

# Gifts and Hospitality Policy



**Please complete the table below:**

*To be added by corporate team once policy approved and before placing on website*

<b>Policy ref no:</b>	6
<b>Responsible Executive Director:</b>	Deputy Chief Executive and Chief Finance Officer
<b>Author and Job Title:</b>	Sarah Carr, Corporate Secretary and Laura Davey, Corporate Manager
<b>Date Approved:</b>	January 2020
<b>Approved by:</b>	Governing Body
<b>Date of next review:</b>	January 2021

**Policy Review Checklist**

	<b>Yes/ No/NA</b>	<b>Supporting information</b>
Has an Equality Impact Assessment Screening been completed?	Yes	See appendix 1. EIA screening has been completed which indicates that a full assessment is not required
Has the review taken account of latest Guidance/Legislation?	Yes	The policy is aligned to the Revised Statutory Guidance on Managing Conflicts of Interest for CCGs (June 2017)
Has legal advice been sought?	No	The policy describes the CCG's statutory responsibilities
Has HR been consulted?	No	The policy does not require specialist HR advice
Have training issues been addressed?	Yes	Mandatory training requirements are detailed in the policy. NHSE provides a mandatory training package which is completed annually.
Are there other HR related issues that need to be considered?	No	There are no HR issues raised in the policy

	Yes/ No/NA	Supporting information
Has the policy been reviewed by Staff Partnership Forum?	No	The policy does not raise HR issues and there has not been reviewed by the Staff Partnership Forum
Are there financial issues and have they been addressed?	No	There are no financial issues arising from the application of the policy
What engagement has there been with patients/members of the public in preparing this policy?	N/A	The policy describes the CCG's statutory responsibilities and there had been no engagement with patients/members of the public in preparing this policy beyond that undertaken by NHSE as part of the legislative process
Are there linked policies and procedures?	Yes	Associated policies are referenced in the policy
Has the lead Executive Director approved the policy?		Executive Director chairs the Policy Review Group
Which Committees have assured the policy?		
Has an implementation plan been provided?	Yes	See appendix 2
How will the policy be shared with		The policy will be published on the CCG website and intranet and will be featured in internal news communication. Regular prompts regarding declaring interests will be placed in internal communications.
Will an audit trail demonstrating receipt of policy by staff be required; how will this be done?	No	
Has a DPIA been considered in regards to this policy?	Yes	This does need to be considered as the register of gifts and hospitality register contains the names of individuals
Have Data Protection implications have been	Yes	Form requests consent to publish on the public register

	<b>Yes/ No/NA</b>	<b>Supporting information</b>
considered?		

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# Gifts and Hospitality Policy

## 1 Introduction

This policy describes the arrangements that NHS Bristol, North Somerset and South Gloucestershire Clinical Commissioning Group has in place for the management of gifts and hospitality. This policy is written in line with the Revised Statutory Guidance on Managing Conflicts of Interest for CCG's which was issued by NHS England in June 2017.

Staff in the NHS offer support during significant events in people's lives. For this work they may sometimes receive gifts as a legitimate expression of gratitude, and individuals should be proud that their services are so valued. However, situations where the acceptance of gifts could give rise to conflicts of interest should be avoided as even gifts of a small value may give rise to perceptions of impropriety and might influence behaviour if not handled in line with this policy.

The NHS England Managing Conflicts of Interest Statutory Guidance for CCGs 2017 defines a gift 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."

The CCG has in place a Conflicts of Interest Policy that reflects the legal requirements and the statutory guidance issued by NHS England under sections 14O and 14Z8 of the Act. This should be read in conjunction with this policy as combined, they describe the overall systems the CCG has in place to create an environment in which staff, governing body and committee members, and member practices feel able, encouraged and obliged to be open, honest and upfront about actual or potential conflicts.

### 1.1 BNSSG CCG Values

The policy supports the CCG values by ensuring the CCG does the right thing, it enables commissioners to demonstrate they are acting fairly and with integrity. The policy outlines best practice for managing gifts and hospitality which enables the CCG to strive for excellence, behave with integrity and to do the right thing.

## 2 Purpose and scope

The aims and objectives of this policy are to:

- Safeguard clinically led commissioning, whilst ensuring objective investment decisions;
- Enable commissioners to demonstrate that they are acting fairly and transparently and in the best interests of their patients and local populations;
- Uphold confidence and trust in the NHS;

- Ensure that the CCG operates within the legal framework.

This policy applies to:

- All CCG employees (including temporary staff, students, apprentices, trainees, agency staff, seconded staff, self-employed consultants, sessional staff or those on short term contracts, self-employed consultants and individuals working for the CCG under a contract for services)
- Any work experience staff or volunteers
- Members of the Governing Body, all members of the CCG's committees, sub-committees or sub groups including co-opted members, appointed deputies and any member of committees/groups from other organisations. Where the CCG is participating in a joint committee, any interests which are declared by the committee members should be recorded on the register(s) of interest
- All Members of the CCG (i.e. each practice) including each provider of primary medical services which is a member of the CCG under Section 14O (1) of the 2006 Act and all GP Partners / individuals directly involved with the business or decision-making of the CCG. GPs and other staff within the CCG's member practices are not required to declare offers/receipt of gifts and hospitality to the CCG which are unconnected with their role and involvement with the CCG. GP staff need to adhere to guidance issued by relevant professional bodies.

These are collectively referred to as 'individuals' hereafter.

### **3 Duties – legal framework for this policy**

This policy is written in line with the Revised Statutory Guidance on Managing Conflicts of Interest for CCG's which was issued by NHS England in June 2017.

The CCG has in place a Conflicts of Interest Policy that reflects the legal requirements and the statutory guidance issued by NHS England under sections 14O and 14Z8 of the Act.

### **4 Responsibilities and Accountabilities**

#### **Chief Executive**

- Has overall accountability for the CCG's management of gifts and hospitality.

#### **Line Managers**

- Provide basic advice, support and guidance on how gifts and hospitality should be managed in line with this policy
- Ensure their team members do not accept a gift or hospitality that would create a breach of this policy

- Ensure and gifts and hospitality offered to their team which meet the criteria described in section 4 is declared regardless of whether or not it is accepted

### **Corporate Secretary**

- Provides advice, support and guidance on how gifts and hospitality should be managed.
- Maintains the register(s) of gifts and hospitality
- Supports the Conflict of Interest Guardian to enable them to carry out their role effectively and,
- Ensures that the appropriate administrative processes are in place to ensure compliance with legislation and statutory guidance

Contact details can be found at Appendix 3.

### **Conflicts of Interest Guardian**

This role is undertaken by the CCG Audit, Governance and Risk Committee Chair who will:

- Act as a conduit for GP Practice staff, members of the public and healthcare professionals who have any concerns with regards to the acceptance of gifts and hospitality or conflicts of interest
- Be a safe point of contact for employees or workers of the CCG to raise any concerns in relation to this policy
- Support the rigorous application of gift and hospitality principles and policies
- Provide independent advice and judgement.
- Provide advice on minimising risks of conflicts of interest

### **Individuals**

All individuals must consider the risks associated with accepting offers of gifts, hospitality and entertainment when undertaking activities for or on behalf of the CCG or their GP practice and should not accept gifts that may affect, or be seen to affect, their professional judgement. This overarching principle should apply in all circumstances and is especially important during procurement exercises, as the acceptance of gifts could give rise to real or perceived conflicts of interests, or accusations of unfair influence, collusion or canvassing. All individuals are expected to declare any gifts and hospitality offered.

All individuals must declare all offers of gifts, hospitality and entertainment whether accepted or rejected.

Under no circumstances should individuals ask for any gifts.

### ALL Individuals - Disclosure UK Database

*Disclosure UK* provides a valuable opportunity for healthcare professionals to further demonstrate their integrity in the eyes of patients and the public. All CCG staff who undertake work for pharmaceutical companies must disclose payments on the [UK Disclosure database](#). All work undertaken with pharmaceutical companies must also be recorded on a Declaration of Interest Form.

## 5 Definitions/explanations of terms used

Gift	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
Hospitality	Offers of meals, refreshments, travel, accommodation, and other expenses in relation to attendance at meetings, conferences, education and training events etc.

## 6 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.

As an overarching principle CCG staff should not accept gifts that may affect, or be seen to affect, their professional judgement. This overarching principle should apply in all circumstances.

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, and the offer which has been declined must be declared to the CCG Corporate Governance Team within 28 days so that it can be recorded in the Gifts and Hospitality register.

Gifts from suppliers or contractors doing business (or likely to do business) with the CCG should be declined, whatever their value (with the exception of low cost branded promotional aids under the value of £6<sup>1</sup> which must be declared). The individual to whom the gift was offered must declare the offer to the CCG Corporate

Governance Team within 28 days so that it can be recorded in the Gifts and Hospitality register.

Modest gifts from other sources (e.g. patients, families and service users) under a value of £50 may be accepted and do not need to be declared. CCG staff should not ask for any gifts.

Gifts over the value of £50 should only be accepted on behalf of the CCG (e.g. to the CCG's charitable funds), not in a personal capacity. These must be declared to the CCG Corporate Team within 28 days so they can be recorded in the Gifts and Hospitality register.

Multiple gifts from the same source over a 12-month period should be treated in the same way as 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).

## 7 Hospitality

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

Delivery of services across the NHS relies on working with a wide range of partners (including industry and academia) in different places and, sometimes outside of 'traditional' working hours. As such, individuals will sometimes appropriately receive hospitality. Staff receiving hospitality should always be prepared to justify why it has been accepted, and be mindful that even hospitality of a small value may give rise to perceptions of impropriety and might influence behaviour.

When accepting or providing hospitality, individuals should be able to demonstrate that the acceptance or provision of hospitality would benefit the NHS or CCG. Individuals must 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.

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 as there may be particular sensitivities, for example if a contract re-tender is imminent. Where there is uncertainty as to whether a gift or hospitality is acceptable, advice should always be sought from the CCG Corporate Governance Team before an offer is accepted.

### **7.1 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) Executive Director approval is given. A clear reason should be recorded in the CCG's Gifts and Hospitality register as to why it was permissible to accept;
- A common sense approach should be applied to the valuing of meals and refreshments (using an actual amount, if known, or an estimate that a reasonable person would make as to its value).

### **7.2 Travel and Accommodation**

- Modest offers (i.e. standard public transport rates in the UK or mileage payments in line with the NHS standard public transport mileage rate) 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 may not usually offer i.e. business class or first class travel and accommodation or foreign travel, need approval by an Executive Director and should only be accepted in exceptional circumstances. Such offers must be declared whether it is accepted or not and a clear reason should be recorded on the Gifts and Hospitality Form as to why it was permissible to accept travel and accommodation of this type;

### **7.3 Sponsored Events**

Sponsorship of CCG events by external parties is valued, and offers to meet some or part of the costs of running an event secures their ability to take place, benefitting NHS staff and patients. Without this funding there may be fewer opportunities for learning, development and partnership working. However, there is potential for conflicts of interest between the organiser and the sponsor and it is important that individuals are aware of the safeguards in place to manage this. As such, the following principles must be adhered to:

- Sponsorship of CCG events by appropriate external bodies should only be approved if a reasonable person would conclude that the event will result in clear benefit for the CCG and the NHS;
- During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection rules and legislation;

- No information should be supplied to the sponsor from which they could gain a commercial advantage, and information which is not in the public domain should not be supplied;
- At the CCG's discretion, sponsors or their representatives may attend or take part in the event but they should not have a dominant influence over the content or the main purpose of the event;
- The involvement of a sponsor in an event should always be clearly identified in the interest of transparency;
- The CCG should make it clear that sponsorship does not equate to endorsement of a company or its products and this should be made visibly clear on any promotional or other materials relating to the event;
- Staff should declare their involvement with sponsored events to CCG Governance Team within 28 days so that the Register of Gifts, Hospitality and Sponsorship can be updated accordingly.
- A Gifts, Hospitality and Sponsorship Form (appendix 4) must be completed and given to the CCG Corporate Governance Team.
- If there is any uncertainty regarding the acceptance of sponsorship, individuals must seek advice from their Line Manager or the CCG Corporate Governance Team before accepting any offer.

The CCG has a separate Policy for the Sponsorship of Activities and Joint Working with the Pharmaceutical Industry that can be found on the CCG website.

<https://bnssgccg.nhs.uk/library/policy-sponsorship-activities-and-joint-working-pharmaceutical-industry/>

A Register of Gifts, Hospitality and Sponsorship template is at appendix 5 and will be made publicly available on the CCG website

Acceptance of commercial sponsorship should not in any way compromise commissioning decisions of the CCG or be dependent on the purchase or supply of goods or services. Sponsors should not have any influence over the content of CCG events, meetings, seminars, publications or training events. The CCG will not endorse individual companies or their products.

### **7.4 Other forms of Sponsorship**

Organisations external to the CCG or NHS may sponsor posts or research. However, there is potential for conflicts of interest to occur, particularly when research funding by external bodies does or could lead to a real or perceived commercial advantage, or if sponsored posts cause a conflict of interest between the

aims of the sponsor and the aims of the organisation, particularly in relation to procurement and competition.

Where such circumstances arise, advice should be sought from the CCG Corporate Governance Team before proceeding or continuing with any arrangement so that the conflict of interest can be appropriately managed. Further information can also be found on the NHS England website at:

<https://www.england.nhs.uk/commissioning/pc-co-comms/coi/>

## **8 Declarations of Gifts and Hospitality**

The CCG is required to maintain one or more registers of gifts, hospitality and sponsorship and must ensure that robust processes are in place to ensure that individuals do not accept gifts or hospitality or other benefits, which might reasonably be seen to compromise their professional judgement or integrity.

A gifts, hospitality and sponsorship register will be maintained for all of the individuals referred to in section 2 by the CCG Corporate Governance Team and will be made publically available on the CCG website.

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 CCG Conflicts of Interest Guardian (please see appendix 3). The outcome of this request will be shared with the individual within 10 working days.

Where a decision is made not to publish information the CCG will retain a confidential un-redacted version of the register(s). Where a decision is made to refuse a request not to publish information the individual will have the right to appeal this decision through the CCG Grievance Policy. During this process a redacted form of the information will be published.

## **9 Audit of Gifts and Hospitality**

The CCG is required to undertake an audit of their Gifts and Hospitality management as part of its internal audit on an annual basis. This audit is completed by the CCG's Internal Auditor and the outcome will be reflected in the CCG's Annual Governance Statement as well as forming part of the discussion at the end of year governance meeting with NHS England.

## 10 Raising Concerns and Breaches

It is the duty of all individuals referred to in section 2 to speak up about genuine concerns in relation to the administration of this policy and to report these concerns in line with the CCG's Freedom to Speak Up Policy. Suspicions must not be ignored or investigated directly.

Anyone who is not an employee or worker of the CCG, but who wishes to report a suspected or known breach of this policy should ensure that they comply with their own organisation's Freedom to Speak Up Policy.

All disclosures will be treated with appropriate confidentiality at all times in accordance with CCG policies and applicable laws. Anybody making such disclosures may expect an appropriate explanation of any decisions taken as a result of any investigation.

Providers, patients and other third parties may make a complaint to NHS Improvement in relation to the CCG's conduct under the Procurement Patient Choice and Competition Regulations.

Anonymised details of breaches will be published on the CCG's website for the purpose of learning and development. The outcomes of any investigation of breaches will also be reported to the Audit, Governance and Risk Committee and NHS England.

## 11 Breaches of the CCG's Gifts and Hospitality Policy

Failure to comply with the policy on Gifts and Hospitality can have serious implications for the CCG and any individuals concerned.

**Civil implications:** The CCG could face civil challenges to decisions it makes. For instance, if breaches occur during a service re-design or procurement exercise, the CCG risks a legal challenge from providers that could potentially overturn the award of a contract, lead to damages claims against the CCG, and necessitate a repeat of the procurement process. This could delay the development of better services and care for patients, waste public money and damage the CCG's reputation. In extreme cases, staff and other individuals could face personal civil liability, for example a claim for misfeasance in public office.

**Criminal implications:** The acceptance of inappropriate Gifts, Hospitality or Sponsorship could lead to criminal investigations into fraud, bribery and corruption. This could have implications for the CCG, linked organisations, and the individuals who are engaged by them.

**Disciplinary implications:** Individuals who fail to disclose any gift or hospitality offered to them in line with this policy will be subject to investigation and, where

appropriate, to disciplinary action. Individuals should be aware that the outcomes of such action may result in the termination of their employment or position with the CCG.

Statutorily regulated healthcare professionals who work for, or are engaged by the CCG are under professional duties imposed by their relevant regulator to act appropriately with regard to conflicts of interest including the acceptance of gifts and hospitality. Failure to comply with this policy may result in the CCG reporting such individuals to their regulator for investigation if they believe that they have acted improperly. The consequences for inappropriate action could include fitness to practise proceedings being instigated which may result in individuals being struck off by their professional regulator.

### **11.1 Managing breaches of this policy**

All breaches of the Gifts and Hospitality policy will be subject to internal investigation in the first instance, notwithstanding any external investigations which may be necessary. Internal investigations will be completed in line with the Freedom to Speak Up and all subsequent actions will be taken in line with relevant Human Resource policies.

Investigation outcomes in relation to breaches of this policy will be shared with the Audit Governance and Risk Committee who will review any lessons to be learnt and recommendations for action. The Audit, Governance and Risk Committee will monitor the implementation of any recommendations raised from the outcomes of investigations.

Once a breach is confirmed, the CCG Corporate Governance Team will ensure that NHS England is notified, including information about the nature of the breach and the actions taken in response. This information will also be published anonymously on the CCG website and communications plans will be put in place to manage any media interest. This will be managed on case by case basis.

## **12 Bribery and Fraud**

### **12.1 Bribery**

The CCG has a zero tolerance to bribery. We have a policy relating to Fraud and Bribery which can be found on the CCG website. The Bribery Act 2010 defines bribery as the giving or taking of a reward in return for acting dishonestly and or in breach of the law. There are four different classifications of bribery:

- Bribing another person.
- Being bribed,
- Bribing a foreign public official; or
- Failure to prevent bribery.

Any offering, promising, giving, requesting, agreeing to, receiving or accepting of any bribe is strictly forbidden by any employee when conducting business on behalf of the CCG or when representing the CCG in any capacity and is contrary to the Bribery Act 2010. Furthermore, the CCG requires all individual to report any offering, promising, giving, requesting, agreeing to, receiving or accepting of any bribe, whether real, suspected or otherwise. Individuals who fail to adhere to this policy will be dealt with by means of a criminal sanction, civil recovery and/or via the CCG's disciplinary processes.

Any suspicions or concerns of acts of bribery can be reported confidentially online via <https://www.reportnhsfraud.nhs.uk/> or via the NHS Fraud and Corruption Reporting Line on 0800 0284060. All calls are dealt with by experienced trained staff and any caller who wishes to remain anonymous may do so.

### **12.2 Fraud**

The CCG has a zero tolerance to fraud. We have a policy relating to Fraud and Bribery which can be found on the CCG website. The Fraud Act 2006 created a criminal offence of fraud and defines three ways of committing it:

- Fraud by false representation;
- Fraud by failing to disclose information; and
- Fraud by abuse of position.

In these cases, an offender's conduct must be dishonest and their intention must be to make a gain or cause a loss (or the risk of a loss) to another.

Any suspicions or concerns of acts of fraud can be reported confidentially online via <https://www.reportnhsfraud.nhs.uk/> or via the NHS Fraud and Corruption Reporting Line on 0800 0284060. All calls are dealt with by experienced trained staff and any caller who wishes to remain anonymous may do so.

### **13 Training requirements**

The information and responsibilities within this policy will be disseminated to staff by the publication of this policy on the BNSSG CCG website and intranet. Conflict of Interest training which includes Gifts and Hospitality is mandatory for all individuals referred to in section 2 and is to be completed annually by all staff. Conflicts of Interest training packages are provided by NHS England. Training compliance rates will be recorded as part of the CCG's annual conflicts of interest audit.

### **14 Equality Impact Assessment**

All relevant persons are required to comply with this document and must demonstrate sensitivity and competence in relation to the nine protected

characteristics as defined by the Equality Act 2010. If you, or any other groups, believe you are disadvantaged by anything contained in this document please contact the Document Lead (author) who will then actively respond to the enquiry.

## **15 Implementation and Monitoring Compliance and Effectiveness**

An implementation plan has been prepared and is attached at appendix 2. Compliance with this policy will be monitored by the Corporate Governance team and reported quarterly to the Audit, Governance and Risk Committee. The outcomes of the mandatory annual audit will be reported to the Audit, Governance and Risk.

## **16 References, acknowledgements and associated documents**

The following related documents may be accessed through our website:

<https://bnssgccg.nhs.uk/library/policy-sponsorship-activities-and-joint-working-pharmaceutical-industry/>

<https://bnssgccg.nhs.uk/library/managing-conflicts-of-interest-policy/>

<https://bnssgccg.nhs.uk/library/fraud-and-bribery-policy/>

## 17 Appendices

### 17.1 Equality Impact Assessment

Equality Impact Assessment Screening		
Query	Response	
What is the aim of the document?	To set out the CCG responsibilities in relation to Revised Statutory Guidance on Managing Conflicts of Interest for CCGs (June 2017) and processes to ensure compliance	
Who is the target audience of the document (which staff groups)?	All staff	
Who is it likely to impact on and how?	Staff	Yes, in that it describes the way in which staff are required to declare all gifts and hospitality as set out in the policy. It does not have an impact on staff in terms of Equalities and Human Rights (see below)
	Patients	no
	Visitors	no
	Carers	no
	Other – governors, volunteers etc.	Yes – all those defined as staff in the policy are required by statutory guidance to conform to the policy. It does not have an impact in terms of Equalities and Human Rights (see below)
Does the document affect one group more or less favourably than another based on the 'protected characteristics' in the Equality Act 2010:	Age (younger and older people)	no
	Disability (included physical and sensory impairments. Learning disabilities. Mental health)	no
	Gender (men or	no

	women)	
	Pregnancy and maternity	no
	Race (includes ethnicity as well as gypsy travellers)	no
	Sexual orientation (lesbian, gay and bisexual people)	no
	Transgender people	no
	Groups at risk of stigma or social exclusion (e.g. offenders, homeless people)	no
	Human Rights (particularly rights to privacy, dignity, liberty and non-degrading treatment)	No – the CCG has in place to ensure that's rights to privacy are protected

## 17.2 Implementation Plan

Target Group	Implementation or Training objective	Method	Lead	Target start date	Target End date	Resources Required
Governing Body	Ensure GB is aware of CCG's responsibilities and provide assurance that appropriate process is established to ensure legal compliance	Cover paper to the policy to be presented to the Governing Body	Corporate Secretary	Jan-20	Jan-20	staff time, governing body time
Executive Directors	Ensure awareness of responsibilities to ensure compliance Individual Executive Director responsibilities Directorate Responsibilities	discussion with individual directors	Corporate Manager	Jan-20	Feb-20	staff time, executive director time
All Staff	Ensure awareness of CCG processes and procedures	Policy to be placed on website * Information about the policy and CCG process to be placed on the Hub* Information about the policy and CCG process to be communicated through internal newsletter* Awareness raising item at individual Directorate SMT and Directorate team meetings** Annual Conflicts of Interests training module***	Corporate Manager /Training manager	Jan-20	* Jan- 20 ** Mar-20 *** Jan-20	staff time training module

### 17.3 Contact details for CCG Governance Lead and Conflict of Interest Guardian

Governance Lead	
Name	Sarah Carr
Title	Corporate Secretary
Telephone No.	0117 900 2632
Email	<a href="mailto:sarah.carr5@nhs.net">sarah.carr5@nhs.net</a>
Conflict of Interest Guardian	
Name	John Rushforth
Title	Deputy Chair, Lay Member Audit and Governance
Email	<a href="mailto:John.rushforth@nhs.net">John.rushforth@nhs.net</a>

## 17.4 Template Declaration of Gifts, Hospitality and Sponsorship

<b>Recipient Name</b>		
<b>Position within the CCG</b>		
<b>Date of Offer</b>		
<b>Date of Receipt (If applicable)</b>		
<b>Details of Gift / Hospitality/Sponsorship</b>		
<b>Estimated Value (£)</b>		
<b>Name of person/company making the offer and nature of business</b>		
<b>Details of any previous offers or acceptance by this person / company</b>		
<b>Name of Officer reviewing and approving the declaration made and date</b>		
<b>Was the Gift / Hospitality/Sponsorship Accepted or Declined?</b>		
<b>Reason for accepting or declining</b>		
<b>Other Comments</b>		

The information submitted will be held by the CCG for personnel or other reasons specified on this form and to comply with the organisation's policies. This information may be held in both manual and electronic form in accordance with the Data Protection Act 1998. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and in the case of 'decision making' staff (as defined within the CCG's Standards of Business Conduct Policy), maybe published in registers that the CCG holds.

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to the CCG as soon as practicable as and no later than 28 days after the interest arises. I am aware that if I do not make full, accurate and timely declarations then civil, criminal, professional regulatory or internal disciplinary action may result.

I **do / do not (cross out as applicable)** give my consent for this information to be published on registers that the CCG holds. If consent is not given, please give reasons below and refer to the process described in CCG Gifts and Hospitality Policy:

**Employee Signature:**

**Employee Print name:**

**Date:**

**Line Manager Signature:**

**Line Manager Print name:**

**Date:**

Please return to **The Corporate Team**, [bnssg.corporate@nhs.net](mailto:bnssg.corporate@nhs.net)

### 17.5 Register of Gifts, Hospitality and Sponsorship

 Bristol, North Somerset and South Gloucestershire Clinical Commissioning Group									
<b>Register of Gifts, Hospitality and Sponsorship                      2019/20</b>									
Name	Position	Date of offer	Declined or accepted	Date of receipt (if applicable)	details of gift or hospitality	estimated value	Supplier/offer or name and nature of business	Reason for Accepting or declining	details of officer reviewing/approving the declaration and date of decision if applicable