

IPCRG Anti-bribery Principles

Definition of Bribery

Very generally, this is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. This could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered as part of a tender process (gov.uk accessed 21 March 2021 <http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-quick-start-guide.pdf>).

Hospitality is different. A reasonable and proportionate level of genuine hospitality, or similar business expenditure is acceptable and is not bribery. To quote from the English Bribery Act 2010 – Quick Start Guide “so you can continue to provide tickets to sporting events, take clients to dinner, offer gifts to clients as a reflection of your good relations, or pay for reasonable travel expenses in order to demonstrate your goods or services to clients if that is reasonable and proportionate for your business.”

The IPCRG is guided by six principles

1. Proportionality

Our action to prevent or deal with bribery must be proportionate to its risk, to our size as a small charity but also in our context of working in healthcare that is subject to a number of potential risks that could affect patient safety or public finances.

2. Top Level Commitment

The Board, guided by the Governance Committee, is responsible for ensuring that the IPCRG conducts activities without bribery and for informing our committees and member organisations that we do not tolerate bribery. The Board, and Governance Committee take this role seriously.

3. Continuous Risk Assessment

We know that the most likely risk of our exposure to bribery would be:

- An individual prescriber associated with the IPCRG is offered a financial or other advantage to prescribe a particular pharmaceutical product or device
- A researcher or research group associated with the IPCRG is offered a financial or other advantage to design research or make conclusions from research that favour a particular product or device
- A medical writer or educator associated with the IPCRG is offered a financial or other advantage to include messages that favour a particular product or device

Therefore, we have a risk assessment process that assesses the risk of conflict of interest, reputational and financial risk for every project and activity we undertake. This process is monitored regularly each year by our Governance Committee, Research Sub-committee and, ultimately, the Board.

4. Due Diligence

Before we enter into any agreement with another organisation we carry out due diligence to avoid putting ourselves at risk. We also ask all our Board and committee members to complete or renew their declaration of interest form annually. These declarations are reviewed by the Executive team. All those who submit an abstract to any of our conferences/research meetings are required to declare all interests and these are published in the abstract book of each conference/research meeting.

5. Communication

We publish these principles on our web platform, and ensure our committees are aware of them.

6. Monitoring and Review

The risks we face and the effectiveness of our procedures may change over time. Therefore we remain vigilant, particularly if we enter new countries, or work with new partners, and if laws or policies change.

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