This material has been prepared for discussion purposes only. As such, the material should not be regarded as incorporating legal or investment advice or providing any recommendation regarding the suitability of the EPIHC for your purposes. Accordingly, please consult your own advisers before making any decision about whether to adopt or align with the EPIHC, or undertake any reporting or confirmation, as provided herein, and consistent with the fiduciary, contractual, and regulatory considerations that may apply from time to time. Furthermore, IFC has no liability to the party willing to adopt or align with the EPIHC or any other person for the oversight or implementation of Principles, and the interested party assumes full responsibility in respect of any action it takes or fails to take in reliance thereon. No third party may rely on or claim the benefit of any provision of the EPIHC. Conclusions expressed in this draft do not necessarily reflect the views of the Executive Directors of the World Bank Group or the governments they represent.
# Ethical Principles in Health Care (EPIHC)

## Context
IFC launched the Ethical Principles in Health Care (EPIHC) initiative due to the significance of ethical considerations in the provision of health care services, and the potential for significant contributions to access, quality and health outcomes through their broad application.

## Relevance
Health care providers operate in a highly complex, ever evolving, health care landscape: for a private health care provider, ethical and responsible conduct is not only important for global health goals and for public relations, it is also a necessary element of performance and risk management, critical for attracting patients, retaining the staff, and providing long-term stakeholder value.

## Approach
The approach to developing the EPIHC was targeted, broadly consultative and iterative, involving a diverse group of investors, providers, experts, and civil society stakeholders, through both individual and group- and event-based consultations, informing the content in aggregate without any individualized attributions.

## Adoption
Private health care providers and investors are encouraged to publicly adopt, support, and reference the EPIHC in their work, as well as to monitor the EPIHC usage and exchange good practices in their application. It is expected that private health care providers would voluntarily commit to follow the principles and that health care investors such as IFC would expect their health care investees to follow the principles.

## Implementation
Private health care organizations have a vital role to play in promoting high ethical standards in the health sector. IFC does not intend to formally monitor or enforce the application of EPIHC within organizations, but it has tools and resources available to assist organizations with the implementation of the EPIHC principles including, for example, IFC’s Hospital Quality Assessment tool.

## Ecosystem
The EPIHC are envisioned as a "living document" to be updated through adoption experiences, and as an element of the ecosystem of performance standards and guiding principles developed and promoted by the IFC, including the IFC’s Environmental and Social Performance Standards which define IFC clients’ responsibilities for managing their environmental and social risk.
The 10 Principles: Our Shared Values and Beliefs

EPIHC1 Respecting Laws and Regulations

EPIHC2 Making a Positive Contribution to the Society

EPIHC3 Promoting High Quality Standards

EPIHC4 Conducting Business Matters Responsibly

EPIHC5 Respecting the Environment

EPIHC6 Upholding Patients' Rights

EPIHC7 Safeguarding Information and Using Data Responsibly

EPIHC8 Preventing Discrimination, Harassment and Bullying

EPIHC9 Protecting and Empowering Staff

EPIHC10 Supporting Ethical Practices and Preventing Harm
Early Adopters
External Consultations

1. Constituency/Event Consultations

- The World Economic Forum Health and Healthcare Industry Strategy Officers Meeting, Washington, D.C., October 2018
- The WISH Investors Meeting, Doha, November 2018
- The World Economic Forum Industry Governor Policy Meeting for Health, Davos, January 2019
- UHC2030 Private Sector Constituency with WHO and the WEF, March 2019
- [UHC2030 Civil Society Constituency, March 2019]
- [EPIHC Survey of the IFC 9th Global Private Health Conference attendees]
- IFC 9th Global Private Health Conference Consultation Draft and Early Adopters Event, Miami, March 2019

2. Experts and Civil Society

- Don Berwick, Institute for Healthcare Improvement
- Katie Malouf Bous and Jessica Hamer, Oxfam
- Dessi Dimitrova, the World Economic Forum
- Kieran Jordan, Health Standards Organization
- Gina Lagomarsino, R&D
- Michael Reich, Harvard T.H. Chan School of Public Health
- Simon Wright, Save the Children

3. Providers and Investors

- Anjali Ajaikumar, HCG
- Naoki Aoyami, Mitsui
- Ayodele Benson Cole, Echo-Lily and Healthcare Federation of Nigeria
- Dr. Olujimi Coker, Hygeia
- Arvan Chan, Centene
- David Easton, CDC Group
- Engr. Sobhi Batterjee, Saudi German Hospitals
- Trevor Gunn, Medtronic
- Antonio Vaninho, Rede Impar
- Dr. Gregg Meyer, Partners Healthcare System
- Paolo Moll, Rede D’Or
- Audrey Obara, Swedfund
- Arjan Poels, Medical Credit Fund, PharmAccess
- Sangita Reddy, Apollo Hospitals
- Pavel Roytberg, Medicina
- Thomas Schumacher and Trevor Gunn, Medtronic
- Isabel Thywissen, DEG
- Dr. Amit Varma, Quadria Capital
- Tom Verghese, TPG-Rise
- Erica Young, Fullerton Health
- Dr. Hazem ZagZoug, Andalusia for Medical Services
- Nikoloz Gamkrelidze, Georgia Health Group
EPIHC 1: Respecting Laws and Regulations

The organization conducts its business legally and responsibly. It ensures that all the staff understand and respect the laws, regulations, policies and standards that affect its business.

CONTEXT:
In most countries health care is a highly regulated sector. Often complex rules apply to aspects such as: facility layout and design, equipment requirements, service provision, employment of health care professionals, pricing, and ownership. However, in some countries such requirements can be vague, outdated, or even contradict each other. Furthermore, in many locations, particularly in poorer countries, enforcement of regulations is weak. As a result some organizations may ignore the law.

IMPORTANCE:
Organizations that break the law risk: incurring legal penalties, which may involve fines or imprisonment; breaking international anti-bribery rules that can apply worldwide; opening themselves to requests for bribes from local officials; damaging their reputation, and that of their investors and partners.

GOOD PRACTICES:
• Understand the laws, regulations, policies and standards that affect the business
• Follow applicable laws, regulations, policies and standards, wherever operating
• Train staff in these laws, regulations, policies and standards
• Display licenses publicly and prominently

PRACTICES TO AVOID:
• Using personal contacts and relationships with local officials to gain advantage, including non-compliance
• Paying bribes to avoid penalties
• Turning a blind eye to infringements
The organization considers its impact on society and the broader health system when planning and delivering services, including considerations of quality, efficiency, access, and affordability. It does not knowingly engage in activities that undermine the goals of the health system or the overall health and wellbeing of the population. It initiates and sustains strong and effective partnerships within the communities it serves and with other actors in the broader health system. This includes actively engaging with stakeholders on efforts to improve access to affordable care and to advance health for all.

CONTEXT:
Private health care providers are an essential component in the delivery of health services in most countries. Therefore they have the potential to make a significant impact on the communities and broader society.

IMPORTANCE:
Realizing health care goals, including universal health coverage, is unlikely to be achieved without leveraging private sector capacity, investment and innovation. Health care providers’ long term success relies on building trust and strong relationships within the communities they serve.

GOOD PRACTICES:
- Understand local health care policies and priorities, as well as the broader goals of the health system
- Support senior staff to initiate, promote, facilitate and monitor effective and sustainable partnerships between the organization and community partners
- Plan services with recognized leaders in the community and other health care organizations
- Develop a Disaster Preparedness Plan (or similar) to respond to likely local emergencies, epidemics, and natural or other disasters that have the potential of occurring within the community
- When recruiting, be mindful of the staffing needs of other local health care organizations (including in government and not-for-profit sectors)
- Support local community health initiatives

PRACTICES TO AVOID:
- Developing services in isolation from local health care organizations, including government policy
- Working “around” policy, legislation and regulation
EPIHC 3: Promoting High Quality Standards

The organization provides the highest possible quality of care, including patient safety. This includes implementing formal processes for continuous quality improvement. It refers to evidence-based internationally recognized practices to support patient care. It makes treatment and care decisions based on the best quality outcome for the patient.

CONTEXT:

There is increasing evidence that poor quality health care is an important cause of mortality and morbidity, especially in lower resource settings. The 2018 Lancet Commission on High-quality health systems in the Sustainable Development Goals Era found that providing health services without guaranteeing a minimum level of quality is ineffective, wasteful, and unethical.

IMPORTANCE:

Quality Improvement is an essential aspect of risk management. The reputation of a health care organization is critical in helping to attract patients. Increasing regulation and the development of private and social health insurance in many markets is also placing a greater emphasis on defined quality standards. Quality Improvement can be linked to performance improvement. IFC’s experience confirms that improving quality through the application of process standardization can also support cost management. From a commercial perspective, all of these outcomes can translate into financial dividends.

GOOD PRACTICES:

• Implement formal policies and procedures to support improvements in quality including:
  • International Patient Safety Goals
  • Ethics, Patient and Family Rights
  • Medication Management and Use
  • Quality Measurement and Improvement
  • Patient Safety
  • Prevention and Control of Infections
  • Governance, Leadership and Direction
  • Facility Management and Safety
  • Staff Qualifications and Education

• Follow evidence-based internationally recognized practices to support patient care
• Implement procedures to prevent over-treatment, under-treatment and inappropriate treatment, including consideration of appropriate staff incentives
The organization accurately and honestly represents and explains the services that it provides. It does not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, or misrepresentation of facts. It acts honestly and does not engage in any activity intended to defraud any individual or organization of money, property, or their time. It avoids conflicts of interest. It enacts policies and practices to fight bribery and corruption. It deals sensitively and humanely with patients who do not have sufficient funds for treatment.

CONTEXT:

The health care sector is regularly cited as a high-risk sector for corruption. Effects include distorted policy, legislative and clinical priorities; a loss of money from health systems; denied or delayed access to health care services; and a loss of trust in health facilities, personnel and to a wider extent national governance as a whole. Individuals in the health care sector do not always understand what corruption is and how it might undermine their work.

IMPORTANCE:

Conducting business matters responsibly, preventing abuse and reducing corruption is important to increase resources available for health, to make more efficient use of existing resources and, ultimately, to improve the general health status of the population.

GOOD PRACTICES:

• Ensure that services provided are represented accurately and honestly.
• Ensure that business relationships are conducted appropriately
• Ensure that all purchases of services and supplies are from qualified and reliable sources and are based upon objective factors
• Act honestly and responsibly, avoiding conflicts of interest and dealing with perceived conflicts of interest with transparency and sensitivity.
• Enact policies and practices to fight bribery and corruption.
• Implement policies and procedures to deal sensitively and humanely with patients who do not have sufficient funds for treatment.

PRACTICES TO AVOID:

Misrepresentation of Services
• Taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, or misrepresentation of facts
• Engaging in any activity intended to defraud any individual or organization of money, property or honest services
• Conflicts of interest
The organization works in ways that minimize negative impact on the environment, including making efforts to conserve energy and reduce waste. All waste, including biomedical waste, is collected, stored and disposed of in a safe and environmentally responsible manner.

**CONTEXT:**
As a sector, hospitals and health care facilities account for a disproportionate amount of energy use and emissions. Many health care facilities store hazardous materials which are potentially highly dangerous to patients, staff, and the environment; often in the weak regulatory contexts.

**IMPORTANCE:**
Environment, including climate change, and health are interconnected.

**GOOD PRACTICES:**
- Work in ways that minimize the negative impact or have a positive impact on the environment
- Look for opportunities to conserve energy and resources, minimize pollution, and reduce waste
- Segregate and properly dispose of waste-water
- Raise awareness of the risks related to health care waste, and of safe practices
- Promote practices that reduce the volume of wastes generated
- Implement a Hazardous Materials Management Program (or similar)
- Select safe and environmentally-friendly management options to protect people from hazards when collecting, handling, storing, transporting, treating or disposing of waste
- Where feasible, promote safe and environmentally sound technologies for treatment of hazardous health care waste
- Take steps to minimize greenhouse gas emissions

**PRACTICES TO AVOID:**
- Storing infectious and biomedical waste in corridors and stairwells
- Disposing of bio-medical waste along with general waste
- Outsourcing waste disposal to unvetted waste disposal organizations
The organization provides care respectful of patients’ personal values and beliefs. It respects patients’ rights to dignity, privacy and confidentiality. It supports patients’ rights during the care process, including informed consent and the right to refuse treatment. It implements mechanisms to oversee research activities. Any person enrolled in clinical research is fully informed of the risks and benefits, and their right to refuse to participate or drop out without risk of reprisal. All are informed about their rights and responsibilities in a manner and language they can understand.

CONTEXT:
Effective protection of patients’ rights could be lacking in many settings. The staff may be unaware of such terms or the conduct expected from them. Health care organizations frequently serve communities with diverse populations and diverse needs. Informed consent and the processes around need to be in place.

IMPORTANCE:
Sound ethical values and respect for the rights of patients and their families are crucial to ethical health care organizations.

GOOD PRACTICES:
Rights of Patients and Families
• Implement processes that support patients’ and families’ rights during care
• Inform patients about all aspects of their medical care and treatment
• Promote participative decision-making around treatment options
• Inform of the right to complain or disagree with care provision
• Provide care that is respectful to patients’ personal values and beliefs
• Respect patients’ rights to privacy and confidentiality of care and information
• Protect patients from harm, and their possessions from theft and loss
• Take measures to reduce physical, language, cultural, and other barriers to access and delivery of services
• Support patients’ rights to assessment and management of pain and respectful compassionate care at the end of life
• Provide information about rights in a manner and language that patients can understand

Informed Consent
• Establish a process to obtain informed consent and train the staff
• Establish a process for patients’ representatives to grant consent

Research
• Implement mechanisms to oversee research activities
• Inform participants of the risks and benefits, and their right to refuse to participate or drop out without risk of reprisal
The organization maintains appropriate administrative, technical and physical safeguards to ensure that information is kept secure, accurate, complete, untampered with, and not available to persons not authorized to have access. It follows appropriate data standards, including in consideration of new and evolving technologies. It maintains confidentiality subject to highest standards, including: data minimization and retention; use for research only on a disclosed and de-identified basis; and transfer or disclosure as necessary for certain public health and claims processing purposes. Patients have the right to obtain, review and correct their health records information.

**CONTEXT:**
Information is key to the business of every health care organization. They are trusted to keep it safe and secure. Technology advancements and use of technology in health care is opening new areas to address and regulate.

**IMPORTANCE:**
Health care organizations usually hold information about patients, customers, staff and suppliers. Considering the sensitive nature of much of this data, it is vital to have a robust and reliable system of information security in place.

**GOOD PRACTICES:**

- Maintain appropriate administrative, technical and physical safeguards to ensure that:
  - That organizational records, documents and reports are kept accurate, complete, and untampered with, whether physical or digital/electronic
  - Medical information is kept confidential
  - Information is protected from loss or misuse
  - Confidentiality of patients and staff data, and other confidential information, meets the applicable legal and ethical standards
- Train staff not to discuss patients’ conditions in public areas
- Ensure data is not sold or monetized without the consent of those contributing to the data, including patient and providers, such that:
  - Explicit written consent is freely given, specific, informed, and unambiguous indication of an individual’s wishes
  - Consent is obtained in a manner distinguishable from other issues, in an easily accessible form and using clear and plain language, and individuals are able to withdraw their consent easily
  - The provision of health services is not conditional on this consent
EPIHC 8: Preventing Discrimination, Harassment, and Bullying

CONTEXT:

Discrimination is behavior that excludes individuals or treats them unfairly because they are members of specific groups. Harassment is any physical or verbal behavior that's not respectful or creates a frightening, humiliating or uncomfortable environment. Bullying (or intimidation) is mean, rude or insulting behavior towards another person that will cause them upset, discomfort or humiliation.

IMPORTANCE:

In addition to being unethical and unacceptable, such behaviors can undermine the operational dynamics of the organizations and have detrimental impact on quality.

GOOD PRACTICES:

• Implement and enforce zero-tolerance policies regarding violence, discrimination, bullying and harassment; including that directed by patients to the staff or staff to patients; between the staff or involving other participants in the health care process
• Promote a positive and respectful environment for everyone including: patients, visitors, staff, volunteers, physicians, students, contract workers
• Welcome people from different backgrounds
• Encourage different perspectives
• Minimize physical, language, cultural, and other barriers of access to services
• Promote a disability-inclusive environment
• Understand the importance of making sure that the workforce represents the communities and the customers served
• Implement dispute resolution and grievance procedures
• Train staff in the applicable policies

The organization promotes a positive and respectful environment for everyone, including patients, visitors, employees, volunteers, physicians, students and contract workers. The organization does not tolerate any form of discrimination, bullying or harassment.
The organization promotes a safe working environment. It makes sure that all staff have the training and tools they need to do their jobs safely. It does not tolerate any type of violence in the workplace or at work-related activities. It ensures that all staff are equipped with the knowledge, qualifications, skills and experience required to meet patients’ and customers’ needs, as well as the standards of applicable professional associations.

**CONTEXT:**
Health care is a staff-intensive sector, and commonly involves people from multiple professional groups and diverse backgrounds working together.

**IMPORTANCE:**
Staff skills and qualifications are key factors influencing service quality.

**GOOD PRACTICES:**

**Training and development**
- Plan staff numbers and qualifications to meet the needs of patients
- Ensure job descriptions define the requirements for all staff members
- Ensure that the staff knowledge and skills are consistent with the requirements of their positions
- Orient the new staff to the organization, department, and job responsibilities
- Provide each staff member with ongoing education and training
- Ensure fair employment practices
- Provide staff with the knowledge, qualifications, skills and experience required to meet patients’ and customers’ needs, as well as the standards of their professional bodies

**Staff safety**
- Actively promote a safe working environment and a culture of zero-harm
- Implement health and safety policies and procedures and make sure that all staff have the training and tools they need to do their jobs safely
- Abide by all laws and regulations regarding occupational safety

**Conflict resolution**
- Implement dispute resolution and grievance procedures
- Ensure whistleblower protections
- Implement adequate disciplinary measures in cases of misconduct, including for those involved in misconduct or those making wrongful accusations
EPIHC 10: Supporting Ethical Practices and Preventing Harm

The organization develops formal policies and procedures for areas with ethical concerns, considering accepted international norms in doing so. Staff are trained in these concerns and how to address them. In addition to activities proscribed by local laws and regulations, the organization does not participate in or condone harmful practices.

**CONTEXT:**
The practice of health care encompasses complex issues, medical, ethical and legal.

**IMPORTANCE:**
At a minimum, organizations follow local laws and regulations. However, organizations must have ways to address and support their staff in addressing ethical issues, particularly where these are not clearly covered by legislation.

**GOOD PRACTICES:**
- Address ethical concerns by formally developing policies, processes and governance using international standards and accepted international norms
- Inform patients of these policies, processes and governance, particularly around critical areas of ethical concerns; establish a mechanism to receive and address concerns
- Inform and train the staff in applicable policies, processes, procedures and governance
- Establish an ethics committee (or similar) to offer advice where necessary; include independent external representation
- Proactively address critical areas of ethical concerns, e.g., ethical concerns related to organ and tissue donation and transplantation
- Proscribe, do not condone, and do not participate in harmful practices
RESOURCES
World Bank and IFC Resources

- IFC Engagements in Health Care | www.ifc.org/health
- IFC Health Publications
- IFC’s IQ-Healthcare Tool | www.ifc.org/iqhealth

- Health Home - World Bank Group
- Business Unusual: Accelerating Progress Towards Universal Health Coverage

- IFC Sustainability Framework
- IFC Sustainability Policy
- IFC Environmental and Social Performance Standards
- IFC Environmental, Health, and Safety Guidelines
- IFC Environmental and Social Management System
- IFC Environmental and Social Review Procedures Manual

- IFC Access to Information Policy
- IFC Corporate Governance Methodology
- IFC Corporate Governance Development Framework
- IFC Environmental and Social Categorization
- IFC Good Practice Note: Non-Discrimination and Equal Opportunity
- Addressing Domestic Violence in the Workplace
- Operating Principles for Impact Management
- IFC Fintech
External Resources (1/5)

MAKING A POSITIVE CONTRIBUTION TO SOCIETY

WHO: Key Components of a Well-functioning Health System
https://www.who.int/healthsystems/publications/hss_key/en/

Declaration of Alma-Ata International Conference on Primary Health Care, Alma-Ata, USSR, 1978
https://www.who.int/publications/almaata_declaration_en.pdf

The "Tavistock Principles": A shared statement of ethical principles for those who shape and give health care

OECD, New Health Technologies: Managing Access, Value and Sustainability

UHC Global Compact 2030, Commitment to take action for universal health coverage

WHO, Coalition for Epidemic Preparedness Innovations (CEPI)
PROVIDING HIGH QUALITY STANDARDS

WHO Patient Safety Guidance
www.who.int/patientsafety

US Institute for Healthcare Improvement
www.ihi.org

UK National Institute for Health and Care Excellence (NICE)
www.nice.org.uk/

Cochrane Library
www.cochranelibrary.com/

International Society for Quality in Health Care (ISQua)
www.isqua.org

US National Academies, Crossing the Global Quality Chasm – Improving Health Care Worldwide

Michael Marmot, The Health Gap - The Challenge of an Unequal World
https://www.bloomsbury.com/uk/the-health-gap-9781408857991/
UPHOLDING PATIENTS' RIGHTS

World Medical Association Declaration of Helsinki – Ethical Principles for Medical Research involving Human Subjects

https://www.wma.net/policies-post/wma-declaration-of-helsinki-ethical-principles-for-medical-research-involving-human-subjects/

The Tavistock Principles

https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1121187/

http://www.gp-training.net/training/tutorials/professional_development/ethics/tavistock.htm

CONDUCTING BUSINESS MATTERS ETHICALLY

Transparency International: Pharmaceuticals and Healthcare Programme

www.transparency.org.uk/our-work/pharmaceuticals-healthcare-programme

RESPECTING THE ENVIRONMENT

IFC Environmental and Social Management System (ESMS) Implementation Handbook – Healthcare Facilities

www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_handbook_esms-healthcarefacilities

WHO, Safe Management for Wastes from Healthcare Activities

www.who.int/water_sanitation_health/publications/wastemanag/en/
**PREVENTING DISCRIMINATION, HARASSMENT AND BULLYING**

IFC Good Practice Note: Non-Discrimination and Equal Opportunity


IFC. Addressing Domestic Violence in the Workplace: A Win-win for Companies and Employees


UN Standards of Conduct for Business: Tackling Discrimination against Lesbian, Gay, Bi, Trans, & Intersex People

[https://www.unfe.org/Standards/](https://www.unfe.org/Standards/)

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**PROTECTING INFORMATION**

Privacy by Design - The 7 Foundational Principles, Ann Cavoukian, Ph.D

[https://www.ipc.on.ca/wp-content/uploads/Resources/7foundationalprinciples.pdf](https://www.ipc.on.ca/wp-content/uploads/Resources/7foundationalprinciples.pdf)


Big Data, Health Law, and Bioethics, I. Glenn Cohen


UN Secretary-Generals' High-level Panel on Digital Cooperation

ADDRESSING ETHICAL CONCERNS

WHO Guiding Principles on Human Cell, Tissue and Organ Transplantation
https://www.who.int/transplantation/en/

American College of Physicians, Ethics and Professionalism
https://www.acponline.org/clinical-information/ethics-and-professionalism

World Medical Association Statement on Organ and Tissue Donation
www.wma.net/policies-post/wma-statement-on-organ-and-tissue-donation/

WHO, Global Health Ethics, Organ and tissue donation
www.who.int/ethics/topics/human-transplant/en/

WHO, Global strategy to stop health-care providers from performing female genital mutilation
www.who.int/reproductivehealth/publications/fgm/rhr_10_9/en/

WHO, Preventing gender-biased sex selection
www.who.int/reproductivehealth/publications/gender_rights/9789241501460/en/