

**Policy Group:** Corporate  
**Version no.:** 1.0  
**Date of issue:** August 2020  
**Approved by:** Charity Executive Committee

# Anti-Bribery & Corruption Policy

## 1. Policy Summary / Statement

The purpose of this Policy is to outline the Charity's position on preventing and prohibiting bribery and corruption, in accordance with the Bribery Act 2010.

St Andrew's Healthcare (StAH) is committed to acting with integrity in all our business dealings and relationships and to implementing effective systems to prevent bribery. Through this approach StAH aims to build and maintain public confidence in the Charity and will uphold all laws relevant to countering bribery and corruption, including the Bribery Act 2010, in every aspect of our conduct including our commercial dealings and the delivery of treatment and care to patients.

To gain assurance that St Andrew's is compliant with the Bribery Act 2010, the Charity strives to be fully compliant with the *Fraud, Bribery and Corruption Standards for NHS Providers* which are published by the NHS Counter Fraud Authority on an annual basis.

The Ministry of Justice has published guidance on the Bribery Act which includes six principles that organisations are expected to consider when addressing the risk of bribery occurring within their business activities. St Andrew's Anti-Bribery & Corruption procedures are based upon these six principles which are as follows:

### **Proportionality**

The Charity has procedures in place to prevent bribery by people associated with it which are proportionate to the bribery risks faced by the Charity, and are also clear, practical, accessible, effectively implemented and enforced.

### **Top level commitment**

The Board of Directors and senior managers are committed to preventing bribery by people associated with the Charity. They foster a culture within the organisation in which bribery is never acceptable.

### **Risk Assessment**

The Charity conducts periodic assessments of the nature and extent of the internal and external bribery risks it faces.

### **Due diligence**

The Charity takes a proportionate and risk based approach to the application of due diligence, in respect of people who perform or will perform services for or on behalf of St Andrew's, in order to mitigate identified bribery risks.

### **Communication (including training)**

The Charity seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training that is proportionate to the risks it faces.

### **Monitoring and review**

The Charity ensures that the Anti-Bribery Policy and supporting procedure are regularly reviewed and updated, so that improvements can be made where necessary.

## **2. Links to Procedures**

The policy is supported by procedures describing the process to be followed to ensure effective implementation, delivery and maintenance of key elements which linked together will provide assurance that the Charity is compliant with the Bribery Act 2010.

Anti-Bribery & Corruption Procedure  
Counter Fraud Procedure  
Procurement Policy and Lifetime Spend Procedures  
Declarations of Interest Procedure  
Working for Organisations outside of St Andrew's Healthcare Guidance  
Capability Policy  
Capability Procedure  
Freedom to Speak Up and Whistle Blowing Procedure  
Charity Code of Conduct

Policies and procedures available via the Policy A-Z:  
<http://simba/sites/Policies/Pages/All-Policies-A-Z.aspx>

## **3. Monitoring and Oversight**

**Chief Finance Officer:** The Chief Finance Officer (CFO) is the member of the Board of Directors responsible for overseeing counter fraud, bribery and corruption work and is ultimately responsible for overseeing and providing strategic management and support for work to tackle economic crime.

**Company Secretary:** The Company Secretary will ensure that there are adequate and effective processes, procedures and controls in place to ensure that compliance with the Bribery Act 2010 is maintained.

**Local Counter Fraud Specialist (LCFS):** The LCFS will promote awareness of anti-bribery processes within the Charity, respond to identified system weaknesses and where appropriate investigate allegations of bribery and corruption.

**Audit & Risk Committee:** The Audit & Risk Committee shall review the Charity's systems and controls for the prevention of bribery, and compliance with competition laws and regulations and receive reports on non-compliance.

## **4. Diversity and Inclusion**



StAH is committed to *Inclusive Healthcare*. This means providing patient outcomes and employment opportunities that embrace diversity and promote equality of opportunity, and not tolerating discrimination for any reason

Our goal is to ensure that *Inclusive Healthcare* is reinforced by our values, and is embedded in our day-to-day working practices. All of our policies and procedures are analysed in line with these principles to ensure fairness and consistency for all those who use them. If you have any questions on inclusion and diversity please email the inclusion team at [DiversityAndInclusion@standrew.co.uk](mailto:DiversityAndInclusion@standrew.co.uk).

## 5. Training

An e-learning module including Fraud, Bribery and Conduct (and incorporating a conflict of interest statement) is available via SAP and all employees are encouraged to complete this. All employees with SAP approval, are required to complete the training and conflict of interest statement on an annual basis. Training and guidance can also be provided by the Company Secretary or Local Counter Fraud Specialist upon request.

## 6. References to Legislation and Best Practice

Bribery Act 2010

<http://www.legislation.gov.uk/ukpga/2010/23/contents>

Ministry of Justice Guidance

<http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf>

NMC code of conduct: Standards of conduct, performance and ethics for nurses, midwives and nursing associates

<https://www.nmc.org.uk/standards/code/>

GMC's Guidance on good Medical Practice for doctors and consultants

<https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/good-medical-practice>

## 7. How to request a Change or exception to this policy

There will be no exceptions to this policy.

## 8. Key changes - please state key changes from the previous version of the policy

Version Number	Date	Revisions from previous issue
v1.0	August 2020	Replaces HR 36 Anti-Bribery Policy and Procedure v5.4. Re-write after the Governance Review in 2018.