

Anti-Fraud, Bribery and Corruption Statement

The Bribery Act 2010 came into effect on 1st July 2011. Bribery is generally defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. The maximum penalty for bribery is 10 years imprisonment, with an unlimited fine. In addition the Act introduces a corporate offence of failing to prevent bribery by an organisation not having adequate preventative procedures in place.

NHS South East London CCG is responsible for the administration of public funds for the purpose of providing healthcare to the community we serve. It is recognised that the existence of fraud, bribery and corruption threatens to prevent these funds providing maximum benefit to patients. It is therefore important that NHS South East London CCG, its employees, suppliers and business partners remain compliant with the legislation.

It is important that we are all aware and remain compliant with the Act; maintaining a robust corporate and employee code of practice. It is essential for us to work together in ensuring we create an anti-bribery culture within the work place. The responsibility to detect and prevent bribery applies to all employees of the CCG, regardless of position held, as well as consultants, vendors, contractors and/or any other parties who have a business relationship with the CCG.

NHS South East London CCG has developed an organisational culture that supports a zero tolerance approach to fraud, bribery and corruption, supported by the Anti-Fraud, Bribery & Corruption Policy in place. It is vital that all employees and those whom we deal with are aware of the policy and assist the organisation in compliance. Any suspected instances of bribery will be taken seriously and dealt with thoroughly by the CCG, and appropriate action will be taken where necessary. If there is any doubt as to whether an action might constitute bribery, the matter should be referred to NHS South East London CCG's Local Counter Fraud Specialist.

How to Report Fraud, Bribery and Corruption

What should I do if I suspect bribery is occurring?

Staff should report any suspicions or allegations of bribery immediately to one of the following:

- the Local Anti-Fraud Specialist, Melanie Alflatt 07899 981415 or melanie.alflatt@tiaa.co.uk
- The NHS Counter Fraud Authority reporting line: 0800 028 4060
- Online reporting at <https://reportfraud.cfa.nhs.uk/>
- As per the CCG Whistleblowing Policy

Andrew Bland, Accountable Officer