

SHEFFIELD HEALTH AND SOCIAL CARE NHS FOUNDATION TRUST

Chief Executive Statement – Bribery

Sheffield Health and Social Care NHS Foundation Trust 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 Trust's behalf is responsible for maintaining the organisation's reputation and for conducting Trust business honestly and professionally.

The Trust considers that bribery and corruption has a detrimental impact on Trust 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 Trust can lead by example and deliver excellent services to our patients.

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

Sheffield Health and Social Care NHS Foundation Trust 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 board and senior management are committed to implementing and enforcing effective systems throughout the Trust to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

The Trust has issued revisions to key policies including, the Fraud Policy & Response Plan, Standards of Business Conduct and Whistleblowing outlining our position on preventing and prohibiting bribery, details can also be found on the Trust'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 Trust. All employees and other individuals acting for the Trust are required to familiarise themselves and comply with these amendments with immediate effect.

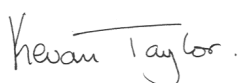
A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly. Employees and others acting for or on 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 policy 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 Trust 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 its 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 Trust'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 Health and Social Care NHS Foundation Trust will support any individuals who make such a report, provided that it is made in good faith.



Kevan Taylor
Chief Executive