

CONTROLLED DOCUMENT

Conflicts of Interest Policy (including Sponsorship, Gifts and Hospitality)

CATEGORY:	Policy
POLICY STATUS:	Reserved
CLASSIFICATION:	Governance
PURPOSE	To set out the principles and framework of a code of conduct in the event that Sponsorships Hospitality and Gifts are offered to, or accepted, by Board members or Trust staff.
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Information for:	All Staff

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Version Control

Version	Title	Issue Date
1.0	Hospitality, Gifts and Inducement Policy	01/03/2002
2.0	Hospitality, Gifts and Inducement Policy	01/06/2006
3.0	Hospitality, Gifts and Sponsorship Policy	08/06/2010
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1. Policy Statement

- 1.1 The purpose of this policy and its associated documents is to ensure that University Hospitals Birmingham NHS Foundation Trust (the 'Trust') has in place appropriate guidance on dealing with Conflicts of Interest, including sponsorship, gifts and hospitality.

The Bribery Act 2010 places a duty on all organisations to have a code of conduct and to have 'appropriate procedures' in place to prevent bribery. The Trust's Staff Code of Conduct which deals with conflict of interests arising out of loyalty interests, Intellectual Property, secondary employment, procurement of goods and services, and clinical private practice for medical staff, should be read in conjunction with this policy.

- 1.1 The aim of this policy is to provide a clear framework whereby the Trust can provide assurance that its staff conduct themselves with honesty and integrity, to protect the Trust and its staff from any suggestion of corruption, partiality and dishonesty. This framework sets out the following:

1.1.1 The core principles for the acceptance of Sponsorship, Gifts and Hospitality;

1.1.2 The kind of Sponsorship, Gifts and Hospitality Trust staff might be allowed to accept;

1.1.3 When a Declaration of Sponsorship, Gifts and Hospitality ("Declaration") is required.

- 1.2 Where conflicts of interest arise, staff must adhere to the guidance as set out in the Staff Code of Conduct and in the case of Sponsorship, Gifts and Hospitality, this policy. The onus of completing a conflict of interest declaration lies with the individual who must declare at the earliest opportunity and always within 28 days of the conflict arising.

2. Scope

- 2.1 This policy applies to all persons working for the Trust, whether in a clinical or a non-clinical capacity, and is inclusive of Non-Executive Directors, volunteers, students, locum staff, bank and agency staff, staff employed on honorary contracts, and University staff when engaged in Trust business. For ease of reference this policy shall refer to all of the above named as "Trust staff".

3. Definitions

Authorising Officer	The appropriate Senior Nurse, Clinical Lead or Manager (i.e. at least Agenda for Change Band 8a or above) of the individual concerned.
Declaration	Confirms the details of a Declarable Gift, Hospitality or Sponsorship that has been offered such as the date and nature of the offer, the name and address of the person/body who made the offer and the name and job title of the person accepting the offer.
Declarable Gifts	Any item of cash or goods, or any service, which is provided for personal benefit, free of charge or at less than its commercial value. Gifts with an individual value in excess of £25, or an aggregate value in excess of £50 over a rolling period of 12 months, which the individual was allowed to accept, must be declared.
Declarable Hospitality	Accepted Hospitality with a value in excess of £25 (see 4.9).
Sponsorship	Non-contractual funding provided to the Trust or its staff from an external source who may prospectively seek to contract with that member of staff and the Trust in relation to the commissioning or provision of services
Declarable Sponsorship	Accepted Sponsorship from Interested Third Parties with a value in excess of £25 (see 4.6)
Gifts	Items which are given without payment or other consideration
Hospitality	The provision of entertainment (including attendance at sporting events), meals and/or other refreshments or services, given without payment or other consideration
Interested Third Parties	Persons or bodies (other than public sector bodies or academic institutions) who are not patients, patients' relatives or friends and who hold or seek to hold contracts with the Trust or who potentially stand to gain some commercial benefit from the Trust's decisions regarding procurement
Nil Return	Declaration by the individual concerned that no Declarable Gifts, Hospitality or Sponsorships have been accepted
Other Third Parties	Persons or bodies who are not patients, patients' relatives or friends

4. Framework

- 4.1 This section describes the broad framework for dealing with Conflicts of Interest including Gifts, Hospitality and Sponsorship within the Trust. Detailed instructions are provided in the associated procedural documents, including the examples / scenarios provided in Appendix B.

The Deputy Chief Executive Officer (Deputy CEO) shall approve all

procedural documents associated with this policy and any amendments to such documents (except that the Authorisation Levels referred to in section 4.3 shall be set by the Deputy CEO with the agreement of the Chief Medical Officer and the Chief Finance Officer) and is responsible for ensuring that such documents are compliant with this policy.

General Rules

4.1.1 As a general rule, staff must not, in their official capacity, receive Sponsorship, Gifts and Hospitality or other benefits of any kind which might reasonably be regarded as compromising the Trust's position or the individual's personal judgement and integrity. In other words, staff must always behave in such manner that a fair-minded member of the public, knowing the facts of the matter, would not see anything improper or suspicious in the receipt of the Sponsorship, Gift, or Hospitality.

4.1.2 In particular, staff must not solicit, propose or agree to receive from any third party any form of Sponsorship, Gift or Hospitality in return for doing or not doing anything in relation to the discharge of their duties and responsibilities on behalf of the Trust or for showing or not showing any favour in relation to such duties and responsibilities.

4.1.3 In addition, all staff who are in contact with suppliers and contractors (including external consultants), and in particular those who are authorised to approve purchase orders, or procure and award contracts for goods, materials or services, are expected to adhere to professional standards of the kind set out in the Chartered Institute of Procurement and Supply's Code of Conduct and Corporate Code of Ethics.

4.1.4 In addition, all staff must undertake their duties according to section 20 of Standing Financial Instructions (SFIs).

4.1.5 Sponsorship, Gifts and Hospitality should be appropriately authorised according to the requirements set down in this policy.

4.1.6 Staff must declare all gifts, hospitality or other inducements received by or offered to staff by or on behalf of:

- any manufacturer, distributor;
- vendor of pharmaceuticals, medical devices, consumables; or
- equipment

of a type which is, or could be, used in the delivery of the Services; and any other actual or potential conflicts of interest on their part in relation to the delivery of the Services.

4.2 Authorisation

Prior authorisation must be sought from the appropriate Authorising Officer dependent on the value of the item/activity and the Authorising Officer must be satisfied that the proposed acceptance does not jeopardise the Trust's impartiality and objectivity. (If there is any doubt, the offer must be politely declined).

4.3 Authorisation Thresholds

The following thresholds are in place for approving Sponsorship, Gifts and Hospitality. Evidence of approval should take the form of a brief email from the Authorising Officer to the individual, which can be provided as evidence.

Authorising Officer Role	Approval Threshold*
No Authorisation required	Up to and including £25.00
Senior Nurse, Clinical Service Lead or Manager (minimum Band 8a)	Up to and including £2499.99
Member of the Hospital Leadership Team/ Corporate equivalents	Up to and including £9999.99
Board Level Director	£10,000 and above

*This threshold applies to the total amount received from/offered by a single party in financial year

4.3.1 The Authorising Officer for:

- the Chief Executive shall be the Chair;
- the Chair shall be the Deputy Chair;
- any Executive Director shall be the Chief Executive; and
- any Non-Executive Director shall be the Chair.

Sponsorship, Gifts and Hospitality are covered in the following sections

4.4 What Sponsorship is

Non-contractual funding provided to the Trust or its staff from an external source who may prospectively seek to contract with that member of staff and the Trust in relation to the commissioning or provision of services for any purpose including, but not restricted to the following:

- All or part of the costs of a member of staff

- Research
- Staff training
- Pharmaceuticals
- Equipment
- Use of external meeting rooms
- Costs associated with attendance at conferences, seminars or meetings
- Hotel and transport costs (including trips abroad)
- Provision of services (e.g. speakers)

4.5 Types of Sponsorship

- a) **“General Sponsorship”** is sponsorship offered to individuals or the Trust by external parties who may prospectively seek to contract with that individual or the Trust in relation to the commissioning or provision of Trust services.
- b) **“Sponsored Events”** are events that are organised by individuals or organisations, and where sources external to the Trust seek to offer to meet some or part of the costs of running the event. Where a Sponsor may be considered to have influence over the content or main purpose of the event, consideration must be given to continuing with the Sponsor, and must be declared.
- c) **“Sponsored Research”** is research carried out by individuals or organisations where sources external to the Trust seek to offer to meet some or part of the costs of running this research.
- d) **“Sponsored Posts”** are positions in the Trust funded in whole or in part by organisations external to the Trust. Prior to any acceptance of a Sponsored Post, written confirmation that the sponsorship will have no impact on purchasing decisions must be obtained. The acceptance of any promotional products as a result of the Sponsored Post must be refused and declared.
- e) **Pharmaceutical Sponsorship** includes
 - Speaking at and chairing meetings;
 - Training services;

- Advisory board meetings;
- Fees and expenses paid to healthcare professionals;
- Sponsorship of attendance at meetings, which include registration fees and the costs of accommodation and travel, both inside and outside the UK; and
- Donations, grants and benefits in kind provided to healthcare organisations.

f) **Research related Sponsorship**

Staff must be aware that research is further subject to separate approval processes as set out in the Research Governance Policies.

Commercial Sponsorship

4.5.1 The principles and rules regarding general sponsorship are that:

- Commercial sponsorship agreements should always be declared.
- Before entering into a commercial sponsorship agreement written approval should be sought from the appropriate individual, as defined by the Trust.
- Commercial sponsorship arrangements should only be approved where there is a clear benefit for the organisation, including organisation benefit derived from individual sponsorship arrangements.
- No information should be supplied to a company for their commercial gain. As a general rule, information which is not in the public domain should not normally be supplied.
- The commercial sponsor of an event, post or research etc. should always be clearly identified in the interest of transparency.
- The senior individual responsible for arranging the commercial sponsorship is responsible for declaring it.

4.5.2 Sponsorship of events by appropriate external bodies will only be approved where the event will result in clear benefit for the Trust. The general principles and rules are:

- Sponsors should not have any influence over the content of an event, meeting, seminar, publication or training event.
- Attendance of the sponsor is at the discretion of the event organiser.
- The fact of sponsorship does not equate to endorsement of a company or its products.
- During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection legislation.
- Sponsorship of events must be declared.

4.5.3 Sponsored research will only be approved provided the proposed research goes through the appropriate approvals process and is able to demonstrate transparent funding as well as an assurance there will be no inducements to purchasing decisions. The general principles and rules are:

- Involvement in Sponsored Research must be declared.
- Commercial funding for research purposes must be transparent.
- Any proposed research must go through the appropriate Health Research Authority approvals process.
- There must be a written protocol and written contract between the health professional(s) and/or the institutes at which the study will take place and the sponsoring organisation, which specify the nature of the services to be provided and the payment for those services.
- The study must not constitute an inducement to prescribe, supply, administer, recommend, buy or sell any medicine, medical devices, equipment or services.

4.5.4 Sponsored posts will only be authorised where the Trust has provided express approval of the same. The general principles and rules are that:

- Prior to entering into an agreement regarding the commercial sponsorship of a post approval should be sought from the appropriate individual as identified by the Trust.

- Arrangements regarding the commercial sponsorship of a post should only be entered where there is written confirmation that the arrangements will have no effect on purchasing decisions.
- Sponsored health professionals should not be involved in the promotion of specific products.
- Sponsors should not have any influence over the duties of the post or have any preferential access to any services, materials or intellectual property relating to or developed in connection with the sponsored role.
- Sponsored posts must be declared.

4.5.5 If there is any doubt as to the appropriateness of accepting a Sponsorship, staff must either politely decline or consult the appropriate Authorising Officer.

4.6 What staff must do to accept Sponsorship

4.6.1 General Sponsorship is the most commonly declared potential conflict of interest in the Trust. Whilst these opportunities can provide considerable benefit to the Trust, it is important that they are appropriately approved

4.6.2 Sponsorship may only be accepted in accordance with the General Rule (see Section 4.1.1). In addition, staff must not accept Sponsorship from Interested Third Parties unless the following conditions are met:

- Any Hospitality element of Sponsorship activity is incidental and proportionate to the event;
- Relevant business information or benefit to the Trust is expected to be gained through the Sponsorship; and
- If the value of the Sponsorship exceeds £25 per staff member involved (Declarable Sponsorship):
 - i) The Sponsorship must be authorised in advance by the appropriate Authorising Officer; and
 - ii) A Declaration must be submitted in accordance with the rules set out in 4.10.

4.6.3 Any expenses incurred as a result of accepting Sponsorship must be claimed in line with the associated Expenses process. All expenses must be approved beforehand by the line manager. For insurance purposes, the Corporate Affairs Manager must be

kept informed of any relevant travel arrangements.

- 4.6.4** Where attendance at an event qualifies as study leave or similar, a copy of an appropriate study leave form or similar is acceptable and no additional approval is required.

4.7 Advance Block Approval of Sponsorship

- 4.7.1** If a member of staff regularly takes part in sponsored activities they can request advance annual block approval from the appropriate Authorising Officer depending on the expected cumulative value of the benefit received with the same supplier.

- 4.7.2** This should take the form of an email from the Authorising Officer to the individual, following a discussion and must address the following points:

- Number of expected occurrences and the supplier involved
- How any time off will be accounted for
- Expected value to be received by the individual and the form this will take:
travel/accommodation/subsistence/payment of fees etc
(the maximum value must accord with the authorisation thresholds)

4.8 Gifts

4.8.1 Cash (including cash equivalents such as vouchers/tokens)

- a) Under no circumstances must staff accept personal Gifts of cash (donation), or cash equivalents such as vouchers or tokens, even where their value is below the £25 threshold. Where cash or cash equivalents, of any value, has been offered to an individual, the donor must be invited to make a donation to the UHB Charities or to a ward fund or similar, subject to a receipt being issued and the cash being banked through the Trust's cashiers office. If the donor does not wish to do that, the Gift must be refused.
- b) Staff must not actively solicit charitable donations, nor agree to receive a charitable donation, in lieu of a professional fee
- c) Decisions about whether a donation is accepted are ultimately for the Trustees of UHB Charities to make, and Trustees should be willing to turn down donations if they are not confident of their legitimacy.

4.8.2 Gifts other than cash or cash equivalent

Subject to the General Rule, set out in 4.1.1, gifts other than cash, or cash equivalent, may be accepted in the following circumstances:

- a) The Gifts have an individual value of £25 or less (or an aggregate value of £50 or less over a rolling period of 12 months), are not in cash or cash equivalent (for cash – see Section 4.8.1 above) and are not pharmaceutical goods, medical devices, consumables or equipment of a type which are or could be used in the delivery of the services of the Trust (prior authorisation in accordance with Section 4.2 is required if staff wish to accept the latter).
- b) Staff must not accept gifts from a colleague where it is given in anticipation/recognition of the staff member providing some form of benefit to the donor. For example a birthday, celebration or leaving gift is appropriate but a gift given at the time of an appraisal or a formal assessment being signed off, gives the impression of an expectation and therefore should be refused.
- c) Staff must not accept gifts other than cash equivalent from an Interested Third Party where the value exceeds £6;
- d) Refusal would cause significant offence due to cultural or similar reasons; or
- e) Authorisation is obtained in accordance with 4.2 above.

Declarations are required where the value of the gift exceeds £25 or £50 over a rolling 12-month period.

4.9 What Hospitality Is

4.9.1 This section does not apply to entertainment, meals and/or refreshments provided at events or occasions (e.g. courses, conferences, seminars, workshops, etc) sponsored or supported by the Trust.

4.9.2 Hospitality from patients, patients' relatives or friends

Staff may accept any hospitality subject to the General Rule (see 4.1.1) and where the value of the hospitality is £25 or less per member of staff.

4.9.3 Hospitality from Other Third Parties

Staff may accept any hospitality subject to the General Rule (see 4.1.1) and where the value of the hospitality is £25 or less per member of staff.

4.9.4 Hospitality from Interested Third Parties

Subject to the General Rule, set out in 4.1.1, Hospitality from Interested Third Parties may be accepted in the following circumstances:

- a) Provision of Hospitality with a value of £25 or less per member of staff. Typical examples would be lunches/refreshments at seminars, courses or workshops where attendance is free of charge to the Trust;
- b) Refusal would cause significant offence due to cultural or similar reasons; or
- c) Authorisation is obtained in accordance with 4.2 below.
- d) Invitations to lunches or dinners may be accepted as long as the purpose of the lunch or dinner is to discuss Trust business and acceptance is considered to be beneficial to the interests of the Trust.
- e) Overnight Accommodation must not normally be accepted. However, it may be appropriate to accept overnight accommodation where there is no convenient alternative and where the invitation arises in connection with an official working visit.
- f) Social, Sporting and Cultural Invitations must not be accepted by staff who have an official involvement in dealing with the Interested Third Party that makes the invitation, but may be accepted for other members of staff who have no such involvement.

Where b) to f) apply, a Declaration must be submitted in accordance with 4.10 below.

4.10 Declarations

4.10.1 Anyone who falls within the scope of this policy, as set out in Section 2.1, must submit an online declaration at the earliest opportunity and, in any event, within 28 days of the acceptance of a Declarable Gift (see 4.8), Declarable Hospitality (see 4.9.1) or Declarable Sponsorship (see 4.6.1).

4.10.2 Staff on Consultant contracts and all staff (for avoidance of

doubt, not just clinical staff) who are on AfC band 8c and above – or equivalent contracts, must submit an annual return (including a Nil Return where relevant) at the beginning of the financial year. These staff are referred to as Decision Making Staff.

4.10.3 Hospital Leadership Teams/and Corporate equivalents Teams will be approached to identify any staff which are felt to be Decision Making Staff but do not fall into the definition in paragraph 4.10.2. These staff will be added to those staff in paragraph 4.10.2 and will be under the same requirements regarding mandatory declarations and publication of names.

4.10.4 Declarations must be submitted on the online form available here:

<http://uhbhome/conflict-of-interest-declaration.htm>

4.10.5 If staff are in any doubt, an interest should be declared.

4.10.6 In addition to 4.10.1, all staff are required to declare if, and to what extent, they have been offered and/or accepted any Sponsorship, Gifts and Hospitality or Sponsorship from an Interested Third Party when they become involved in any procurement process relating to that Interested Third Party and such declarations will be noted. For further details please see the Procurement Policy.

4.10.7 Where the acceptance of a Declarable Gift, Hospitality and/or Sponsorship requires prior authorisation, evidence of such authorisation must be forwarded to corporate.compliance@uhb.nhs.uk

4.11 Publication of the Register

4.11.1 The Director of Corporate Affairs shall oversee the publication of a register in accordance with the NHSI Guidance (Managing Conflicts of Interest in the NHS) and the NHS Standard Contract.

4.11.2 An interest will remain on the register for a minimum of 6 months after the interest has expired.

4.12 Declined offers of Gifts, Hospitality and/or Sponsorship/ Bribe/Commission

Offers of Gifts, Hospitality or Sponsorships that are declined should be declared. Any offer of a bribe or a commission or any other offer, or a number of offers made by the same person or body over a period of

time, which might be seen to be improper or suspicious by a fair-minded member of the public, knowing the facts of the matter, must be reported immediately to the Deputy CEO.

4.13 Breaches of this policy

4.13.1 Staff have a responsibility to speak up about actual or suspected breaches of this policy by others. Legitimate and genuine concerns about conflicts of interest and other financial integrity or business conduct issues may be raised through the Trust's Freedom to Speak up Guardian or through application of the Policy for Raising Concerns in the Public Interest (Whistleblowing) and associated Policy.

4.13.2 The SFIs have been adopted by the Board and are mandatory for all staff of the Trust including Directors. This Policy forms an integral part of the SFIs and is therefore also mandatory. Failure to comply is a disciplinary offence and, if appropriate, may be referred to the Local Counter Fraud Specialist and/or could result in disciplinary proceedings which may include dismissal and criminal prosecution. All staff who are aware of a breach of this Policy must report this immediately to their Line Manager and the Chief Legal Officer, so that appropriate action can be taken which may result in a referral to the Local Counter Fraud Specialist. Any breaches of this policy will be investigated jointly by Corporate Affairs, Human Resources and other appropriate staff.

4.13.3 Where appropriate, the Trust will report any breaches by regulated healthcare professionals to the relevant regulator if it believes that the staff member has acted improperly, so that these concerns can be investigated.

4.14 Freedom of Information Act 2000

Staff must note that, under the Freedom of Information Act 2000, the information contained within the Trust Register will be subject to disclosure to any member of the public on request.

5. Duties

5.1 Chief Executive

The Chief Executive has overall responsibility for the implementation of this policy. They have to ensure that the Trust has appropriate procedures in place which ensure that all Trust staff are impartial, honest and beyond suspicion of corruption in the conduct of their business.

5.2 Executive Directors

Executive Directors are required to remind staff that they are obliged to complete the on-line declaration, if they accept any kind of Declarable Gift, Hospitality or Sponsorship. If the staff members are Decision Making Staff, they must make an annual declaration.

5.3 **Deputy Chief Executive Officer**

The Deputy CEO will:

- provide an annual report to the Audit Committee, summarising all Declarations detailing breaches of this policy; and
- Receive reports from staff regarding concerns identified according to paragraph 4.13

5.4 **Members of the Hospital Leadership Teams/ Corporate equivalents/Executive Directors**

Members of the Hospital Leadership Teams/Executive Directors may approve the acceptance of Gifts, Hospitality and Sponsorships in exceptional and justifiable circumstances, details of which are set out in 4.2 above. They have a duty to exercise this power with the utmost care and under careful consideration of the consequences. Approval may only be granted where the acceptance of a Gift, Hospitality or Sponsorship can under no circumstances be perceived as a breach of the duty to remain impartial, independent, honest and above suspicion of corruption.

5.5 **Director of Corporate Affairs**

5.6 The Director of Corporate Affairs is responsible for:

- investigating any suspected conflicts of interest, and preparing a report of any findings to the Deputy CEO as and when required.

5.7 **Corporate Risk and Compliance Manager**

The Corporate Risk and Compliance Manager is responsible for:

- collecting the Declarations (including Nil Returns), the results of which will then be entered into the Register;
- publishing the Conflict of Interest Register on an annual basis on the Trust website, in accordance with the NHSI Guidance (Managing Conflicts of Interest in the NHS) and the NHS Standard Contract.

5.8 **Local Counter Fraud Specialist**

The Local Counter Fraud Specialist is responsible for:

- Investigating referrals received from the Trust; and
- Advising the Trust where potential criminal prosecution may be appropriate.

5.9 Freedom to Speak Up Guardian

The Freedom to Speak up Guardian will consider all legitimate and genuine concerns about conflicts of interest and other financial integrity or business conduct issues raised to them and advise the Executive Directors accordingly.

5.10 Trust staff

5.10.1 Trust staff have a duty to:

- a) submit Declarations for any Declarable Gifts, Hospitality and Sponsorship or any other conflict;
- b) submit Nil Returns where required (see 4.10.2);
- c) report any suspected conflicts of interest to the Director of Corporate Affairs; and
- d) Adhere to this policy, any relevant code of conduct and all good business and corporate governance practices.
- e) Staff must not accept direct or indirect financial incentives from private providers other than those allowed by Competition and Markets Authority guidelines.
- f) Where the Trust becomes aware of a potential undeclared interest, staff will be approached and requested to account for the potential interest. Such is request must be complied with, within 28 days.

5.10.2 Trust staff must be aware that the breach of the provisions of the Bribery Act 2010 renders them liable to prosecution and may also lead to loss of their employment and superannuation rights.

6. Implementation and Monitoring

The Director of Corporate Affairs and the Corporate Risk and Compliance Manager will provide advice and support to staff regarding the implementation of this policy.

7. References

The Bribery Act 2010

Managing Conflicts of Interest in the NHS: Guidance for staff and organisations, NHS England, February 2017

[Commercial Sponsorship – Ethical Standards for the NHS](#)

Chartered Institute of Procurement and Supply (CIPS) Code of Conduct (2013)

CIPS Corporate Code of Ethics - Chartered Institute of Procurement and Supply (2014)

EU Public Sector Directive 2014/24/EU as transposed into UK law as the Public Contracts Regulations 2015

EU Treaty principles which require transparency, equal treatment and appropriate and fair competition

NHS Standard Contract 2020/2021

[Standards of Business conduct for NHS staff](#)

8. Associated Policy and Procedural Documentation

Counter Fraud and Corruption Policy

Disciplinary Procedure

Freedom of Information Policy

Policy for Raising Concerns in the Public Interest (Whistleblowing)

Procurement Policy

Staff Code of Conduct

Standing Financial Instructions

Standing Orders

Appendix A

Monitoring Matrix

MONITORING OF IMPLEMENTATION	MONITORING LEAD	REPORTED TO PERSON/GROUP	MONITORING PROCESS	MONITORING FREQUENCY
Declarations of Gifts, Hospitality or Sponsorship	Director of Corporate Affairs	Audit Committee	Summary of declarations by Decision Making Staff within a report which looks at trends and themes and confirms the publication of the annual register.	Annually
Monitoring of mandatory declarations by Decision Making Staff	Director of Corporate Affairs	Audit Committee	Quarterly update on progress	Quarterly

Gifts

Example	Action required
Chocolates, stationery, other minor office items or small gifts to staff from patients, relatives or a Third Party who is not an Interested Third Party	None so long as the individual value does not exceed £25 (or £50 in the aggregate over a 12 month period), and: a) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such a Gift; and b) Acceptance of such Gifts does not contravene any relevant professional code of conduct.
Diaries or calendars from an Interested Third Party	None so long as the value does not exceed £6, and: a) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such a Gift; and b) Acceptance of such Gifts does not contravene any relevant professional code of conduct.
Gifts of cash or vouchers to go to ward or departmental charitable funds	All donations can be made to the Trust Charities for the benefit of patients and/or staff. Vouchers can be converted into a cash value by the Trust. Take the name and address of the donor and contact Charities on ext. 14852 (0121 371 4852) or email charities@uhb.nhs.uk and they will collect the gift and send a thank you letter.
Personal gifts of cash or vouchers	Not acceptable under any circumstances. Donors must be invited to make a donation to the Trust Charities, ward fund or similar. Breaches to be reported to Line Manager and the Head of Corporate Governance
Larger gifts such as food hampers or cases of wine	May be accepted in exceptional circumstances where refusal would cause significant offence due to cultural or similar reasons. If gift is accepted, this must be declared within 28 days of receipt.
Pharmaceuticals goods, medical devices, or consumable equipment of a type which is or could be used in the delivery of the services of the Trust (excluding the above)	Prior authorisation must be obtained in writing from the Authorising Officer who must be satisfied that the proposed acceptance does not jeopardise the Trust's impartiality and objectivity. Breaches to be reported to Line Manager and the Head of Corporate Governance.

Hospitality

Example	Action required
Working lunches with existing suppliers on Trust premises	<p>Staff may accept Hospitality provided that:</p> <ul style="list-style-type: none"> a) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Hospitality; and b) Acceptance of such Hospitality does not contravene any relevant professional code of conduct.
Hospitality (e.g. lunch, dinner) whilst attending trade fairs or conferences less than £25	<p>Staff may accept Hospitality provided that:</p> <ul style="list-style-type: none"> a) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Hospitality; and b) Acceptance of such Hospitality does not contravene any relevant professional code of conduct.
Hospitality whilst attending trade fairs or conferences more than £25.	<p>Must be declared and entered into the Register, indicating value.</p> <p>Staff may accept Hospitality provided that:</p> <ul style="list-style-type: none"> a) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Hospitality; and b) Acceptance of such Hospitality does not contravene any relevant professional code of conduct. <ul style="list-style-type: none"> i) With regards to lunch/dinner - the purpose of any lunch/dinner is to discuss Trust business and acceptance is considered to be beneficial to the interests of the Trust; <u>or</u> ii) with regards to overnight accommodation - there is no alternative and the invitation arises in connection with an official working visit; <u>or</u> iii) with regards to social, sporting or cultural events – there is no personal involvement in dealing with the party who makes the invitation or the invitation is accepted for staff who do not have any involvement; <u>or</u> iv) the refusal might offend.

Sponsorship

Example	Action required
<p>Sponsorship for attending conferences abroad for attendee only (note that the giving and receiving of gifts or hospitality must conform to the law of the countries where they are made or received)</p>	<p>Staff may accept Sponsorship provided that:</p> <ul style="list-style-type: none"> a) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Sponsorship; and b) Acceptance of such Sponsorship does not contravene any relevant professional code of conduct. <p>Prior authorisation is required.</p>
<p>Sponsorship of Trust training events</p>	<p>A written agreement must be in place and:</p> <p>Staff may accept Sponsorship provided that:</p> <ul style="list-style-type: none"> a) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Sponsorship; and b) Acceptance of such Sponsorship does not contravene any relevant professional code of conduct. <p>The sponsorship must be disclosed in any papers relating to the meeting, including any minutes taken</p>
<p>Personal sponsorship to attend trade or training events</p>	<p>Staff may accept Sponsorship provided that:</p> <ul style="list-style-type: none"> a) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Sponsorship; and b) Acceptance of such Sponsorship does not contravene any relevant. <p>Prior authorisation is required.</p>