

Chief Executive's Statement on Bribery & Corruption

The Bribery Act 2010

1. Introduction

The Bribery Act 2010 came into force on 1st July 2011, with the aim of tackling bribery and corruption in both the public and private sector.

All NHS organisations need to consider the impact of the Bribery Act carefully and take appropriate action to ensure that 'adequate procedures' are in place to prevent bribery or corruption in their organisation.

Staff should report any suspicions or allegations of fraud, bribery or corruption by one of the following methods:-

- Via your Local Counter Fraud Specialist. The LCFS for Blackpool Teaching Hospitals NHS Foundation Trust is **John Marsden** and his contact number is **01253 953232** or via email on johnmarsden@nhs.net
- Via the Trust's Raising Concerns (Whistleblowing) Policy;
- Via the NHS Fraud and Corruption Reporting Line on **0800 028 40 60**;
- Via the online fraud reporting form at www.reportnhsfraud.nhs.uk

Bribery and corruption is generally defined as giving someone a financial incentive, gift, favour, payment, benefit in kind or any other advantage to encourage a person to perform their functions or activities improperly or to reward that person for having already done so.

The Act introduces new bribery offences, which are detailed as follows:-

- To give, promise or offer a bribe;
- To request, agree to receive or accept a bribe, either in the UK or overseas;
- A corporate offence of failure to prevent bribery by persons working on behalf of a commercial organisation.

Organisations that are found guilty under the Act could face a large fine and imprisonment of the individuals involved. However, an organisation can avoid conviction if it can show that it has "adequate procedures" in place to prevent bribery. What counts as "adequate" will depend on the bribery risks that the organisation faces and the nature, size and complexity of the organisation.

As a result, I can confirm that Blackpool Teaching Hospitals NHS Foundation Trust will commit sufficient time and resources to the development and embedding of an appropriate anti-bribery and corruption programme, which will include:

- A commitment to carry out business fairly, honestly and openly;
- A commitment to zero tolerance towards bribery and/or corruption;
- Acknowledging the consequences of breaching the policies for employees and managers and Trust Board members;
- To support key individuals and departments involved in the development and implementation of the Trust's bribery and corruption prevention procedures.

2. Application of the Act

As a responsible employer, Blackpool Teaching Hospitals NHS Foundation Trust has a duty to ensure that all staff are aware of the risks associated with accepting a bribe.

As the Bribery Act became law on the 1st of July 2011 all staff are reminded of the Standards of Business Conduct Policy and the need to declare all gifts, sponsorships and hospitality. All employees need to declare any conflict of interest. A register is kept of all declarations of interests. For further information please contact the Foundation Trust Secretary.

It is essential that staff are aware of the standards of behavior that is expected of them. These standards are detailed within Trust policies and represent the ethics, professional conduct and probity standards that is required of all employees.

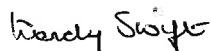
Staff are required to report offers of sponsorship and hospitality, receipt of any gifts and to declare any interests in businesses that have any connection to Blackpool Teaching Hospitals NHS Foundation Trust. **NOTE:-**The Declaration of Interests extends to staff member's spouse.

3. Further Information

The Local Counter Fraud Specialist has created a Bribery Act 2010 page within the counter fraud area of the intranet. The site contains a number of informative documents, including the Act itself. The link to the page is as follows:-

<http://fcsharepoint/divisions/global/counterfraud/Pages/BriberyAndCorruption.aspx>

All staff are strongly encouraged to visit the Bribery Act page and familiarise themselves with information contained therein.



**Wendy Swift,
Chief Executive.**