

CONFIDENTIALITY MARKING

AGENDA ITEM NO:

**UNIVERSITY HOSPITALS BIRMINGHAM NHS FOUNDATION TRUST
BOARD OF DIRECTORS
THURSDAY 3 JUNE 2010**

Title:	Hospitality Policy
Responsible Director:	David Burbridge, Director of Corporate Affairs
Contact:	David Burbridge, Director of Corporate Affairs, ext. 2881

Purpose:	To introduce a new declaration process for Trust staff receiving hospitality, gifts and/or sponsorships from Third Parties.
Confidentiality Level & Reason:	
Annual Plan Ref:	
Key Issues Summary:	
Recommendations:	To consider, and if thought fit, approve the new Hospitality, Gift and Sponsorship Policy.

Signed:	Date: 25 May 2010
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CONFIDENTIALITY MARKING

UNIVERSITY HOSPITAL BIRMINGHAM NHS FOUNDATION TRUST

**BOARD OF DIRECTORS
THURSDAY 3 JUNE 2010**

HOSPITALITY, GIFT AND SPONSORSHIP POLICY

PRESENTED BY DIRECTOR OF CORPORATE AFFAIRS

1. Introduction

- 1.1 It is a long and well established principle that public sector bodies must be impartial and honest in the conduct of their business, and that their employees should remain above suspicion of corruption.
- 1.2 The new Hospitality, Gift and Sponsorship Policy aims to protect Trust staff (including Non Executive Directors, volunteers, students, locum staff, agency staff and University staff when engaged in Trust business) from any suspicion of corruption by introducing clear principles and guidelines as to when Hospitality, Gifts and/or Sponsorships from Third Parties may be acceptable.

2. Review

- 2.1 The policy has been reviewed extensively by the Audit Committee, an Audit sub-committee and the Policy Review Group.
- 2.2 Further, all senior managers of grade 8a and above and staff side have been consulted.

3. Framework

- 3.1 As part of the review by the Audit Sub-Committee, it was discussed how the policy's main aim could be best achieved. Different approaches, such as the requirement for approval of all Hospitality, Gifts and Sponsorship above a certain value, were discussed. It was concluded that such a generic requirement would be too impractical/time consuming and would prevent staff from taking advantage of benefits which, by their very nature, are not likely to cast any doubt on the honesty and integrity of Trust staff (e.g. free training).
- 3.2 Thus, an approach has been taken which is, on the one hand, flexible so as to take account of the different types of benefits being offered to Trust staff and which, on the other hand, offers clear principles Trust staff can adhere to. Consequently, the policy categorises/differentiates offers of benefits in three ways:

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3.2.1 The different types of benefits Trust staff might be offered:

- 3.2.1.1 “Gifts” (items which are given without payment or other consideration),
- 3.2.1.2 “Hospitality” (provision of entertainment – including sporting events, meals and/or other refreshments or services, given without payment or other consideration); and
- 3.2.1.3 “Sponsorship” (non contractual funding provided to the Trust or its staff from an external source for any purpose).

3.2.2 The type of the person/body making the offer, i.e. whether it is:

- 3.2.2.1 (a) a patient, patient’s relative or friend,
- 3.2.2.2 (b) another Third Party or
- 3.2.2.3 (c) an Interested Third Party, that is a person/body who holds or is likely to seek to hold contracts with the Trust or who partially gain some commercial benefit from the Trust’s decisions regarding procurement

3.2.3 The value of the benefit:

Hospitality, Gifts and Sponsorships with an individual value of £25 or less or an aggregate value of £100 or less over a rolling period of 12 months are acceptable without the need to obtain prior authorisation.

3.3 Thus, depending on the three elements laid out above, an offer can be accepted either with or without prior authorisation from the Authorising Officer who, depending on the value of the Hospitality, Gift or Sponsorship in question, is either the appropriate Senior Nurse/Clinical Service Lead/Senior Manager or the Divisional Director/Director of Operation (for offers of a value in excess of £200) or the appropriate Board Director (for offers of a value in excess of £2,000).

3.4 With regards to the Declarations confirming the receipt of a Declarable Gift, Hospitality or Sponsorship, the new policy differentiates between Executive and Non Executive Directors, and any other staff. Executive and Non Executive Directors are expected to submit a Declaration to the Senior Manager Corporate Affairs (or where nothing was accepted a Nil Return) on a monthly basis. Other staff are required to make such a Declaration as and when they become involved in any procurement process relating to an Interested Third Party, or whenever they accept a Declarable Gift, Hospitality and/or Sponsorship.

3.5 Declarable Gifts and Hospitalities are those that were only acceptable because refusal would have caused significant offence due to cultural or other reasons, or where authorisation was obtained. Declarable Sponsorships are those with a value in excess of £25.

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3.6 Declarations can now be made online, using an electronic form, or by submitting a hard copy form. All Declarations are logged in a register which is presented by the Director of Corporate Affairs twice a year to the Audit Committee.

4. Recommendation

To consider, and if thought fit, approve the new Hospitality, Gift and Sponsorship Policy.

David Burbridge
Director of Corporate Affairs

**Hospitality, Gifts and Sponsorship
Policy**

CATEGORY:	Policy
CLASSIFICATION:	Governance
PURPOSE	To set out the principles and framework of a code of conduct in the event that hospitalities, gifts or sponsorships are offered to or accepted by Board members or Trust staff
Controlled Document Number:	62
Version Number:	3
Controlled Document Sponsor:	Director of Corporate Affairs
Controlled Document Lead:	Senior Manager Corporate Affairs
Approved By:	BOD
On:	
Review Date:	
Distribution:	
Essential Reading for:	Directors, Line Managers, Procurement staff, All Senior Managers of Band 8A and above
Information for:	All staff

Hospitality, Gift and Sponsorship Policy Contents

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HOSPITALITY, GIFT AND SPONSORSHIP POLICY

1 POLICY STATEMENT

- 1.1 It is a long and well established principle that public sector bodies must be impartial and honest in the conduct of their business, and that their employees should remain above suspicion of corruption.
- 1.2 Furthermore, under the Prevention of Corruption Acts 1906 and 1916, it is an offence for employees corruptly to accept any gifts or consideration as an inducement or reward for:
 - 1.2.1 doing, or refraining from doing, anything in their official capacity; or
 - 1.2.2 showing favour or disfavour to any person in their official capacity, and,

any money, gift or consideration received by an employee in public service from a person or organisation holding or seeking to obtain a contract will be deemed to have been received corruptly unless the employee proves to the contrary.
- 1.3 Trust staff should be aware that the breach of the provisions of these Acts renders them liable to prosecution and may also lead to loss of their employment and superannuation rights. Even when the acceptance of gifts or hospitality is not illegal, acceptance can still be improper and may lead to internal disciplinary action.
- 1.4 The aim of this policy is to protect the Trust and its staff from any suggestion of corruption, partiality and dishonesty, through a clear framework whereby the Trust can provide assurance that its staff conduct themselves with honesty and integrity, which sets out the following:
 - 1.4.1 The core principles for the acceptance of Gifts, Hospitality and Sponsorships;
 - 1.4.2 The kind of Hospitality, Gifts and Sponsorships Trust staff might be allowed to accept;

1.4.3 When a Declaration of Hospitality, Gift and Sponsorship (“Declaration”) is required.

2 SCOPE

- 2.1 This policy applies to all persons working for the Trust, whether in a clinical or a non-clinical capacity. As well as including all employees of the Trust, this includes Non Executive Directors, volunteers, students, locum staff, agency staff 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**”.
- 2.2 This policy applies to Gifts, Hospitality or Sponsorship offered by any person or body, although (as detailed later) the specific requirements of the policy vary according to the nature of the person or body making the offer.

3 FRAMEWORK

- 3.1 This section describes the broad framework for dealing with Gifts, Hospitality and Sponsorship within the Trust. Detailed instructions are provided in the associated procedural documents, including the Declaration Process (see Annex A).
- 3.2 The Director of Corporate Affairs shall approve all procedural documents associated with this policy and any amendments to such documents (save that the Authorisation Levels referred to in section 3.3.1 shall be set by the Director of Corporate Affairs with the agreement of the Medical Director and the Director of Finance) and is responsible for ensuring that such documents are compliant with this policy.
- 3.3 **Definitions**
- 3.3.1 “**Authorising Officer**” means the appropriate Senior Nurse, Clinical Service Lead or senior manager (i.e. at least Agenda for Change Band 8a or above) of the individual concerned save for
- a) Declarable Gifts, Hospitality and/or

Sponsorship in excess of Level 1 (as set out in the Declaration Process – Annex A) which must be authorised by the appropriate Divisional Director or Director of Operation for staff within the operational divisions and the relevant Board Director for other staff; and

- b) Declarable Gifts, Hospitality and/or Sponsorship with a value in excess of Level 2 (as set out in the Declaration Process) per staff member which must be authorised by a Board Director.

3.3.2 The Authorising Officer for:

- a) the Chief Executive shall be the Chairman;
- b) the Chairman shall be the Deputy Chairman; and
- c) any Executive Director shall be the Chief Executive.
- d) Any Non-Executive Director shall be the Chairman.

3.3.3 A “**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.

3.3.4 “**Declarable Gifts**” are Gifts from Other Third Parties with an individual value in excess of £25 or an aggregate value in excess of £100 over a rolling period of 12 months, which the individual was allowed to accept because refusal would cause significant offence due to cultural or similar reasons or authorisation has been obtained (see 3.5.3).

3.3.5 “**Declarable Hospitality**” is accepted Hospitality from Interested Third Parties with a value in excess of £25 (see 3.6).

3.3.6 “**Declarable Sponsorship**” is accepted Sponsorship from

Interested Third Parties with a value in excess of £25 (see 3.7).

- 3.3.7 **“Gifts”** means items which are given without payment or other consideration.
- 3.3.8 **“Hospitality”** means the provision of entertainment (including attendance at sporting events), meals and/or other refreshments or services, given without payment or other consideration.
- 3.3.9 **“Interested Third Parties”** are persons or bodies (other than public sector bodies or academic institutions) who are not patients, patients’ relatives or friends and who hold or are likely to seek to hold contracts with the Trust or who potentially stand to gain some commercial benefit from the Trust’s decisions regarding procurement.
- 3.3.10 A **“Nil Return”** is a declaration by the individual concerned that no Declarable Gifts, Hospitality or Sponsorships have been accepted.
- 3.3.11 **“Other Third Parties”** are persons or bodies who are not patients, patients’ relatives or friends.
- 3.3.12 The **“Register”** collates the data of all Declarations over a specific time period.
- 3.3.13 **“Sponsorship”** means non-contractual funding provided to the Trust or its staff from an external source 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)

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

3.3.14 “**Trust staff**” means all employees of the Trust, including Non Executive Directors, volunteers, students, locum staff, agency staff and University staff when engaged in Trust business.

3.4 **General Rule**

3.4.1 As a general rule, staff must not, in their official capacity, receive Gifts, Hospitality, Sponsorship 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 should 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 Gift, Hospitality and/or Sponsorship.

3.4.2 In particular, staff must not solicit, propose or agree to receive from any third party any form of Gift, Hospitality or Sponsorship 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.

3.4.3 In addition, 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 Ethical Code of the Institute of Purchasing and Supply (IPS) as set out in Annex B.

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

3.5 Gifts

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

Under no circumstances must staff accept personal Gifts of cash, 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 should 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.

3.5.2 Gifts from patients, patients' relatives or friends

The Trust expects its staff to act with honesty and integrity and in compliance with their respective professional code of conduct with regard to the acceptance of Gifts from patients, patients' relatives or friends. Section 3.5.1 still applies in respect of Gifts of cash or cash equivalent.

3.5.3 Gifts from Other Third Parties (including Interested Third Parties)

Subject to the General Rule, set out in 3.2, Gifts from Other Third Parties (including Interested Third Parties) may be accepted in the following circumstances:

- a) The Gifts have an individual value of £25 or less (or an aggregate value of £100 or less over a rolling period of 12 months) and are not in cash or cash equivalent (for cash – see Section 3.5.1 above). Typical examples would be items such as pens, calendars, diaries, flowers or chocolate from organisations with which the Trust does business;
- b) Refusal would cause significant offence

due to cultural or similar reasons; or

- c) Authorisation is obtained in accordance with 3.8 below.

Where b) or c) apply, a Declaration must be submitted in accordance with 3.9 below.

3.6 **Hospitality**

3.6.1 Hospitality means the provision of entertainment (including attendance at sporting events), meals and/or other refreshments or services, given without payment or other consideration. Thus, this section does not apply to entertainment, meals and/or refreshments provided at events or occasions (eg. courses, conferences, seminars, workshops, etc) sponsored or supported by the Trust.

3.6.2 **Hospitality from patients, patients' relatives or friends**

As with Gifts, the Trust expects staff to act with honesty and integrity and in compliance with their respective professional code of conduct with regard to the acceptance of Hospitality from patients, patients' relatives or friends.

3.6.3 **Hospitality from Other Third Parties**

Hospitality from Other Third Parties who are not Interested Third Parties may be accepted in accordance with the General Rule (see 3.4).

3.6.4 **Hospitality from Interested Third Parties**

Subject to the General Rule, set out in 3.4, 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) Lunches & Dinners – 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;
- c) Overnight Accommodation – should 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;
- d) Social, Sporting and Cultural Invitations – should not normally be accepted by staff who have a personal 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;
- e) Refusal would cause significant offence due to cultural or similar reasons; or
- f) Authorisation is obtained in accordance with 3.8 below.

Where b) to f) apply, a Declaration must be submitted in accordance with 3.9 below.

3.7 Sponsorship

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

- a) Any Hospitality element is incidental and proportionate to the event;
- b) Relevant business information or benefit to the Trust is expected to be gained through the

Sponsorship; and

- c) 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 3.9.

3.7.2 Should there be any doubt as to the appropriateness of accepting a Sponsorship, staff should either politely decline or consult the appropriate Authorising Officer.

3.8 **Authorisation**

3.8.1 Where prior authority is required for the acceptance of Gifts, Hospitality or Sponsorship, the following applies:

- a) Prior authorisation must be sought from the appropriate Authorising Officer (see 3.3) who must be satisfied that the proposed acceptance does not jeopardise the Trust's impartiality and objectivity. (If there is any doubt, the offer should be politely declined); and
- b) Authorisation should be confirmed in writing, including email. 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.

3.9 **Declarations and Register**

3.9.1 Anyone who falls within the scope of this policy, as set out in 2.1, with the exception of Executive Directors and Non-Executive Directors (see 3.9.2), must submit a Declaration to the Senior Manager Corporate Affairs within 30 days of the acceptance of a Declarable Gift (see 3.5.3), Declarable Hospitality (see 3.6.4) and Declarable Sponsorship (see 3.7.1).

- 3.9.2 Executive Directors and Non-Executive Directors will be asked each calendar month to submit to the Senior Manager Corporate Affairs a Declaration including, where appropriate, a Nil Return.
- 3.9.3 In addition to 3.9.1, all staff are required to declare if, and to what extent they have been offered and/or accepted any Gifts, 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.
- 3.9.4 Declarations should be completed by using the online form published on the Trust's intranet ([insert link](#)). A hard copy form can be found in Annex C, the completed copy of which is to be returned to the Senior Manager Corporate Affairs.
- 3.9.5 Where the acceptance of a Declarable Gift, Hospitality and/or Sponsorship required prior authorisation, the Declaration must be sent to the Senior Manager Corporate Affairs together with a copy of any relevant authorisation.
- 3.9.6 The Foundation Secretary shall cause a register of all Declarations of Hospitality (including Nil Returns) to be maintained.

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

Offers of Gifts, Hospitality or Sponsorships that are declined need not be declared. However, 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 Director of Corporate Affairs.

4 DUTIES

4.1 Chief Executive

The Chief Executive has overall responsibility for the successful implementation of this policy. He/she has 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.

4.2 Executive Directors

Executive Directors are required to remind staff that they are obliged to complete and return the hospitality form, should they accept any kind of Declarable Gift, Hospitality or Sponsorship.

4.3 Director of Corporate Affairs

A copy of the Register is to be presented by the Director of Corporate Affairs twice a year to the Audit Committee.

4.4 Divisional Directors/Directors of Operations/Executive Directors

Divisional Directors, Directors of Operation and Executive Directors may approve the acceptance of Hospitality, Gifts and Sponsorships in exceptional and justifiable circumstances, details of which are set out in 3.8. 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 Hospitality, Gift or Sponsorship can under no circumstances be perceived as a breach of the duty to remain impartial, independent, honest and above suspicion of corruption.

4.5 Senior Manager Corporate Affairs

The Senior Manager, Corporate Affairs is responsible for collecting the Declarations (including Nil Returns), the results of which are then entered into the Register. The Register is available for public inspection during normal office hours.

4.6 Trust staff

Trust staff have a duty to:

- 4.6.1 Submit Declarations for any Declarable Gifts, Hospitality and Sponsorship accepted;

- 4.6.2 Submit Nil Returns where required (see 3.9.3);
- 4.6.3 Where requested, submit a statement as part of their appraisal process confirming that they have complied with this policy;
- 4.6.4 Adhere to this policy, any relevant code of conduct and all good business and corporate governance practices.

5 IMPLEMENTATION AND MONITORING

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

5.2 Breaches of this policy

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 Officer and/or could result in disciplinary proceedings which may include dismissal. All staff who are aware of a breach of this Policy must report this immediately to their Line Manager and the Director of Corporate Affairs, so that appropriate action can be taken.

5.3 Freedom of Information Act 2000

Staff should 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.

5.4 Reporting

The Director of Corporate Affairs will provide a report to the Audit Committee, summarising all Declarations collated during a 6 months period and detailing breaches of this policy.

6 REFERENCES

The Public Bodies Corrupt Practices Act 1889

Prevention of Corruption Acts 1906 and 1916

European Commission Directives on Public Purchasing for Works and Supplies

Standards of Business conduct for NHS staff, available on:

http://www.dh.gov.uk/en/PublicationsAndStatistics/LettersAndCirculars/HealthServiceGuidelines/DH_4017845

Commercial Sponsorship – Ethical Standards for the NHS, available on:

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4005135

7 ASSOCIATED DOCUMENTATION

Declaration Process

Standing Financial Instructions

Standing Orders

Freedom of Information Policy

Counter Fraud and Corruption Policy

Annex A - Declaration Process

Authorisation Limits (see 3.3.1)	Level 1: £200 Level 2: £2,000		
Type of Hospitality	Rules	Required Action	Completion of Declaration required
Improper Gifts/ Hospitalities/ Sponsorship	Staff must not solicit or propose to receive from any third party any form or Gift, Hospitality or other benefit in return for doing or not doing anything in relation to the discharge of their duties and responsibilities.	All staff to report breaches of this rule to the Director of Corporate Affairs	N/A
<u>Cash/ Cash equivalent</u> (tokens/voucher)	Donors are invited to make a donation to the UHB Charities, ward fund or similar. Under no circumstances must cash or cash equivalent be accepted, even where the value is less than £25.	All staff to report breaches of this rule to the Line Manager and the Director of Corporate Affairs.	No, but receipt for donation required.
<u>Gifts from patients, patient's relatives or friends</u>	Staff may accept such gifts provided the following conditions are met: (1) The Gift is neither in cash nor in cash equivalent	In case of doubt, consult the Line Manager.	No

Annex A - Declaration Process

	<p>(voucher/ token);</p> <p>(2) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Gift; <u>and</u></p> <p>(3) Acceptance of such Gift does not contravene any relevant professional code of conduct.</p>		
<p><u>Gifts from Other Third Parties (including Interested Third Parties) with an individual value of £25 or less or an aggregate value of £100 or less over a rolling period of 12 months</u></p>	<p>Staff may accept such gifts provided the following conditions are met:</p> <p>(1) The Gift is neither in cash nor in cash equivalent (voucher/ token);</p> <p>(2) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Gift; <u>and</u></p> <p>(3) Acceptance of such Gift does not contravene any relevant professional code of conduct.</p>		No

Annex A - Declaration Process

<p><u>Gifts</u> from Third Parties (including Interested Third Parties) with an individual <u>value in excess</u> of £25 or an aggregate value in excess of £100 over a rolling period of 12 months</p>	<p>Staff may accept such gifts provided the following conditions are met:</p> <p>(1) The Gift is neither in cash nor in cash equivalent (voucher/ token);</p> <p>(2) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Gift;</p> <p>(3) Acceptance of such Gift does not contravene any relevant professional code of conduct; <u>and</u></p> <p>(4) Refusal would either cause significant offence due to cultural or similar reason <u>or</u> acceptance of the Gift has been authorised by the Authorising Officer.</p>	<p>Prior Authorisation is required unless the refusal would offend.</p>	<p>Yes (see 3.3.3)</p>
<p><u>Hospitality</u> from patients, patients' relatives or friends</p>	<p>Staff may accept Hospitality from patients, patients' relatives or friends as long as:</p> <p>(1) A fair-minded member of the public would not see anything improper or suspicious in the receipt of</p>	<p>In case of doubt, consult the Line Manager.</p>	<p>No</p>

Annex A - Declaration Process

	<p>such Hospitality <u>and</u></p> <p>(2) Acceptance does not contravene any relevant professional code of conduct.</p>		
<p>Hospitality from Other Third Parties (i.e. Third Parties that are not Interested Third Parties)</p>	<p>Staff may accept Hospitality from Other Third Parties as long as:</p> <p>(1) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Hospitality; <u>and</u></p> <p>(2) Acceptance does not contravene any relevant professional code of conduct.</p>	<p>In case of doubt, consult the Line Manager.</p>	<p>No</p>
<p>Hospitality from Interested Third Parties with a value of £25 or less</p>	<p>Staff may accept Hospitality from Interested Third Parties as long as:</p> <p>(1) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Hospitality; <u>and</u></p> <p>(2) Acceptance does not contravene any relevant</p>	<p>In case of doubt, consult the Line Manager.</p>	<p>No</p>

Annex A - Declaration Process

	professional code of conduct.		
Hospitality from Interested Third Parties with a value in excess of £25	<p>Staff must <u>not</u> accept Hospitality from Interested Third Parties with a value in excess of £25, unless:</p> <p>(1) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Hospitality; <u>and</u></p> <p>(2) 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></p> <p>with regards to overnight accommodation - there is no alternative and the invitation arises in connection with an official working visit; <u>or</u></p> <p>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></p>	Prior Authorisation might be required (see left).	Yes (see 3.4.4)

Annex A - Declaration Process

	<p>the refusal might offend; <u>or</u></p> <p>prior authorisation has been obtained from the Authorising Officer.</p>		
<p><u>Sponsorships</u> from a person/ body other than an Interested Third Party</p>	<p>Staff may accept such Sponsorship provided:</p> <p>(1) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Sponsorship; <u>and</u></p> <p>(2) Acceptance does not contravene with any relevant professional code of conduct.</p>	<p>In case of doubt, consult the Line Manager.</p>	<p>No</p>
<p><u>Sponsorships</u> from an Interested Third Party with a value of £25 or less per staff member</p>	<p>Staff must <u>not</u> accept such sponsorships, unless</p> <p>(1) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Sponsorship;</p> <p>(2) Acceptance does not contravene with any relevant professional code of conduct;</p> <p>(3) Any Hospitality element is incidental and</p>	<p>In case of doubt, consult the Line Manager.</p>	<p>No</p>

Annex A - Declaration Process

	<p>proportionate to the event; <u>and</u></p> <p>(4) Relevant business information is expected to be gained through the attendance.</p>		
<p><u>Sponsorships from an Interested Third Party with a value in excess of £25 per staff member</u></p>	<p>Staff must <u>not</u> accept such sponsorships, unless</p> <p>(1) A fair-minded member of the public would not see anything improper or suspicious in the receipt of such Sponsorship;</p> <p>(2) Acceptance does not contravene with any relevant professional code of conduct;</p> <p>(3) Any Hospitality element is incidental and proportionate to the event; <u>and</u></p> <p>(4) Relevant business information is expected to be gained through the attendance;</p> <p>(5) The Sponsorship is authorised in advance by the Authorising Officer and a Declaration is submitted.</p>	<p>If the value of the Sponsorship exceeds £25 per staff member, the Sponsorship must be authorised in advance by the Authorising Officer.</p>	<p>Yes (see 3.5.1)</p>

Annex B

Institute of Purchasing and Supply – Ethical Code

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Introduction

The code set out below was approved by the Institute's Council on **26** February 1977 and is binding on IPS members.

Precepts

Members shall never use their authority of office for personal gain and shall seek to uphold and enhance the standing of the Purchasing and Supply profession and the Institute by:

- Maintaining an unimpeachable standard of integrity in all their business relationships both inside and outside the organisations in which they are employed;
- Fostering the highest possible standards of professional competence amongst those for whom they are responsible;
- Optimising the use of resources for which they are responsible to provide the maximum benefit to their employing organisation;
- Complying both with the letter and the spirit of the law of the country in which they practise; such guidance on professional practice as may be issued by the Institute from time to time; and contractual obligations;
- Rejecting any business practice which might reasonably be deemed improper.

In applying these precepts, members should follow the guidance set out below:

a. Declaration of interest: Any personal interest which may impinge or might reasonably be deemed by others to impinge on a member's impartiality in any matter relevant to his or her duties should be declared.

Annex B

b. Confidentiality and accuracy of information: The confidentiality of information received in the course of duty should be respected and should never be used for personal gain; information given in the course of duty should be true and fair and never designed to mislead.

c. Competition: While bearing in mind the advantages to the member's employing organisation of maintaining a continuing relationship with a supplier, any relationship which might, in the long term, prevent the effective operation of fair competition, should be avoided.

d. Business Gifts: Business gifts other than items of very small intrinsic value such as business diaries or calendars should not be accepted.

e. Hospitality: Modest hospitality is an accepted courtesy of a business relationship. However, the recipient should not allow him or herself to reach a position whereby he or she might be deemed by others to have been influenced in making a business decision as a consequence of accepting such hospitality; the frequency and scale of hospitality accepted should not be significantly greater than the recipient's employer would be likely to provide in return. When it is not easy to decide between what is and is not acceptable in terms of gifts or hospitality, the offer should be declined or advice sought from the member's superior.

DECLARATION OF GIFT, HOSPITALITY AND SPONSORSHIP

Name	Position:
Month/Period	

A. NIL RETURN	
I confirm that for the above period, I have not received any Gift, Hospitality or Sponsorship that need to be declared in accordance with the Gifts, Hospitality and Sponsorship Policy.	
Signature:	Date:

B. HOSPITALITY DECLARATION			
For the above period I wish to declare having accepted the following Gift, Hospitality and/or Sponsorship:			
Date of Acceptance:	Name, Address & Business Source/Provider of Hospitality, Gift, or Sponsorship:	Nature and estimated value of Hospitality, Gift, or Sponsorship:	Notes/Authorisation given by:
I confirm that I have complied with the Hospitality, Gift and Sponsorship Policy.			
Signature:		Date:	

Once completed, please return to the Senior Manager, Corporate Affairs at Trust Headquarters.