

## **Bribery policy**

The Bribery Act 2010 came into force on 1 July 2011 with the aim of tackling bribery and corruption in both the private and public sectors. Bribery is defined as the giving or receiving of a financial or other advantage in exchange for improperly performing a relevant function or activity.

Manchester University NHS Foundation Trust is committed to applying the highest standards of ethical conduct, following good NHS business practice and having robust controls in place to prevent bribery. However, as an organisation we cannot afford to be complacent and under no circumstances is the giving, offering, receiving or soliciting of a bribe acceptable and the trust will not tolerate this in any form.

The trust's zero tolerance approach to bribery and corruption is set out in further detail within the Counter Fraud, Bribery and Corruption Policy, and across a range of other trust policies and procedural documentation. This applies to all staff and non-executives, together with contractors and agents working or acting on behalf of the trust.

All are responsible for gaining an understanding of the requirements, the standard of conduct expected of them and ensuring that they comply at all times with all of our policies and procedures. This includes those in relation to procurement, hospitality and the acceptance of gifts.

Bribery and corruption under the act are punishable for individuals as a criminal offence by up to 10 years imprisonment and if the trust is found to have taken part in the corruption the trust could face an unlimited fine and face incalculable damage to our reputation. The trust therefore takes its legal responsibilities very seriously.

Any act of bribery undertaken by a member or an employee of the trust will result in disciplinary action and will be treated with a similar level of importance by the trust's board.

The success of the organisation'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 the behalf of the organisation are encouraged to report any suspected bribery in accordance with the procedures set out in either the Freedom to Speak Up Programme or the Counter Fraud, Bribery and Corruption Policy.

Any concerns of fraud, bribery and corruption should be reported to either the Local Counter Fraud Specialist ([darrell.davies@nhs.net](mailto:darrell.davies@nhs.net), [kevin.howells1@nhs.net](mailto:kevin.howells1@nhs.net)) or the national Fraud and Corruption Reporting Line on 0800 028 40 60 (online at <https://cfa.nhs.uk/reportfraud>).