

23 October 2023

## Chief Executive's Statement on Bribery & Corruption

### The Bribery Act 2010

#### 1. Introduction

The Bribery Act 2010 came into force on 1<sup>st</sup> 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 Counter Fraud manager. 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](mailto:johnmarsden@nhs.net)
- Via the Trust's Freedom to speak up: raising concerns (whistleblowing) policy;
- Via the NHS Fraud and Corruption Reporting Line on **0800 028 40 60**;
- Via the online fraud reporting facility <https://cfa.nhs.uk/reportfraud>

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.

Caring • Safe • Respectful

Chair: Steve Fogg

Chief Executive: Trish Armstrong-Child

RESEARCH MATTERS AND SAVES LIVES – TODAY'S RESEARCH IS TOMORROW'S CARE

Blackpool Teaching Hospitals is a Centre of Clinical and Research Excellence providing quality up to date care. We are actively involved in undertaking research to improve treatment of our patients. A member of the healthcare team may discuss current clinical trials with you.



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 expected standards of honesty, integrity and transparency, including the need to declare all gifts, hospitality, secondary employment etc.

All employees need to declare any conflict of interest and all Directors, senior management or “decision makers” have to make an appropriate declaration, even if that declaration is a “nil” declaration.

There are 11 types of declarations, plus a nil declaration option, and a register is kept of all declarations and I would encourage any staff member needing further information to contact the Trust's Counter Fraud manager.

The declaration process will be an electronic system and will be available from June 2019 onwards, when information as to how to make a declaration will be cascaded to all staff.

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.

There are 11 different types of declaration, for example, staff are required to declare offers of hospitality, receipt of gifts, secondary employment, private practice and any financial interest in a business that has a commercial or sponsorship connection to Blackpool Teaching Hospitals NHS Foundation Trust.

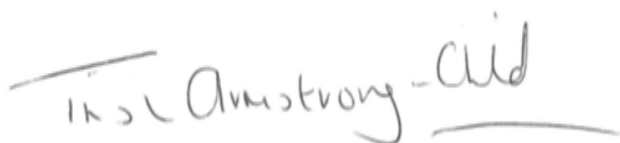
**NOTE: -The Declaration of Interests (Loyalty) extends to staff member's spouse/ partner or close family member.**

### 3. Further Information

The Counter Fraud manager has created a Bribery and Corruption page within the counter fraud area of the intranet. The site contains a number of informative documents and has recently been updated to take into account the Standards of Business Conduct policy, a number of associated guidance notes, general advice (including an explanation on adequate procedures to prevent bribery and corruption) and a number of new bribery and corruption videos that explains bribery and corruption in the workplace.

The link to the Bribery and Corruption Intranet page is [HERE](#).

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



**Trish Armstrong-Child**  
**Chief Executive**

## Appendix 1

The types of declarations, together with a brief explanation, are shown below: -

Declaration	Context
Gifts	Declare <b><u>all</u></b> relevant gifts over £50 from suppliers, contractors, patients, families, service users. Refer to the <a href="#">policy</a> for further details. <b>NOTE:</b> - money or vouchers of any amount are not acceptable.
Hospitality	Declare <b><u>all</u></b> meals, refreshments, travel and accommodation.
Outside Employment	Declare <b><u>all</u></b> employment outside of the Trust.
Shareholding and other ownership issues	Declare <b><u>any</u></b> shareholdings, other ownership interests in any publicly listed, private or not-for-profit company, business, partnership or consultancy.
Patents and Intellectual Property	Declare <b><u>all</u></b> patents and other intellectual property rights, including where applications to protect have started or are ongoing.
Donations	Declare <b><u>all</u></b> donations.
Sponsored Events	Declare <b><u>all</u></b> sponsorship of events by external bodies.
Sponsored Research	Declare <b><u>all</u></b> funding sources for research.
Sponsored Posts	Declare <b><u>all</u></b> external sponsorship of any post.
Clinical Private Practice	Declare <b><u>all</u></b> private practice. For consultants, the declaration should match any private practice commitments, as detailed on individual job plans.
Loyalty Interests	Declare <b><u>all</u></b> interests to an organisation, such as holding a position in another NHS organisation, commercial business, charity, voluntary, professional, statutory or other body (including honorary posts), sitting on advisory groups or other paid or unpaid decision making forums.  Declarations <b><u>must</u></b> also be made if you are involved in recruitment, e.g. interview panels or the management of close family members and relatives, friends (including social media or other outside of work interests/relationships), associates and business partners.  <b><u>Declarations are also relevant for</u></b> close family members and relatives, friends (as detailed above), associates and business partners who have decision making responsibilities in regard to businesses or organisations that have any form of business relationship with the Trust.
Nil Declaration	Staff can make a "Nil Declaration" when they have none of the above positive declarations to make.  Nil declarations are <b><u>mandatory</u></b> for Directors and Non-Executive Directors.