

Counter Fraud, Bribery and Corruption - Chief Executive's Statement

The Bribery Act 2010 came into force on 1 July 2011, with the purpose of preventing bribery and corruption in both the public and private sectors.

Bribery can be defined as the giving or receiving of an advantage (financial or otherwise) in exchange for improperly performing a relevant function or activity.

Any individual found guilty of bribery and corruption under the act can be sentenced up to 10 years imprisonment and/or an unlimited fine.

The Bribery Act also introduced a corporate offence of failing to prevent bribery if organisations, including those in the NHS, do not have adequate procedures in place designed to prevent associated persons from engaging in bribery. Any organisation prosecuted under the Bribery Act can be given an unlimited fine. Incalculable reputational damage would almost certainly occur.

Additionally, on 1 September 2025, a corporate offence of failure to prevent fraud was introduced under the Economic Crime and Corporate Transparency Act 2023 and this also applies to the ICB. Similar to the Bribery Act, a defence exists if organisations in scope can show they had reasonable procedures in place to prevent fraud, committed by associated persons, for the organisation's benefit.

The ICB takes its legal responsibilities very seriously and is committed to applying the highest standards of ethical conduct, following good NHS business practices and having robust controls in place to prevent fraud and bribery.

It is essential that everyone working for, or on behalf of, the ICB is aware of the standards of behaviour expected of them.

These standards are set out in the ICB's policies and procedures and reflect not only the law, but the expectations of behaviour enshrined in the ICB's vision and core values.

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 ICB will not tolerate this or any forms of fraud.

If you have any concerns or suspicions that fraud or bribery is being committed against the NHS, please contact the ICB's counter fraud provider, AuditOne, on 0191 441 5916 or counterfraud@auditone.co.uk.

On behalf of the ICB, I confirm our commitment to ensuring that all staff are aware of their responsibilities in relation to the prevention of fraud and bribery within our organisation.

Sam Allen, Chief Executive, 2 December 2025