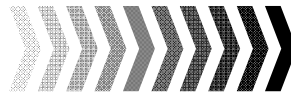


Policy Document

# **GIFTS, HOSPITALITY AND SPONSORSHIP POLICY**

Version	1.4
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Applies to	All Staff
Related policies	tba
Approved by	DILP Management Group
Approval Date	October 2011
Review Date	June 2013

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## VERSION CONTROL AND RATIFICATION

Document ratification and history	
File name	<b>GIFTS, HOSPITALITY AND SPONSORSHIP POLICY</b>
Owning department	<b>MANAGING DIRECTOR</b>
Authors	<b>PHILIP SUTCLIFFE / TOM BLACKWELL</b>
Review date	<b>JUNE 2013</b>

Date	Version	Description/Reason for change
20.2.11	1.0	Original based on NHSL template – to CDOG for comments
4.3.11	1.1	Amends from A Hannah incorporated; further discussion at OMG
27.5.11	1.2	General refresh for DILP-MG meeting in June
12.7.11	1.3	Final version
25.8.11	1.4	Addition of contact process if suspect fraud or corruption
04.10.11	1.4	Addition of gifts, hospitality and sponsorship declaration form

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## 1. INTRODUCTION

This policy sets out the Deanery's standards of conduct in relation to the acceptance of gifts, hospitality and sponsorship, and reflects standards in place at NHS London. The policy reflects standards for a wide range of activities, which can be broadly considered as:

- Gifts of money, goods or services (including hospitality and sponsorship), or a combination of these;
- the loan of goods, money or service, or a combination of these; and
- the receipt of beneficial terms that are not generally available regarding the purchase or lease of goods or services.

Goods' include food, drink, gifts, equipment, vehicles, furnishings or furniture. 'Services' includes invitations to events, hospitality, entertainment, travel, accommodation, sponsorship or work carried out.

This document is based on guidelines issued by the NHS Executive, EL(96)49, which make it clear that the provision of hospitality when using public money, and its receipt, must be considered very carefully and avoided in the majority of circumstances.

## 2. POLICY STATEMENT

The policy of the Deanery is that:

- hospitality, gifts and sponsorship should not generally be accepted;
- where exceptionally an individual believes there is a case for acceptance, appropriate approval must be obtained in all cases from the Managing Director, Dean Director or other member of the Management Group (LCMDE or DILP/PSSO); and
- where approval is granted, any gift, sponsorship or hospitality received, regardless of value, must be recorded in the Register of Gifts, Hospitality and Sponsorship using the form attached to this policy.

## 3. SCOPE OF POLICY

The policy applies to all employees and contractors (including agency staff) of the Deanery in respect of their Deanery responsibilities, whether they be LCMDE, DMDE or DILP/PSSO, and regardless of whether their employment contracts were issued by the University of London, NHS London or any Trust or other NHS organisation.

It is the responsibility of deans, directors and line managers to ensure that all employees are aware of and follow this policy. Staff should be aware that disciplinary action may be taken where there is a breach of this policy.

Under the Prevention of Corruption Acts, 1906 and 1916, it is an offence for employees to accept gifts or consideration as an inducement or reward for:

- doing, or refraining from doing, anything in their official capacity; or
- showing favour or disfavour to any person in their official capacity e.g.: placing a contract for goods and services with a person or organisation.

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#### **4. CASUAL GIFTS**

It is appropriate for staff to accept small tokens, up to a value of £10.00. This may include items of low intrinsic value such as diaries or calendars, or small tokens of gratitude from trainees or associates, such as chocolates. However, at no time should cash be accepted.

Casual gifts, offered by contractors or other external organisations, should be politely but firmly declined if it is thought that it would constitute an offence under the Prevention of Corruptions Acts as outlined above.

Please note that although the limit is set at £10.00, staff may still be required to explain the acceptance of any gift, hospitality or sponsorship. In cases of doubt staff should either consult their line manager or politely decline acceptance.

#### **5. RECORDING OFFERS, ACCEPTANCES AND DECLINES**

Regardless of value, and whether a gift is accepted or not accepted, the employee's line manager, dean or director (as appropriate) should be informed.

All offers and outcomes MUST be recorded within two weeks on the Deanery's Register of gifts/hospitality/sponsorship notification form, appended to this policy (and available via Sharepoint), a copy of which must be submitted to the relevant Managing Director's (LCMDE or DILP) Office.

The Managing Director will then review the case and record whether s/he is happy with the action and if not, what further action is to be taken.

Copies of the completed and signed-off form will then be kept safely and an annual report made to the Management Group, or (if required) Strategic Health Authority and/or its auditor.

#### **6. HOSPITALITY OF A NON-COMMERCIAL NATURE**

Accepting modest hospitality is allowable, provided it is normal and reasonable in the circumstances, e.g.: lunches in the course of a working visit, though it should be similar to the scale of hospitality which the Deanery as an employer would be likely to offer.

Staff should decline all other offers of hospitality or entertainment. If they are in any doubt, they should seek advice from their line manager, dean or director.

#### **7. COMMERCIAL SPONSORSHIP – HOSPITALITY AND MEETINGS**

As a general rule, sponsorship arrangements involving the Deanery should be at a corporate rather than an individual level. These guidelines apply to any member of the Deanery working under either University of London or NHS terms or conditions and receiving (or being offered) sponsorship from agencies and/or commercial industry.

Agency/industry representatives organising meetings are permitted to provide appropriate hospitality and/or meet all reasonable costs which may be incurred. Hospitality must be secondary to the purpose of the meeting.

The level of hospitality offered must be appropriate to the occasion; and the costs involved must not exceed that level which the recipients would normally expect when

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paying for themselves or that which could be reciprocated by the Deanery. It should not be extended beyond those whose role makes it appropriate for them to attend the meeting.

Any meeting that is sponsored must be disclosed in papers relating to the meeting and any published minutes or other proceedings.

In all instances of being offered gifts or hospitality or where any individual benefits from sponsored hospitality, the attached form should again be completed, showing the:

- nature of the goods/hospitality/sponsorship offered (e.g.: a lunch/dinner);
- approximate value (where this is unknown an estimate should be included);
- person/ organisation offering the goods;
- date of the offer; and
- action taken (i.e. accepted or declined)

and any supporting information appended.

The form should be reviewed by the employee's line manager and then sent to the Managing Director (LCMDE or DILP) within two weeks of the offer.

## **8. AUTHORISATION**

Only authorised signatories may approve the provision of hospitality or commercial sponsorship.

## **9. IF YOU SUSPECT FRAUD OR CORRUPTION**

In the event of suspected fraud or corruption, the London Deanery Head of HR or Managing Director should be informed. The Head of HR and or Managing Director will then contact the NHS Fraud and Corruption Team as appropriate

## GIFTS HOSPITALITY AND SPONSORSHIP DECLARATION FORM

(To be completed where the value of the one off hospitality, gift or sponsorship offered or accepted is estimated to exceed £25)

Date hospitality, gift or sponsorship offered/received:	
Name of person offered/receiving the hospitality, gift or sponsorship:	
Work address:	
Department:	
Hospitality, gift or sponsorship received from:	
Details of Interest, hospitality, gift or sponsorship offered/received:	
Approximate value of hospitality, gift or sponsorship offered/received:	£
<p><b>Declaration:</b> <i>(please delete as appropriate)</i></p> <ol style="list-style-type: none"> <li>1. The hospitality, gift or sponsorship was offered but was declined.</li> <li>2. I declare that the interest/gift/hospitality/sponsorship acquired or received was entirely consistent with the requirements of the Deanery Gifts Hospitality and Sponsorship policy and that no business decisions have or will be improperly influenced by gifts or no advancements or personal gain obtained.</li> </ol> <p>I confirm that I have read and understand the Deanery Gifts Hospitality and Sponsorship policy (if appropriate) and have made all necessary declarations during the last year.</p>	
Print Name:	
<b>Signed and dated:</b>	
	(If the declaration is made <b>by e-mail</b> , state by e-mail in the signature box above)
<b>Managers Statement:</b>	I confirm I have been made aware of the hospitality, gift or sponsorship offered or received by this individual. I consider the action taken to be reasonable/ I have taken the following action with regard to the matter:
Print Name:	
Signed and Dated:	
<b>Board Secretary's statement:</b>	I confirm I have been made aware of the hospitality, gift or sponsorship offered or received by this individual. I consider the action taken to be reasonable/ I have taken the following action with regard to the matter:
Print Name:	
Signed and Dated:	

This form must be completed, not later than the end of the month following that in which the hospitality/gift or sponsorship **offer was made or received** and sent to:

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**LONDON DEANERY**

(LCMDE, DMDE and DILP)

**REGISTER OF GIFTS, HOSPITALITY OR SPONSORSHIP**

Please append any written offers, supporting information, statements or additional explanation.

Staff Name ..... Department .....

Job Title .....

Description of Gift, Hospitality or Sponsorship offered: .....

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Offered by ..... Date offered .....

Action taken .....

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Reason for Action .....

**Signed**..... **Date**.....

**DEAN / DIRECTOR'S REVIEW**

I have reviewed the gift/hospitality/sponsorship recorded above.

I consider the action taken to be reasonable / inappropriate. I have taken the following action with regard to the matter

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**I will forward a copy of this form to the Managing Director's Office**

**Signed** .....