

SUMMARY GUIDE OF DECLARING INTERESTS AND OFFERS AND ACCEPTANCE OF GIFTS AND HOSPITALITY

Introduction

The CCG has a responsibility to ensure that it has arrangements in place to mitigate any potential risks. This guide provides a summary of the main points from the CCG's policies on Conflicts of Interest and Offers and Acceptance of Gifts and Hospitality Policy Including Sponsorship.

Staff must ensure they read and understand the full details included in these policies (available on the CCG's website), adhere to all the principles and comply with any necessary actions expected of them.

Policies are in place to protect individuals as well as the CCG from accusations of wrong doing and to alleviate the risk of any potential conflicts of interest between outside interests and the expected standards of business conduct.

Why do I need to make declarations?

CCG's have to make arrangements to manage potential conflicts of interest as part of their Constitution and full details are contained within the Conflicts of Interest Policy.

- Declared interests of the Governing Body are included in the Annual report and accounts. These are published on the website, together with declared interests of staff and relevant others and Declarations of Gifts and Hospitality.
- The Conflicts of Interest Policy is subject to a quarterly self-certification process and annual audit.

What Do I Need to Do?

- Undertake the mandatory conflicts of interest e-learning.
- Declarations of interest are to be completed on appointment to the CCG or its Council of members, governing body or any Committees, at meetings, on changing role, responsibility or circumstances and in addition to this on a six monthly basis (as per the CCGs timeline). A nil return must be completed, even if there are no interests to declare.
- Declarations forms for Gifts and Hospitality are to be completed on receipt of a gift and/or hospitality.
- Declaration Forms are available on the CCG website and on the shared drive under corporate templates and forms.
- All Individuals completing a declaration form must provide sufficient detail of each interest so that a member of the public would be able to understand clearly the sort of conflict of interest that might arise.
- Declaration Forms must be either signed as a hard copy or submitted using an electronic signature. (Typed signatures cannot be accepted).
- Ensure your details are kept up to date by reporting any changes/additions to the Corporate Affairs Officer Michelle Longden.
- If a conflict becomes apparent in the course of a meeting, make an oral declaration which will be minuted.

- Declarations forms should be submitted as soon as possible thereafter or within 28 days.
- If you suspect any breach of the policy or have any Concerns about the management of Conflicts of Interest these should be raised with the Associate Director of Corporate Affairs Mike Napier or the Conflicts of Interest Guardian Karen Marshall.

ACCEPTANCE OF GIFTS AND/OR HOSPITALITY

On **gifts** staff should...

- Decline anything that may affect your professional judgement.
- All offers of gifts **must be refused** where they are made under the following circumstances:
 - *Gifts from **suppliers or contractors** doing business (or likely to do business) with the CCG. However, low cost branded promotional items may be accepted where they are under the value of £6 and **do need not be declared.***
- Gifts from other sources e.g. patients, family, service users, non-contractual organisations that the CCG works with:
 - *Only accept gifts with a value over £50 on behalf of the CCG and **declare these.***
 - *The same applies to multiple gifts from the same source with a cumulative value of over £50.*
 - *Modest gifts accepted under a value of £50 **do not need to be declared.***
- Offers of any of the following **must be refused** under all circumstances:
 - *Cash (including gift vouchers)*
 - *Paid holidays*
 - *Use of company flats or facilities*

On **hospitality** staff should...

- Decline anything that may affect your 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.
- Accept **without declaring** hospitality up to £25, **declare** hospitality between £25 and £75 and **refuse** hospitality over £75 (unless exceptional senior approval is given).

	<ul style="list-style-type: none">• 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, should only be accepted in exceptional circumstances, and must be declared.
<p>If you require any further guidance in relation to the policies referred to in this leaflet, please contact the Corporate Governance Team on 01482 344700.</p>	