

## Statement in support of Anti-Bribery and Corruption in line with The Bribery Act 2010 (“The Act”)

### Introduction

The Bribery Act 2010, effective from 1<sup>st</sup> July 2011, has been introduced to make it easier to tackle the issue of bribery. Bribery can be defined as;

*‘Giving someone a financial or other advantage to encourage them to perform their functions or activities improperly or reward them for having done so, for example, payment to manipulate a procurement process’*

The Christie NHS Foundation Trust is committed to supporting anti-bribery and corruption initiatives and recognises the importance of ensuring that there are appropriate policies and procedures in place to ensure that all staff are aware of their responsibilities.

The Christie NHS Foundation Trust 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.

The Act introduces a corporate offence of failing to prevent bribery by the organisation not having adequate preventative procedures in place (“the section 7 offence”). We are as committed to the prevention, deterrence and detection of bribery just as we are to combating 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 Trust is expected to play their part. The Trust has adopted and implemented a corporate anti-bribery strategy (from July 2011).

### Existing arrangements

The Christie NHS Foundation Trust already has a number of policies and procedures in place, including:

- Risk assessments to identify high risk areas
- Senior staff responsibility
- Requirement for all staff to adhere to the codes of conduct and good governance as follows; [Anti Fraud, Bribery and Corruption Policy](#), [Code of Conduct \(Management of Conflicts of Interest\) 2017](#), The Code of Conduct for NHS Managers (2002); Standards of Business Conduct for NHS Staff (1993); The NHS Foundation Trust Code of Governance (2006)
- Requirement for staff not to accept gifts and/or hospitality that will compromise them or the organisation and to complete the Gift and Hospitality register [Gifts & Hospitality register](#)
- Requirement for staff to complete the Declaration of Interests Register where there is a potential to result in a conflict of interest.
- Staff induction contains information on The Act as does the essential counter fraud training given to all staff every 3 years.
- Whistleblowing policy (see policies & guidelines on the intranet)
- Supplier contracts / tenders updated in line with the Act.

In addition, there are a number of routes through which staff can raise any concerns or suspicions:

- Via your line manager
- Our Local Counter Fraud Specialist on 0151 285 4500
- NHS Fraud and Corruption Reporting Line 0800 028 40 60 or
- Online fraud reporting form at [www.reportnhsfraud.nhs.uk](http://www.reportnhsfraud.nhs.uk).

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