Anti-bribery and corruption statement

**Our commitment**

Bribery is defined as the giving or receiving of a financial or other advantage in exchange for improperly performing a relevant function or activity.

Gloucestershire Health and Care NHS Foundation Trust (the Trust) is committed to applying the highest standards of ethical conduct, following good NHS business practice and have robust controls in place to prevent bribery. We expect all organisations, partners and suppliers doing business with us to have a comparable commitment and this enables us to reassure our patients, members and stakeholders that public funds are safeguarded. Under no circumstances is the giving, offering, receiving or soliciting of a bribe acceptable and the Trust will not tolerate this in any form.

Our zero tolerance approach to bribery and corruption is set out in further detail within the [Counter Fraud, Bribery and Corruption policy](https://www.ghc.nhs.uk/wp-content/uploads/2023/04/Counter-Fraud-Bribery-and-Corruption-Policy-February-2023.docx), and across a range of other trust policies and procedural documentation. This applies to all colleagues and non-executives, together with contractors and agents working or acting on behalf of the Trust.

We are all responsible for gaining an understanding of the requirements, the standard of conduct expected of us and ensuring that they comply at all times with all of our policies and procedures. This includes those in relation to procurement, conflicts of interest, hospitality and the acceptance of giftsand is set out in the [Managing Conflicts of Interest Policy](https://ghc.nhs.uk/wp-content/uploads/RATFIEDManagingConflictsofInterestPolicyNovember2017.docx).

Bribery and corruption under the Act are punishable for individuals as a criminal offence by up to 10 years imprisonment and the Trust could face an unlimited fine and face incalculable damage to our reputation. The Trust therefore takes its legal responsibilities very seriously.

The success of the organisation’s anti-bribery measures depends on all colleagues, and those acting for the organisation, playing their part in helping to detect and eradicate bribery. Therefore, all colleagues 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 the [Counter Fraud, Bribery and Corruption policy](https://ghc.nhs.uk/counter-fraud/).

If you are in any doubt as to whether any conduct could amount to bribery please contact a [member of the Trust’s board](https://ghc.nhs.uk/board-and-governors/meet-our-board/), the Trust Secretary, [Trust.Secretary@ghc.nhs.uk](mailto:Trust.Secretary@ghc.nhs.uk) or on 0300 421 800, Local Counter Fraud Manager [leesheridan@nhs.net](mailto:leesheridan@nhs.net) or alternatively 0300 422 2726.

**Douglas Blair**

Chief Executive Officer

Gloucestershire Health and Care NHS Foundation Trust