



Managing Director Statement on Bribery

Derbyshire Support and Facilities Services Ltd (DSFS) is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on behalf of DSFS is responsible for maintaining the reputation of DSFS, its Parent Company (Chesterfield Royal Hospital NHS Foundation Trust) and the wider clients of DSFS, conducting business honestly and professionally.

DSFS considers that bribery and corruption has a detrimental impact on the business by undermining good governance. We benefit from carrying out our functions in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in the NHS and wider public sector. By ensuring a level playing field, DSFS can lead by example and deliver excellent services to our patients, staff and wider clients.

Transparent, fair conduct helps to foster deeper relationships of trust between DSFS and our partners. It is vital for our reputation and future growth.

Derbyshire Support and Facilities Services Ltd does not tolerate any form of bribery, whether direct or indirect, by, or of, its staff, agents or consultants or any persons or entities acting for it or on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout the company to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

As our parent company, the Chesterfield Royal Hospital NHS FT's Managing Conflicts of Interest policy is fully adopted and outlines our position on preventing and prohibiting bribery, details of which can also be found on the Trust's internet. The provisions of this policy applies to all employees, as well as agency workers, consultants and contractors acting for or on behalf of the Trust and DSFS. All employees and other individuals acting for the Trust are required to familiarise themselves and comply with these policies.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly. Employees and others acting for or on behalf of the Trust are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, the Trust and DSFS are committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with the procedures set out in the Trust's policy.

A breach of the Managing Conflicts of Interest Policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal.





Employees and other individuals acting for the Trust should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

DSFS will not conduct business with service providers, agents or representatives that do not support the anti-bribery objectives of the company. We reserve the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, DSFS, the Trust or our clients with immediate effect where there is evidence that they have committed acts of bribery.

The success of DSFS's anti-bribery measures depends on all employees, and those acting for the company, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, DSFS, the Trust or clients are encouraged to report any suspected bribery in accordance with the procedures set out in the Managing Conflicts of Interest policy. DSFS will support any individuals who make such a report, provided that it is made in good faith.

DSFS Directors have all been through a Fit and Proper Person process, guidance relating to this process can be found here <https://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-5-fit-proper-persons-directors>

Our Company secretary carries out an annual review of the register of interests for all DSFS Directors and decision makers within the company, and they are all encouraged to undertake Conflict of Interest training provided through our Aspire training platform.

Kate Schroder

Interim Managing Director

Derbyshire Support and Facilities Services Ltd

