

**THE BRIBERY ACT 2010**

**ANTI-BRIBERY STATEMENT OF NORTH EAST LINCOLNSHIRE CLINICAL**

**COMMISSIONING GROUP (The CCG Board’s Anti-Bribery Statement)**

North East Lincolnshire Clinical Commissioning Group (The CCG) recognises that bribery is a hugely damaging practice that undermines the reputation of public and private bodies involved. This statement demonstrates the CCG’s commitment to preventing bribery. The CCG welcomes the Bribery Act 2010 (the Act) and it is the policy of the CCG is to act with integrity and to seek to prevent bribery and corruption.

The CCG will implement and enforce effective systems to counter bribery as set out in the CCG’s Counter Fraud, Bribery and Corruption policy that sets out the CCG’s procedures designed to prevent all persons associated with the CCG undertaking acts of bribery or corruption.

The CCG will uphold all laws relevant to countering bribery and corruption including those under the Bribery Act 2010 in respect of every aspect of the CCG’s business. Bribery and corruption under the Act are punishable for individuals by up to ten years' imprisonment and if the CCG is found to have taken part in corruption the CCG could face an unlimited fine and face incalculable damage to its reputation. The CCG therefore takes its legal responsibilities very seriously.

Any act of bribery undertaken by a member, or an employee of the CCG will result in disciplinary action and will be treated extremely seriously by the CCG’s Board.

The CCG’s Board recognise that a zero-tolerance approach towards bribery demonstrates that the CCG has a reputation for honest and ethical practice and instils confidence in our patients and wider public that the CCG is governed by these principles.

One of the six principles of the Act is that there is top level commitment in the organisation to

the prevention of bribery. The Board of Directors at North East Lincolnshire Clinical Commissioning Group are committed to this and will discuss the Act at its Board meetings, to agree ways to communicate the importance of transparency and openness at all times.

A Board member has been identified as the lead person in the organisation for the prevention of bribery.

As an NHS organisation, the CCG follows good NHS Business Practice and has robust controls in place to prevent bribery. The CCG will work closely with the NHS Counter Fraud Authority, to investigate thoroughly if any claims of bribery or corruption are made. The CCG has reviewed its policies and procedures in the light of the Act to ensure organisational compliance.

On behalf of the CCG I confirm our commitment to ensuring that all staff are aware of their responsibilities in relation to the prevention of Bribery.

For further information see [http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-](http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf) [guidance.pdf](http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf)

Dr Peter Melton Clinical Chief Officer

To read more about how the CCG tackles fraud click [here](https://www.northeastlincolnshireccg.nhs.uk/about-us/countering-fraud-in-the-nhs/)

*Delivering joined up solutions*