

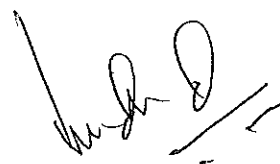
*At NHS Thurrock CCG we value our reputation for top quality care, financial probity and sound governance and we conduct our business in an ethical manner. The Bribery Act 2010, effective from 1<sup>st</sup> July 2011 was introduced to make it easier to tackle the issue of bribery. Bribery can be defined as ‘giving someone a financial or other advantage to encourage them to perform their function or activity improperly or reward them for having done so.’*

*In order to limit our exposure to bribery we have in place a clear Anti-Fraud, Bribery and Corruption Policy (2019), Conflict of Interest Policy (2019), Standards of Business Conduct Policy (2019), Whistleblowing Policy (2017) and a Local Counter Fraud Specialist who will investigate any allegation. We encourage staff to report any suspicion of bribery and rigorously investigate any allegations. In addition, we maintain a register of interests for Board Members, staff and Member Practices and we ask them not to accept gifts or hospitality outside the limited circumstances set out in the Standards of Business Conduct Policy.*

*The Board carries out its business in an open and transparent way. We are committed to the prevention of bribery as well as to combating fraud and expect those organisations we work with to do the same. Doing business in this way enables us to reassure our members, stakeholders and members of the community that public funds are properly safeguarded.*



Mandy Ansell  
**Accountable Officer**



Dr Anand Deshpande  
**CCG Chair**

**November 2019**