

Managing Director

NHS Gloucestershire Managed Services (a wholly owned subsidiary company of Gloucestershire Hospitals NHS Foundation Trust)

Fraud and Bribery Statement

1 March 2026

On 1 September 2025, a new legal duty came into effect under the Economic Crime and Corporate Transparency Act 2023. This duty holds large organisations, including NHS bodies, criminally liable if a fraud is committed by someone associated with the organisation and the organisation does not have reasonable procedures in place to prevent it.

In addition, the Bribery Act 2010 creates criminal offences covering the offering, promising or giving of a bribe and the requesting, agreeing to receive or accepting of a bribe. The Act created corporate liability for failing to prevent bribery on behalf of a commercial organisation. Bribes can be in the form of money, favours, promise of later payment or anything else the recipient views as valuable. A commercial organisation may be liable to prosecution if a person associated with it bribes another person intending to obtain or retain business or an advantage in the conduct of business for that organisation.

Our Commitment

At NHS Gloucestershire Managed Services, we are committed to delivering safe, high-quality care and using public resources responsibly. We must all ensure that public funds are used appropriately and that business is conducted fairly, honestly and openly.

I can assure everyone that this organisation takes its responsibilities very seriously. Protecting NHS resources from fraud is essential. Fraud and bribery damages public confidence, diverts funds away from patient care and undermines the values of the NHS.

We have zero tolerance for fraud, bribery, or corruption in any form. As Managing Director, I am committed to ensuring that we have strong and effective arrangements in place to prevent, detect, and respond to bribery and fraud by any person associated with us.

We actively strive to deter and prevent all and any associated persons from committing fraud or bribery but anyone who does so against or on behalf of the organisation could be subject to all sanctions available: criminal, civil, disciplinary, and regulatory action.

What We Are Doing

We have been working with the Gloucestershire NHS Counter Fraud Service to ensure all 'associated persons' know their responsibilities and that robust arrangements to prevent all forms of fraud, bribery or corruption are in place. To this end, we maintain a robust prevention framework designed to prevent fraud and bribery and foster a culture of ethical conduct. This includes but is not limited to regular risk assessments, clear policies and procedures, targeted training for staff, and communication to employees and associated persons.

The organisation adopts and implements the 'prevention procedures' approach suggested by the new offence. These procedures are designed to prevent persons associated with the organisation from committing fraud offences. These are similar to the 'adequate procedures'

that have already been introduced in relation to the offence of failure to prevent bribery introduced in the Bribery Act 2010.

Our combined fraud and bribery prevention framework is informed by the six principles set out in Ministry of Justice and Government guidance, headlined with the critical principle of top-level commitment. This involves active involvement and leadership from senior management, with a clear culture established and embedded from the top to ensure a no tolerance approach towards fraud, bribery, and corruption throughout the organisation and across all organisations with which we contract.

Working Together

Preventing fraud and bribery is everyone's business. Service users, contractors, service providers, patients, staff, and members of the public can all play a part by staying alert and reporting anything suspicious. We encourage all genuine suspicions of such activity to be reported. Any concerns should be reported immediately to the Trust Local Counter Fraud Specialist or the Finance and Commercial Director.

Should you wish to read about the new legislation in more detail, the NHS Counter Fraud Authority has provided specific guidance, [failure to prevent fraud offence | NHS Counter Fraud Authority](#).


We would encourage you to read the organisations Counter Fraud, Bribery and Corruption Policy or speak to a member of the Gloucestershire NHS Counter Fraud Service, to whom you can also report any concerns in relation to fraud within the NHS:

0300 422 2726 / ghn-tr.fraudAccountMailbox@nhs.net

NHS Fraud & Corruption Reporting Form (online) [https://cfa.nhs.uk/report-fraud /](https://cfa.nhs.uk/report-fraud/) by telephone **0800 028 4060**

Conclusion

The NHS exists to serve patients and the public. Every pound lost to fraud, bribery and other corruption is a pound not spent on care. This organisation is committed to doing everything reasonable to prevent such activities, protect our resources, and maintain the trust placed in us.



Dr Mike Gregson

NHS Gloucestershire Managed Services