

**NHS CAMBRIDGESHIRE AND PETERBOROUGH
CLINICAL COMMISSIONING GROUP – Annex B**

TOP LEVEL COMMITMENT STATEMENT – THE BRIBERY ACT 2010

Bribery may be considered as:

An inducement or reward offered, promised or provided to someone to perform their function of activities improperly in order to gain a personal, commercial, regulatory and/or contractual advantage.

The NHS takes bribery very seriously. It is a crime and Cambridgeshire and Peterborough CCG does not, and will not, pay bribes or offer improper inducements to anyone for any purpose. Nor do we accept bribes or improper inducements. This applies to everyone who works for us or with us, including third parties who carry out work on our behalf.

The Bribery Act 2010 came into force during 2011 and creates specific criminal offences which carry custodial sentences of up to ten years and potentially unlimited fines. The CCG in conjunction with NHS Protect, will seek to obtain the strongest penalties – including criminal prosecution, as well as disciplinary and civil sanctions against anyone associated with the CCG who is found to be involved in any bribery.

We are committed to anti-Bribery and as an organisation will expect everyone to play their part. The strategy includes the following measures:

- Governing Body-level commitment to ensuring a zero-tolerance culture toward bribery,
- Risk-assessing those areas of the organisation which may be most vulnerable to the threat of bribery,
- Ensuring that all policies, protocols, procedures and core documentation (including contract, documentation) are in place to prevent and mitigate the bribery risk,
- Communicating internally to staff and member practices and externally to suppliers and others to ensure they are aware of the CCG's compliance with the Bribery Act 2010 and knows what to do if they suspect or discover bribery.



Signed

Maureen Donnelly
Lay Chair



Dr Neil Modha
Chief Clinical Officer

On behalf of the CCG Governing Body

Reporting Concerns

If you have any concerns or suspicions regarding bribery, corruption or fraud, please contact:
Your Local Counter Fraud Specialist – Lisa George on 020 3313 2828 email:
lisa.george@tiaa.co.uk

NHS Fraud & Corruption Reporting Line on 0800 028 40 60

