



Standards of Business Conduct and Receipt of Hospitality Policy

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Performance Indicators

Report on declarations made from policy to the Audit Committee for review.

Contents

Section		Page
1.	Introduction	5
2.	Aims and Objectives	5
3.	Scope of the Policy	5
4.	Accountability	6
5.	Summary	9
6.	Hospitality and Gifts	9
7.	Conflicts of Interest - Declarations of Interests	12
8.	Outside Employment	13
9.	Contracts for goods and services	14
10.	Candidates for Appointments	14
11.	Canvassing for Appointments	14
12.	Bribery	15
13.	Counter Fraud Measures	15
14.	Charitable Collections/Fundraising	15
15.	Recording Arrangements for Receipt of Hospitality	16
16.	Equality and Diversity	17
17.	Implementation and Dissemination	17
18.	Monitoring Compliance with and the Effectiveness of Procedural Documents	17
19.	References	17
20.	Associated Documentation	17

Appendices:

Appendix 1	Declaration of Hospitality / Gifts	18
Appendix 2	Outside Employment / Private Practice	20
Appendix 3	Declaration of External Remunerated Activity	21
Appendix 4	Charitable Fundraising Form	22
Appendix 5	Simple guide to declaration of gifts and hospitality	23
Appendix 6	Equality Impact Assessment	24

1 Introduction

As a public sector body, NHS Wakefield Clinical Commissioning Group (CCG) must be impartial and honest in the conduct of business and employees should remain beyond suspicion. This is in keeping with good governance.

All CCG staff are responsible for ensuring that they are not placed in a position which risks conflict between their private interests and their NHS duties. Every member of staff is responsible for ensuring that he / she complies with this policy on standards of business conduct and hospitality. Some staff may additionally be required to adhere to a code of conduct of their own professional body.

This policy sets out the standards of conduct in relation to business conduct whilst an employee or contractor of NHS Wakefield CCG and provides guidance for staff. It supplements the Constitution and the Code of Conduct for NHS Managers.

2 Aims and Objectives

This policy:

- provides guidance on what is deemed to be acceptable in terms of receipt of hospitality, including gifts and provides a code of conduct that staff are expected to follow with respect to hospitality.
- highlights staff responsibilities to declare outside interests and employment outside of the organisation.
- describes the organisational arrangements staff should use to publicly declare and record information about any form of hospitality or sponsorship.

3 Scope of the Policy

The policy applies to NHS Wakefield CCG and all its employees and must be followed by all those who work for the organisation, including the Governing Body, those working for commissioning support services, those on temporary or honorary contracts, secondments, pool staff, contractors and students. The policy provides guidance for independent contractors and their staff.

Employees also have a responsibility to comply with the requirements of their own professional body's codes of professional conduct and codes of practice.

It is the responsibility of managers, in line with the Code of Conduct for NHS Managers and Standards of Business Conduct for NHS staff, to ensure that this policy is followed by all employees. Managers will need to provide guidance to staff as required on the interpretation of the policy in given situations. A number of commonly asked questions and situations that have arisen are included at Appendix 2 to help guide staff in applying this policy.

3.1 Links to other policies

This policy should be read in partnership with the CCG's

- Anti-Fraud, Bribery and Corruption Policy.
- Joint working and sponsorship Policy;
- Conflict of Interest Policy.

Staff should be aware that disciplinary action may be taken where there is a breach of this policy; please refer to the CCG's Disciplinary Policy.

4 Accountability

Standards of Business Conduct state that all employees and officers of the NHS must be impartial and honest in the conduct of their business and do not place themselves in a position which risks or appears to risk conflict between their private interest and NHS duties. High standards of corporate and personal conduct are a requirement throughout the NHS and, since it is publicly funded, it must be accountable to Parliament for the services it provides and for the effective and economical use of taxpayers' money.

Chief Officer is the organisation's designated 'Accountable Officer' and has overall responsibility for ensuring NHS Wakefield CCG operates efficiently, economically and with probity. The Chief Officer (alongside other members of the Governing Body) has a duty to ensure that the CCG provides a secure environment in which to work, and one in which people are confident to raise concerns which will be listened to and addressed.

Chief Financial Officer is responsible for ensuring this policy is in place. The Chief Financial Officer, in conjunction with the Chief Officer, monitors and ensures compliance with the Secretary of State's Directions regarding fraud and corruption. In addition in consultation with the Local Counter Fraud Specialist (LCFS), the Chief Financial Officer will decide whether there is sufficient cause to conduct an investigation in relation to bribery, and whether the Police and external audit need to be informed.

Governance and Board Secretary is responsible for administering this policy and ensuring reporting to the Audit Committee.

All members of the **Governing Body**, must act in accordance with this policy and lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures.

Line Managers are responsible for assisting employees in complying with this policy by:

- ensuring that this policy and its requirements are brought to the attention of employees for whom they are responsible, and that those employees are aware of its implications for their work ensuring that members of staff have a thorough understanding of NHS Wakefield CCG's governance arrangements.

Staff are required to:

- ensure they do not place themselves in a position which might reasonably be seen to compromise their professional judgement or integrity.

- consider the risks associated with accepting gifts and hospitality.
- act honestly and with integrity at all times and to safeguard the organisation's resources for which they are responsible.
- ensure that they read, understand and comply with this policy.
- comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which the organisation operates, in respect of the lawful and responsible conduct of activities.
- adhere to all relevant regulations, policies and procedures.
- raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

In addition all Staff are expected to:

- ensure that the interests of patients remain paramount at all times
- be impartial and honest in the conduct of their official business
- use the public funds entrusted to them to the best advantage of the service, always ensuring value for money
- not abuse their official position for personal gain or to benefit their family or friends
- not seek to gain advantage or further private business or other interests, in the course of their official duties
- be aware that it is both a serious criminal offence (Bribery Act 2010, the Theft Act 1968 and the Fraud Act 2006) and disciplinary matter to corruptly receive or give any fee, loan, gift, reward or other advantage in return for doing (or not doing) anything or showing favour (or disfavour) to any person or organisation
- understand that failure to follow this policy may damage NHS Wakefield CCG and its work and so may be viewed as a disciplinary matter. The organisation's Disciplinary Policy makes it clear that bringing the organisation into disrepute is potentially gross misconduct.

As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

It should also be noted that statutorily regulated healthcare professionals who work for, or are engaged by, CCGs are under professional duties imposed by their relevant regulator to act appropriately with regard to conflicts of interest. Where appropriate the CCG will report statutorily regulated healthcare professionals to their regulator if they believe that they have acted improperly, so that these concerns can be investigated. Statutorily regulated healthcare professionals should be aware that the consequences for inappropriate action could include fitness to practise proceedings being brought against them, and that they could, if appropriate, be struck off by their professional regulator as a result.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the organisation or under its control. All staff are required to avoid activity that breaches this policy.

4.1 Public Service Values

NHS Wakefield CCG endorses the three crucial public service values that must underpin the work of the NHS:

- a. **Accountability**
everything done by those who work in the NHS must be able to stand the test of parliamentary scrutiny, public judgements on propriety and professional codes of conduct.
- b. **Probity**
there should be an absolute standard of honesty in dealing with the assets of the NHS. Integrity should be the hallmark of all personal conduct in decisions affecting patients, staff and suppliers, and in the use of information acquired in the course of NHS duties.
- c. **Openness**
there should be sufficient transparency about NHS activities to promote confidence between any NHS body and its staff, service users and the public.

4.2 Principles of Conduct in Public Life

In addition to the public service values described above, all employees should follow the *Seven Principles of Public Life*, set out by the Committee on Standards in Public Life (the Nolan Principles):

- i. **Selflessness**
Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.
- ii. **Integrity**
Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties
- iii. **Objectivity**
In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
- iv. **Accountability**
Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- v. **Openness**
Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

- vi. **Honesty**
Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- vii. **Leadership**
Holders of public office should promote and support these principles by leadership and example.

All staff are expected to adopt these principles when conducting official business for and on behalf of NHS Wakefield CCG so that appropriate ethical standards can be demonstrated at all times.

5 Summary

The policy of NHS Wakefield CCG in relation to hospitality is summarised below and covers the following areas:

- acceptance of hospitality, including gifts
- declaration of outside interests
- outside employment
- appointments

In the course of their duties for or on behalf of the CCG staff should ensure they do not place themselves in a position which might reasonably be seen to compromise their professional judgement or integrity. In all cases the individual should consider the risks associated with accepting gifts and hospitality.

6 Hospitality and Gifts

6.1 Receipt of Hospitality

Hospitality means *'meals, refreshments, travel, accommodation and other expenses in relation to attendance at meetings, conferences, education and training events etc.'*

A blanket ban on accepting hospitality is neither practical nor desirable. However individuals covered by this policy should be able to demonstrate accepting hospitality would benefit the NHS or CCG. Also GPs and other staff within the CCG's member practices are not required to declare offers/receipt of gifts and hospitality which are unconnected with their role or involvement in the CCG.

When considering receiving hospitality the following principles should be applied:

- CCG staff should not ask for or accept hospitality that may affect, or be seen to affect, their professional judgement;
- Hospitality must only be accepted when there is a legitimate business reason and it is proportionate to the nature and purpose of the event;
- Particular caution should be exercised when hospitality is offered by actual or potential suppliers or contractors, these can be accepted if

modest and reasonable, but individuals should always obtain senior approval and declare these.

Hospitality provided in normal and reasonable circumstances may be acceptable. Below are simple meal and refreshment rules to be adhered too

Meals and refreshments:

- Under a value of £25 - may be accepted and need not be declared.
- Of a value between £25 and £75 - may be accepted and must be declared.
- Over a value of £75 - should be refused unless (in exceptional circumstances) prior approval must be sought from a Director and the Governance & Board Secretary (using Appendix 1) and the reason recorded on the organisation's register(s) of interest as to why it was permissible to accept.

All offers of hospitality from actual or prospective suppliers or contractors (whether or not accepted) should be declared and recorded (using Appendix 1).

Travel and Accommodation:

- Modest offers to pay some or all of the travel and accommodation costs related to attendance at events may be accepted and must be declared;
- Offers which go beyond modest, or are of a type that the CCG itself might not usually offer, need approval by senior staff (e.g. the CCG governance lead or equivalent), should only be accepted in exceptional circumstances, and must be declared. A clear reason should be recorded on an organisation's register(s) of interest as to why it was permissible to accept travel and accommodation of this type;
- A non-exhaustive list of examples includes:
 - Offers of business class or first class travel and accommodation (including domestic travel); and
 - Offers of foreign travel and accommodation

In cases of doubt, advice should be sought from your line manager or the Governance & Board Secretary.

6.2 Receipt of Gifts

A gift is defined as '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.'

All gifts of any nature offered by suppliers or contractors linked (currently or prospectively) to the CCG's business should be declined, whatever their value (subject to this, low cost branded promotional aids may be accepted and not declared where they are under the value of a common industry standard of £6). All offers of gifts from actual or prospective suppliers or contractors (whether or not accepted) should be declared and recorded (using Appendix 1).

With gifts from other sources e.g. patients, families, service users, modest gifts under a value of £50 may be accepted and do not need to be declared. Gifts valued at over £50 should be treated with caution and only be accepted on behalf of an organisation (i.e. to an organisation's charitable funds), not in a personal capacity and these should be declared and recorded by staff (using Appendix 1); multiple gifts from the same source over a 12 month period should be treated in the same way as single gifts over £50 where the cumulative value exceeds £50.

A common sense approach should be applied to the valuing of gifts (using an actual amount, if known, or an estimate that a reasonable person would make as to its value);

In a situation where a gift is refused the individual should promptly return the unacceptable gifts, with a letter politely explaining the terms of this policy and stating that you are not allowed to accept them.

Any personal gift of cash or cash equivalents (e.g. vouchers, tokens, offers of remuneration to attend meetings whilst in a capacity working for or representing the CCG) must always be declined, whatever their value and whatever their source. The offer which has been declined must be declared (using Appendix 1).

In cases of doubt, advice should be sought from your line manager or the Governance & Board Secretary.

If a member of staff is in any doubt as to whether to make a declaration relating to a gift, he/she should make a declaration using the appropriate forms (see Appendix 1). The use of the reporting system will be reviewed regularly by the Governance & Board Secretary.

6.3 Register of gifts / hospitality

Individuals covered by this policy have a responsibility to complete a declaration where required. Individuals should complete the hospitality / gifts declaration form at (Appendix 1) as soon as is reasonably practicable. In cases of doubt the Governance & Board Secretary should be consulted.

The Governance & Board Secretary is responsible for maintaining the register of gifts and hospitality.

Following receipt of a declaration of hospitality or gifts, the declared must be promptly transferred to a register of gifts and hospitality. This will include any gifts and hospitality declared in meetings.

The register will record:

- Recipient's name;
- Current position(s) held by the individual (within the CCG);
- Date of offer and/or receipt;
- Details of the gifts of hospitality
- The estimated value of the gifts or hospitality

- Details of the supplier/offeror (e.g. their name and the nature of their business);
- Details of previous gifts and hospitality offered or accepted by this offeror/ supplier;
- Details of the officer reviewing/approving the declaration made and date;
- Whether the offer was accepted or not; and
- Reasons for accepting or declining the offer.

A copy of the register of gifts and hospitality will be reported to the Audit Committee on a regular basis.

The register will be published on the NHS Wakefield CCG website on an annual basis.

In exceptional circumstances, where the public disclosure of information could give rise to a real risk of harm or is prohibited by law, an individual's name and/or other information may be redacted from the publicly available register(s). Where an individual believes that substantial damage or distress may be caused, to him/herself or somebody else by the publication of information about them, they are entitled to request that the information is not published. Such requests must be made in writing to the Governance & Board Secretary. Decisions not to publish information must be made by the Conflicts of Interest Guardian. The Governance & Board Secretary will ensure that the CCG retains a confidential un-redacted version of the register entry.

7. Conflicts of Interest - Declaration of Interests

All employees must ensure that public confidence in their integrity is not compromised or damaged in any way by maintaining high standards of conduct at all times.

A conflict of interest occurs where an individual's ability to exercise judgement, or act in a role is, could be, or is seen to be impaired or otherwise influenced by his or her involvement in another role or relationship. In some circumstances, it could be reasonably considered that a conflict exists even when there is no actual conflict. In these cases it is important to still manage these perceived conflicts in order to maintain public trust.

Conflicts of interest can arise in many situations, environments and forms of commissioning. Interests can be captured in four categories:

- 1) Financial interests
- 2) Non-financial professional interests
- 3) Non-financial personal interests
- 4) Indirect interests:

All individuals covered by this policy will be required to complete a Declarations of Interest Proforma which can be found in the Conflicts of Interest Policy):

- a) Upon their appointment to their position.

- b) On an annual basis when invited to refresh their conflicts of interest declaration by the Governance & Board Secretary
- c) If their circumstances change in any way which affects the individual's interest, a further declaration must be made to reflect the change in circumstances. This must be completed within 28 days of them becoming aware.

In addition, at meetings (governing body, committee, sub-committee or working group) all attendees will be required to declare any interest they have in any agenda items as soon as it becomes apparent.

The CCG will ensure that training is offered to all individuals covered by this policy. The training will seek to ensure that individuals understand what conflicts are and how to manage them effectively.

Please also refer to the CCG's Conflicts of Interest Policy for further information.

8. Outside Employment

Individuals covered by this policy are required to obtain prior permission from the CCG before engaging in any secondary employment. Individuals should inform the CCG (by notifying their line manager) if they are employed or engaged in, or wish to be employed or engage in, any employment or consultancy work in addition to their work with the CCG. The purpose of this is to ensure that the CCG is aware of any potential conflict of interest. The CCG reserves the right to refuse permission where it believes a conflict will arise which cannot be effectively managed.

Examples of work which might conflict with the business of the CCG, including part-time, temporary and fixed term contract work, include:

- Employment with another NHS body;
- Employment with another organisation which might be in a position to supply goods/services to the CCG;
- Directorship of a GP federation; and
- Self-employment, including private practice, in a capacity which might conflict with the work of the CCG or which might be in a position to supply goods/services to the CCG.

Any existing or proposed outside employment should be declared using the form at Appendix 2.

In addition staff are required to declare any other remunerated activity using the form at Appendix 3. Examples of other remunerated activity include:

- Payment for speaking at events (if not speaking in capacity as NHS Wakefield CCG member).
- Payment for attending 'advisory boards'.

It should be noted that individuals covered by this policy must not be in receipt of payments from the pharmaceutical or devices sector. Any such proposed payments will require prior approval from the Chief Officer.

9. Contracts for goods and services

All staff who are in contact with suppliers and contractors (including external consultants), and in particular those who are authorised to sign Purchase Orders or place contracts for goods, materials or services, are expected to adhere to professional standards of the kind set out in the Code of Conduct of the Institute of Purchasing and Supply (IPS).

Fair and open competition between prospective contractors or suppliers for NHS contracts is a requirement of NHS Standing Orders and of EU Directives on Public Purchasing for Works and Supplies. This means that:

- No private, public or voluntary organisation which may bid for NHS business should be given any advantage over its competitors, such as advance notice of NHS requirements. This applies to all potential contractors, whether or not there is a relationship between them and the NHS employer (NHS Wakefield CCG), such as a long-running series of previous contracts.
- Each new contract should be awarded solely on merit, taking into account the requirements of the NHS and the ability of the contractors to fulfil them.

NHS Wakefield CCG should ensure that no special favour is shown to current or former employees or their close relatives or associates in awarding contracts to private or other businesses run by them or employing them in a senior or relevant managerial capacity. Contracts may be awarded to such businesses where they are won in fair competition against other tenders, but scrupulous care must be taken to ensure that the selection process is conducted impartially, and that staff who are known to have relevant interest play no part in the selection.

10. Candidates for Appointments

Candidates for any appointment with the CCG must disclose in writing if they are related to or in a significant relationship with (eg spouse or partner) any Director or employee of the CCG. Failure to disclose such a relationship may result in applications being made void.

A member of an appointment panel which is to consider the employment of a person to whom he/she is related must declare the relationship before an interview is held. Candidates for any appointment with the CCG shall, when applying, also disclose cases where they or their close relatives or associates have a controlling and/or significant financial interest in a business (including a private company, public sector organisation, other NHS employer and/or voluntary organisation), or in any other activity or pursuit, which may compete for an NHS contract to supply either goods or services to the CCG.

11. Canvassing for appointments

Canvassing or lobbying of CCG employees, CCG Governing Body members, or any members of an appointments committee, either directly or indirectly, shall disqualify a candidate. This shall not preclude a member from giving a written reference or testimonial of a candidate's ability, experience or

character for submission to an appointments panel. Jobs will be awarded on the merit of the individual candidate and not through any such canvassing or lobbying.

12. Bribery

Bribery is defined as “an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage”. Bribery can also be described as corruption, the offering or acceptance of inducements, gifts, favours, payment or benefit-in-kind which may influence the action of a person.

All employees have a personal responsibility to protect NHS Wakefield CCG from bribery and corruption and not engage in any form of bribery, in the UK or abroad.

Please refer to the CCG’s Anti-Fraud, Bribery and Corruption Policy.

13. Counter Fraud Measures

As noted in section 4 staff are expected not to use their position to gain advantage. The organisation is keen to prevent fraud and encourages staff with concerns or reasonably held suspicions about potentially fraudulent activity or practice, to report these. In accordance with the NHS Wakefield CCG’s Anti-Fraud, Bribery and Corruption Policy and also the CCG’s Whistleblowing Policy staff should inform the nominated Local Counter Fraud Specialist (LCFS) or NHS Wakefield CCG’s Chief Financial Officer immediately, unless the Chief Financial Officer or LCFS is implicated. If that is the case, they should report it to the Chair or Chief Officer, who will decide on the action to be taken.

Employees can also call the NHS Fraud and Corruption Reporting Line on free phone 0800 028 40 60. This provides an easily accessible and confidential route for the reporting of genuine suspicions of fraud within or affecting the NHS. All calls are dealt with by experienced trained staff and any caller who wishes to remain anonymous may do so.

14. Charitable Collections/Fundraising

14.1 Individual charitable collections

The CCG is supportive of employees or Governing Body members who wish to undertake charitable collections amongst immediate colleagues. Permission is not required for such charitable collections, however, in doing so no reference or implication should be drawn to suggest that the CCG is supporting the named charity as opposed to any other.

Permission is not required for informal collections amongst immediate colleagues on occasions such as a birthday, retirement, birth of a child, marriage or a new job.

14.2 Fundraising events

The CCG supports the raising of funds by employees or Governing Body members for donation to a charitable organisation or in response to an appeal. To ensure that these funds are raised in the spirit of this policy, the following process must be followed by anyone intending to raise more than £100 from a fundraising event, sponsorship or sale of raffle tickets:

- Charitable fundraising events which reference the CCG must be authorised by SMT, the Chief Officer or the Chief Finance Officer in advance. (please see appendix 4 – Charitable fundraising form)
- Any monies collected should be given to the Chief Finance Officer for safekeeping in the CCG's safe until they are passed to the charitable organisation. The individual will be provided with a receipt in order to provide a record of the monies saved.
- After the fundraising activity, the fundraiser must notify the Associate Director of Corporate Affairs of the amount of money raised, together with a receipt from the charity to indicate that they have received the money.
- The Corporate Governance Team will keep a record of all donations raised in this way.

15. Recording Arrangements for Receipt of Hospitality

Hospitality/gifts accepted by staff should be recorded on the Hospitality Register as soon as possible by completing the hospitality declaration form at Appendix 1.

The following forms are attached:

- Hospitality / gifts (Appendix 1)
- Details of outside employment (Appendix 2)
- Details of external remunerated activity (Appendix 3).
- Charitable Fundraising Form (Appendix 4)
- Simple guide to declaration of gifts and hospitality (Appendix 5)

Declaration of interests – the form can be found in the Conflicts of Interest Policy available on the Intranet (add link)

All the above forms will be available on the Intranet.

Heads of Service should ensure that arrangements are in place for their staff to record any hospitality, declarations of interest or outside employment using the appropriate forms. Heads of Service should ensure that any hospitality, gifts and declarations of outside interests are notified to the Governance & Board Secretary.

The register of hospitality will be regularly presented to the Audit Committee.

Whilst Heads of Services are expected to respond to enquiries within their teams, should further advice and guidance on this procedure be required the Head of Service should contact the Governance & Board Secretary.

16. Equality and Diversity

An Equality Impact Assessment has been completed for this policy and there are no negative equality implications. The Equality Impact Assessment is attached as Appendix 6.

17. Implementation and Dissemination

This policy will, following ratification by the Integrated Governance Committee be disseminated to staff via the CCG's intranet.

18. Monitoring Compliance with and the Effectiveness of Procedural Documents

Effectiveness of this procedure is monitored through the Audit Committee through regular reports on declarations made in line with the policy.

Any member of staff wishing to provide feedback on this policy and its use in practice should send their comments to the Governance & Board Secretary.

19. References

HSG (93) 5 Standards of Business Conduct for NHS staff
Nolan Principles of Standards in Public Life 2003
The Codes of Conduct and Accountability for NHS Boards 2004
The Code of Conduct for NHS Managers 2002
Prevention of Corruption Acts
Chartered Institute of Purchasing and Support – Code of Conduct
(http://www.cips.org/Documents/About%20CIPS/CIPS_Code_of_conductv2_10_9_2013.pdf)

20. Associated Documentation

- NHS Wakefield CCG Constitution
- Whistle Blowing Policy
- Disciplinary Policy
- Policy for Joint Working with the Pharmaceutical Industry and other Organisations
- Anti-Fraud, Bribery and Corruption Policy
- Policy for approving Primary Care Prescribing Rebate Schemes

**NHS Wakefield Clinical Commissioning Group
INDIVIDUAL HOSPITALITY / GIFT REGISTER**

Name	Position	Date of Offer of / Receipt of - Gift of Hospitality	Details of the Gift or Hospitality	Value where known (or estimated value) £	Supplier / Offeror (name & nature of their business)	Details of previous gifts and hospitality offered / accepted by this supplier/offeror	Was the Gift / Hospitality accepted?	Reason for accepting / declining the offer

<p>Declaration made by:</p> <p>Name: Job title: Date:</p> <p>I do/do not give my consent for this information to be published on registers that the CCG holds.</p>	<p>Where declaration requires prior approval – approved by:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Name:</td> <td style="width: 50%; border: none;">Name:</td> </tr> <tr> <td style="border: none;">Job title:</td> <td style="border: none;">Job title:</td> </tr> <tr> <td style="border: none;">Date:</td> <td style="border: none;">Date:</td> </tr> </table>	Name:	Name:	Job title:	Job title:	Date:	Date:
Name:	Name:						
Job title:	Job title:						
Date:	Date:						

If consent is NOT given, please give reasons why:	
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This form should be completed electronically or a hand written form sent as soon as possible to the Governance & Board Secretary at NHS Wakefield Clinical Commissioning Group, White Rose House, West Parade, Wakefield WF1 1LT

NHS Wakefield Clinical Commissioning Group

OUTSIDE EMPLOYMENT / PRIVATE PRACTICE

Details of Outside Employment/outside practice:

Employer

Nature / Type of Business

Other Relevant Information

.....

.....

.....

.....

.....

.....

Do you envisage a conflict of interests between this employment/outside practice and your CCG employment? YES / NO

Signature: Date:

Print Name: Contact No:

Service / Dept:

Job Title:

Managers Signature: Date:.....

Print Name: Contact No:

Service / Dept:

Job Title:

This form should be returned to the Governance & Board Secretary at NHS Wakefield CCG, White Rose House, West Parade, Wakefield WF1 1LT.

Guidance Notes:

This form is to notify NHS Wakefield CCG if you are engaged in, or wish to engage in outside employment in addition to your work with the CCG.

If such work would mean that your working hours may exceed 48 hours per week, you should refer to the CCG's 'Working Time Regulations (1998) Policy and Procedure' which details arrangements in such cases.

**NHS Wakefield Clinical Commissioning Group
External remunerated activity**

Name Job Title

Question	Response
Name of organisation	
Nature of the event (eg advisory board)	
Date of event	
Value	
Was this in CCG funded time	
Was this in your CCG role	
Was the event connected with the pharmaceutical or devices sector. NB: Any such proposed payments will require prior approval from the Chief Officer	

Charitable Fundraising Form

To be completed and signed by the person intending to raise the money either individually or on behalf of a charitable organisation.

Name of Charity/Appeal for which money is to be raised	
Contact details of liaison person within the charity	
Purpose of the fundraising	
Type of fundraising – collection, cake sale, etc.	
Date of event/period of fundraising	
Would any of the activities require a health and safety risk assessment?	
Would any of the activities have public liability/insurance implications?	

I confirm that I have read Wakefield CCG's Standards of Business Conduct and Receipt of Hospitality Policy and have complied with the requirements. I confirm that this does not breach the policy.

Signed..... Dated.....

Name (printed).....(Fundraiser)

Simple guide to declaration of gifts and hospitality

HOSPITALITY		
	Can I accept	Must I declare
Modest hospitality – below £25.00	✓	X
Value between £25 and £7	✓	✓
Modest hospitality from actual or prospective suppliers – below £25.00	✓	✓
GIFTS		
From suppliers/contractors	X	✓
Other sources –but could suggest favouritism	X	✓
Promotional aid gifts if value below £6	✓	X
Multiple low value gifts which combined exceed the below value limits	✓	✓
Gifts from other sources (not suppliers/contractors) to <u>individuals</u> with value below £75	✓	✓
Gifts from other sources (not suppliers/contractors) to <u>individuals</u> with value above £75	X	✓
Gifts from other sources (not suppliers/contractors) to the <u>organisation</u> with value above £75	✓	✓
Cash or voucher	X	✓
A declaration should be completed in advance NB If the declaration relates to Pharmacy this will require Chief Officer approval	✓	✓
WHERE PRIOR AUTHORISATION IS REQUIRED		
<ul style="list-style-type: none"> Externally remunerated activity (Section 8 Outside employment) Hospitality were the value exceeds £75 needs prior approval by Director and Governance and Board Secretary with exceptional reason for acceptance recorded on the public register (Section 6 Gifts and Hospitality) Travel and accommodation were offers go beyond reasonable circumstances (Section 6 Gifts and Hospitality) 		

Equality Impact Assessment

1. Outline	
<p>Give a brief summary of your policy, project or service</p> <ul style="list-style-type: none"> • Aims • Objectives • Links to other policies, including partners, national or regional 	<p>This document defines the Standards of Business Conduct Policy for NHS Wakefield Clinical Commissioning Group (NHS WCCG).</p> <p>The policy applies to all employees of NHS WCCG (including those on temporary or honorary contracts, secondments, pool staff and students).</p>
<p>What outcomes do you want to achieve</p> <ul style="list-style-type: none"> • Desired outcomes • Benefits • Who for 	<ul style="list-style-type: none"> • provides guidance on what is deemed to be acceptable in terms of receipt of hospitality, including gifts and provides a code of conduct that staff are expected to follow with respect to hospitality • highlights staff responsibilities to declare outside interests and employment outside of the organisation • describes the organisational arrangements staff should use to publicly declare and record information about any form of hospitality or sponsorship

2. Consideration of relevant information – what do we know about peoples and groups access, experience or outcomes?	
Protected group	2a. Consultation, engagement or experience data
Generic issues	No issues identified.
Human rights	No issues identified.
Age	No issues identified.
Carers	No issues identified.
Disability	No issues identified.
Sex	No issues identified.
Race	No issues identified.
Religion or belief	No issues identified.
Sexual orientation	No issues identified.
Gender reassignment	No issues identified.
Pregnancy and maternity	No issues identified.
Marriage and civil partnership (only eliminating discrimination)	No issues identified.
Other relevant group a group identified as relevant ie, rural communities, asylum seekers and refugees	No issues identified.

Protected group	2b. Evidence, data or research available
Generic issues	No issues identified.
Human rights	No issues identified.
Age	No issues identified.
Carers	No issues identified.
Disability	No issues identified.
Sex	No issues identified.
Race	No issues identified.
Religion or belief	No issues identified.
Sexual orientation	No issues identified.
Gender reassignment	No issues identified.
Pregnancy and maternity	No issues identified.
Marriage and civil partnership (only eliminating discrimination)	No issues identified.
Other relevant group	No issues identified.

3. Analysis of impact			
<p>This is the core of the assessment, using the information above detail the actual or likely impact on protected groups, with consideration of the general duty to;</p> <ul style="list-style-type: none"> • eliminate unlawful discrimination • advance equality of opportunity • foster good relations 			
	What key issues have you identified?	What action do you need to take to address these issues?	What difference will this make?
General issues	No issues identified.		
Human rights	No issues identified.		
Age	No issues identified.		
Carers	No issues identified.		
Disability	No issues identified.		
Sex	No issues identified.		
Race	No issues identified.		
Religion or belief	No issues identified.		
Sexual orientation	No issues identified.		
Gender reassignment	No issues identified.		
Pregnancy and maternity	No issues identified.		
Marriage and civil partnership (only eliminating discrimination)	No issues identified.		
Other relevant group	No issues identified.		

Using the above actions populate the plan below.

4. Action plan				
Action	Progress milestones	Lead	Timescale	How will impact be measured
No actions required.				

5. Monitoring, Review and Publication			
How will you review/monitor the impact and effectiveness of your actions	Not applicable		
How will these actions form part of mainstream activity	Not applicable		
Lead Officer:	Amrit Reyat	Review date:	August 2019

6. Sign off			
Lead Officer:	Amrit Reyat		
Director:	Ruth Unwin	Date approved:	August 2019