

Statement from the Chief Executive and the Director of Finance

Bribery Act 2010 and Trust Anti-Bribery Strategy

On the 1st of 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 creates specific criminal offences which carry custodial sentences of up to 10 years and potentially unlimited fines. It also introduces a corporate offence which means that if Bridgewater Community Healthcare NHS Foundation Trust [‘the Trust’] 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. The 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.

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. The Trust will seek the most stringent sanctions available against anyone seeking to commit bribery.

To this end, everyone associated with the Trust is expected to play their part. The Trust has adopted a corporate Anti-Bribery Strategy since July 2011 and has suitable measures in place to combat bribery.

To find out more about the Bribery Act 2010 and how it might affect your department or area of responsibility, please contact the director of corporate governance, Jan McCartney - jan.mccartney@nhs.net.

Signed:



Colin Scales, Chief Executive

Signed:



Nick Gallagher, Director of Finance

Reporting Concerns

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

- Linda Daisley, Anti-Fraud Specialist
Email - linda.daisley@miaa.nhs.uk
- Nick Gallagher, Director of Finance
Email - nick.gallagher@nhs.net
- NHS Fraud and Corruption Reporting Line
Tel - 0800 028 40 60 (freephone)
- NHS Fraud & Corruption Online Reporting Form
<https://cfa.nhs.uk/reportfraud>