

## **Chief Executive Officer**

### **NHS Gloucestershire ICB**

**19 November 2025**

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.

#### **Our Commitment**

At NHS Gloucestershire ICB, we are committed to delivering safe, high-quality care and using public resources responsibly.

I can assure everyone that this organisation takes its responsibilities very seriously. Protecting NHS resources from fraud is essential. Fraud 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 Chief Executive, I am committed to ensuring that we have strong and effective arrangements in place to prevent, detect, and respond to fraud.

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

#### **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 fraud prevention framework designed to prevent fraud and foster a culture of ethical conduct. This includes but is not limited to regular fraud risk assessments, clear policies and procedures, targeted training for staff, and communication to employees and associated persons.

The organisation adopts and implements the 'reasonable procedures' approach suggested by the new offence. These are similar to the 'adequate procedures' 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 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.

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](#).

You can also read the organisation's 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](mailto:ghn-tr.fraudAccountMailbox@nhs.net)

NHS Fraud & Corruption Reporting Form (online) <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 is a pound not spent on care. This organisation is committed to doing everything reasonable to prevent fraud, protect our resources, and maintain the trust placed in us.



**Sarah Truelove**  
**Chief Executive**  
**NHS Gloucestershire ICB**

