

## Report to the NHS Somerset Clinical Commissioning Group on 25 March 2021

<b>Title: Anti-Bribery Statement</b>	<b>Enclosure L</b>
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Version Number / Status:	1
Executive Lead	James Rimmer, Accountable Officer and Chief Executive
Clinical Lead:	Dr Ed Ford, Somerset CCG Chair
Author:	James Rimmer, Accountable Officer and Chief Executive

### Summary and Purpose of Paper

The document sets out Somerset CCG's zero tolerance to bribery and confirms that we will implement and enforce effective systems to counter bribery. The attached statement is a renewal of the commitment that the CCG has always adopted in tackling, fraud, corruption and bribery.

To further demonstrate our commitment to prevent Fraud and Bribery from affecting our organisation, we contract with BDO to help us develop and implement our Anti-fraud and Bribery corruption prevention procedures.

### Recommendations and next steps

The Governing Body is asked to Approve the Anti-Bribery Statement and note that it will be published on the Somerset CCG website as evidence of our commitment to countering fraud and bribery of any description.

### Impact Assessments – key issues identified

<b>Equality</b>	We require that all contractors instructed by our organisation demonstrate a comparable commitment to bribery prevention in order to do business with us.  Any act of bribery undertaken by any member or any employee of the CCG — either offering or receiving - will result in disciplinary action.
<b>Quality</b>	In the event that bribery occurs, there could be a significant impact on the quality of service delivery.
<b>Privacy</b>	All service providers/potential service providers will receive the same information regarding any commissioning activity undertaken by Somerset CCG.
<b>Engagement</b>	We have not engaged with members of the public/providers about this Statement, as it stands on its own
<b>Financial / Resource</b>	Generally Not Applicable – but the potential of an unlimited fine and incalculable damage to reputation.

<b>Governance or Legal</b>	<ul style="list-style-type: none"> <li>• Bribery Act 2010 and the Ministry of Justice’s statutory guidance</li> <li>• Somerset CCG’s policies of: <ul style="list-style-type: none"> <li>- Anti-Fraud, Bribery and Corruption</li> <li>- Standards of Business Conduct</li> <li>- Gifts and Hospitality</li> <li>- Working with the Pharmaceutical Industry</li> <li>- Whistleblowing</li> <li>- Standing Financial Instructions and Standing Orders</li> </ul> </li> </ul>			
<b>Risk Description</b>				
<b>Risk Rating</b>	Consequence	Likelihood	RAG Rating	GBAF Ref

## **ANTI-BRIBERY STATEMENT**

The Governing Body of NHS Somerset CCG recognises that bribery is a hugely damaging practice that undermines competition and the reputation of public and private bodies involved. This statement demonstrates our commitment to preventing bribery. It is our policy to act with integrity and we will not tolerate bribery and corruption. We will implement and enforce effective systems to counter bribery.

We have created an Anti Fraud, Bribery and Corruption Policy that sets out procedures designed to prevent everyone associated with us from undertaking acts of bribery or corruption. This policy has been created with reference to the Bribery Act 2010 and the Ministry of Justice's statutory guidance.

We will uphold all laws relevant to countering bribery and corruption, including those under the Bribery Act 2010, in respect of every aspect of our business. Bribery and corruption under the Act are punishable for individuals by up to ten years' imprisonment and if the CCG is found to have taken part in corruption we could face an unlimited fine and incalculable damage to our reputation. We therefore take our legal responsibilities very seriously. Any act of bribery undertaken by a member or an employee of the CCG will result in disciplinary action and will be treated extremely seriously by the CCG Governing Body. We require that all contractors instructed by our organisation demonstrate a comparable commitment to bribery prevention in order to do business with us.

We believe a zero tolerance approach towards bribery supports our reputation for honest and ethical practice, and instils confidence in our patients and the wider public.

As part of our commitment to prevent bribery within the CCG, the Governing Body has a number of bribery prevention procedures which include:

- Anti-Fraud, Bribery and Corruption Policy
- Policies that govern Standards of Business Conduct, Gifts and Hospitality, Disciplinary procedures, Working with the Pharmaceutical Industry and Whistleblowing
- Standing Financial Instructions and Standing Orders

If you have any concerns or queries in relation to this statement or our procedures in respect to bribery prevention please contact us at [enquiries@somersetccg.nhs.uk](mailto:enquiries@somersetccg.nhs.uk)

James Rimmer  
Chief Executive and Accountable Officer

12 February 2021