



Public Trust Board				31 July 2012	
Title	Business Conduct for Staff – Interests, Gifts, Hospitality, Sponsorship and Bribery Act Policy			Paper Ref	7.2
PURPOSE (X)		Information		Strategic Objective	Business Plan Objective
Approval		Decision			
Assurance	X	Discussion		Finance	F1
Purpose of the paper	This policy is presented to the Trust Board describing the business conduct behaviour required by all staff who potentially may benefit as a recipient of gifts, hospitality or sponsorship arrangements.				
Recommendation	The Board is asked to approve the policy.				
Author	Rod Barnes Executive Director of Finance & Performance	Accountable Director:		Rod Barnes Executive Director of Finance & Performance	
RISK ASSESSMENT				Yes	No
Changes to the Corporate Risk Register and/or Board Assurance Framework					X
Resource Implications					X
Legal implications					X
ASSURANCE/COMPLIANCE					
CQC Registration Outcome(s)	Auditors' Local Evaluation		NHSLA Risk Management Standards for Ambulance Trusts		

**BUSINESS CONDUCT FOR STAFF – INTERESTS, GIFTS, HOSPITALITY,
SPONSORSHIP AND BRIBERY ACT POLICY**

1. PURPOSE/AIM

- 1.1 This policy is presented to the Trust Board describing the business conduct behaviour required by all staff who potentially may benefit as a recipient of gifts, hospitality or sponsorship arrangements.
- 1.2 The policy also describes the staff obligations in respect of declarations of business interests.
- 1.3 The policy serves as an important defence against any actions brought under the 2011 Bribery Act.

2. BACKGROUND/CONTEXT

- 2.1 The Trust has a legal obligation to act in the best interests of the organisation, in accordance with its governing document. It is therefore essential that there are clear and robust systems in place for declaring the acceptance of gifts and hospitality.
- 2.2 It is the responsibility of staff to ensure that they are not placed in a position which risks, or appears to risk, conflict between their private interest and their NHS duties. In general, whilst articles of low intrinsic value, such as calendars, diaries, biscuits and chocolates may be accepted. The offer of gifts from contractors or others should be politely and firmly declined. Staff are advised that if in doubt then they should contact their line manager for clarification.
- 2.3 The NHS Code of Conduct was ratified at Joint Steering Group (JSG) in January 2010 and is due to be reviewed again in October 2012.
- 2.4 Reminders from the Director of Finance and Performance appear periodically in Operational Update reminding staff that they must comply with the NHS Code of Conduct regarding the acceptance of gifts and hospitality. A link to the Code of Conduct is attached to this reminder. Once the policy is agreed there will be a link to this policy and relevant forms to complete.
- 2.5 The PA to the Executive Director of Finance & Performance receives and registers these declarations following director sign off.
- 2.6 The gifts and hospitality register is presented to the Audit Committee on an annual basis.

3. PROPOSAL/NEXT STEPS

- 3.1 It is proposed that the report is accepted by the Board and the policy agreed.

4. RECOMMENDATIONS

4.1 The Board is asked to approve the policy.

5 APPENDICES

- Business Conduct for Staff – Interests, Gifts, Hospitality, Sponsorship and Bribery Act Policy