

Accountable Officer – Statement on Bribery

Gloucestershire Clinical Commissioning Group (GCCG) is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the CCG's behalf is responsible for maintaining the organisation's reputation and for conducting the CCG's business honestly and professionally.

GCCG considers that bribery and corruption has a detrimental impact on the CCG's business by undermining good governance. We benefit from carrying out our functions in a transparent and ethical way and thereby helping to ensure that there is honest, open and fair competition in the NHS. Where there is a level playing field, GCCG can lead by example and deliver excellent services to our patients.

Transparent, fair conduct helps to foster deeper relationships of trust between GCCG and our partners. It is vital for our reputation and continued sustainability. The CCG does not tolerate any form of bribery, whether direct or indirect, by, or of, its staff, agents or consultants or any persons or entities acting for it or on its behalf. The Governing Body and senior management are committed to implementing and enforcing effective systems throughout the CCG to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

The CCG has developed and regularly reviews key policies outlining our position on preventing and prohibiting fraud and bribery, promoting the highest standards of business conduct, and managing conflicts of interest. These policies include the Counter Fraud policy, Standards of Business Conduct policy, and the Whistleblowing policy. These policies, which are available on the CCG's intranet, apply to all employees, as well as temporary and agency workers, management consultants and contractors acting for or on behalf of the CCG. All employees and other individuals acting for the CCG are required to familiarise themselves with the CCG's policies and comply with any amendments with immediate effect.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly. Bribery does not have to involve cash or an actual payment exchanging hands and can take many forms such as a gift, lavish treatment during a business trip or tickets to an event. Employees and others acting for or on behalf of the organisation are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, the organisation is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must only be offered or accepted in accordance with the procedures set out in the organisation's policies. A breach of the organisation's Standards of Business Conduct policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for the organisation should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

GCCG will not conduct business with service providers, agents or representatives that do not support the organisation's anti-bribery objectives. We reserve the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, the organisation with immediate effect where there is evidence that they have committed acts of bribery.

The success of the organisation's anti-bribery measures depends on all employees, and those acting for the organisation, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, the organisation are encouraged to report any suspected bribery. Employees are encouraged to use internal

reporting procedures as set out in the Whistleblowing policy and the Counter Fraud policy. The CCG will support any individuals who make such a report, provided that it is made in good faith.

However, employees can also report their concerns externally as an alternative to internal reporting procedures if they wish to remain anonymous to The Local Counter Fraud Service on fraud.account@glos.nhs.uk or call 01452 318 842/826; <http://www.gloshospitals.nhs.uk/en/Wards-and-Departments/Other-Departments/Counter-Fraud-Service/Contact-Us/> or via

The NHS Fraud and Corruption Reporting Line on Freephone 0800 028 40 60 or by filling in an online form at www.reportnhsfraud.nhs.uk

This provides an easily accessible route for the reporting of genuine suspicions of fraud / bribery within or affecting the NHS. All calls are dealt with by experienced caller handlers.