

## Accountable Officer's Statement on Bribery

NHS Sheffield Clinical Commissioning Group is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on the CCG's behalf is responsible for maintaining the organisation's reputation and for conducting CCG business honestly and professionally.

The CCG considers that bribery and corruption has a detrimental impact on CCG business by undermining good governance. We benefit from carrying out our functions in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in the NHS. Where there is a level playing field, the CCG can lead by example and deliver excellent services to our patients.

Transparent, fair conduct helps to foster deeper relationships of trust between the CCG and our partners. It is vital for our reputation and future growth.

Sheffield Clinical Commissioning Group does not tolerate any form of bribery, whether direct or indirect, by, or of, its staff, agents or consultants or any persons or entities acting for it or on its behalf. The governing body and senior management are committed to implementing and enforcing effective systems throughout the CCG to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

The CCG has issued revisions to key policies including, the Fraud Policy & Response Plan, Standards of Business Conduct & Conflicts of Interest Policy and Procedure, and Whistleblowing outlining our position on preventing and prohibiting bribery, details can also be found on the CCG's intranet. The provisions of these updated policies apply to all employees, as well as agency workers, consultants and contractors acting for on behalf of the CCG. All employees and other individuals acting for the CCG are required to familiarise themselves and comply with these amendments with immediate effect.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly. Employees and others acting for or on behalf of the organisation are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, the organisation is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with the procedures set out in the organisation's policies.

A breach of the organisation's Standards of Business Conduct & Conflicts of Interest Policy and Procedure by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for the organisation should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

The CCG will not conduct business with service providers, agents or representatives that do not support the organisation's anti-bribery objectives. We reserve the right to terminate our contractual arrangements with any third parties acting for, or on behalf of, the organisation with immediate effect where there is evidence that they have committed acts of bribery.

The success of the CCG's anti-bribery measures depends on all employees, and those acting for the organisation, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, the organisation are encouraged to report any suspected bribery in accordance with the procedures set out in either Whistleblowing Policy and/or the Fraud Policy & Response Plan. Sheffield Clinical Commissioning Group will support any individuals who make such a report, provided that it is made in good faith.

A handwritten signature in black ink that reads "Maddy Ruff". The signature is written in a cursive, slightly slanted style.

Maddy Ruff  
Accountable Officer  
NHS Sheffield Clinical Commissioning Group