



Asthma UK Centre
for Applied Research



Asthma UK Centre for Applied Research Anti-Bribery Principles

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 16 January 2014 <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.”

Asthma UK Centre for Applied Research are guided by 6 principles:

1. Proportionality

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

2. Top Level Commitment

The Centre Management Committee (CMC) is responsible for ensuring that the Asthma UK Centre for Applied Research conducts activities without bribery and for informing members of our Centre that we do not tolerate bribery. The CMC take this role seriously.

3. Continuous Risk Assessment

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

- An individual clinical member of the Centre is offered a financial or other advantage to prescribe a particular pharmaceutical product or device.
- A researcher or research group associated with the Centre is offered a financial or other advantage to design research or make conclusions from research that favour a particular product or device.
- A researcher or educator associated with the Centre 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 CMC.

4. Due Diligence

We ask all Asthma UK Centre CMC members to complete or renew their conflict of interest form annually.

5. Communication

These principles will be published on Asthma UK Centre for Applied Research website, and we will ensure our Centre collaborators are aware of them.

6. Monitoring and Review

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

Policy agreed by: Centre Management Committee

Date: 21 Jan 201

Version number	Effective Date	Reason(s) for Change(s)
1.0	21 January 2014	New document
2.0	07 February 2017	New logo added