

Our Anti-Fraud, Bribery and Corruption, Money Laundering and Economic Crimes Statement

Berkshire Healthcare NHS Foundation Trust is committed to reducing fraud, bribery, corruption and money laundering in the NHS, freeing up public resources for better patient care.

Our Counter Fraud Policy & Procedures applies to all Trust employees, bank and locum staff, contractors, consultants, suppliers, internal and external stakeholders, and covers:

- How the Trust will improve the knowledge and understanding of everyone in our Trust, irrespective of their position, about the risk of fraud, bribery and corruption within the organisation and its unacceptability
- How the Trust will promote an anti-fraud culture and an environment where staff feel able to raise concerns and understand that fraud, bribery and corruption are unacceptable
- The Trust's responsibilities in terms of the deterrence, prevention, detection and investigation of fraud, bribery and corruption
- How we ensure that appropriate sanctions are considered following an investigation, which may include internal disciplinary action, civil recovery, criminal prosecution, or referral to a professional regulatory body

Fraud

Fraud involves dishonestly making a false representation, failing to disclose information or abusing a position held, with the intention of making a financial gain or causing a financial loss to the NHS. The gain or loss does not have to succeed for fraud to have been perpetrated, as long as the intent is there. The 'failure to prevent fraud' offence was introduced as part of the Economic Crime and Corporate Transparency Act 2023 and came into effect on 1 September 2025. The Trust is committed to having reasonable fraud prevention procedures in place following the six principles of top-level commitment, fraud risk assessment, prevention procedures, due diligence procedures, communication including training, and monitoring/review.

Bribery

The Bribery Act 2010 introduced new legislation to combat bribery and corruption and came into force in July 2011. Bribery is broadly defined as giving or offering someone a financial or other advantage to encourage that person to perform their function improperly; or requesting, agreeing to receive or accepting the advantage offered. Section 7 of the Act introduced a new corporate offence.

In order to minimise the risk of unfounded allegations of bribery, corruption and money laundering, if staff are offered hospitality or gifts or are considering offering any to another person they should refer to the Standards of Business Conduct Policy.

This policy also sets out what material interests staff should declare such as secondary employment and directorships.

Paul Gray Chief Financial Officer

Reporting your concerns

The Trust contracts TIAA Ltd to provide its counter fraud service and you can contact our Counter Fraud Specialist, Kim Hampson, in confidence.

Email: kim.hampson@tiaa.co.uk

Email: kim.hampson@nhs.net

Call: **07881 840 869**

All genuine suspicions of fraud, bribery, corruption, money laundering, or other economic crimes can also be reported in confidence to the NHS Fraud and Corruption Reporting Line:

Call: **0800 028 40 60**

Visit: cfa.nhs.uk/reportfraud



berkshirehealthcare.nhs.uk