

Board Meeting in Public

Tuesday, 30 January 2024

Title of Report	Anti-fraud, Bribery and Corruption Policy	Agenda No.	4.2
Nature of Report	<input checked="" type="checkbox"/> Official	<input type="checkbox"/> Official Sensitive	
Author(s)	Duncan Boud, Assistant Director – Financial Control & Operations		
Lead Executive	Carl Vincent, Chief Financial Officer		
Non-Executive Director Sponsor	n/a		
Presented for (tick all that applies)	<input checked="" type="checkbox"/> Approval	<input type="checkbox"/> Information	
	<input type="checkbox"/> Assurance	<input type="checkbox"/> Update	
Purpose of the report and key issues			
<p>Purpose: To present the new draft Anti-Fraud, Bribery and Corruption Policy, and request approval by the Board, subject to any amendments that it may request.</p> <p>Key Issues: The existing policy had been in existence for some time, and included sections on conflicts of interest, which are now covered by a separate standalone policy. In addition, as part of our work towards achieving Government Functional Standard GovS 013: Counter Fraud, we had received feedback from the Government Counter Fraud Function Health Peer Review Group that the existing policy did not fully meet the requirements of the standard. The new policy addresses the points raised in that feedback.</p>			
Previously Considered by			
<p>Audit, Risk and Governance Committee on 11 January 2024. The policy was recommended for approval without amendment, but with a request that an annual report be presented to the May ARGC meeting, setting out how the policy had been applied and the activity undertaken over the last year to detect and prevent fraud, bribery and corruption. The committee also highlighted the need for mandatory training for Non-Executive Directors, the importance of training for the Commercial team, and the greater risks around international business. In addition, the committee requested that the Whistleblowing Policy should be made available to external parties; it has subsequently been confirmed that this is already available here: https://www.nhsbt.nhs.uk/who-we-are/transparency/policies-and-regulations/</p>			
Recommendation	The Board is asked to approve the new policy, subject to any amendments that it may request.		
Risk(s) identified (Link to Board Assurance Framework Risks)			
Finance F-05: Loss of reputation for sound financial control (due to fraud)			
Strategic Objective(s) this paper relates to: [Click on all that applies]			
<input type="checkbox"/> Collaborate with partners <input type="checkbox"/> Invest in people and culture <input type="checkbox"/> Drive innovation <input type="checkbox"/> Modernise our operations <input type="checkbox"/> Grow and diversify our donor base			
Appendices:	Appendix 1 - Anti-Fraud Bribery and Corruption Policy DRAFTv1.1		