

THE BRIBERY ACT 2010

ANTI-BRIBERY STATEMENT OF NORTH EAST LINCOLNSHIRE CLINICAL COMMISSIONING GROUP (The Trust Board's Anti-Bribery Statement)

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

The Trust will implement and enforce effective systems to counter bribery and has created a Bribery Prevention policy that sets out the Trust's procedures designed to prevent all persons associated with the Trust undertaking acts of bribery or corruption.

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

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

The Trust's Board recognise that a zero tolerance approach towards bribery demonstrates that the Trust has a reputation for honest and ethical practice, and instils confidence in our patients and wider public that the Trust 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 Trust follows good NHS Business Practice and has robust controls in place to prevent bribery. The Trust will work closely with the NHS Counter Fraud Authority, to investigate thoroughly if any claims of bribery or corruption are made. The Trust has reviewed its policies and procedures in the light of the Act to ensure organisational compliance.

On behalf of the Trust 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-guidance.pdf>



Dr Peter Melton
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Delivering joined up solutions

