

13-14 MAY 2026 | SANDTON

FWAE Charter

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Outline

- Background
- Historical context and objectives
- Section 59 context
- Recommitment
- Key amendments
- Conclusion

Background

- USD 442 billion → Estimated global losses from organised fraud and scams annually
- Fraud now ranks among the top global organised crime threats, alongside drug trafficking and money laundering
- Healthcare is a **high-value, high-complexity target** for organised fraud due to large financial flows, fragmented systems, and multiple payers.
- **Key Shift for Healthcare**
 - From **isolated fraud control** → to a **coordinated, intelligence-driven healthcare fraud ecosystem response**

United Nations Office on Drugs and Crime. (n.d.). Global Fraud Summit. <https://www.unodc.org/unodc/en/organized-crime/global-fraud-summit/>

Global commitment

- Establishment of a **shared global anti-fraud cooperation framework**
- Alignment on:
 - Common definitions of fraud typologies
 - Standardised reporting and escalation protocols
 - Shared accountability mechanisms across jurisdictions

United Nations Office on Drugs and Crime. (n.d.). Global Fraud Summit. <https://www.unodc.org/unodc/en/organized-crime/global-fraud-summit/>

Origin of the Charter

- 2019 FWA Summit – Council for Medical Schemes
- Brought regulators, funders, providers, administrators together
- Responded to system inefficiencies and integrity risks
- Led to development of Industry Charter

FWAE Charter – Key Objectives



Section 59 Context

- Highlighted tensions in regulatory enforcement
- Concerns around fairness and due process
- Administrative burden on providers
- Need for balanced adjudication mechanisms

Section 59 Context: Charter Objective #2

Emerging Priorities

- Transparency in claims and decisions
- Algorithm and automation governance
- Mediation and dispute resolution
- Stakeholder engagement strengthening

Shared Accountability

- Sustainability requires collective responsibility
- Providers, schemes, administrators, regulators, beneficiaries, and other stakeholders
- System-wide alignment is critical
- Trust-building across the ecosystem

Why recommitment to the Charter Matters?

- Healthcare fraud, waste and abuse affect everyone
- Members face rising healthcare costs
- Providers experience strained relationships and administrative burdens
- The Charter promotes fairness, accountability and collaboration

Voluntary - Non-binding Nature

Weak Enforcement Power

Uneven Implementation

Binding to signatories

Key proposed amendments

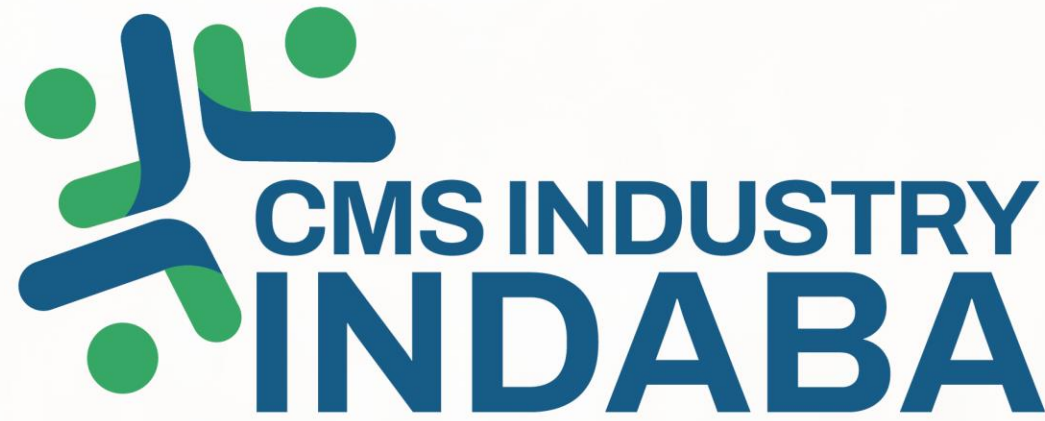
- Distinguish Fraud, Waste, Abuse and Error through revised definitions.
- Replace the term “Parties” with “**Stakeholders**” throughout the Charter.
- Include an objective promoting the highest ethical standards in conducting business activities.
- Clarify that the Charter applies to the prevention, detection, investigation, and prosecution of healthcare FWAE.
- Cross-reference the Charter to the FWAE Tribunal Rules for dispute resolution.

Other amendments

- Professional Associations to support schemes and administrators through evidence-based clinical guidance and benchmarking.
- Strengthen the role of Professional Societies and Associations in communicating FWAE concerns and securing provider buy-in.
- Include the Twin Peaks/Financial Sector Regulation (FSR) Act within the legislative framework.
- Add the National Treasury, Prudential Authority and FSCA as key stakeholders.

Conclusion

- Strengthen industry collaboration to combat fraud, waste, abuse, and error.
- Align with legislative updates, including the recent policy reforms.
- Improve transparency in fraud detection, recoveries (clawbacks), and claims validation processes.
- Enhance the enforceability of the Industry Charter and its dispute resolution mechanisms.



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Thank you!

