

ANTI-BRIBERY POLICY

Date Approved: 14th June 2013

Date for Review: July 2014

Lead Director: Hardev Virdee

Lead Manager: Rebecca Chappell

NOTE: This is a CONTROLLED Document. Any documents appearing in paper form are not controlled and should be checked against the server file version prior to use.

DOCUMENT CONTROL AND AMENDMENT RECORD

Anti Bribery Policy

Version	Date	Details	Author / Reviewer	Approving Committee (s)	Date of Approval
1.0	18/12/12		Rebecca Chappell	Audit Committee	N/A
1.1	24/04/13	Updates to correct terminology, wording etc.	Rebecca Chappell	Audit Committee	14/06/13

CONTENTS

1. Introduction
 - 1.1 Rationale
 - 1.2 Aims and Objectives
 - 1.3 Scope
2. Definitions
3. Public Service Values
4. Duties and Policy
 - 4.2 Facilitation Payments
 - 4.3 Gifts & Hospitality
 - 4.4 Political and Charitable Contributions
 - 4.5 Sponsoring
5. Raising Concerns
6. Roles and Responsibilities
 - 6.1 The Governing Body
 - 6.2 Employees
 - 6.3 Managers
 - 6.4 Local Counter Fraud Specialist (LCFS)
 - 6.5 Senior Compliance Officer
 - 6.6 Chief Financial Officer
 - 6.7 Internal and External Audit
 - 6.8 Human Resources
 - 6.9 Information Management and Technology
 - 6.10 Procurement
7. External Communications
8. Training
9. Monitoring Compliance and Effectiveness
10. Additional Information

Wandsworth Clinical Commissioning Group

1. Introduction

This document sets out Wandsworth Clinical Commissioning Group's policy and advice to employees in dealing with bribery or suspected bribery. This policy details the arrangements made by Wandsworth Clinical Commissioning Group for such concerns to be raised by employees or members of the public; and sets out Wandsworth Clinical Commissioning Group's policy for dealing with detected or suspected bribery and corruption.

1.1 Rationale

1.1.1 The Bribery Act 2010 introduces a new, clearer regime for tackling bribery that applies to all businesses based or operating in the UK. It covers all sorts of bribery; the offering and receiving of a bribe, directly or indirectly, whether or not it involves a public official, in the UK or abroad. There are offences for individuals, and a corporate offence for corporate and partnerships; and penalties for non-compliance are serious.

1.1.2 Bribery is a criminal offence for both an individual and a commercial organisation; and can be punished with imprisonment of up to 10 years and unlimited fines. If an employee was accused of bribery, Wandsworth Clinical Commissioning Group's reputation might be damaged considerably, and subsequent enforcement action would be time-consuming and hinder Wandsworth Clinical Commissioning Group from focusing on its core business and service delivery.

1.2 Aims and Objectives

1.2.1 It is therefore the policy of Wandsworth Clinical Commissioning Group to prohibit any form of bribery covered by the Bribery Act 2010. This policy applies to all CCG members, employees, members of the Governing Body, members of the Governing Body's committees and sub-committees and persons working on behalf of the CCG. This policy shall be respected at all times.

1.3 Scope

1.3.1 This policy relates to all forms of bribery and is intended to provide direction and help to employees who may identify suspected bribery. The overall aims of this policy are to:

- improve the knowledge and understanding of everyone within Wandsworth Clinical Commissioning Group, irrespective of their grade and position, about the risk of bribery within the organisation and its unacceptability
- assist in promoting a climate of openness and a culture and environment where staff feel able to raise concerns sensibly and responsibly

- set out Wandsworth Clinical Commissioning Group’s responsibilities in terms of the deterrence, prevention, detection and investigation of bribery and corruption
 - ensure the appropriate sanctions are considered following an investigation, which may include any of the following:
 - Criminal prosecution
 - Civil prosecution
 - Internal / external disciplinary action (including professional / regulatory bodies)
- 1.3.2 This policy applies to all CCG members, employees, members of the Governing Body, members of the Governing Body’s committees and sub-committees, persons working on behalf of the CCG and/or any other parties who have a business relationship with Wandsworth Clinical Commissioning Group. It will be brought to the attention of all employees and form part of the induction process for new staff. It is incumbent on all of the above to report any concerns they may have concerning bribery.
- 1.3.3 This policy covers all business activities of employees or others acting on behalf of Wandsworth Clinical Commissioning Group.
- 1.3.4 This policy is applicable to all employees, contracted staff and staff on honorary contracts whose payroll costs are partially or fully funded by a third party under a formal arrangement. It is also applicable for trainee professionals and students hosted for the provision of work or vocational experience, including temporary staff, volunteers and other people engaged to work on Wandsworth Clinical Commissioning Group business.
- 1.3.5 In implementing this policy, managers must ensure that all staff are treated fairly and within the provisions and spirit of Wandsworth Clinical Commissioning Group’s Equal Opportunities Policy. Special attention should be paid to ensuring the policy is understood where there may be barriers to understanding caused by the individual’s circumstances, where the individual’s literacy or use of English is weak, or where the individual has little experience of working life.

2. Definitions

2.1 Definitions for bribery and corruption vary. Some common definitions are:

Bribery – Under the Bribery Act 2010, bribery is defined as “Inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other privileges”. No actual gain or loss has to be made.

Corruption – This can broadly be defined as the offering or acceptance of inducements, gifts, favours, payment or benefit-in-kind which may influence the action of any person. Corruption does not always result in a loss. The corrupt person may not benefit directly from their deeds; however, they may be unreasonably using their position to give some advantage to another.

Gift – a ‘gift’ is defined as any item of cash or goods, or any service, which is provided for personal benefit at less than its commercial value

2.2 Wandsworth Clinical Commissioning Group has procedures in place that reduce the likelihood of bribery occurring. These include Prime Financial policies, documented procedures, a system of internal control (including Internal and External Audit) and a system of risk assessment. In addition, Wandsworth Clinical Commissioning Group seeks to ensure that a comprehensive anti-bribery culture exists throughout the organisation via the appointment of a Senior Compliance Officer and Local Counter Fraud Specialist.

3. Public Service Values

3.1 **The Code of Conduct; Code of Accountability for NHS Boards published by the NHS Executive in April 1994 sets out the following public service values. It says high standards of corporate and personal conduct, based on the recognition that patients come first, have been a requirement throughout the NHS since its inception. The three fundamental public service values are:**

Accountability Everything done by those who work in the NHS must be able to stand the tests of parliamentary scrutiny, public judgements on propriety and professional codes of conduct.

Probity There should be an absolute standard of honesty in dealing with the assets of the NHS; integrity should be the hallmark of all personal conduct in decisions affecting patients, staff and suppliers, and in the use of information acquired in the course of NHS duties.

Openness There should be sufficient transparency about NHS activities to promote confidence between Wandsworth Clinical Commissioning Group and its staff, patients and the public.

In addition, all those who work for or are in contract with Wandsworth Clinical Commissioning Group should exercise the following when undertaking their duties:

Selflessness ...should take decisions in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family or their friends

Integrity ...should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties

Objectivity ...should, in carrying out public business (including making public appointments, awarding contracts, or recommending individuals for rewards and benefits) make choices on merit

Accountability ...are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office

Openness	...should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest demands
Honesty	...have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest
Leadership	...should promote and support these principles by leadership and example

All those who work for / on behalf of Wandsworth Clinical Commissioning Group should be aware of, and act in accordance with these values.

4. Duties and Policy

- 4.1.1 All employees have a personal responsibility to protect Wandsworth Clinical Commissioning Group from bribery or corruption.
- 4.1.2 Wandsworth Clinical Commissioning Group is committed to maintain an honest, open and well-intentioned atmosphere within the organisation, so as to best fulfil the objectives of the CCG, and of the NHS. It is, therefore, also committed to the elimination of bribery within the organisation, to the rigorous investigation of any such allegations and to taking appropriate action against wrong doers, including possible criminal action.
- 4.1.3 Off-the-book accounts and false or deceptive booking entries are strictly prohibited. All gifts, payments or any other contribution made under the Anti-Bribery policy and these guidelines, whether in cash or in kind; shall be documented, regularly reviewed and properly accounted for on the books of Wandsworth Clinical Commissioning Group. Record retention and archival policy must be consistent with Wandsworth Clinical Commissioning Group's accounting standards and other applicable laws and regulations.
- 4.1.4 Wandsworth Clinical Commissioning Group procures goods and services ethically and transparently with the quality, price and value for money determining the successful supplier/contractor, not by receiving (or offering) improper benefits. The organisation will not engage in any form of bribery, neither in the UK or abroad. The organisation and all employees, independent of their grade and position, shall at all times comply with the Bribery Act 2010 and with this policy.
- 4.1.5 Employees of Wandsworth Clinical Commissioning Group will not request or receive a bribe from anybody, nor imply that such an act might be considered. This means that they will not agree to receive or accept a financial or other advantage from a former, current or future client, business partner, contractor or supplier or any other person as an incentive or reward to perform improperly your function or activities.
- 4.1.6 Bribing anybody is prohibited. Employees of Wandsworth Clinical Commissioning Group will not pay a bribe to anybody. This means that they will not offer, promise, reward in any way or give a financial or other advantage to any person in order to induce that person to perform his/her function or activities improperly. It does not matter whether the other person is a UK or foreign public official, political candidate, party official, private individual, private or public sector

employee or any other person (including creating the appearance of an effort to improperly influence another person).

- 4.1.7 Wandsworth Clinical Commissioning Group may, in certain circumstances, be held responsible for acts of bribery committed by intermediaries acting on its behalf such as clients, business partners, contractors, suppliers, agents, advisors, consultants or other third parties. The use of intermediaries for the purpose of committing acts of bribery is prohibited.
- 4.1.8 All intermediaries shall be selected with care, and all agreements with intermediaries shall be concluded under terms that are in line with this policy. Wandsworth Clinical Commissioning Group will contractually require its agents and other intermediaries to comply with the Anti-Bribery policy and to keep proper books and records available for inspection by Wandsworth Clinical Commissioning Group, auditors or investigating authorities. Agreements with agents and other intermediaries shall at all times provide for the necessary contractual mechanisms to enforce compliance with the anti-bribery regime. Wandsworth Clinical Commissioning Group will monitor performance and, in cases of non-compliance, require the correction of deficiencies, apply sanctions and, or eventually terminate the agreement even if this may result in a loss of business.
- 4.1.9 All employees should be aware that bribery will normally, dependent upon the circumstances of the case, be regarded as gross misconduct thus warranting summary dismissal without previous warnings. However, no such action will be taken before a proper investigation and a disciplinary hearing have taken place. Such actions may be in addition to the possibility of criminal prosecution.

4.2 Facilitation Payments

- 4.2.1 Facilitation payments are small payments made to secure or expedite the performance of a routine action by a government official or agency (e.g. issuing licences or permits, installation of a telephone line, processing goods through customs etc.) to which the payer (or the company) has legal or other entitlement.
- 4.2.2 Facilitation payments are prohibited under the Bribery Act 2010 like any other form of bribe. They shall not be given by Wandsworth Clinical Commissioning Group or its employees in the UK or in any other country.

4.3 Gifts and Hospitality

- 4.3.1 Courtesy gifts and hospitality must not be given or received in return for services provided or to obtain or retain business but shall be handled openly and unconditionally as a gesture of esteem and goodwill only. Gifts and hospitality shall always be of symbolic value, appropriate and proportionate in the circumstances, and consistent with local customs and practices. They shall not be made in cash. Please refer to the organisation's Gifts and Hospitality policy for more guidance.

4.4 Political and Charitable Contributions

- 4.4.1 Wandsworth Clinical Commissioning Group does not make any contributions to politicians, political parties or election campaigns.

- 4.4.2 Wandsworth Clinical Commissioning Group may make charitable payments. However, these payments shall not be provided to any organisation upon suggestion of any person of the public or private sector in order to induce that person to perform improperly the function or activities which he or she is expected to perform in good faith, impartially or in a position of trust or to reward that person for the improper performance of such function or activities.
- 4.4.4 Donations to individuals and for-profit organisations and donations paid to private accounts are incompatible with Wandsworth Clinical Commissioning Group's ethical standards and are prohibited.

4.5 Sponsoring

- 4.5.1 Sponsoring means any contribution in money or in kind by Wandsworth Clinical Commissioning Group towards an event organised by a third party in return for the opportunity to raise Wandsworth Clinical Commissioning Group's profile. All sponsoring contributions must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the consideration offered by the event host. They may not be made towards events organised by individuals or organisations that have goals incompatible with Wandsworth Clinical Commissioning Group's ethical standards, or that would damage Wandsworth Clinical Commissioning Group's reputation. All sponsorships will be publicly disclosed.
- 4.5.2 Where commercial sponsorship is used to fund Wandsworth Clinical Commissioning Group training events, training materials and general meetings, the sponsorship must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the occasion. Where meetings are sponsored by external sources, that fact must be disclosed in the papers relating to the meeting and in any published minutes/proceedings.
- 4.5.3 Where sponsorship links to the development of guidelines and advice, this should be carried out in consultation with the Senior Compliance Officer in conjunction with the appropriate Wandsworth Clinical Commissioning Group working group, independent of the sponsors. While it is recognised that consultation with the industry may be necessary when developing a guideline, the overall decision on what is included should lie with Wandsworth Clinical Commissioning Group's working group.

5. Raising Concerns

- 5.1 Wandsworth Clinical Commissioning Group wishes to encourage anyone having reasonable suspicions of bribery to report them. Wandsworth Clinical Commissioning Group's policy, which will be rigorously enforced, is that no individual will suffer any detrimental treatment as a result of reporting reasonably held suspicions. The Public Interest Disclosure Act 1998 came into force in July 1999 and gives statutory protection, within defined parameters, to staff who make disclosures about a range of subjects, including bribery and corruption; which they believe to be happening within the Group employing them. Within this context, "reasonably held suspicion" means any suspicions, other than those which are raised maliciously and are subsequently found to be groundless.
- 5.2 Any unfounded or malicious allegations will be subject to a full investigation and where appropriate, disciplinary action.

5.3 Wandsworth Clinical Commissioning Group expects anyone having reasonable suspicions of bribery to report them to the Senior Compliance Officer and/or their Local Counter Fraud Specialist, who will ensure that procedures are followed. Concerns can also be raised through Wandsworth Clinical Commissioning Group's Whistle Blowing policy.

6. Roles & Responsibilities

6.1 The Governing Body

6.1.1 The Governing Body has a duty to ensure that it provides a secure environment in which to work, and one where people are confident to raise concerns without worrying that it will reflect badly on them. This extends to ensuring that staff feel protected when carrying out their official duties and are not placed in a vulnerable position. If staff have concerns about any procedures or processes they are asked to be involved in, Wandsworth Clinical Commissioning Group has a duty to ensure that those concerns are listened to and addressed.

6.1.2 The Governing Body and the Senior Compliance Officer will be liable to be called to account for failing to prevent bribery. Wandsworth Clinical Commissioning Group therefore has a duty to ensure employees receive adequate training and support in order to carry out their responsibilities. Therefore the Chief Officer and Chief Financial Officer will monitor compliance with this policy.

6.2 Employees

For the purpose of this policy, "Employees" includes staff employed Wandsworth Clinical Commissioning Group; and persons working on behalf of the CCG. It is expected that:

6.2.1 CCG members, members of the Governing Body, members of the Governing Body's committees and sub-committees and staff at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures.

6.2.2 Employees must act in accordance with Wandsworth Clinical Commissioning Group's Standards of Business Conduct, Gifts and Hospitality and Declaration of Interest policies which include guidance on the receipt of gifts or hospitality.

6.2.3 All employees are expected to act in accordance with the standards laid down by their Professional Institute(s) where applicable and have a personal responsibility to ensure that they are familiar with those standards. Employees who are involved in receiving offers of sponsorship, funding or gifts from outside agencies should also comply with their own professional codes of practice. Professional staff must also make themselves aware of their own professional body codes of conduct, e.g. Nursing and Midwifery Council, General Medical Council, professional, legal, accounting and other bodies.

6.3 Managers

6.3.1 Managers at all levels have a responsibility to ensure that an adequate system of internal control exists within their areas of responsibility and that controls operate

effectively. The responsibility for the prevention and detection of bribery therefore primarily rests with managers but requires the co-operation of all employees.

As part of that responsibility, line managers need to:

- Inform staff of Wandsworth Clinical Commissioning Group's code of business conduct, gifts and hospitality, declarations of interest and anti-fraud and anti-bribery policies as part of their induction process, paying particular attention to the need for accurate completion of personal records and forms
- ensure that all employees for whom they are accountable are made aware of the requirements of the policy
- assess the types of risk involved in the operations for which they are responsible
- ensure that adequate control measures are put in place to minimise the risks. This must include clear roles and responsibilities, supervisory checks, staff rotation (particularly in key posts), separation of duties wherever possible so that control of a key function is not invested in one individual, and regular reviews, reconciliations and test checks to ensure that control measures continue to operate effectively
- be aware of Wandsworth Clinical Commissioning Group's Anti-Bribery policy
- identify financially sensitive posts
- ensure that controls are being complied with
- contribute to their department's assessment of the risks and controls within their business area, which feeds into Wandsworth Clinical Commissioning Group's and the Department of Health Accounting Officer's overall statements of accountability and internal control

6.3.2 All instances of actual or suspected bribery, which come to the attention of a manager, must be reported immediately. It is appreciated that some employees will initially raise concerns with their manager, however, in such cases managers must not attempt to investigate the allegation themselves, and they have the clear responsibility to refer the concerns to the Senior Compliance Officer and/or nominated LCFS as soon as possible.

6.4 Local Counter Fraud Specialist (LCFS)

6.4.1 The Directions to NHS Bodies on Counter Fraud Measures 2004 require Wandsworth Clinical Commissioning Group to appoint and nominate an LCFS. The LCFS's role is to ensure that all cases of actual or suspected bribery and corruption are notified to the Chief Financial Officer and reported accordingly.

6.4.2 The LCFS will regularly report to the Chief Financial Officer on the progress of the investigation and when/if referral to the police is required.

6.4.3 In accordance with Wandsworth Clinical Commissioning Group's Policy in Relation to Fraud & Fraud Response Plan, investigation of the majority of cases of alleged fraud within Wandsworth Clinical Commissioning Group will be the responsibility of the nominated LCFS. NHS Protect will only investigate cases which should not be dealt with by Wandsworth Clinical Commissioning Group.

6.4.5 The LCFS will:

- Ensure that the Chief Financial Officer is kept apprised of all referrals and cases
- Investigate all cases of bribery, as per 6.4.3 above
- In consultation with the Chief Financial Officer and NHS Protect, will report any case to the Police as agreed
- Report any case and the outcome of the investigation to NHS Protect and Chief Financial Officer, and provide required reports to NHS Protect
- Ensure that other relevant parties are informed where necessary e.g. Human Resources will be informed where an employee is a suspect
- Ensure that the CCG incident and losses reporting systems are followed
- Ensure that any system weaknesses identified as part of the investigation are followed up with management or Internal Audit

6.4.6 The LCFS in consultation with the Chief Financial Officer will review the strategic objectives within the assurance framework to determine any potential bribery risks. Where risks are identified, these will be included on Wandsworth Clinical Commissioning Group's Risk Register so the risk can be proactively reviewed and addressed.

6.5 Senior Compliance Officer

6.5.1 Wandsworth Clinical Commissioning Group has appointed the Director of Corporate Affairs, Performance and Quality as Senior Compliance Officer; being responsible for implementing the Anti-Bribery policy and these guidelines, monitoring compliance and sanctioning violation of the policy. The Director of Corporate Affairs, Performance and Quality will review annually the suitability, adequacy and effectiveness of Wandsworth Clinical Commissioning Group's anti-bribery arrangements and implement improvements as and when appropriate.

6.5.2 The Director of Corporate Affairs, Performance and Quality directly reports to the Chief Officer on Bribery matters. Once a year, ordinarily in March the Director of Corporate Affairs, Performance and Quality will report the results of reviews and any developments to the Governing Body.

6.5.3 Any incident or suspicion that comes to the attention of the Senior Compliance Officer will be passed immediately to the LCFS.

6.6 Chief Financial Officer

6.6.1 The Chief Financial Officer, in conjunction with the Chief Officer; monitors and ensures compliance with Secretary of State Directions regarding fraud and bribery. The Chief Financial Officer will, depending on the outcome of investigations (whether on an interim, ongoing or concluding basis) and / or the potential significance of suspicions that have been raised, inform appropriate CCG members, members of the Governing Body or members of the Governing Body's committees and sub-committees accordingly.

6.6.2 The LCFS shall be responsible, in discussion with and on behalf of the Chief Financial Officer, for informing third parties such as external audit or the police at the earliest opportunity, as circumstances dictate.

6.6.3 The Chief Financial Officer will inform and consult the Chief Officer in cases where the loss may be above the agreed limit or where the incident may lead to adverse publicity.

- 6.6.4 The Chief Financial Officer will inform the Head of Internal Audit at the first appropriate opportunity. If an investigation is deemed appropriate, the Chief Financial Officer will delegate to the appropriate LCFS, who has responsibility for leading the investigation, whilst retaining overall responsibility themselves.
- 6.6.5 The Chief Financial Officer or the LCFS will consult and take advice from the Head of Human Resources (HR) if a member of staff is to be interviewed or disciplined. The Chief Financial Officer or LCFS will not conduct a disciplinary investigation, but the employee may be the subject of a separate investigation by HR.
- 6.6.6 The Chief Financial Officer is responsible for informing the Audit Committee of all categories of loss.

6.7 Internal and External Audit

- 6.7.1 Any incident or suspicion that comes to internal or external audit's attention will be passed immediately to the nominated LCFS. The outcome of the investigation may necessitate further work by internal or external audit to review systems.
- 6.7.2 Internal and/or External Audit may be required to obtain and review evidence from other NHS organisations regarding compliance with the Bribery Act 2010 to provide assurance to Wandsworth Clinical Commissioning Group.

6.8 Human Resources

- 6.8.1 Human Resources will liaise closely with the Clinical Commissioning Group and the LCFS from the outset, where an employee is suspected of being involved in bribery or corruption in accordance with agreed liaison protocols. HR is responsible for ensuring the appropriate use of the organisation's Disciplinary policy. The HR department shall advise those involved in the investigation in matters of employment law and in other procedural matters, such as disciplinary and complaints procedures, as requested. Close liaison between the LCFS and HR will be essential to ensure that any parallel sanctions (i.e. criminal, civil and disciplinary) are applied effectively and in a coordinated manner.
- 6.8.2 HR will take steps at the recruitment stage to establish, as far as possible, the previous record of potential employees, as well as the veracity of required qualifications and memberships of professional bodies, in terms of their propriety and integrity. In this regard, temporary and fixed-term contract employees are treated in the same manner as permanent employees.
- 6.8.3 New joiners will be bound by a contractual obligation in the employment contract not to engage in bribery as defined in the Anti-Bribery policy and to comply with all relevant policies and procedures.

6.9 Information Management and Technology

The Head of Information Management and Technology (or equivalent) will contact the LCFS immediately in all cases where there is suspicion that IT is being used for bribery purposes. This includes inappropriate internet/intranet, e-mail, telephone and PDA use. HR will also be informed if there is a suspicion that an employee is involved.

6.10 Procurement

6.10.1 Procurement practices will be conducted in a fair and transparent manner; and contractors or suppliers known or reasonably suspected to be paying bribes will not be dealt with. Before engaging contractors and suppliers, Wandsworth Clinical Commissioning Group will ensure that properly documented due diligence is undertaken. Unless prospective contractors and suppliers have effective anti-bribery programmes in place, Wandsworth Clinical Commissioning Group will contractually require them to comply with the Anti-Bribery policy. Agreements with contractors and suppliers shall, at all times, provide for the necessary contractual mechanisms to enforce compliance with the anti-bribery arrangements. Wandsworth Clinical Commissioning Group will monitor performance and, in cases of non-compliance, will require the correction of deficiencies. Sanctions may be applied, or eventually agreements will be terminated.

7. External Communications

7.1 Individuals (be they employees, agency staff, locums, contractors or suppliers) must not communicate with any member of the press, media or another third party about a suspected act of bribery as this may seriously damage the investigation and any subsequent actions to be taken. Anyone who wishes to raise such issues should discuss the matter with either the Chief Financial Officer or Chief Officer.

8. Training

8.1 Wandsworth Clinical Commissioning Group will provide anti-bribery training to all its employees on a regular basis to make them aware of our Anti-Bribery policy and guidelines, in particular of possible types of bribery, the risks of engaging in bribery activity and how employees may report a suspicion of bribery.

8.2 Where employees are undertaking work on behalf of Wandsworth Clinical Commissioning Group, but employed by another NHS body which is not Wandsworth Clinical Commissioning Group; details of anti-bribery procedures and training will be sought from the relevant NHS employer on an annual basis to provide assurance to Wandsworth Clinical Commissioning Group.

9. Monitoring Compliance and Effectiveness

9.1 Compliance with Wandsworth Clinical Commissioning Group's Anti-Bribery policy and guidelines will be monitored regularly. Employees within Wandsworth Clinical Commissioning Group will be randomly picked and contacted by the Senior Compliance Officer, or LCFS on their behalf after 6 months from the ratification date of this policy to identify:

- Awareness and level of understanding of the policy and Bribery Act 2010
- Any implications of the policy

10. Additional Information

10.1 Any abuse or non-compliance with this policy or procedures will be subject to a full investigation and appropriate disciplinary action.

- 10.2 This policy will be reviewed annually by the owner noted on the cover sheets and will be approved by Wandsworth Clinical Commissioning Group's Audit Committee. The content of this policy will be monitored against template policies provided by NHS Protect, and will be amended as required to demonstrate changes either legislative, or Secretary of State Directions or the NHS Fraud and Corruption manual (as amended).
- 10.3 For further information, including referral form and LCFS contact details please read Wandsworth Clinical Commissioning Group's Policy in Relation to Fraud & Fraud Response Plan.

Acknowledgements

RSM Tenon Template Anti-Bribery policy
NHS Protect Bribery Act Guidance (version 17)
NHS South West London Anti-Bribery policy