

**NHS Greater Preston CCG**  
Chorley House  
Lancashire Business Park  
Centurion Way  
Leyland  
Lancashire  
PR26 6TT

## Statement in relation to Fraud and Bribery

The Bribery Act 2010 came into effect on 1 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. The organisation may avoid conviction if it can show that it had procedures and protocols in place to prevent bribery. The corporate offence is not a stand-alone offence, but always follows from a bribery and/or corruption offence committed by an individual associated with the company or organisation in question.

On behalf of the organisation, I confirm that NHS Chorley and South Ribble CCG will commit sufficient time and resources to the development and embedding of an appropriate anti-bribery programme to include:

- a commitment to carry out business fairly, honestly and openly;
- a commitment to zero tolerance towards bribery;
- the consequences of breaching the policies for employees and managers;
- the avoidance of doing business with others who do not commit to doing business without bribery as a 'best practice' objective;
- the protection and procedures for confidential reporting of bribery (Whistleblowing);
- to support key individuals and departments involved in the development and implementation of the CCG's bribery prevention procedures.

With the support of internal governance arrangements, and as set out in our Constitution, procedures will be implemented and reviewed to ensure that all staff are aware of the anti-fraud and bribery services in place and how to report any incidences or suspicions of fraudulent or bribery activity. This will also extend to stakeholders with whom the CCG conducts its business.



**Denis Gizzi**  
Chief Accountable Officer

