

Policies against bribery and corruption are crucial for several reasons:

1. **Legal Conformity:** Non-compliance with anti-corruption legislation can have serious legal repercussions in an era of strict rules, which can be detrimental to a company's brand and financial stability. By adopting the ABAC Policy, Dr. Reddy's Laboratories makes sure that it complies with several laws, such as the UK Bribery Act of 2010 and the US Foreign Corrupt Practices Act of 1977.
2. **Global Operations:** Dr. Reddy's operates in a variety of markets with various regulatory environments. The ABAC Policy offers a standardised structure in line

with global anti-corruption norms, guaranteeing that moral values are upheld internationally.

3. **Reputation Maintenance:** A single corruption incident has the potential to permanently damage a company's reputation. Dr. Reddy's Laboratories protects its standing as a respectable and reliable organisation by proactively tackling bribery and corruption through strict rules.

4. **Fostering a Culture of Integrity:** Anti-corruption laws play a crucial role in developing a company culture that places a high value on morality and honesty. They make it quite obvious to all parties involved that unethical behaviour won't be accepted.

ABAC Policy of Dr. Reddy: A Commitment to Excellence

It is clear from Dr. Reddy's Anti-Bribery and Anti-Corruption Policy how committed the business is to keeping the highest moral standards. One of the policy's main components is:

1. **Application to All Stakeholders:** The ABAC Policy extends its principles to officers, board members, and outside parties acting on the company's behalf in addition to its workforce. This openness demonstrates Dr. Reddy's dedication to moral behaviour at all levels.

2. **Zero Tolerance for Corruption:** The policy declares that corruption and bribery are unacceptable. It lists banned actions, such as offering, providing, or receiving bribes, and it emphasises the repercussions of breaking the law.

3. **Comprehensive Guidance:** Dr. Reddy's ABAC Policy offers thorough instructions on how to spot fraudulent practices, stop them, and report them. Employees are given the knowledge and resources they need to make moral decisions in challenging circumstances.

4. **Training and Awareness:** The business runs awareness campaigns and training programmes to ensure optimal execution. Employees and stakeholders are given the knowledge they need to identify and deal with corrupt behaviour as a result.

5. **Mechanisms for Reporting:** The policy creates accessible, private mechanisms for reporting alleged infractions. Measures for protecting whistleblowers are in place to promote reporting without concern for retaliation.

Due to its continuous dedication to moral principles, Dr. Reddy's Laboratories Limited has established an ideal standard for business ethics. The Anti-Bribery and Anti-Corruption Policy (ABAC Policy) is evidence of the organization's commitment to openness, responsibility, and moral behaviour.

Strategies for Mitigation

In addition to strong mitigation techniques, Dr Reddy's is committed to reducing the compliance risk, through various mitigation measures, such as:

1. **Comprehensive Training:** All levels of employees receive training on compliance, ethics, and preventing fraud. This enables them to quickly identify and report any potential problems.
2. **Whistle-blower process:** Dr Reddy's has set up a private and safe whistle-blower process that enables staff members to disclose any unethical or fraudulent activity without worrying about repercussions.
3. **Technology Integration:** To find abnormalities and patterns, the corporation invests in cutting-edge technology, such as data analytics.

III. Whistle-Blower Policy

A whistle-blower policy is a set of guidelines and procedures established in organization to encourage employees, contractors, or other stakeholders to report unethical, illegal, or improper activities within the organization. Whistle-blower policies are designed to protect individuals who come forward with information about wrongdoing, ensuring that they can do so without fear of retaliation.

Key components of a whistle-blower policy typically include:

- **Confidential Reporting Mechanisms:**

The policy outlines how individuals can report concerns or wrongdoing while maintaining their anonymity if desired. This may include anonymous hotlines, email addresses, or designated individuals within the organization who can receive reports.

- **Protection from Retaliation:**

The policy should clearly state that individuals who report concerns or wrongdoing will be protected from retaliation, such as harassment, discrimination, or adverse employment actions.

- **Investigation Procedures:**

The policy specifies how the organization will investigate reported concerns. This may involve an internal investigation, the involvement of a third party, or a combination of both.

- **Non-Retaliation Assurance:**

The policy should emphasize that retaliation against whistle-blowers is strictly prohibited and that any such actions will result in disciplinary measures against the responsible parties.

- **Reporting Channels:**

It provides information on who individuals can contact within or outside the organization if they believe their concerns are not adequately addressed internally.

- **Preservation of Evidence:**

Whistle-blower policies often advise individuals to preserve any evidence related to the reported concerns.

- **Reporting Timelines:**

The policy may set timeframes within which individuals should report concerns after becoming aware of them.

- **Follow-up and Remediation:**

The policy may describe how the organization will address and remediate issues identified through whistle-blower reports.

Whistle-blower policies are an important aspect of corporate governance and ethics, as they help maintain transparency, prevent misconduct, and protect the interests of employees and stakeholders. Many countries have laws and regulations in place that require certain organizations, especially those in sectors like finance and healthcare, to establish whistle-blower policies to comply with legal requirements and promote ethical behaviour.

The pharmaceutical industry is highly regulated and has a significant impact on public health. Whistle-blower policies are essential for identifying and addressing potential risks, violations, and ethical concerns, ultimately helping to ensure the industry's integrity, safety, and compliance with regulations.

MERCK KGaA DARMSTADT GERMANY

Merck's dedication lies in the development of innovative medications for individuals affected by challenging medical conditions, with a strong emphasis on ensuring safety and expeditious development.

Merck has been working actively towards ensuring the practice of good governance. Practices at Merck are purely patient safety based, which they achieve through well-implemented policies. This approach of Merck furthers the concept of value-based healthcare, which needs to be a focus area for the stakeholders in the healthcare industry.

The safety of patients taking Merck's medicines is a clear priority for them. Merck is fully committed to comply with these regulatory obligations. By driving this proactive approach, Merck Global Patient Safety adds value in protecting its patients and safeguarding the reputation of Merck.

In furtherance, the successful policies that Merck has in place help them achieve the goals of transparency and good governance.

Discussed below are the policies[1] and practices of Merck: -

I. CODE OF CONDUCT

Merck has mandatory policies in place for specific topics and areas that must be complied with. These serve to protect both each individual and the company. Each manager is called upon to ensure that every employee knows, understands, and follows the rules. Everyone at Merck is strongly encouraged to be attentive, to look closer, and to speak openly when there is something we can improve.

The following values have been focused upon in the Code of Conduct.

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[1] Source: https://www.merckgroup.com/in-en and https://www.merckgroup.com/en

Fundamental Principles in the Workplace:

- Promoting trustful collaboration.
- Committed to diversity and equal opportunity.
- Respecting the dignity of all individuals.
- Respecting each individual's privacy.
- Recognising the value of business information and handling it with care.
- Cooperation in an inspection by authorities.
- Ensuring the well-being of the employees.
- Protecting assets and property of the Company.

Principles for dealing with external partners and customers:

- **Standing for fair competition**

    Merck expressly declines unlawful agreements with other market players. This also applies to arrangements with other market players who aim to influence the market.

- **Adherence to neither taking nor giving bribes**

    They stand for fair competition, in which the supplier with the best products and services prevails. Accordingly, they firmly reject all forms of corruption or attempts to gain improper influence.

- **Ensuring transparent communication with all the healthcare partners**

   In the healthcare sector, Merck cooperates with many stakeholders including research institutes, doctors, pharmacists, hospitals, and patient organizations among others to ensure that complete and up-to-date information is available on diseases and treatment.

- **Merck strongly discourages insider trading.**

- **Selection of suppliers after the detailed review process.**

   Merck uses fair, transparent processes when selecting their suppliers and contractors, and regularly reviews existing relationships based on defined sustainability criteria.

Respecting and abiding by Human Rights:

Upholding human rights is indispensable and non-negotiable for Merck. Merck endeavours to reduce the risk of human rights violations as far as possible, not only at their sites but also along their entire supply chain. That is why they are continuously integrating human rights due diligence more firmly into its business processes. This practice of upholding human rights is a unique approach adopted at Merck, which sets them apart.

Merck makes it the responsibility of every individual working in the company to ensure that the principles laid down in the Code of Conduct are complied with, in turn, making every person accountable for their action.

II. CORPORATE SOCIAL RESPONSIBILITY ('CSR')

Merck has prepared the CSR Policy in alignment with its objectives, principles, and values, delineating its responsibility as a socially and environmentally responsible corporate citizen.

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                                    ┌─────────────────┐
                                    │     HEALTH      │
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                                    ┌─────────────────┐
                                    │   ENVIRONMENT   │
                                    └─────────────────┘
        ┌─────────────────┐         ┌─────────────────┐
        │  SCOPE OF CSR   │─────────│ EDUCATION, ART  │
        └─────────────────┘         │   AND CULTURE   │
                                    └─────────────────┘
                                    ┌─────────────────┐
                                    │    DISASTER     │
                                    │     RELIEF      │
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                                    │  PARTNERSHIPS   │
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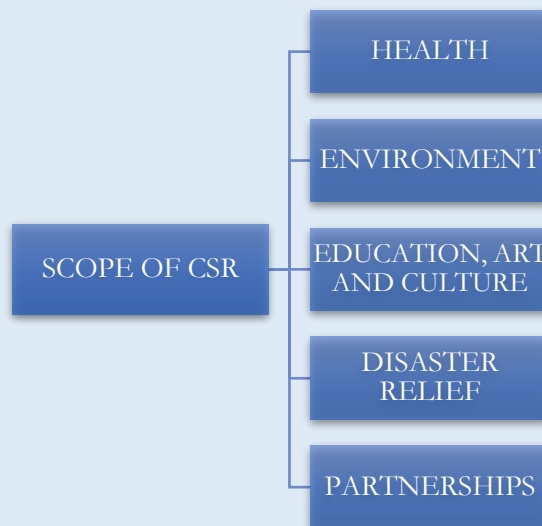
1. **Health:** CSR programmes shall strive to enhance access to health and influence community behaviors both through preventive and curative measures and actions with a special focus on woman's health and underprivileged communities.

2. **Environment:** Merck ensures that their plants emit minimum waste and hazardous waste as much as possible. They strive to use technology to reduce waste surrounding their plants.

3. **Education, Art, and Culture:** Their education initiative focuses on access, equity, and quality of education and creates an enabling environment for the young generation. This may be achieved by providing financial support to students from weaker sections of society, offering scholarships to them, and recognizing scientists, creating educational infrastructure facilities. Art and Cultural inspiration also open people up to new and innovative ideas.

4. **Disaster Relief:** In times of natural calamities, the impacted people need immediate support. Merck tries to support affected people during such disasters either directly or through governments or non-profit organisations.

5. **Partnerships:** CSR programmes are generally carried out either directly by the Company or through Implementing Agencies. Merck may also collaborate with Government, the District Authorities, the village panchayats, gram sabhas, NGOs, and other similarly placed organisations for meeting CSR objectives. The Company may also engage or participate in CSR programmes run by well-established and recognized programs managed by well-reputed organisations such as FICCI, CII, ASSOCHAM, or other non-profit organisations.

The Company aims to implement systems to monitor, evaluate, and assess the impact of its CSR initiatives. Wherever applicable under the legal provisions, such Impact assessment is carried out at regular intervals through an independent agency.

III. QUALITY CONTROL

Quality control and compliance in pharma are essential to reach safe therapies for the patients who need it. Merck's prime focus always is on accuracy, authenticity, and compliance during the drug development procedure. At every stage of drug development, they collaborate and partner with pharmaceutical experts to enable workflow solutions and scientific choices at various stages of drug development.

They provide products with a unique range of specifications and accreditation which is at par with global standards. Additionally, they offer complete quality documentation assistance to facilitate accreditation and audits.

Complying with international specifications for quality control (QC) and pharmaceutical analysis from the early stage of drug development is important.

Being in the pharmaceutical industry, it is imperative to ensure that there is complete transparency in the work that is being carried out. This ensures the trust of the client and the customer.

IV. TESTING POLICIES

In addition to the above-discussed policies, Merck, to promote the best practices for good governance, has ready and affordable solutions available for food and beverage testing and Environmental testing.

1. **Food and beverage testing**: Merck provides food safety solutions for reliable food testing. If any organization is in the food and beverage business, Merck can be their efficient partner in detecting contaminants and chemical residues. Merck's products can spot the nutritional value of food and beverages, and identify inconsistencies in quality.

2. **Environment testing:** Contaminants in the environment often pose a threat to people. Monitoring the environment becomes imperative to avoid risking the safety of communities everywhere. At Merck, they enable a healthy and safe environment by helping their customers manufacture safe consumer goods, create new cures, and examine environmental pollution. Their product portfolio offers active and passive

air monitoring systems, particle counters, extensive support for sample preparation, proficiency testing standards, and analysis.

In conclusion, Merck's commitment to transparency and responsible data sharing is commendable. Overall, Merck's efforts promote transparency, trust, and the advancement of medical science for the benefit of patients and the broader healthcare community.

Merck's dedication to providing value-based healthcare and focusing on patient safety is the best practice followed by them, which can serve as a roadmap for many stakeholders in the Healthcare sector.

Merck's policies not only underscore their commitment to corporate social responsibility (CSR) and quality control but also reflect a steadfast dedication to good governance and anti-corruption principles. By promoting transparency, ethical conduct, and accountability throughout its operations, Merck actively contributes to a corporate culture that prioritizes integrity, effectively preventing corruption and fostering responsible governance.

CASE STUDY-3

BIOCON LIMITED

Biocon, a leading biopharmaceutical company, sets an excellent example for implementing a robust policy to regulate insider trading. By preventing the use of non-public information for personal gain, this policy ensures a level playing field and builds trust among investors. It also contributes to good governance by setting clear ethical guidelines for corporate behavior. Additionally, enforcing insider trading policy aligns with broader anti-corruption efforts, sending a strong message against the abuse of privileged information.

Discussed below is a detailed overview of the insider trading policy[2].

UNDERSTANDING TRADING AT BIOCON

1. **Pre-Clearance of Trading**

➢ The designated person must obtain pre-approval of trades by submitting an application to the Compliance Officer and in case of a trade by the Compliance Officer, shall obtain clearance of trade from the Managing Director/ Executive Director of the Company;

➢ If the Designated person has UPSI –

- Designated person shall neither trade nor apply for pre-clearance.

- Compliance Officer shall not approve any proposed trade by Designated Person.

➢ Compliance Officer, upon due satisfaction, approves trading by Designated Officer – on condition that such trade shall be executed within 7 trading days, following the date of approval.

➢ Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

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[2] Source: https://www.biocon.com/

2. Trading Plan

➢ Insider shall be entitled to formulate Trading Plan, in compliance with SEBI Regulations – subject to approval and public disclosure by Compliance Officer

➢ Requisites of 'Trading Plan' –

- Not Entail –

  - Starting trading, earlier than 6 months from public disclosure.

  - Overlap with another period of trading in place.

  - Trading in securities for market abuse.

  - Trading during the period between 20 trading days before the last day for which results are required to be announced and two trading days after the disclosure of such results, inclusive of the window closure period.

- Entail trading period of 12 months.

- Trading window norms and restrictions on contra trade & etc.

3. Trading Window

➢ The Compliance Officer shall notify a 'trading window' during which the Designated Person may Trade.

➢ Upon Closure of the 'trading window', neither the designated person nor immediate relatives shall trade.

➢ The trading window shall be closed for all designated persons from 1st day immediately following the relevant calendar quarter till the conclusion of 48 hours after disclosure of such quarterly/ annual financial results of the company to the stock exchange.

➢ A trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.

4. Additional trading restrictions on designated persons

➢ No Director, Key Managerial Personnel, or Designated Persons shall enter into a derivative transaction in respect of securities of the company.

➢ No Designated Persons shall do intra-day trading in the securities of the Company, etc.

5. Disclosure requirements

All designated persons shall be required to disclose the name and PAN or any other identifier authorized by law of the following persons to the Company on an annual basis and as and when the information changes:

Immediate relatives	→	Persons with whom such designated person(s) shares a material financial relationship	→	Phone, mobile, and cell numbers which are used by them;
Name of educational institutions from which designated persons have graduated	→	Names of the past employers		
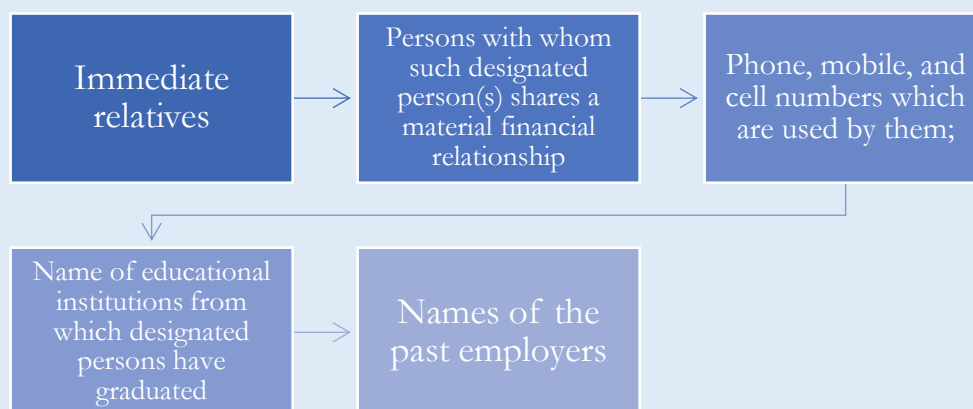
TYPE OF DISCLOSURE	WHAT	BY	TO	DURATION	FORM
INITIAL DISCLOSURES	Holding of securities of the company as on date of appointment	Upon becoming KMP, Director, Promoter, and member of the promoter group	Company	Within 7 days of such appointment	FORM B set out in Annexure 4
CONTINUAL DISCLOSURES	Value of securities traded, in aggregate, **in a calendar quarter**, exceeds traded value of Rs. 10 Lakhs	Designated persons, Promoters, Directors and member of the promoter group	Company	Within 2 trading days of such transaction	¹FORM C set out in Annexure 5
		Company	Stock Exchange	Within 2 trading days of receipt of disclosure or on becoming aware of such information	FORM C set out in Annexure 5
DISCLOSURE BY OTHER CONNECTED PERSON	As required by the company – (to disclose the holding and trading's at such frequency)	Connected Person	Company	As specified by the Company	FORM D set out in Annexure 6
ANNUAL DISCLOSURE	Holding of securities of the Company	Designated Persons	Company	As at Financial year beginning	FORM E set out in Annexure 7

DISCOURAGING USE OF UNPUBLISHED SENSITIVE INFORMATION (UPSI)

1. **Prohibition on communicating or procuring UPSI**

   ➢ An insider shall not communicate, provide or allow access to any UPSI, to any person.

   ➢ No person shall procure from or cause the communication by an insider of UPSI, relating to the Company or its securities.

   Provided,

If in furtherance of Legitimate purposes, performance of duties or discharge of legal obligations under appropriate confidentiality and non-disclosure agreements being executed.	If in the event the Board of Directors directs or causes the public disclosure of UPSI in the best interest of the company under appropriate confidentiality and non-disclosure agreements being executed	Within a group of persons if such persons have been identified and secluded within the "Chinese wall" or information barrier by the Compliance officer from the rest of the company for a particular purpose.

2. **Prohibition on Insider Trading**

   An insider shall not directly or indirectly:

   ➢ Trade in securities that are listed or proposed to be listed when in possession of UPSI.

   ➢ Trade in securities of the company except when the Trading Window is open and the insider does not have UPSI.

   NOTE: Any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered as an "insider" for the purpose and provisions of this code of conduct.

   Provided (nothing as above cited applies to)

Transaction that is an off-market inter-se transfer between insiders.	Transaction carried out through the block deal window mechanism b/w persons w/out being in breach of regulation 3 of SEBI Regulations, 2018.	Transaction carried out in pursuant to a statutory or regulatory obligation to carry out a bona fide transaction	Transaction carried out in pursuant to the exercise of stock options in respect of which the exercise price was pre-determined.	Trades pursuant to a trading Plan set-up, in accordance with this code of conduct.

NOTE: UPSI obtained for transactions prohibited above shall not be obtained under Regulations 3(3) of SEBI PIT regulations and such transaction shall be reported by insider to company within 2 working days.

3. Establishment and review mechanisms for prevention of insider trading.

Chief Executive Officer, Managing Directors, etc shall put in place adequate and effective system of internal controls to ensure compliance with provisions of this Code of Conduct.	Audit Committee shall review the compliance of Code on quarterly basis and annually verify the system for internal control.	Policies and procedure to initiate appropriate inquiry in case of suspected leak or leak of UPSI.

SEBI or other regulatory authority is to be informed promptly for such leak or suspicion of leak.	Awareness be created among employees about such leak or suspicion for leak.

PENAL PROVISIONS

Subjects of Disciplinary Action	By whom Disciplinary Actions be taken	When Disciplinary Action needs to be taken	Action that may be taken
Any Director, Officer, KMP, or Designated Persons of the Company who violates this Code of Conduct	The Disciplinary Action may be taken by the Compliance Officer/ Management/ Audit Committee of the Company.	When a company is not able to determine quantitative benefit or benefit determined is negligible	Warning letter and/or Monetary relief of 10,000/- (min.) or more as may be decided, based on the seriousness of the situation.
			In addition to the above penalty, disciplinary action may be taken, as per the Company Policy.
		The Audit Committee is permitted to take any additional disciplinary action, depending upon the seriousness of the situation (incl. levying an extra monetary Penalty) even at 1st instance.	
		Any penalty collected for violation of this code shall be remitted to the Investor Protection and Education Fund administered by SEBI.	
		The stock exchanges where the securities of the company are traded or any other appropriate regulatory authority as may be specified, be informed promptly of the violation committed by	

		any Designated Person and/or his immediate relatives.

In furtherance to the above-discussed policy, BIOCON has a code of practices and procedures for fair disclosure of unpublished price-sensitive information as required under the SEBI (Prohibition of Insider Trading) Regulations, 2018

Overview of the Code of Practices and Procedures for Fair Disclosure of Unpublished price sensitive information

The Board of Company shall designate a senior officer as a Chief Investor Relations Officer ("CIRO") who could be responsible for ensuring timely, adequate, uniform, and universal dissemination of information and disclosure of UPSI to Analysts, Shareholders, and Media under Code of Conduct.

The CIRO shall ensure that information shared with analysts and research personnel is not UPSI.

The Company should follow the following guidelines while dealing with analysts and institutional investors, →	(A) Only Public Information is to be provided	Alternatively, the information shall be made public.
	(B) Recording of discussions	To avoid the misquoting or misrepresentation.
	(C) Handling of Unanticipated Questions	CIRO should take them seriously and take note of them for responses to be given later.
	(D) Simultaneous Release of Information	Press release or post relevant information on its website, and may also consider live webcasting of analyst meets.

Violation of this policy –

Any Violation of this policy by an employee, officer, or director of the group shall be brought to the attention of the CEO, CFO, Compliance Officer, and the Board of Directors & may constitute grounds for punitive action including termination of service.

Code of practices and procedures	Policy for determination of legitimate purposes
	Policy for procedure of Inquiry in case of leak of UPSI
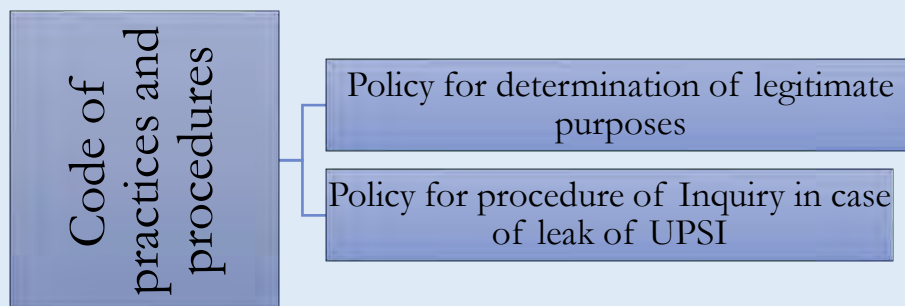
A. Policy 1 – **"Policy for determination of legitimate purposes"**

WHAT DOES 'LEGITIMATE PURPOSES' MEAN?

- Auditors (either secretarial, internal, statutory, or any other)
- Staff members of the audit firm
- Collaborators
- Lenders
- Customers
- Suppliers
- Bankers/ merchant Bankers
- Legal Advisors
- Investors
- Insolvency Professionals
- Consultants
- Any other advisor/ consultant
- Any other with whom UPSI is shared.
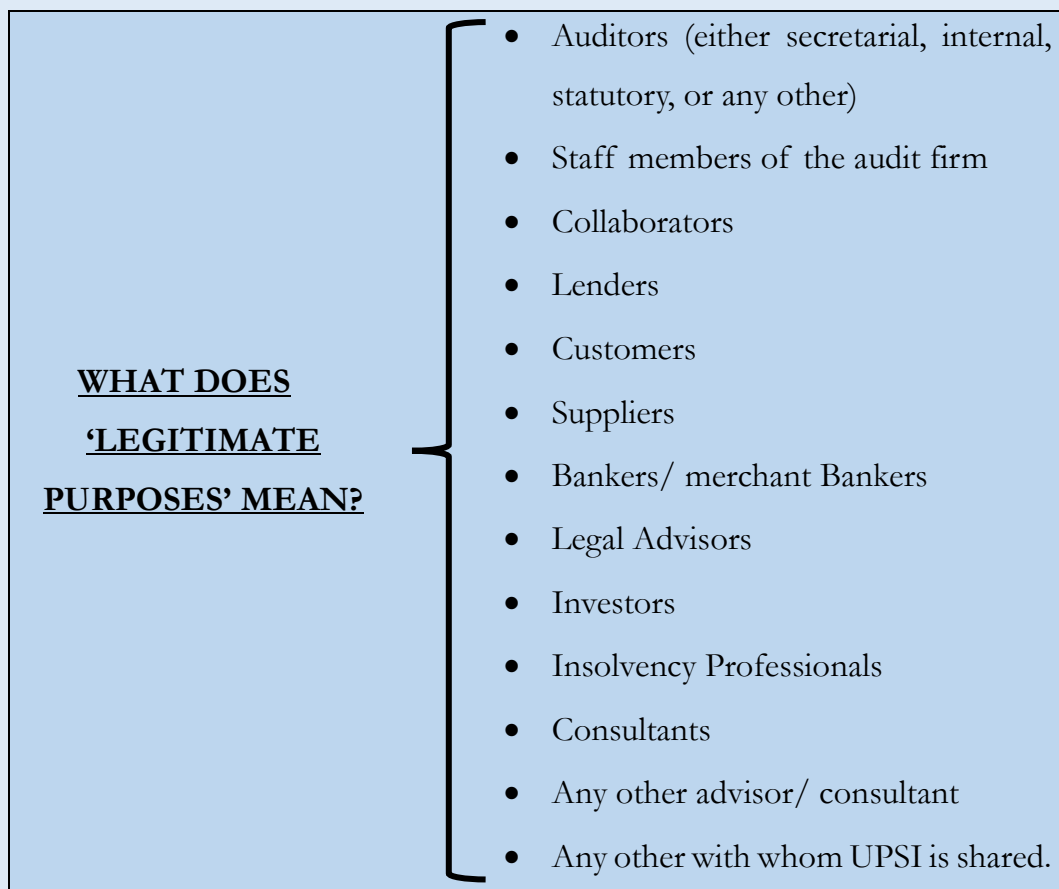
> **Restrictions on communication and trading by insiders**
>   - ➜ Board of directors shall require the parties to execute confidentiality and non-disclosure agreements on the part of such parties and such information shall be kept confidential.
>   - ➜ The provision of this code of conduct shall apply to an insider, who has obtained UPSI in pursuance of his performance of duties or discharging a legal obligation.

> **Maintenance of Digital Database**
>   - ➜ Shall ensure that a structured digital database is maintained containing the nature of UPSI and the names of persons who have shared and to whom such information has been shared.
>   - ➜ The board of Directors of the company shall ensure that the structured digital database is preserved for not less than eight years after completion of relevant transactions, except otherwise required upon receipt from SEBI.

Preliminary Inquiry – "a fact finding exercise".

Report of Preliminary Inquiry – "to enquire the matter of actual or suspected leak of UPSI & report be submitted within reasonable time".

Disciplinary Action – "any violator whether known or un-known, may be subjected to disciplinary action.

B. **Policy 2** – **"Policy for the procedure of Inquiry in case of leak of UPSI"**

> **Applicability –** "The code applies to an insider, as defined in Code.

> **Purpose –**
>   - ➜ Strengthen internal control system to prevent leak of UPSI,

- ➜ Prohibit sharing UPSI, with any unauthorized persons,
- ➜ Initiate inquiry in case of leak or suspected leak of UPSI, &
- ➜ Penalise insider, who is found guilty of violation of this policy.

- ➢ **Duties of Compliance Committee** –
  - ➜ Conduct a preliminary investigation to ascertain the truth contained in information or complaints,
  - ➜ Authorise any person including any external agency to collect necessary support material, and
  - ➜ Decide and recommend disciplinary action.

- ➢ **Compliance Committee, Inquiry Process & Reporting** –

  The <u>Compliance Committee</u> will comprise of CEO, CFO, Company Secretary and Compliance Officer, Head of the Legal Department, and Risk & Compliance Manager of the Company. The Compliance Committee shall appoint one of its members as Chairperson, who shall preside over the meetings.

  - ➜ <u>REPORTING</u> - The Compliance Committee shall report every quarter of any violation under this policy, to the Audit Committee or Board of the Company.

    Action taken by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (PIT) Regulations, 2015.

The "Code of Conduct for Prevention of Insider Trading" & "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" of BIOCON LIMITED is the best practice that can be adopted in an organisation to curb '<u>Insider Trading</u>'. Moreover, this Code of Conduct is very well in compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015.

HOSPITALS

CASE STUDY-4

APOLLO HOSPITALS ENTERPRISES LIMITED

Apollo Hospitals (hereinafter referred to as "Apollo") has emerged as Asia's foremost integrated healthcare services provider and has a robust presence across the healthcare ecosystem, including Hospitals, Pharmacies, Primary Care & Diagnostic Clinics, and several retail health models. The cornerstones of Apollo's legacy are its unstinting focus on clinical excellence, affordable costs, modern technology, and forward-looking research & academics.

Apollo Hospitals has multiple initiatives running across all the centres that help in promoting good governance and maintaining transparency throughout the system. The highlights of the initiatives have been discussed further.

I. INITIATIVE: APOLLO QUALITY PROGRAMME [AQP]

ABOUT AQP

1. A comprehensive patient safety program, the **Apollo Quality Programme (AQP)**, structured in the form of a patient-safety dashboard is used as a tool to establish and strengthen the fabric of quality and safety across Apollo Hospitals.

2. The dashboard consists of essential patient safety parameters that are measurable and objective.

3. AQP incorporates all the essential tenets of patient safety. The programme led to a progressive improvement in patient safety.

4. The AQP empowered the leadership to retrospect and analyse each of their units' performance for patient safety and quality in a systematic manner.

STRUCTURE OF AQP

AQP comprises the five essential components and processes, for standardizing and subsequently monitoring compliance could enhance patient safety across the hospital network.

These were namely: -

1. Standardization of clinical handovers

2. IPSG implementation

3. Surgical care improvement plan

4. Medication Management and Blood Transfusion Safety

5. Medical Records Compliance
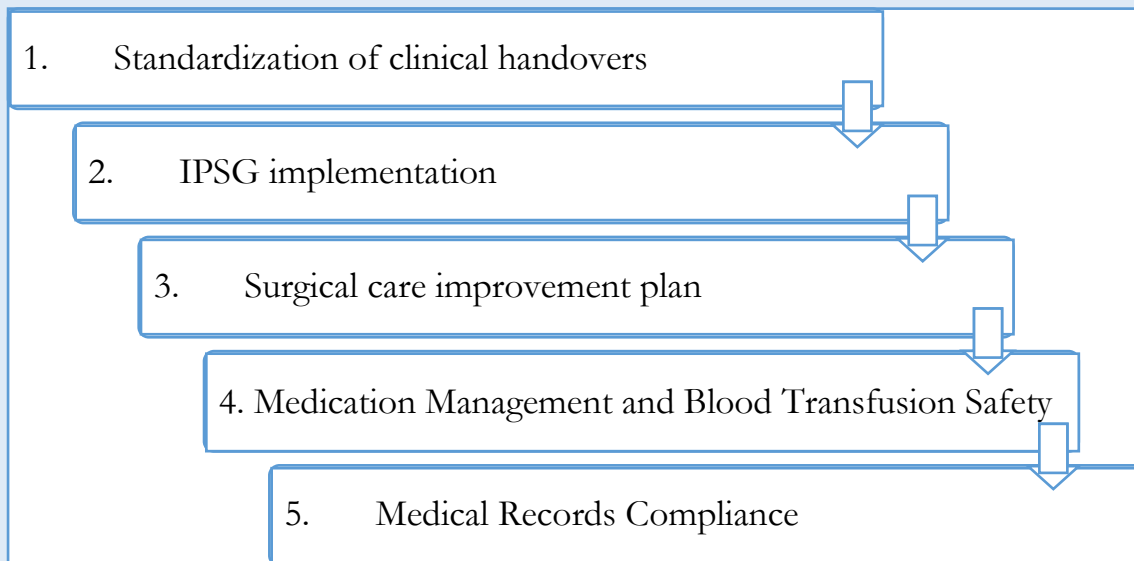
- The various parameters are defined for the AQP platform in a structured document, complete with data definitions, exclusions, and inclusions.
- Data structures are established for monitoring compliance to clinical handoffs, International Patient Safety Goals, improvement for surgical care, medicine and blood transfusion safety, and minimum content of patient records.
- Audit tools were created to check monthly compliance with each parameter. The scoring systems along with targets as internal benchmarks were established.

FUNCTIONING OF AQP

- All parameters collectively form an online-measurable dashboard of 20 parameters.
- The result ranges are defined and color-coded as green, orange, and red. Each parameter of AQP has a maximum score of five for parameters scoring in green; three for parameters scoring in orange and one for parameters in red.
- The total maximum score of the AQP dashboard is 100. The scoring for AQP for each hospital and the overall network hospitals is hence done as a percentage.
- Showing the range of data and sources helps the viewer to understand the differences between the target performance and actual levels achieved.

S.No.	Monitoring Parameter	Scoring		
	Effective Communication			
1	Percentage compliance to use of nursing handover form for patient handover	100%	90-99.9%	<90%
2	Percentage compliance to use of physician handover form for patient handover	100%	90-99.9%	<90%
3	Notation of action taken in the medical records by the physician in case of critical test result values	100%	90-99.9%	<90%
	IPSGs			
4	IPSG 1 Tracker score	100%	90-99.9%	<90%
5	IPSG 2 Tracker score	100%	90-99.9%	<90%
6	IPSG 3 Tracker score	100%	90-99.9%	<90%
7	IPSG 4 Tracker score	100%	90-99.9%	<90%
8	IPSG 5 Tracker score	100%	90-99.9%	<90%
9	IPSG 6 Tracker score	100%	90-99.9%	<90%
	Surgical Care Improvement			
10	Percentage of patients receiving antimicrobial prophylaxis one hour before surgery	>95%	90-95%	<90%
11	Major discrepancy between pre-op and post-op diagnosis	None	1 to 3	>3
12	Number of instances of wrong patient, wrong side, wrong procedure surgery	None		Any
13	Adverse events during procedural sedation and anaesthesia	None	1 to 3	>3
14	Incidents of retained foreign body during surgery	None		Any
	Medication Management and Blood Transfusion Safety			
15	Medication errors per 100 discharges	<=2.2%	2.21 - 2.85 %	>2.86%
16	Adverse drug reactions	<=3%	3.01 - 3.85 %	>3.86%
17	Medication errors wrt high alert medications	<=2.2%	2.21 - 2.85 %	>2.86%
18	Blood transfusion reactions	<=1.5	1.51-1.8%	>1.8%
	Medical Records Compliance			
19	Medical records having incomplete/improper consent	None	1 - 3%	>3%
20	Percentage of inpatient files with initial medical assessment form completed within 24 hours of admission	>95%	90-95%	<90%

ONLINE DASHBOARD – AQP

- An online data repository and dashboard, called the 'Apollo Lighthouse' has been created, wherein each of the network hospitals upload their data every month.
- The Lighthouse has an inbuilt structure to visually represent the performance levels of each parameter for every unit hospital in red, orange, and green. This is because the ranges for the scores as internal benchmarks are defined.
- The results generated are colour coded as green, orange, and red for a better visual impact of comparison of the current state against the target.
- The leadership team can compare overall as well as parameter-wise performance across all the units at any given time.

The AQP dashboard has emerged as a unique platform that not only establishes and promulgates patient safety and quality in the various hospitals of the Apollo Group but

also creates a robust framework for clinical governance. This was because the scores of AQP were connected to each hospital's progress scorecard and also the performance of the Medical and Operational Leadership. Improvement efforts were triggered, every time there was a dip in the AQP scores. The AQP dashboard hence created the fabric of patient safety and quality.

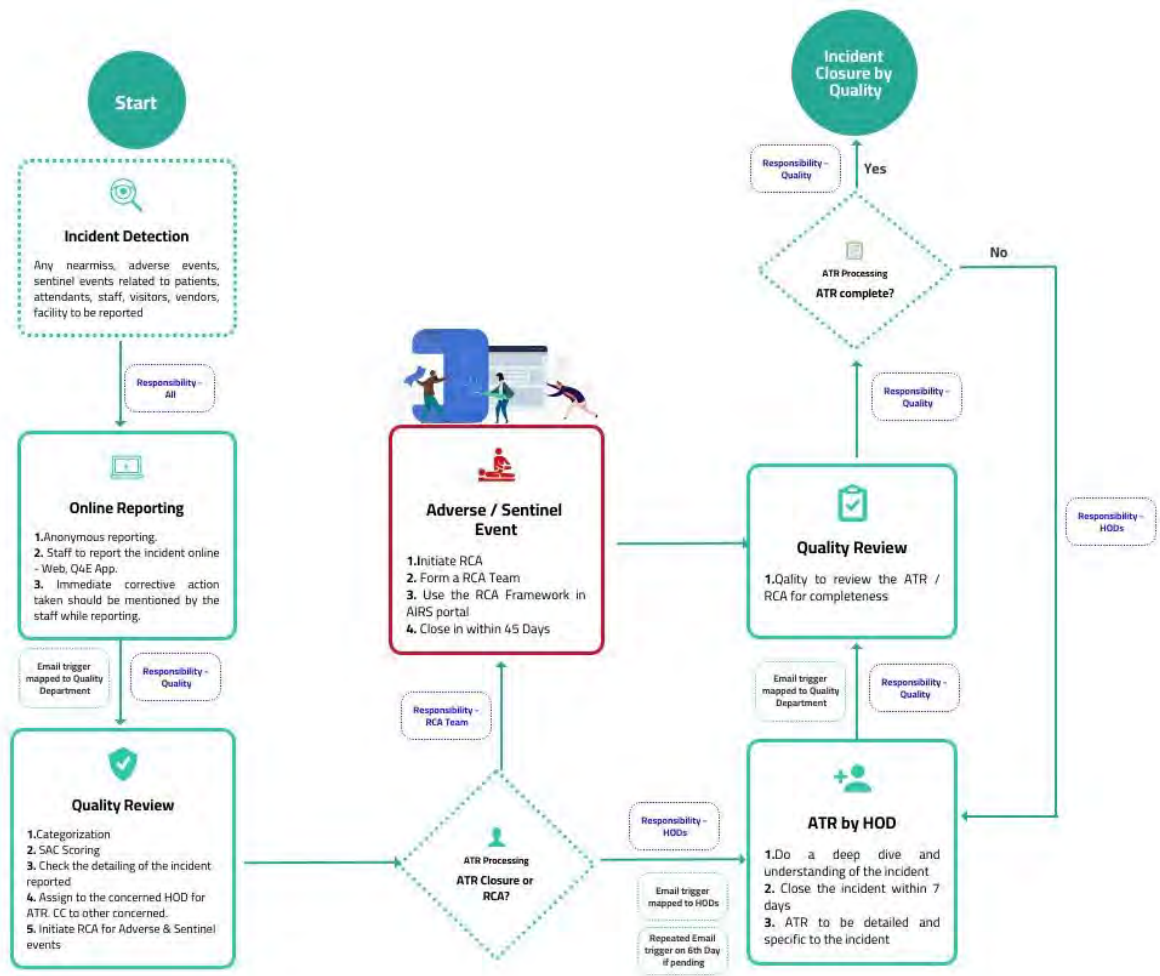## II.   INITIATIVE: AUTOMATED INCIDENT REPORTING SYSTEM (AIRS)

ABOUT AIRS

- Apollo Hospitals have an online Incident Reporting Module called Automated Incident Reporting System (AIRS).
- It is an anonymous incident reporting module where any staff or doctors can raise a safety incident related to staff, patient, process, or facility. Staff who have witnessed an incident firsthand, usually report the incident within 24 hours after the incident occurred.
- The automated incident management ensures that critical events are detected, addressed, and resolved in a fast, efficient manner. Safety events are reported by personnel involved in the events themselves.
- The advantages of voluntary event reporting systems include their relative acceptability and the involvement of frontline personnel in identifying safety hazards for the organization.

FUNCTIONING OF AIRS

- Severity Assessment Scoring (SAC) is carried out for every incident raised through AIRS. A risk score is calculated that reflects the severity of the risk. Risk scores are computed as a factor of probability and impact.
- SAC Score of 1 & 2 and any sentinel events are considered for Root Cause Analysis (RCA).
- The RCAs are multidisciplinary, involving expertise from relevant clinical and non-clinical experts that successfully contribute to improving the patient as well as staff safety.
- Incident reports are reviewed and analysed by a Quality Team regularly, to identify the most important risks to patient safety and to coordinate systematic, non-punitive investigations into those problems.
- The Incident analysis is shared with all departments and reviewed by the Quality Steering Committee and Safety Committee periodically.

Incident Reporting and Closure – Process Flow

Start

Incident Detection
Any nearmiss, adverse events, sentinel events related to patients, attendants, staff, visitors, vendors, facility to be reported

Responsibility – All

Online Reporting
1. Anonymous reporting.
2. Staff to report the incident online - Web, Q4E App.
3. Immediate corrective action taken should be mentioned by the staff while reporting.

Email trigger mapped to Quality Department

Responsibility – Quality

Quality Review
1. Categorization
2. SAC Scoring
3. Check the detailing of the incident reported
4. Assign to the concerned HOD for ATR. CC to other concerned.
5. Initiate RCA for Adverse & Sentinel events

ATR Processing ATR Closure or RCA?

Adverse / Sentinel Event
1. Initiate RCA
2. Form a RCA Team
3. Use the RCA Framework in AIRS portal
4. Close in within 45 Days

Responsibility – RCA Team

Responsibility – HODs

Email trigger mapped to HODs

Repeated Email trigger on 6th Day if pending

ATR by HOD
1. Do a deep dive and understanding of the incident
2. Close the incident within 7 days
3. ATR to be detailed and specific to the incident

Email trigger mapped to Quality Department

Responsibility – Quality

Quality Review
1. Qality to review the ATR / RCA for completeness

Responsibility – Quality

ATR Processing ATR complete?

Yes / No

Responsibility – Quality

Responsibility – HODs

Incident Closure by Quality

STEPS TAKEN TO ENCOURAGE REPORTING

- **Training of staff:**

Incident investigation is a rich source of information that helps newly joined staff understand why we have a specific process that may differ from their previous workplaces.

Training programs that stress quality and service safety measures are conducted for members of all units annually.

To promote a culture of safety, options are provided to raise incidents anonymously.

- All Quality Teams do a 'Daily Quality Tool Box Talk' where the importance of incident reporting is emphasized.
- 9th of every month, a campaign is done across all units on reporting and safety culture. 'Thank You' card/note is sent to all staff who have raised the highest number of near misses & incidents.
- Lessons from any adverse events are discussed with all units every month in the 'Open House' forum.
- Every Quarter all units showcase near-miss events where they have prevented a sentinel or adverse event through 'Good Catch Awards'.

As a result of AIRS, Apollo has been able to increase reports of incidents and also have been successful in creating a safe culture for their staff and patients.

A brief discussion of the initiatives adopted by Apollo Hospitals is a great example of the best practices that can be adopted in the Healthcare sector to maintain transparency in the daily operations of the organization. Initiatives ensuring constant improvement in service to efficient complaint handling system, along with encouraging detailed feedback from customers, has helped in instilling confidence amongst the staff as well as customers, that the organization will be able to deliver what they promise.

STATE HEALTH GOVERNMENT AGENCY

CASE STUDY-5

<u>TAMIL NADU MEDICAL SERVICES CORPORATION LIMITED [TNMSC]</u>

As the healthcare sector continues to evolve and become more complex – and more competitive – it's imperative for healthcare providers to assess their procurement goals and processes to see how they stack up.

One of the biggest challenges is the complex nature of the healthcare supply chain, as a result of a wide range of products and services, as well as multiple stakeholders and regulatory requirements. Another challenge that healthcare procurement organizations need to constantly balance is the need to balance cost savings with quality and patient safety.

Implementing best practices in healthcare procurement helps streamline procurement processes and identify cost savings opportunities, collaborating with other stakeholders to improve efficiency.

Unlike the common approach, TNMSC stands out by having a comprehensive Procurement policy readily available on its website. A quick review of the policy unmistakably demonstrates the presence of strong governance practices within the organization.

I.   PROCUREMENT POLICY[3]

The provisions in the policy are included to guarantee the on-time delivery of the medication, allowing TNMSC to meet the institutions' requirements promptly, following an evaluation of the drug quantities.

As an organization engaged in the procurement and distribution of medical drugs and equipment, its foremost priority is the maintenance and assurance of the highest quality. Any lapse in this regard could pose significant safety and health risks.

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[3] The detailed policy can be accessed on https://tnmsc.tn.gov.in/html/Procurement%20&%20Tender.php

TNMSC finalizes the Essential Drug List for drugs, surgical and suture items every year by getting the requirements from the Govt. Medical Institutions situated throughout the State of Tamil Nadu.

Tenders will be invited by giving ad in the leading all India level newspapers, Regional papers and tender bulletins. Subsequently the tender notifications will be issued to all the State Drug Controllers, Pharma Manufacturing Associations and Pharma publications to increase number of participants and competitors.
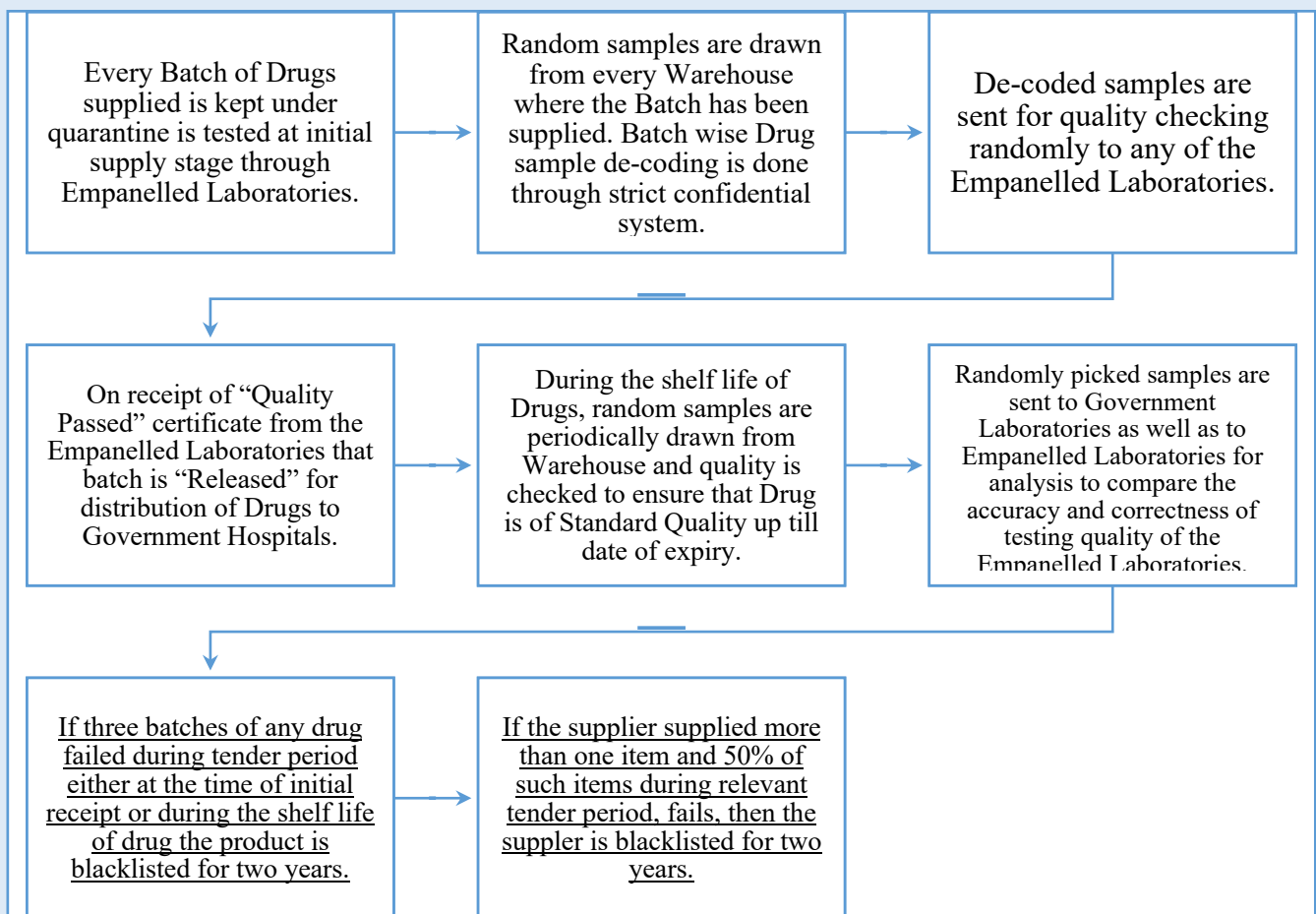
The L1 tenderers will be called for price negotiations as per the Tamil Nadu Transparency in Tenders Act. After finalization of the L1 rates, the L1 rates and the list of tenderers will be placed in the Tender Committee of the Board for verification and recommendation to the Board for approval.

After Board's approval, letters will be issued to the L1 tenderers. Subsequently, letters also issued to the tenderers who are participated in the tender and request them to send their willingness for matching the L1 rate.

The matched suppliers will be kept as reserve, in case of any additional requirement and in case of exigency, orders will be issued to the matched tenderers.

As per the tender conditions, the supplier has to supply the ordered quantity within the defined time intervals. If supplier defaults on the supply, subsequent orders will be placed with the matched supplier or with the next tenderer at higher rate.

QUALITY ASSURANCE & BLACKLISTING POLICY

Every Batch of Drugs supplied is kept under quarantine is tested at initial supply stage through Empanelled Laboratories.	Random samples are drawn from every Warehouse where the Batch has been supplied. Batch wise Drug sample de-coding is done through strict confidential system.	De-coded samples are sent for quality checking randomly to any of the Empanelled Laboratories.
On receipt of "Quality Passed" certificate from the Empanelled Laboratories that batch is "Released" for distribution of Drugs to Government Hospitals.	During the shelf life of Drugs, random samples are periodically drawn from Warehouse and quality is checked to ensure that Drug is of Standard Quality up till date of expiry.	Randomly picked samples are sent to Government Laboratories as well as to Empanelled Laboratories for analysis to compare the accuracy and correctness of testing quality of the Empanelled Laboratories.
If three batches of any drug failed during tender period either at the time of initial receipt or during the shelf life of drug the product is blacklisted for two years.	If the supplier supplied more than one item and 50% of such items during relevant tender period, fails, then the suppler is blacklisted for two years.	

As a practice to maintain transparency and promote good governance, TNMSC has elaborately provided information on failed batches and blacklisted companies on its website, which can be accessed through this link.

In furtherance to the existing policies, TNMSC has a very robust complaint redressal system. Any query/complaint can be raised through their online portal, which can be accessed through this link.

TNMSC has successfully established a commendable precedent in maintaining impeccable standards to safeguard against any infiltration of corrupt practices within their operations. Their comprehensive procurement policy underscores the importance of stringent quality checks and transparent disclosures, all of which are readily accessible on their official website.

This commitment to transparency and quality assurance serves as a beacon of integrity, fostering trust and accountability within the organization's framework, and reinforcing their dedication to ethical conduct.

CENTRAL AND STATE GOVERNMENTS

CASE STUDY-6

MINISTRY OF HEALTH AND FAMILY WELFARE, GOVERNMENT OF INDIA

INITIATIVE: QR CODING OF THE MEDICINES

In a notification by the Ministry of Health and Family Welfare (MoHFW), dated 17/11/2022, w.e.f. 01/08/2023, an amendment introduced in the Drug and Cosmetics Rule, 1945. Rule 96 of the Drug Rules has been amended to include sub-rules that require the manufacturer of certain drug formulation products to incorporate a Barcode or Quick Response Code onto their packaging labels.

Schedule H2 to the Drug Rules includes a list of nearly 300 drugs ranging from antipyretics like Dolo to antibiotics like Azithromycin, which are now required to carry a barcode on their packaging labels, starting August 1.

This code will store critical data and information that can be verified using specialized software. The stored data within the code includes vital details such as: -

-   product's unique identification code,
-   proper and generic name,
-   brand name,
-   manufacturer's name and address,
-   batch number,
-   date of manufacturing,
-   date of expiry,
-   manufacturing license number.

MINISTRY OF HEALTH AND FAMILY WELFARE
(Department of Health and Family Welfare)
NOTIFICATION
New Delhi, the 17th November, 2022.

G.S.R. 823(E).—Whereas a draft of certain rules further to amend the Drugs Rules, 1945 was published, as required under sub-section (1) of section 12 and sub-section (1) of section 33 of the Drugs and Cosmetics Act, 1940 (23 of 1940) *vide* notification of the Government of India in the Ministry of Health and Family Welfare (Department of Health and Family Welfare) number G.S.R. 448(E), dated the 14th June, 2022, in the Gazette of India, Extraordinary, Part II, section 3, sub-section (i), inviting objections and suggestions from persons likely to be affected thereby, before the expiry of a period of thirty days from the date on which the copies of the Official Gazette containing the said notification were made available to the public;

And whereas, copies of the said Official Gazette were made available to the public on the 15th June, 2022;

And whereas, objections and suggestions received from the public on the said draft rules have been considered by the Central Government;

Now, therefore, in exercise of the powers conferred by sections 12 and 33 of the Drugs and Cosmetics Act, 1940 (23 of 1940), the Central Government, after consultation with the Drugs Technical Advisory Board, hereby makes the following rules further to amend the Drugs Rules, 1945, namely:—

1. (1) These rules may be called the Drugs (Eighth Amendment) Rules, 2022.
    (2) They shall come into force on the 1st day of August, 2023.
2. In the Drugs Rules, 1945 (hereinafter to be referred as the said rules), in rule 96, after sub-rule (5) and before the explanation, the following sub-rules shall be inserted, namely:—
    "(6) The manufacturers of drug formulation products as specified in Schedule H2 shall print or affix Bar Code or Quick Response Code on its primary packaging label or, in case of inadequate space in primary package label, on the secondary package label that store data or information legible with software application to facilitate authentication.
    (7) The stored data or information referred to in sub-rule (6) shall include the following particulars, namely:—
    (i)   unique product identification code;
    (ii)   proper and generic name of the drug;

STEP-BY-STEP PROCESS

The unique QR code is inside the lid of the packaging.	⇨	When the user scans he/she will be directed to a page to check if the product is original and safe.	⇨	The user scans a unique URL that contains a token that allows us to check if the product is real.
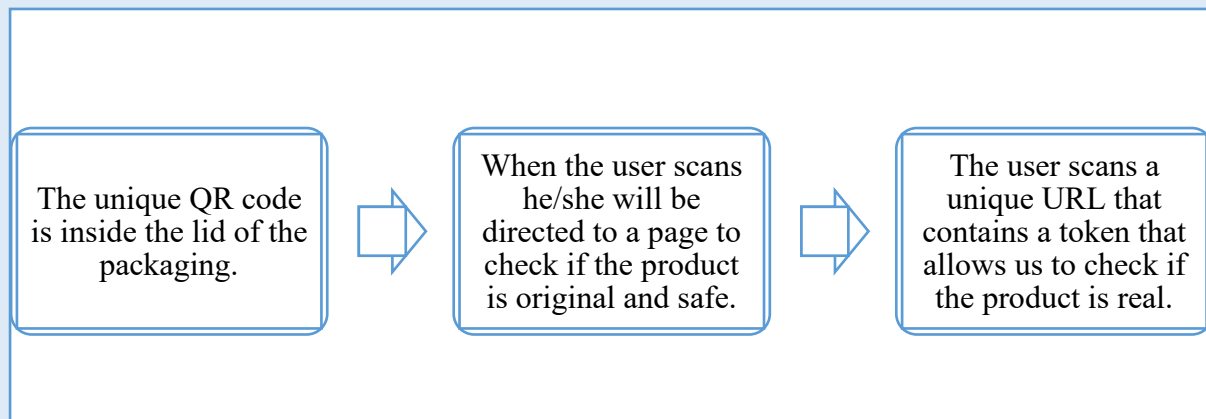
The QR codes on medicinal packaging will be scanned with the help of smartphone devices to access its verification data online.

BENEFITS

This move not only enhances transparency and accountability in the pharmaceutical supply chain

This will also ensure the authentication and accurate labelling of drug formulation products.

It serves as a deterrent against counterfeit or substandard drugs entering the market. Especially to strengthen and safeguard the quality of medicines in the OTC sector through the introduction of QR codes, which confirm that products are genuine and can be fully trusted.

It provides consumers with accurate information about the medicines purchased. It also helps to enhance consumer literacy and build consumer

This effort by the Central government is laudable as it is a major step to ensure safe medicines for the public. Proper compliance with these new regulations will make sure that **the** healthcare marketplace is safe for all players involved.

This move will prove to be a great example of one of the best practices to exist and make the healthcare sector corruption free and more transparent and efficient.

CASE STUDY-7

GOVERNMENT OF INDIA

AYUSHMAN BHARAT DIGITAL MISSION

The Ayushman Bharat Digital Mission (ABDM), with its focus on developing a robust digital health infrastructure, not only signifies a leap forward in India's healthcare sector but also underscores the government's commitment to fostering good governance and combating corruption. Ayushman Bharat has successfully used the available public digital infrastructure to provide end-to-end services through an information technology (IT) platform from identification of beneficiaries to their admission and treatment in hospitals to their discharge and paperless payment to hospitals.

More often than we know, people belonging to the disadvantageous section of the society have found it difficult to directly get access to good healthcare and therefore, they rely on middlemen for assistance. Middlemen play a significant role in perpetuating corruption. The government through Ayushman Bharat has reduced the involvement of middlemen in the whole process, thereby, focusing on e-governance.

By leveraging technology to bridge existing gaps among different stakeholders in the healthcare ecosystem, ABDM aligns with the principles of transparency, efficiency, and accountability inherent in good governance practices.

The digitalization of healthcare services not only enhances accessibility but also creates a more accountable and traceable system, reducing the likelihood of corruption.

The components of ABDM[4] are discussed below in detail.

I.   ABHA NUMBER

The Ayushman Bharat Health Account (ABHA) Number represents a transformative step towards modernizing and streamlining healthcare accessibility in India. Serving as a hassle-free method for digital health record management, ABHA facilitates seamless interaction with participating healthcare providers. This initiative allows individuals to effortlessly receive and share their digital lab reports, prescriptions, and diagnoses from verified healthcare professionals and service providers.

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[4] Source: https://abdm.gov.in/

By embracing digital platforms, ABHA not only enhances convenience for individuals but also contributes to the efficiency and transparency of healthcare services. This innovation aligns with the broader goals of Ayushman Bharat, promoting accessibility, accountability, and a more patient-centric approach to the delivery of healthcare services. The digitization of health records through ABHA reflects a commitment to leveraging technology for the betterment of healthcare, emphasizing the principles of efficiency and transparency in governance.

Creating Ayushman Bharat Health Account Number:-
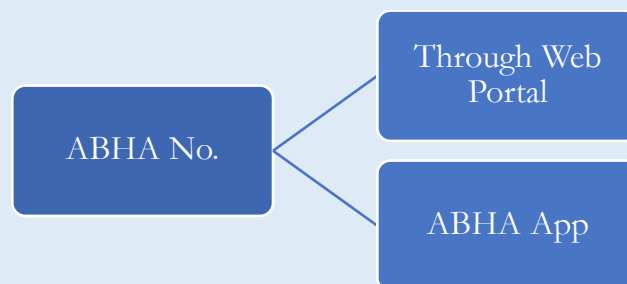
The ABHA no. can be generated either through the web portal (https://abha.abdm.gov.in/abha/v3/register) or by downloading the ABHA App.

For creating an account, the concerned individual can log in using either:

- Aadhaar Card
- Driving License
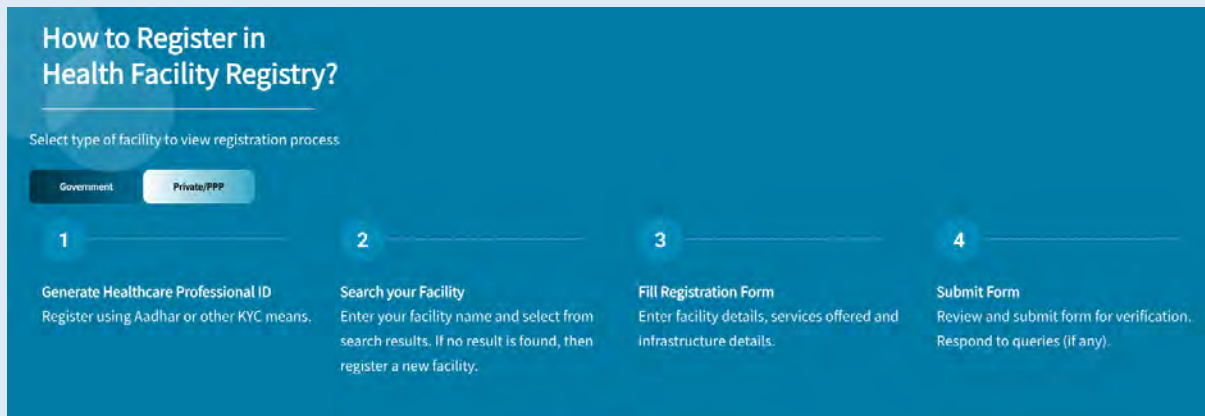
II.   HEALTH FACILITY REGISTRY

The implementation of the Health Facility Registry as a comprehensive repository for all health facilities, encompassing both public and private sectors, represents a crucial stride towards collective action against corruption in the healthcare system. By consolidating information on hospitals, clinics, diagnostic laboratories, and other healthcare entities, the registry establishes a transparent and easily accessible database. This not only streamlines the process for individuals seeking healthcare services but also creates a foundation for accountability and oversight.

The transparent documentation of health facilities, spanning various systems of medicine, serves as a deterrent against corrupt practices by fostering a collective commitment to ensuring the integrity of healthcare services. In this way, the Health Facility Registry

becomes an essential tool in promoting transparency, discouraging corruption, and advancing the shared goal of a more accountable and equitable healthcare system.

<u>Private Facility</u>

<u>Government Facility</u>

III.   <u>HEALTHCARE PROFESSIONAL REGISTRY</u>

The Healthcare Professionals Registry serves as an extensive database encompassing all healthcare practitioners engaged in providing healthcare services across contemporary and traditional medical systems.

Healthcare professionals who register with the HPR gain access to a range of interoperable, digitally-enabled services designed to facilitate healthcare activities and service delivery. The

vision for the HPR is to transform into a platform that prioritizes both citizens and practitioners, aligning with global healthcare standards to ensure compliance and efficacy in healthcare practices.
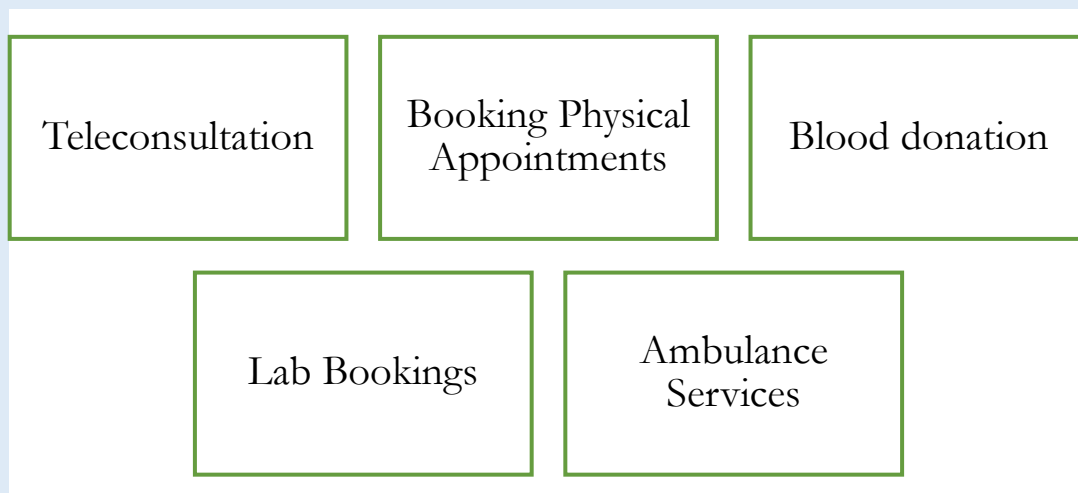
Steps to register in Healthcare Professionals Registry

Generate Healthcare Professional ID using Aadhar or other KYC → Fill registration form: enter personal, registration, academic and work details → Review and submit form for verfication. Respond to queries (if any)

IV. UNIFIED HEALTH INTERFACE (UHI)

The Unified Health Interface (UHI) is a network of open protocols that enable interoperability in health services. UHI is one of the foundational layers in the Ayushman Bharat Digital Mission (ABDM) Stack that focuses on the discoverability and delivery of health services. While the current ABDM building blocks enable the interoperable exchange of personal health data and provide registries for doctors, patients, and health facilities, UHI leverages these building blocks to provide a seamless end-to-end experience for the users.

Services under UHI

Teleconsultation	Booking Physical Appointments	Blood donation
Lab Bookings	Ambulance Services	

Benefits of UHI

For Patients

- Improved access to healthcare
- Greater choice of application
- Transparency in pricing
-

For Healthcare Service Providers

- Greater discoverability
- Ability to decide their service price
- Platform to expand their physical offering.

In conclusion, the Ayushman Bharat Digital Mission (ABDM) represents a significant leap forward in India's healthcare sector, aligning with the principles of e-governance to foster transparency, efficiency, and accountability. By leveraging digital technology, ABDM addresses longstanding challenges in healthcare accessibility, reducing reliance on middlemen and minimizing the potential for corruption. The introduction of the Ayushman Bharat Health Account (ABHA) Number, Health Facility Registry, Healthcare Professionals Registry, and Unified Health Interface (UHI) collectively establishes a robust digital infrastructure that streamlines processes, enhances accountability, and empowers individuals with greater control over their healthcare information.

CASE STUDY-8

GOVERNMENT OF ODISHA

VISION 5T

Odisha's governance is steered by the quintet of '5Ts': transparency, teamwork, technology, timeliness, and transformation. As per the government's new policy, all government action must be governed by these five cardinal principles. The Naveen Patnaik-led administration has wholeheartedly embraced the '5T' agenda, aiming to revolutionize governance by implementing substantial, institution-level reforms, rather than incremental improvements.

The Government of Odisha, with the 5T approach, plans to innovate the healthcare sector in the State, the first phase will be carried out from January 2023 to October 2023[5].

Phase 1 will involve: -

- Transformation of 147 health facilities: As a part of this, Physical Health Infrastructure, basic patient amenities, and service delivery system in the public health facilities, i.e. Community Health Centres, Sub-District Hospitals, and District Head Quarter Hospitals will be upgraded.

In its endeavour to ensure zero out-of-pocket expenditure and provide universal health coverage, Odisha is the first and only State in the country to mandate free treatment for all persons, in all public health facilities.

1. **Universal Health Coverage in Odisha:**
   - The free services cover:
     - Free drugs.
     - Free diagnostics.
     - Free OPD (Outpatient Department) services.
     - Free IPD (Inpatient Department) services.

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[5] Source: https://timesofindia.indiatimes.com/city/bhubaneswar/now-odisha-govt-focusses-on-hospitals-for-5t-transformation/articleshow/97145436.cms

- ▪ Free surgery.
  - ▪ Free ICU (Intensive Care Unit) services.
- - Applicable in all government healthcare facilities, from Primary Health Centres to Medical College Hospitals.
- - Available to all people regardless of residence, caste, or economic status.

2. **Specific Schemes for Free Services:**
   - - Niramaya:
     - ▪ Ensures free drugs to all patients.
   - - Nidaan:
     - ▪ Provides free diagnostic services.
   - - Sahay:
     - ▪ Offers free dialysis services in all districts.
   - - Free blood provision for patients requiring blood in Public Health Facilities.
   - - Free chemotherapy facility for cancer patients.

Some of the achievements of the 5T initiatives on healthcare development: -

- - Transforming SCB Medical College and Hospital into AIIMS plus category hospital.
- - Introducing BSKY Smart Health Cards.
- - Launching **Mukhya Mantri Bayu Swasthya Seva[6]** (Air health services).
- - The State government has taken additional measures to safeguard the health of economically vulnerable sections of society, and women in particular, through the BSKY or **Biju Swasthya Kalyan Yojana.[7]**
- - To defeat cancer, "**Bagchi Srishankar Cancer Hospital**" with 750 beds and all modern amenities is being established in the State capital.
- - The goal of the Government is to ensure that all public health facilities have the required numbers of doctors and paramedics. Towards this end, nearly 4,000 doctors have been recruited in the last 5 years alone, and over 5,000 doctors are expected to be recruited in 2023-24.

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[6] Source: https://newsroomodisha.com/odisha-witnesses-incredible-transformation-in-health-sector-pujari/

[7] Source: https://newsroomodisha.com/odisha-health-dept-highlights-its-achievements-at-senior-ias-officers-conference/

By adopting 5T initiatives, the accountability of health officials in public health facilities has improved and patient satisfaction has increased. Odisha Government through their 5T initiative has been able to set an excellent example of good governance.

CIVIL SOCIETY ORGANISATIONS

CASE STUDY-9

INSTITUTE FOR GLOBAL DEVELOPMENT (IGD)

TRANSPARENCY, ETHICS, AND COMMUNITY ACCOUNTABILITY HELP IN STRENGTHENING VALUE-BASED HEALTHCARE.

Institute for Global Development (IGD) has been continually working towards promoting and encouraging value-based healthcare. This patient-centered model encourages preventive care, early intervention, and efficient care coordination to improve overall quality while reducing healthcare expenditures. As payers increasingly adopt value-based reimbursement models, the healthcare industry is witnessing a shift towards a more sustainable and effective system that focuses on delivering high-quality care at a lower cost.

Nestled in Piludara village (Bharuch, Gujrat), a notable case study emerges from IGD's successful battle against malnutrition—a testament to the transformative prowess of the Institute for Global Development (IGD). Beyond rescuing infants from despair, IGD demonstrated an unwavering commitment to community well-being in the face of daunting healthcare challenges. This particular case study reflects a broader commitment to empowering communities, particularly the vulnerable, with a focus on women and children, embodying IGD's core values of compassion, education, and support.

IGD has been able to achieve excellent results from its approach purely because of the following factors, which can be seen as a wonderful guiding path for other healthcare organizations that aim to strengthen value-based healthcare.

➔ **Strategic Planning Excellence:** IGD's success stems from its meticulous strategic planning. The organization goes beyond mere crisis response, employing a thoughtful analysis of existing healthcare infrastructures, identifying gaps, and implementing targeted interventions. This strategic approach ensures that IGD addresses the root causes of health disparities and delivers value to patients in need.

➔ **Investment in Capacity Building:** Recognizing that knowledge is a powerful tool, IGD invests substantially in capacity building and training programs for healthcare professionals. By enhancing the skills of health workers in areas like preventive care, infant and child vaccination, nutrition supplementation, hygiene practices, and ethical healthcare, IGD contributes to the delivery of high-quality, patient-centered care.

➔ **Holistic Monitoring and Follow-up:** IGD's involvement extends beyond immediate crisis resolution. The organization champions a framework for continuous monitoring and follow-up care, aligning its practices with the principles of good governance. By

emphasizing accountability, transparency, and responsiveness in delivering essential services, IGD ensures that the impact of its interventions is sustained over time.

➔ **Community Engagement and Empowerment**: IGD understands the significance of involving communities and empowering them to take charge of their health. By bridging information gaps and promoting community engagement, education, and leadership, IGD's preventative approach aligns seamlessly with value-based care principles.

➔ **Transparency, Accountability, and Good Governance:** Functioning on the pillars of transparency, accountability, and good governance, IGD sets a standard for both development organizations and institutions alike. Its commitment to financial and systemic transparency not only fosters personal and professional growth but also establishes IGD as a model organization in the field of development.

➔ **Data-Driven Decision-Making and Policy Advocacy:** IGD emphasizes the importance of data in decision-making, aligning with the principles of value-based healthcare. By promoting data collection and analysis, IGD enables informed decision-making, identifies high-risk populations, and tracks health outcomes. The organization's advocacy efforts to influence policy changes, at local, state, and national levels, further solidify its commitment to advancing value-based care principles.

➔ **Measuring and Evaluating Impact:** Continuous evaluation and measurement of healthcare interventions are at the core of IGD's approach. By assessing the impact of programs on patient outcomes, cost-effectiveness, and overall healthcare quality, IGD ensures that its initiatives consistently align with the principles of value-based healthcare.

IGD 's strategic and well-coordinated approach not only rescued infants in Pitludara village of Bharuch, Gujrat from the clutches of despair but also demonstrated its unwavering commitment to community well-being, even in the face of formidable challenges. The infant's journey, from a fragile baby battling malnutrition to a symbol of resilience, echoes the core values of IGD — compassion, education, and support.

The strategic planning, capacity-building investments, holistic monitoring, community engagement, and commitment to transparency and governance epitomize IGD's comprehensive approach. This approach aligns seamlessly with the principles of value-based healthcare, emphasizing patient-centered strategies for improved outcomes. By strategically analysing healthcare infrastructures, identifying gaps, and implementing targeted interventions. IGD ensures a thoughtful response that addresses the root causes of health disparities and delivers value to patients in need.

IGD stands as a beacon of hope, proving that with dedication and a comprehensive approach, a healthier and brighter future is not only possible but achievable for our communities.

CASE STUDY-10

YOUTH FOR SOCIAL DEVELOPMENT (YSD)

Youth for Social Development (YSD) is a development organisation working with duty bearers and rights holders to improve the lives of urban and rural poor in the state of Odisha, India. YSD interventions are primarily in the fields of governance and entitlements, including, health, education, water, sanitation, housing, and climate change.

Some of their healthcare initiatives have been discussed below.

INITIATIVE 1: **COVID-19 VACCINATION EXPERIENCE OF VULNERABLE AND MARGINALIZED SECTIONS IN GANJAM DISTRICT OF ODISHA IN INDIA**

Youth for Social Development (YSD) worked on creating an enabling environment around COVID-19 vaccination by understanding people's perceptions about COVID-19 vaccination, sensitizing them on the health and social benefits of vaccination, identifying the most vulnerable and marginalized people and supporting them in getting vaccinated to improve equitable access.

To help plan its actions, a rapid assessment was initiated by YSD in May 2021. Households (HH) were surveyed to understand their perceptions and experiences about the coronavirus disease, vaccine hesitancy vs eagerness, and other related aspects of vaccine deployment. Vaccination centers (VC) were observed to understand the efficiency and compliance with the COVID protocol.

The COVID-19 vaccination experience of vulnerable and marginalized sections of society has varied widely depending on factors such as location, government policies, healthcare infrastructure, and societal factors. Here are some key points to consider:

1. Access to Vaccines
2. Vaccine Hesitancy
3. Digital Divide
4. Transportation and Mobility
5. Language and Cultural Barriers
6. Vaccine Clinics in Underserved Areas
7. Community Outreach and Education
8. Vaccine Equity Initiatives

It's important to note that the situation regarding COVID-19 vaccines is dynamic, and efforts to improve access and address disparities continue to evolve. Governments, organizations, and communities are working together to ensure that vulnerable and marginalized populations have equitable access to vaccines and the necessary support to overcome barriers to vaccination.

FINDINGS FROM OBSERVATION OF VACCINATION CENTERS-

The COVID-19 vaccination experience has produced various findings and insights, which have evolved as the vaccination campaigns progressed. Some key findings and observations from the global COVID-19 vaccination experience include:

1. **Vaccine Development Speed:** The development of multiple COVID-19 vaccines in record time, using innovative technologies like mRNA, showcased the potential for rapid vaccine development during a pandemic.

2. **Vaccine Efficacy:** Clinical trials and real-world studies have demonstrated varying levels of vaccine efficacy against COVID-19, with some vaccines showing high protection against severe disease and hospitalization.

3. **Vaccine Hesitancy:** Vaccine hesitancy has been a significant challenge in many countries. Misinformation, mistrust, and safety concerns have led to some individuals being reluctant to get vaccinated.

4. **Equity and Access:** Ensuring equitable access to vaccines has been a global concern. Disparities in vaccine distribution between high-income and low-income countries highlighted the need for greater international cooperation.

5. **Vaccine Variants:** Emerging variants of the virus have raised questions about vaccine effectiveness. Some variants have shown reduced susceptibility to existing vaccines, emphasizing the importance of continued research and vaccine development.

6. **Booster Shots:** Booster doses have become a topic of discussion and policy decisions in various countries. Data on waning immunity and the need for boosters have been under scrutiny.

7. **Vaccine Distribution Challenges**: The logistics of distributing and administering vaccines have been complex. Maintaining the cold chain, vaccine storage, and equitable distribution have been key challenges.

8. **Vaccine Passports:** Some countries and regions have implemented digital vaccine passports or certificates for travel and access to certain venues. This has raised ethical, privacy, and accessibility concerns.

9. **Side Effects and Safety:** Most COVID-19 vaccines have shown a favourable safety profile, with common side effects being mild and short-lived. Rare cases of severe side effects have been investigated and monitored.

10. **Global Collaboration:** The pandemic highlighted the importance of global collaboration in vaccine development, manufacturing, and distribution. Initiatives like COVAX aimed to ensure equitable access to vaccines.

11. **Public Health Messaging:** Effective public health communication has been crucial in addressing vaccine hesitancy and ensuring public confidence in the vaccination process.

12. **Community Engagement:** Engaging with local communities and community leaders has been essential in reaching underserved populations and addressing vaccine equity.

13. **Vaccine Mandates**: Some governments and organizations have implemented vaccine mandates for certain sectors or activities, sparking debates over individual rights and public health.

14. **Long-Term Impact:** The long-term impact of COVID-19 vaccines on the trajectory of the pandemic remains a subject of ongoing study, including the potential for herd immunity.

It is important to note that the COVID-19 vaccination experience is dynamic, and new findings continue to emerge as more people are vaccinated and as new variants of the virus emerge. Research and surveillance efforts are ongoing to monitor vaccine effectiveness, safety, and the evolving nature of the pandemic.

RECOMMENDATIONS FROM YSD BASED ON THE FINDINGS

FOR BENEFICIARIES:

1. Improve IEC Activities:

   - Focus on general COVID norms.

   - Emphasize strict adherence to COVID norms when tested positive.

   - Reassure people about the quality of COVID care in hospitals.

   - Promote the necessity and safety of vaccination.

   - Utilize innovative IEC materials and campaigns.

2. Target Senior Citizens:

   - Concentrate concerted IEC efforts on senior citizens.

   - Seek funding from corporate entities and private donors for IEC activities.

3. Facilitate Vaccination Registration:

   - Establish help centres in every village to assist with vaccine registration.

   - Engage local volunteers or CSOs to support registration efforts.

4. Reduce Waiting Time for Vulnerable Groups:

   - Set up separate counters at vaccination centres for seniors and disabled individuals.

   - Promote prior registration and document verification.

   - Organize special vaccination camps for vulnerable groups.

5. Increase Vaccination Centres:

   - Expand the number of vaccination centres.

   - Utilize larger open grounds or schools for vaccination centres.

   - Create designated areas for waiting, vaccination, and observation.

   - Reduce transportation costs and loss of wages for the public.

FOR MANAGEMENT OF VACCINATION CENTRES:

1. Staff Training and Monitoring:

   - Train staff on the importance of adhering to guidelines.

   - Implement monitoring systems with assistance from CSOs.

   - Engage local leaders for supervision and volunteering at centres.

2. Ensuring Staff Safety:

   - Maintain sufficient supplies of masks, hand sanitizers, PPE suits, and gloves.

   - Consider involving family members or CSOs to manage supply inventory.

3. Efficient Staff Deployment:

   - Ensure adequate staffing at each centre.

   - Recruit and train volunteers with the help of CSOs to support staffing needs.

4. Designated Rooms and Seating Arrangements:

   - Emphasize the need for separate waiting, vaccination, and observation areas.

   - Utilize better premises for clear separation.

   - Organize seating and distancing with assistance from residents and CSOs.

5. Role of CSOs:

   - Engage CSOs (e.g., Self Help Groups, Youth Associations, small NGOs) at various stages of the vaccination program.

   - CSOs can assist in IEC activities, staff training, monitoring vaccination centres, and distributing supplies, leveraging their local presence.

In conclusion, ensuring the successful and efficient implementation of vaccination programs in these three blocks requires a multi-faceted approach. Prioritizing staff training and adherence to guidelines, with robust monitoring systems in place, is crucial. Collaborating with CSOs, local leaders, and volunteers can enhance staff safety, optimize deployment, and facilitate designated areas for vaccination. These measures, supported by CSOs' involvement will contribute significantly to the program's success. The collective efforts of all stakeholders are essential to achieving widespread vaccination coverage and mitigating the impact of COVID-19 in these communities.

<u>INITIATIVE 2:</u> ASSESSMENT OF MATERNAL & CHILD HEALTH SERVICES AND CHALLENGES OF FRONTLINE HEALTH PROFESSIONALS DURING COVID-19 IN GANJAM, ODISHA

The Youth for Social Development (YSD) assessed Maternal and Child Health Services and the Challenges of Frontline Health Professionals during COVID-19 in Ganjam, Odisha. Their initiatives included a systematic sample survey involving pregnant women, lactating women, and service providers. The assessment revealed several key findings:

Findings from Pregnant Women:

- A significant number of pregnant women were advised not to visit health facilities during the lockdown.
- Most pregnant women sought essential check-ups and tests.
- Many had to purchase medicines from private pharmacies, often with limited knowledge about their usage.
- Extra expenses were incurred when visiting public health facilities.
- Hygiene and physical distancing measures were reasonably well-maintained in health centers.

Findings from Lactating Mothers:

- Most lactating mothers visited health centers for delivery.
- A majority of children had been vaccinated.
- Availability of necessary medications from government stores varied.
- Some mothers had to pay substantial amounts for medications.

Findings from Service Providers (ASHA, ANM, AWW):

- Only a portion of frontline workers were assigned duties at temporary medical centers for COVID-19 patients.

- A significant percentage of positive/suspected cases were not immediately attended to at these centers.

- Not all frontline workers consistently used masks and PPE kits.

- Many had received mandatory training, but not all.

- Social distancing compliance among patients was not universal at health centers.

- Few health centers displayed COVID-19 guidelines and posters.

<u>Policy Recommendations:</u>

YSD made several policy recommendations to improve the situation:

- Enhancing governance and preparedness for health services.

- Facilitating access to free services.

- Providing better support for frontline workers.

- Linking pregnant women with appropriate health facilities.

- Optimizing home visits by ASHA workers.

- Ensuring timely payment and incentives for frontline workers.

- Regulating the cost of treatment and medication in private hospitals.

In summary, the Youth for Social Development (YSD) played a pivotal role in assessing and addressing critical issues within the healthcare sector, particularly in maternal and child health services during the COVID-19 pandemic in Ganjam, Odisha. Through their comprehensive initiatives, YSD provided valuable insights and policy recommendations to improve governance, access to services, and support for frontline healthcare workers. YSD's contribution serves as a testament to the crucial role civil society organizations can play in advancing public health and well-being.

ACADEMIC & RESEARCH INSTITUTE

CASE STUDY-11

ATMIYA UNIVERSITY

### ANTI-CORRUPTION EDUCATION WITH CONSCIOUSNESS DEVELOPMENT

Higher education is a strong driver for ethics and integrity through driving knowledge, skills, and attitudes for sustainable living.

Atmiya University is a member of the United Nations Academic Impact (UNAI) as well as the UN Global Compact Principles for Responsible Management Education (PRME). University follows a unique approach to address the UN Global Compact 10th Principle through education. Aligning with the recommendations from the Anti-Corruption Toolkit developed by the PRME Anti-Corruption Working Group, the university has integrated both the behavioural as well as skilling aspects, which are essential for effective anti-corruption training and education to the new business professionals.

This unique approach by the University will play a huge role in snipping the ill practices from the ground level. Inculcating values of integrity and ethics will have a domino effect which will reflect throughout the entire healthcare ecosystem and business sector as well.

ATMIYA APPROACH: INTEGRITY AND ETHICS AT THE CORE

The University is on a transformative mission, seeking to elevate not just its students but all stakeholders from a state of underdeveloped consciousness to a higher level of human consciousness. This ambitious goal is pursued through a comprehensive approach to education that encompasses holistic value education. The Atmiya model of ethics and value-driven education can be conceptually understood through Figure 1.
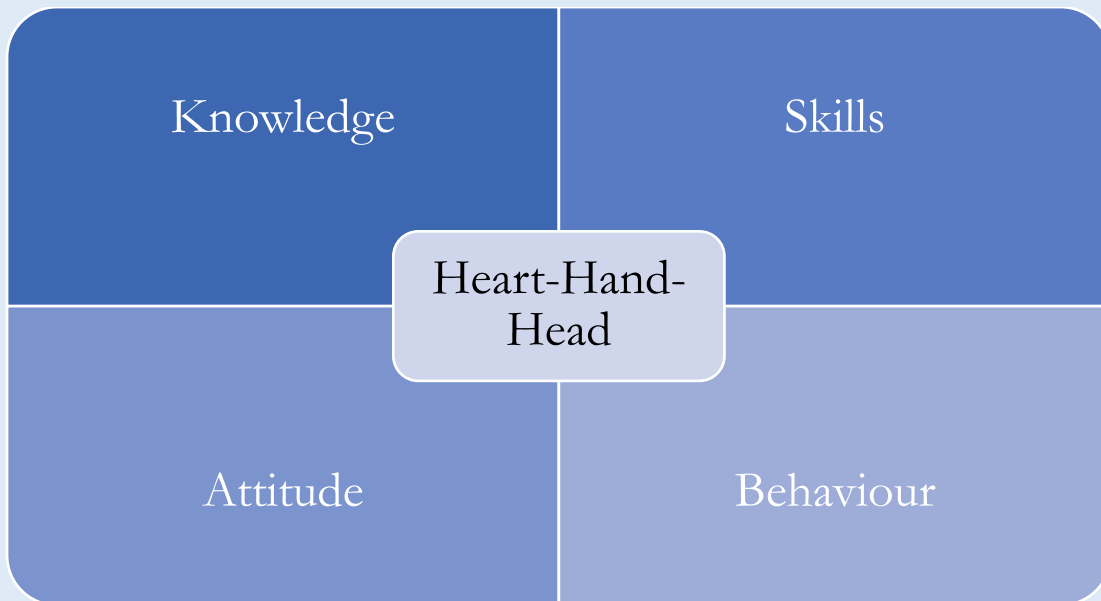
Figure 1: Atmiya Approach to Education

Contrary to the conventional models of education with the supremacy of head over heart, Atmiya University focuses on developing the values through empathy and compassion which they refer to as the Heart to Head approach. This approach remains at the core of the development of knowledge, skills, attitude, and desired behaviour. The salient features of the transformative governance/education model at Atmiya University are given in Figure 2.

Figure 2: Salient Features of Transformative Education at Atmiya University
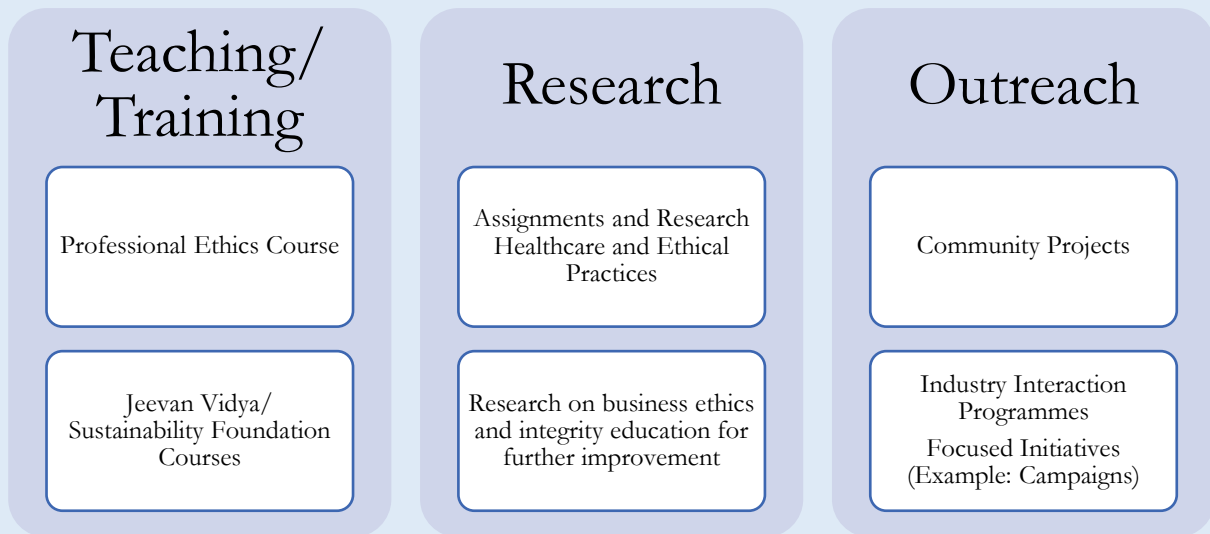
Since 2014, the University has adopted the study of Universal Human values through Co-existential Philosophy. At the heart of this transformative journey is the integration of the Jeevan Vidya concept into diverse academic disciplines. The University has taken a proactive step by introducing a credit course titled "Human Values for Holistic Living" across all its programs. This strategic move is aimed at permeating the essence of Jeevan Vidya throughout various domains, ensuring that students graduate not only with academic knowledge but also with a profound understanding of values that contribute to a holistic and fulfilling life. Beyond the academic sphere, the university sees this endeavour as a social responsibility.

To extend the impact of its teachings beyond the classroom, the institution is actively involved in organizing a series of workshops. These workshops, both within the university and in external communities, serve as platforms for practical application and engagement with societal well-being. Impressively, over 100 workshops have been conducted to date which directly impacted more than 50,000 individuals.

In essence, the university's commitment reaches far beyond traditional education. It aspires to contribute to a paradigm shift in consciousness, fostering individuals who are not only academically adept but also equipped with the values and perspectives needed for a more harmonious and fulfilling society. Through education, workshops, and a profound sense of social responsibility, the university is actively shaping a brighter and more conscientious future for the new generation and professionals.

EDUCATION FOR UN GLOBAL COMPACT 10TH PRINCIPLE

The transformative education model of Atmiya University addresses the requirements of most of the principles of the UN Charter as well as the UN Global Compact in general. However, more specifically in the context of professional education i.e. Allied Healthcare, Business, and Engineering, the educational programmes touch on the specific requirements of UN Global Compact 10th Principle i.e. Businesses should work against corruption in all its forms, including extortion and bribery. Figure 3 shows how the professional programmes at Atmiya University are incorporating the ethics and integrity issues in line with the requirements of the UN Global Compact 10th Principle.

Teaching/ Training	Research	Outreach
Professional Ethics Course	Assignments and Research Healthcare and Ethical Practices	Community Projects
Jeevan Vidya/ Sustainability Foundation Courses	Research on business ethics and integrity education for further improvement	Industry Interaction Programmes Focused Initiatives (Example: Campaigns)

Figure 3: Professional Education Approach for UN Global Compact 10th Principle

In summary, the infusion of universal human values at Atmiya University is helping to create a transformative educational environment. It goes beyond academic excellence, fostering a community of individuals who are not only educated and well-educated but also guided by a strong moral compass, ready to contribute positively to society. However, the initial experience shows that education for integrity and ethics requires continuous learning in terms of research on what is working and what is not working. It has also been realized that collective action, involving institutions, universities, media, civil society organizations, and industries can be quite effective in accelerating efforts towards educating the need to discourage corrupt activities across the sectors including healthcare.

Atmiya University, through its various research and programmes, is helping diverse sectors to promote and ensure good governance and business integrity to mitigate corruption challenges through the following ways…

➢ Identify corruption challenges and provide solutions.
➢ Provide fact sheet/information to advocate with decision makers which can further help Govt develop relevant policies to mitigate/ eradicate corruption across the sectors.
➢ Help the business community create a culture of integrity.
➢ Help businesses improve their compliance and governance system by incorporating AI.
➢ Develop policies for Govt to reduce/control corruption.

CONCLUSION AND RECOMMENDATIONS

Based on the initiatives adopted by various organizations in the healthcare sector, it is clear that several best practices can be recommended to maintain transparency and ethical conduct in daily operations. These initiatives span various aspects of healthcare, including corporate governance, compliance, quality assurance, and public health.

The above-discussed case studies/ success stories can be evaluated on many criteria, which also make them ideal examples of Anti-Corruption Best Practices in the healthcare sector.

1. **Dr. Reddy's Laboratories**
   - All healthcare organizations, especially those in regulated sectors, should establish detailed Anti-bribery and Anti-corruption policies, whistle-blower policies, and Anti-money-laundering policies to inculcate integrity and ethics across the organisation. Dr. Reddy's bulletproof policies manage to cover all the minute details which assist in detailing the problem, in case it arises, and also discourage it at the very grassroots level.

   - These policies help maintain transparency, prevent misconduct, and protect the interests of employees and stakeholders.

   - Considering the language, coverage, and understandability of all the policies, they can be easily used and reproduced as per the needs of the organisations by those who wish to implement the same.

2. **Merck KGaA Darmstadt Germany**

   - As a leading biopharmaceutical company, Merck has been able to promote transparency and responsible data sharing in clinical research. After clinical trial policy, strong emphasis on quality control, and a code of conduct, maintain an environment of strong vigilance, as a result discouraging any wrongdoings. Merck's clinical trial policy is very innovative with clear instructions on how to navigate through the whole process.

   - Apart from Clinical trial policy, code of conduct and quality control policies can be seen as a very sustainable option for many organisations and can be implemented irrespective of the industry.

3. **Biocon Limited**

   - Biocon's Code of Conduct for Prevention of Insider Trading is an efficient and extremely effective policy that ensures true compliance with the SEBI guidelines. Every company has to deal with information that is sensitive and needs to be handled with care. Therefore, a robust policy on the prevention of insider trading policy seems to be a necessity.

   - Implementation of these practices that prevent insider trading helps to maintain trust and legality within the organization.

4. **Apollo Hospitals**

   - Every organization strives to grow and maintain goodwill in the market. One of the major factors which contribute to achieving the same is, to make sure that quality of service is maintained throughout the lifecycle of the company. Apollo has been able to set a wonderful example in this respect by ensuring internal quality programs as well as tough reporting systems. These systems majorly promote transparency and accountability within the organization.

   - This approach by Apollo is again an imperative system that should be implemented across the healthcare sector and is also easily replicable with detailed instructions.

5. **Tamil Nadu Medical Services Corporation Limited (TNMSC)**
   - The need to maintain impeccable standards in procurement is reflected in the procurement policy of TNMSC. Procurement is a very corruption-prone process, therefore, this policy of TNMSC can be considered as an innovative step towards implementing procurement policies readily accessible on official platforms to foster trust and accountability.

   - Also, as a step towards maintaining transparency, proper disclosures concerning blacklisting companies on account of malpractices has been mentioned in the website, another practice which should be adopted by many organization engaged in the procurement of medical equipment.

6. QR Coding of Medicines (Government of India)

- Government of India has been able to introduce and enforce regulations to ensure the safety of medicines in the healthcare marketplace. Manipulation in medicines has been a recurring issue caused due to corrupt activities. With the revolutionary approach of QR Coding, transparency will ensure a smoother supply chain and develop customer trust as well.

- Compliance with these regulations is crucial for a corruption-free, transparent, and efficient healthcare sector.

7. Ayushman Bharat Digital Mission (Government of India)

- Ayushman Bharat Digital Mission stands as a beacon of modernization and sustainability in India's healthcare landscape. By embracing digital technology, the mission has not only enhanced accessibility to healthcare for the disadvantaged but has also significantly reduced corruption by minimizing the role of middlemen. This innovative approach, grounded in good governance practices, has created a more efficient and transparent healthcare system.

- The intersection of innovation, efficiency, and sustainability in healthcare through ABDM exemplifies the transformative power of technology in addressing societal challenges and fostering positive change.

8. 5Ts Initiative (Government of Odisha)

- Odisha's adoption of the '5T' agenda in healthcare exemplifies a commitment to efficiency and innovation. The state government's transformative measures, from upgrading health facilities to ensuring universal health coverage, showcase a pioneering approach.

- Through the seamless integration of technology, transparent governance, and a focus on timely service delivery, Odisha not only enhances the efficiency of its healthcare system but also sets a benchmark for innovative and accountable governance in public health.

9. **Civil Society Involvement in Healthcare:**

- IGD's approach is not an isolated triumph but represents IGD's dedication to a holistic model of care, incorporating data-driven decision-making, policy advocacy, and continuous evaluation. Through this lens, IGD emerges as a trailblazer in the field of value-based healthcare, setting a standard for development organizations.

- Youth for Social Development encourages civil society organizations to assess and address critical healthcare issues, support initiatives that provide valuable insights and policy recommendations, and recognize the vital role civil society organizations play in advancing public health and well-being.

10. **Atmiya University:**

- Atmiya University's commitment to ethical education is commendable. The university's emphasis on universal human values goes beyond academic excellence, shaping individuals with both skills and a strong moral compass.

- Value-based education lies at the core of Atmiya University's transformative approach, producing graduates ready to contribute positively to society. Atmiya University is paving the way for a future where individuals are not only proficient professionals but also dedicated to upholding enduring values in their endeavours.

- The academic and Research institutes like Atmiya University, through its various research and programmes, can help healthcare and other sectors to promote and ensure good governance and business integrity to mitigate corruption challenges through the following ways…

➢ Identify corruption challenges and provide solutions.
➢ Provide fact sheet/information to advocate with decision makers which can further help Govt develop relevant policies to mitigate/ eradicate corruption across the sectors.
➢ Help the business community create a culture of integrity through improved compliance and governance system.
➢ Develop policies for Govt to reduce/control corruption.

The best practices covered in this compendium will play a significant role in bettering the healthcare sector. Let this be a testament to the contributions made and work towards collective action against healthcare corruption.

Driving Force and support behind the development of the "Best Practice Compendium on Anti-Corruption for the Healthcare Sector in India"

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ABOUT UNGC

As a special initiative of the United Nations Secretary-General, the UN Global Compact (UNGC) is a call to companies worldwide to align their operations and strategies with the Ten Principles in the areas of "Human Rights, Labour, Environment, and Anti-Corruption. Our ambition is to accelerate and scale the global collective impact of business by upholding the Ten Principles and delivering the Sustainable Development Goals (SDGs) through accountable companies and ecosystems that enable change. With more than 18,000 companies and 3,800 non-business signatories based in over 101 countries, and 62 Local Networks, the UN Global Compact is the world's largest corporate sustainability Initiative - One Global Compact uniting business for the better world. (https://www.unglobalcompact.org/)

ABOUT GCNI

Global Compact Network India (GCNI), the Indian Local Network of the United Nations Global Compact (UNGC), New York is the first Local Network established with full legal recognition. As the UNGC's local arm, UN GCNI has been acting as a country-level platform in providing a robust platform for Indian businesses, academic institutions, and civil society organizations and encouraging them to join hands in strengthening responsible business practices. UNGC's Ten Principles in the areas of Human Rights, Labour, Environment, and Anti-corruption provide a common ethical and practical Framework for Corporate Responsibility - and the 17 'Sustainable Development Goals (SDGs)' adopted in September 2015, by all 195 Member States of the United Nations including India to end extreme poverty, fight inequality and injustice, and protect our planet. UN GCNI helps corporates/businesses, CSOs, and its other members from across the sectors to ensure and uphold ethical practices, transparency, Governance, and integrity in businesses. (https://globalcompact.in/).

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses.

Labour Standards

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labour;

Principle 5: The effective abolition of child labour; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Anti - Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

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