

Clinical Chief Accountable Officer, and Chief Finance Officer Statement

Bribery Act 2010 & NHS St Helens CCG Anti-Bribery Strategy

On 1st July 2011 the Bribery Act 2010 came into force, reforming the criminal law of bribery and corruption making it easier to tackle these offences proactively. It created specific criminal offences which carry custodial sentences of up to 10 years and potentially unlimited fines. It also introduced a corporate offence which means that if NHS St Helens Clinical Commissioning Group (CCG) is exposed to criminal liability, it is punishable by an unlimited fine, for failing to prevent bribery.

Bribery may be considered to be: **an inducement or reward offered, promised or provided to someone to perform their functions or activities improperly in order to gain a personal, commercial, regulatory and/or contractual advantage.**

Bribery is a criminal offence. NHS St Helens CCG does not, and will not, pay bribes or offer improper inducements to anyone for any purpose; nor do we, or will we, accept bribes or improper inducements. This approach applies to everyone who works for us, or with us. To use a third party as a conduit to channel bribes to others is a criminal offence. We do not, and will not, engage indirectly in, or otherwise encourage, bribery.

We are as committed to the prevention, deterrence and detection of bribery just as we are to combatting fraud in the NHS. As an organisation, we have a zero-tolerance attitude towards bribery and we aim to maintain anti-bribery compliance as "business as usual", rather than as a one-off exercise.

To this end, everyone associated with the CCG is expected to play their part. The CCG has adopted and implemented a corporate Anti-Bribery Strategy.

Reporting Concerns

If you have any concerns or suspicions regarding bribery, corruption or fraud, please contact:

- The CCG's Anti-Fraud Specialist, Virginia Martin, telephone 0151 285 4500
- The CCG's Chief Finance Officer, Paul Brickwood
- NHS Fraud & Corruption Reporting Line, telephone 0800 028 40 60
- Online: <http://www.reportnhsfraud.nhs.uk/>