

Statement from the Accountable Officer and the Chief Finance Officer

Bribery Act 2010 and CCG Anti-Bribery Strategy

On the 1st 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 **NHS West Lancashire Clinical Commissioning Group** [‘the CCG’] 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 CCG 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 CCG will seek the most stringent sanctions available against anyone seeking to commit bribery.

To this end, everyone associated with the CCG is expected to play their part. The CCG has adopted a corporate Anti-Bribery Strategy since April 2013 and has suitable measures in place to combat bribery.

To find out more about the Bribery Act and how it might affect your department or area of responsibility, please contact the CCG’s Chief Finance Officer, Paul Kingan.

Signed: .. 
Dr Amanda Doyle OBE
Interim Shared Accountable Officer

Signed: 
Paul Kingan
Chief Finance Officer

Reporting Concerns

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

- Your Anti-Fraud Specialist - Phillip Leong
Tel - 07721 237352
Email - phillip.leong@miaa.nhs.uk
- Your Chief Finance Officer - Paul Kingan
Email - paul.kingan@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>