

Livewell Southwest

**Acceptance of Gifts/Hospitality Policy  
(incorporating Declarations of Interest)**

Version No.1.2  
Review: March 2018

**Notice to staff using a paper copy of this guidance**

**The policies and procedures page of Intranet holds the most recent version of this guidance. Staff must ensure they are using the most recent guidance.**

**Author: Corporate Secretary**

**Asset Number: 878**

## Reader Information

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### Document Review History

Version No.	Type of Change	Date	Originator of Change	Description of Change
0.1	New policy	September 2014	Corporate Secretary	New policy
1	Minor amend	November 2014	Policy Ratification group	Ratified.
1.1	Minor amend	May 2015	Corporate Secretary	Amendments to reflect Locality Changes.
1.2	Minor amend	March 2017	Counter Fraud – Audit South West	Amendment to include secondary employment declaration.

<b>Contents</b>		<b>Page</b>
1	Introduction	4
2	Duties	4
3	Casual Gifts	4
4	Substantial Gifts/Donations	5
5	Hospitality	5
6	Declarations of Interest	6
7	Commercial Sponsorship of Attendance at Courses/ Conferences	6
8	Preferential Treatment in Private Transactions	6
Appendix A	Acceptance of Gifts/Hospitality Flowchart	8
Appendix B	Acceptance of Gifts & Hospitality Notification Form	9
Appendix C	Declaration of Interests Form	10

# Acceptance of Gifts/Hospitality Policy (incorporating Declarations of Interest)

## 1. Introduction

- 1.1 As a Community Interest Company, Livewell Southwest (LSW) must be impartial and honest in the conduct of its business and its employees must be beyond suspicion. The Bribery Act 2010 came into force on 1st July 2011 and it reforms the criminal law of bribery, making it easier to tackle this offence proactively in the public and private sectors. It is an offence under the Bribery Act 2010 for an employee to accept any inducement (bribe) or reward for doing, or refraining from doing, anything in his/her official role, or corruptly showing bias in the handling of contracts.
- 1.2 All staff and volunteers must also strive to avoid any conflict of interest between the interests of the organisation and personal, professional and business interests. This includes perceived conflicts of interest as well as actual conflicts of interest.
- 1.3 This policy aims to protect the integrity of the organisation's decision-making process, to enable our stakeholders to have confidence in our integrity and to protect the integrity and reputation of volunteers, apprentices, staff and committee members.
- 1.4 You must:
  - Ensure that the interests of patients and clients remain paramount at all times.
  - Be impartial and honest in your work.
  - Use any funds entrusted to you to the best advantage of the service, always ensuring value for money.
- 1.5 You must not:
  - Abuse your official position for personal gain, or to benefit your family or friends.
  - Do anything to promote or give advantage to private business or other interests, in the course of your work.
  - Retain any funds given in error, i.e. overpayments.

## 2. Duties

- 2.1 The Board is responsible for ensuring the impartiality and honesty of the business and its employees.
- 2.2 Managers should:

- Make staff aware of the procedure for accepting gifts, hospitality and declaring interests (refer to Appendices A-C).
- Ensure that gifts and hospitality are appropriately recorded in the gift register.

2.3 Employees should adhere to the reporting process (refer to Appendices A-C).

### **3. Casual Gifts**

3.1 You may:

- Accept small tokens of gratitude (excluding money) from patients or their relatives but details must be advised to the ward/clinical area/line manager for entry into the gift register.

3.2 You must not:

- Accept a gift of money personally. Anyone wishing to donate money must be referred to the:
  - Ward Manager.
  - Clinical Manager.
  - Cashier (Mount Gould Hospital).

3.3 You must:

- Politely refuse casual gifts from contractors (with the exception of standardised advertising articles such as diaries and calendars).

### **4. Substantial Gifts/Donations**

4.1 Where a significant financial gift or donation is proposed by any individual benefactor or an agency on behalf of an individual, whether the individual wishes to remain anonymous or has a high profile locally or nationally, the LSW Board will acknowledge and confirm its agreement to accept the gift or donation. Any publicity or media coverage will require appropriate consent and chaperoning arrangements where individual patients, their families or carers are included.

### **5. Hospitality**

5.1 You may:

- Accept modest hospitality provided it is reasonable in the circumstances. This may be simply a cup of tea but in general it is limited to the extent of a working lunch or equivalent.

5.2 You must:

- Declare all other offers of hospitality or entertainment on behalf of Livewell Southwest using the attached form.

## **6. Declarations of Interest**

6.1 If you have relationships and/or hold additional posts that could potentially result in a conflict of interest with LSW, you should complete a written disclosure (Appendix C) which will be kept on file and updated as appropriate. Examples include:

- Controlling and/or significant financial interest by you (or by a close relative or associate) in a business, which may compete with LSW for services or goods. This includes private care, nursing and residential homes.

6.2 In the course of meetings or activities, committee members will disclose any interests in a transaction or decision where there may be a conflict between the organisation's best interests and the committee member's best interests or a conflict between the best interests of two organisations that the committee member is involved with.

6.3 After disclosure, the committee member may be asked to leave the room for the discussion and may not be able to participate in the decision depending on the judgement of the other committee members present at the time. Any such disclosure and subsequent actions taken will be noted in the minutes.

## **7. Commercial Sponsorship of Attendance at Courses/Conferences**

7.1 You must:

- Obtain written permission from your manager to attend a course or conference under commercial sponsorship. Permission will be refused if acceptance could compromise or be perceived as compromising future decisions in any way.

7.2 For full details of principles and standards expected when working with sponsors, please refer to the Sponsorship and Working with Industry Policy.

## **8. Preferential Treatment in Private Transactions**

8.1 You must not:

- Seek or accept preferential rates or benefits in kind for private transactions carried out with companies with which you have had (or may have) official dealings on behalf of Livewell Southwest.

**All policies are required to be electronically signed by the Lead Director. Proof of the electronic signature is stored in the policies database.**

**The Lead Director approves this document and any attached appendices. For operational policies this will be the Locality Manager.**

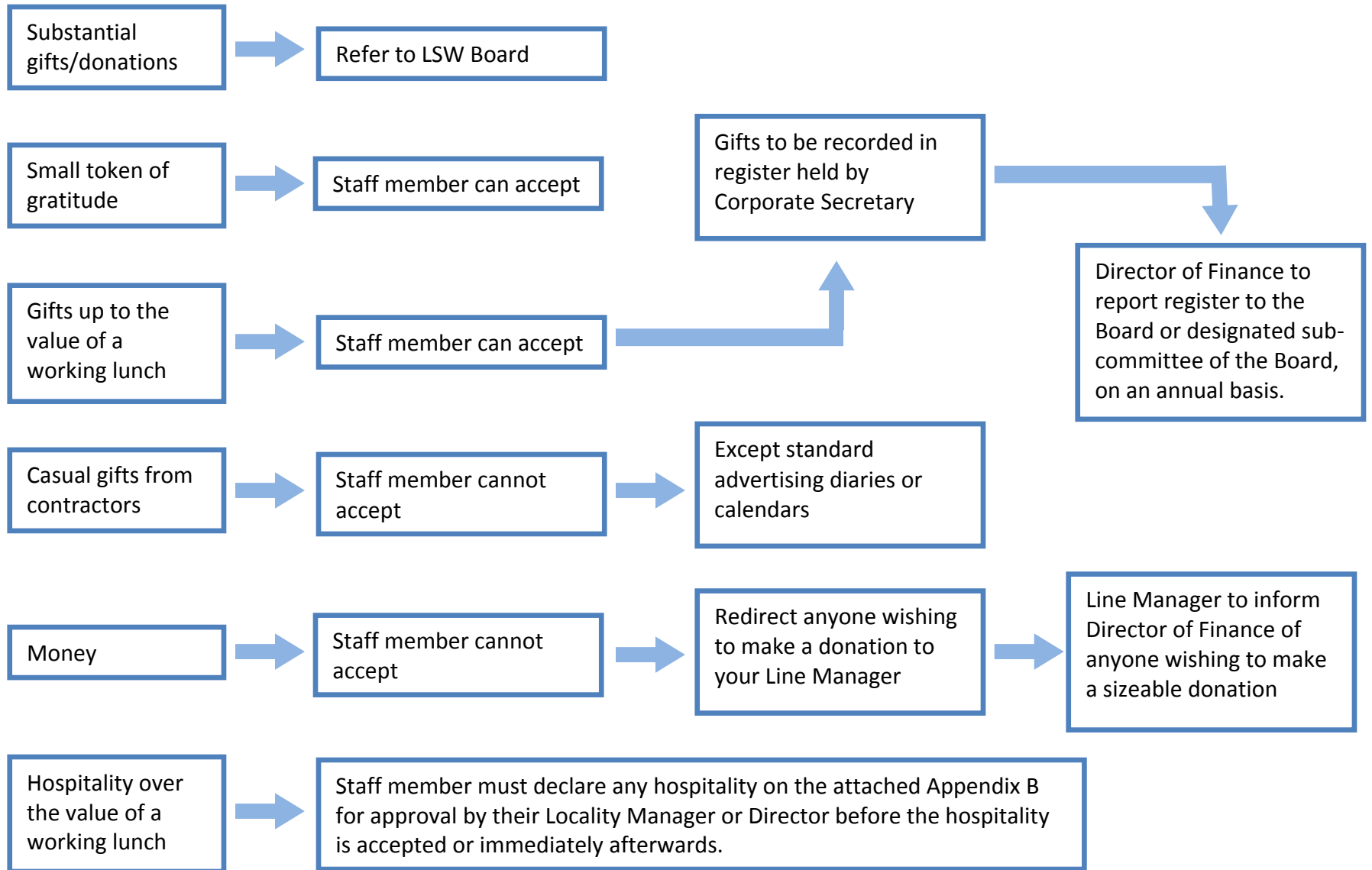
**The Executive signature is subject to the understanding that the policy owner has followed the organisation process for policy Ratification.**

Signed: Director of Finance

Date: 2<sup>nd</sup> January 2015



## Appendix A – Acceptance of Gifts/Hospitality Flowchart



## Appendix B

### ACCEPTANCE OF GIFTS AND HOSPITALITY NOTIFICATION

Details of staff member	
Surname:	
First name(s):	
Job title:	
Employment base:	
Details of person/organisation from whom gift or hospitality was offered or received	
Surname:	
First name(s):	
Organisation name & address:	
Type of gift / hospitality and description	
Date of receipt:	Value:
Signature of person who received/is going to receive gift:	
Date:	
Name of Locality Manager / Director:	
Authorising Signature:	
Date:	
<p><b>Please send the completed form to:</b> Corporate Secretary, Livewell Southwest, 1<sup>st</sup> Floor, Windsor House, Tavistock Road, Plymouth, PL6 5UF.</p>	
For Corporate Office Use:	
Date received:	
Approved by Chief Executive:	

## Appendix C DECLARATION OF INTERESTS

Name of staff member				
Surname:				
First name(s):				
Job title:				
Employment base:				
Position held				
<i>Please circle your staff group</i>				
Admin & Clerical	Allied Health Professionals	Estates/ Maintenance	Hotel Services	
Nursing & Midwifery	Senior Management	Training & Development		
<i>Please circle your Directorate/Locality</i>				
Chief Executive	Finance	HR & Corporate Services	Medical	Professional Practice
City Wide	North & East	South & West	Urgent Care	
Details of interest to be declared				
Self/spouse/immediate family/ friend/other (specify):				
Interest details (name of business/activity etc.):				
Purpose of interest (type of business):				
Position held i.e. job title				
Other declared activity outside of LSW:				
Potential for conflict with LSW activities/business:				
Signatures				
Signature of staff member:		Date:		
Signature of Line Manager:		Date:		
Name of Line Manager (please print):				

**Please send the completed form to:** Corporate Secretary, Livewell Southwest, 1<sup>st</sup> Floor, Windsor House, Tavistock Road, Plymouth, PL6 5UF.