

Board Meeting in Public

Tuesday, 03 February 2026

Title of Paper	Anti-Fraud, Bribery and Corruption Policy		Agenda No.	4.2
Nature of Paper	<input checked="" type="checkbox"/> Official	<input type="checkbox"/> Official Sensitive		
Author(s)	Duncan Boud, Assistant Director – Financial Control & Operations Maxine Spivey, Local Counter Fraud Specialist			
Lead Executive	Carl Vincent, Chief Financial Officer			
Non-Executive Director Sponsor	n/a			
Presenter(s) at Meeting	Duncan Boud, Assistant Director – Financial Control & Operations			
Presented for	<input checked="" type="checkbox"/> Approval	<input type="checkbox"/> Information		
	<input checked="" type="checkbox"/> Assurance	<input checked="" type="checkbox"/> Update		
Is there a plan to communicate this to the organisation?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yet to be determined	
Executive Summary				
The Anti-Fraud, Bribery and Corruption Policy is reviewed annually. Changes from the version approved last year are tracked in purple text. The changes are very minor, and mainly relate to removing references and links to guidance previously published by NHS England, which has now been withdrawn, and amending the wording around the nature of the counter fraud training.				
The Audit Risk and Governance Committee reviewed the policy at its 8 January 2026 meeting, and requested that the proposed updated wording relating to the counter fraud training be made more specific, particularly if the training is to be linked to defined responsibilities or job categories. To address this, the previously proposed wording relating to staff completing the training “as applicable to their role” has been replaced with “particularly those staff at Band 8a and above, and those fulfilling the role of budget holder”. This links to plans for the training to be mandatory for staff at Band 8a and above, and for the inclusion of the counter fraud training in the training course for budget holders, which is currently being updated and which will be relaunched at the beginning of April.				
Previously Considered by				
Audit, Risk and Governance Committee on 8 January 2026. The policy was recommended for approval, subject to the wording relating to the counter fraud training being made more specific.				
Recommendation				
The Board is asked to approve the updated policy, subject to any amendments that it may request.				
Risk(s) identified (Link to Board Assurance Framework Risks)				
P-05 Finance, contributory risk Fin-04 Loss of reputation for sound financial control				
Strategic Objective(s) this paper relates to:				
<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:	BLP11V2 Anti Fraud Bribery and Corruption Policy January 2026 DRAFT v1.1.docx			