



**Wandsworth
Clinical Commissioning Group**

Standards of Business Conduct Policy

Version 2.0

Date approved: 09/04/2014
Date for review: April 2017
Lead Director: Director of Corporate Affairs, Performance and Quality
Lead Manager: Business Manager

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DOCUMENT CONTROL AND AMENDMENT RECORD

| Version | Date | Reason for review/update | Author/ Reviewer | Approving Committee(s) | Date of approval |
|----------------|-------------|--|----------------------------|-------------------------------|-------------------------|
| 0.1 | 13/08/13 | Initial draft to Integrated Governance Committee | S Allingham | | |
| 0.2 | 08/11/13 | Inclusion of comments from IGC and Counter Fraud | S Allingham/ R Chappell | | |
| 0.3 | 02/01/14 | Inclusion of comments from Audit Committee | S Allingham | | |
| 1.0 | April 2014 | Policy approved by the Board | | Board | 09/04/14 |
| 1.1 | August 2015 | Guidance from Dame Barbara Hakin | S Allingham | IGC | 18/08/15 |
| 2.0 | August 2015 | Inclusion of comments from IGC | S Allingham | IGC | 18/08/15 |
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1. INTRODUCTION

- 1.1 The purpose of this policy is to ensure exemplary standards of business conduct are adhered to, as custodians of public money, by Clinical Commissioning Group (CCG) Board members, committee and sub-committee members, and employees of the CCG (as well as individuals contracted to work on behalf of the group or otherwise providing services or facilities to the group such as those within commissioning support services). Through this policy individuals will be aware of their own responsibilities as well as the CCG's responsibilities as a corporate body (including the constituent Member Practices).
- 1.2 Importantly, the policy draws attention to the consequences of non-compliance with the requirements which may include disciplinary action and/or legal action.
- 1.3 The production of this policy draws on the wide range of guidance issued over the years for NHS bodies in relation to this important matter and to guidance published specifically for CCGs.

2. GUIDANCE AND LEGAL FRAMEWORK

- 2.1 The NHS Management Executive published guidance, "Standards of business conduct for NHS staff", (HSG (93) 5), which remains extant and which provides specific guidance on:
 - the standards of conduct expected of all NHS staff where their private interests may conflict with their public duties; and
 - the next steps which NHS employers should take to safeguard themselves and the NHS against conflicts of interest.

Specifically, it makes it clear that 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 interests and their NHS duties.

For specific information relating to Conflict of Interests, please refer to the Managing Conflicts of Interest Policy.

- 2.2 The Department of Health's document, "Code of Conduct for NHS Managers", (October 2002), provides guidance on core standards of conduct expected of NHS Managers to act in the best interests of the public and patients/clients to ensure that decisions are not improperly influenced by gifts or inducements. Professional Codes of Conduct governing health care professionals are also pertinent. Similarly, the General Medical Council's guidance, "Leadership and management for all doctors" (March 2012), details the standards and expectations required of clinicians in leadership and management positions.
- 2.3 Other important guidance on conduct is to be found in "The Code of Conduct: Code of Accountability in the NHS" (Appointments Commission/DOH – 2nd Rev: 2004) and the Department of Health's guidance on "Commercial Sponsorship – Ethical Standards for the NHS" (Department of Health, November 2000).

- 2.4 The underpinning legal framework is provided by the Bribery Act 2010 – for further information please refer to the Anti-Bribery Policy.
- 2.5 Section 25 of the Health and Social Care Act 2012 imposes duties on CCGs in relation to maintaining registers of interest and managing conflicts of interest. Further guidance was published in December 2014 to reflect the opportunity for CCGs to take an increased responsibility for the commissioning of primary care. This guidance is embodied in the Managing Conflicts of Interest Policy.
- 2.6 This policy has been produced taking into account all of the current guidance and legal framework.

3. APPLICATION OF PUBLIC SERVICE VALUES AND PRINCIPLES TO THE NHS

- 3.1 Public service values must be at the heart of the NHS. High standards of corporate and personal conduct, based on recognition that patients come first, have been a requirement throughout the NHS since its inception. Moreover, since the NHS is publicly funded, it is accountable to Parliament for the services it provides and for the effective and economic use of taxpayers' money.
- 3.2 The Code of Conduct: Code of Accountability in the NHS (Appointments Commission/DOH – 2nd Rev: 2004) defines three crucial public service values which must underpin the work of the health service:
 - **Accountability**- everything done by those who work in the NHS must be able to stand the test of parliamentary scrutiny, public judgements on propriety and professional codes of conduct.
 - **Probity**- there should be an absolute standard of honesty in dealing with the assets of the NHS: integrity should be the hallmark of all personal conduct in decisions affecting patients, staff and suppliers, and in the use of information acquired in the course of NHS duties.
 - **Openness** – there should be sufficient transparency about NHS activities to promote confidence between the NHS body and its staff, patients and the public.
- 3.3 Following the findings of the Nolan Committee in 1994, a set of recommendations was published by the government setting out 'Seven Principles of Public Life' which apply to all in the public service and which are embodied within the CCG's Constitution. These are attached at Appendix 1.

4. RESPONSIBILITIES

- 4.1 Wandsworth CCG

The CCG is responsible for ensuring that the requirements of this policy and supporting documents are brought to the attention of all staff and that machinery is put in place for ensuring that the guidelines are effectively implemented. These responsibilities are particularly important given the corporate responsibility set out in the Bribery Act for organisations to ensure that their anti-bribery procedures are robust.

Such awareness will be promoted in:

- A clause in written statements of terms and conditions or employment;
- Publication on the CCG's intranet site for staff.

4.2 Wandsworth CCG Staff

All staff must apply the following principles in the conduct of their employment:

- They must not accept gifts, hospitality or benefits of any kind from a third party which might be perceived as compromising their personal judgement or integrity.
- They must not make use of their official position to further their private interests or those of others.
- They must declare any private interests which are relevant and material relating to the position they hold in the NHS.
- They must base all purchasing decisions and negotiations of contracts solely on achieving best value for money for the tax payer.
- They must refer to their line manager when faced with a situation for which the guidance available requires further interpretation.
- If in any doubt, they must seek advice from the Director of Corporate Affairs, Performance and Quality, Chief Finance Officer or Accountable Officer.

It is the responsibility of all staff to raise any concerns regarding staff business conduct.

All staff should ensure that they are not placed in a position that risks, or appears to risk, conflict between their private interests and their NHS duties.

- #### 4.3 Member Practices, CCG Board and Committee members and individuals acting on behalf of the CCG
- CCG Board, Committee members and individuals acting on behalf of the CCG (and its constituent Member Practices), must act in accordance with this policy in circumstances whether they are either employed fully by the CCG, hold appointments with the CCG, are employed on a sessional basis or on an honorary contract, or provide services under a service level agreement with the CCG.

Member Practices and individuals of those individual Practices acting on their behalf in exercise of the CCG's commissioning functions must act in accordance with this policy.

4.4 Audit Committee

The Audit Committee is responsible for reviewing the Hospitality, Gifts and Sponsorship Register on behalf of the CCG Board.

5. THE GUIDANCE IN PRACTICE

5.1 Overriding Principle

As a public body, the CCG has a duty to ensure fairness and honesty in its relationships with suppliers, contractors, service providers and service users or any other person or organisation with whom the CCG has or might have business connections.

All employees and others acting on behalf of the CCG must uphold the highest standards of business conduct within such relationships. This is important to ensure that no employee, especially those responsible for making decisions in relation to purchases and procurement, acts in any way that is inconsistent with the organisation's objectives or compromises the integrity of the business by accepting a gift in circumstances where it could influence, or be perceived to influence, that employee's business actions or decisions.

Employees of the CCG, individuals of Member Practices, Board and Committee members and individuals acting on behalf of the CCG, must not accept any fee or reward for work done whilst on CCG duty other than that agreed under their terms and conditions of employment. As a general rule employees should not accept gifts or hospitality arising from their employment or appointment with the CCG, except where these are of a token nature only, in which case employees should inform their manager. This includes gifts or hospitality offered by suppliers and potential suppliers of goods and services to the CCG, and any participation in quasi-official and social events either within or outside normal working hours.

It is not possible to define all instances where transactions should be reported in the Gifts and Hospitality Register, however, the following guiding principles should be observed:

- Record the transaction in the gift Register
- Think about how a transaction looks to the outside world
- Before accepting any form of hospitality consult with your line manager
- If you have forgotten to declare something at the time, it must be recorded in the Register at the earliest opportunity.

Any offers of gifts, hospitality or sponsorship shall be recorded in accordance with section 6.

5.2 Gifts

Casual gifts of intrinsic value offered by contractors or others, (for example, at Christmas time), may not be in any way connected with the performance of duties so as to constitute an offence at law. Such gifts should, nevertheless, be politely but firmly declined. Articles of low intrinsic value, ie less than £10 per gift, such as diaries or calendars, or small tokens of gratitude from patients or their relatives, need not necessarily be refused. However, gifts over £10 should be declared and generally declined. If several small gifts worth a total of over £100 are received from the same or closely related source in a 12 month period they should generally be declined. In cases of doubt, advice should be sought from the line manager, or the gift should be politely declined.

5.3 Acceptance of Hospitality

Modest hospitality, provided it is usual, responsible and proportionate in the circumstances, (eg lunch in the course of working visits), may be acceptable, though it should be similar to the scale of hospitality which the NHS as an employer would be likely to offer. All other offers of hospitality or entertainment (eg such as theatre or concert tickets etc) should be politely declined. In cases of doubt, advice should be sought from the line manager, or the gift should be politely declined.

5.4 The Provision of Hospitality

The Code of Conduct: Code of Accountability in the NHS advises that the use of NHS monies for hospitality and entertainment, including hospitality at conferences or

seminars, should be carefully considered. It advises that all expenditure on these items should be capable of justification as reasonable in the light of general practice in the public sector. It reminds NHS organisations that hospitality or entertainment is open to challenge by auditors and that ill-considered actions can damage respect for the NHS in the eyes of the community.

5.5 Payment for speaking at a meeting/conference

Should a member of staff, Member Practices, Board and Committee members and individuals acting on behalf of the CCG be asked to speak at an event relating to CCG business for which a payment is offered and it is delivered in working hours then there are two choices open to the member of staff which must be agreed with their line manager:

- The payment should be credited to the CCG.
- The member of staff takes annual leave or unpaid leave and the payment is made to the member of staff as a private matter between the organisation making the payment and the individual member of staff. The member of staff remains responsible for any tax liability which arises.

5.6 Commercial sponsorship

5.6.1 In recognition that NHS bodies work together, and in collaboration with other agencies, to improve health services for the populations they serve, the Department of Health published guidance "Commercial Sponsorship: Ethical Standards for the NHS" (November 2000).

5.6.2 The guidance acknowledges that collaborative partnerships with industry can have a number of benefits. It advises that it is important to have a transparent approach about any proposed sponsorship which would benefit the CCG and for the CCG to consider fully the implications of a proposed sponsorship deal before entering into any arrangement. If any such partnership is to work, there must be trust and reasonable contact between the sponsoring company and the NHS.

5.6.3 For the purpose of this policy, commercial sponsorship is defined as:

"NHS funding from an external source, including of all, or part of, the costs of a member of staff, NHS research, staff training, pharmaceuticals, equipment, meeting rooms, costs associated with meetings, meals, gifts, hospitality, hotel and transport costs (including trips abroad), provision of free services (speakers), buildings or premises".

5.6.4 In all these cases, CCG employees, Member Practices, Board and Committee members, and individuals acting on behalf of the CCG must declare sponsorship or any commercial relationship linked to the supply of goods or services and be prepared to be held to account for it. This should be recorded in the Hospitality, Gifts or Sponsorship Register (see section 6).

5.6.5 Where such collaborative partnerships involve a pharmaceutical company, the proposed arrangements must also comply fully with the relevant regulations.

5.6.6 As a general rule, sponsorship arrangements involving the CCG will be at a corporate, rather than individual level.

5.6.7 If publications are sponsored by a commercial organisation, that organisation should have no influence over the content of the publication. The company logo can be displayed on the publication, but no advertising or promotional information should be displayed. The publication should contain a disclaimer which states that sponsorship of the publication does not imply that the CCG endorses any of the company's products or services.

5.6.8 All CCG employees, Member Practices, Board and Committee members and individuals acting on behalf of the CCG should discuss the implications, with their manager, before accepting an invitation to speak at a meeting organised by a pharmaceutical company. The company should have no influence over the content of any presentation made by the CCG employee/representative. It should be made clear that CCG presence does not imply that the CCG endorses any of the company's products or services.

5.6.9 Under no circumstances will the CCG agree to 'linked deals' whereby sponsorship is linked to future purchase of particular products or to supply from particular sources.

5.6.10 Before entering into any sponsorship agreement, reference should be made to the Department of Health's Policy 'Commercial Sponsorship – Ethical Standards for the NHS'.

5.7 Placing of orders and contracts

5.7.1 Fair and open competition between prospective contractors or suppliers for CCG contracts (including where the CCG is commissioning a service through Any Qualified Provider) is a requirement of NHS Standing Orders and of EC Directives on Public Purchasing for Works and Supplies. This means that:

- No private, public or voluntary organisation or company which may bid for CCG business should be given any advantage over its competitors, such as advance notice of CCG requirements. This applies to all potential contractors, whether or not there is a relationship between them and the CCG, such as a long-running series of previous contracts.
- Each new contract should be awarded solely on merit, taking into account the requirements of the CCG and the ability of the contractors to fulfil them.
- No special favour is to be shown to current or former employees or their close relatives or associates in awarding contracts to private or other businesses run by them or employing them in any capacity. Contracts may be awarded to such businesses when they are won in fair competition against other tenders, but scrupulous care must be taken to ensure that the selection process is conducted impartially, and that staff who are known to have a relevant interest play no part in the selection.

5.7.2 All staff, Member Practices, Board, Committee members and individuals acting on behalf of the CCG, in contact with suppliers and contractors (including external consultants), and in particular those who are authorised to sign orders or place contracts for goods, materials or services, are expected to adhere to professional standards of a kind set out in the ethical code of the Institute of Purchasing and

Supply (attached at Appendix 2). They are also required to declare any interest if they are participating in a specific procurement and tendering processes.

5.8 Commissioning of Services where GP Practices are potential providers of CCG-commissioned services

In the circumstances of commissioning of such services including Local Enhanced Services, all individuals must comply with the principles and main content of the NHS England's Code of Conduct in this area. Arrangements for managing any such declarations of interest are set out in section 7.

5.9 Private Transactions

Individual staff, Member Practices, Board and Committee members, and individuals acting on behalf of the CCG, must not seek or accept preferential rates or benefits in kind for private transactions carried out with companies with which they have had, or may have, official dealings on behalf of the CCG. (This does not apply to concessionary agreements, negotiated with companies by NHS management, or by recognised staff interests, on behalf of all staff – for example, NHS staff benefits schemes).

5.10 Employees' outside employment

5.10.1 The standard contract used across the CCG sets out terms concerning outside employment: 'You shall not be employed by any other person, firm or company, without the express permission of the CCG. If you have employment other than your employment with the CCG, you must write to your Manager giving details of the hours and days worked and duties carried out, seeking agreement that this work will not be detrimental to your employment within the CCG.'

5.10.2 Any employee who may be considering outside employment should discuss this in the first instance with their line manager or director before undertaking the employment.

5.10.3 If staff wish to take on additional paid work, such as panel membership, speaking at conferences, undertaking peer review, which is directly related to their role in the NHS, the following process will apply:

- All requests to participate in additional activities to be submitted in writing to their director;
- If agreed the assumption will be made that in these cases staff will be released for additional activities during work time with any remuneration to be paid directly to the CCG;
- In exceptional circumstances it may be that, at director's discretion, staff may be allowed to undertake additional responsibilities outside of work hours or through annual leave and for staff to retain remuneration;
- Any participation in additional activities must be explicitly agreed with the relevant director and recorded;
- In all cases staff must declare any additional paid work as part of the Declaration of Interests process.

5.10.4 Employees must not engage in outside employment during any periods of sickness absence from the CCG. To do so may lead to a referral being made to the Local Counter Fraud Specialist for investigation which may lead to criminal and/or

disciplinary action in accordance with the CCG's Policy in Relation to Fraud and Fraud Response Plan.

5.11 Donations in relation to the organisation

5.11.1 Employees must check with their line manager or director before making any requests for donations (eg to Charitable Funds) to clarify appropriateness and/or financial or contractual consequences of acquisition. Requests for equipment or services should not be made without the express permission of a senior manager.

5.11.2 Donations/Gifts from individuals, charities, companies (as long as they are not associated with known health-damaging products) – often related to individual pieces of equipment or items – provide additional benefits to patients but may have resource implications for the CCG. Further guidance regarding Charitable Funds and gifts and donations can be requested from the Chief Finance Officer.

5.11.3 Any gifts to the organisation should be receipted and a letter of thanks should be sent.

5.13 Rewards for Initiative

5.13.1 The CCG will identify potential intellectual property rights (IPR), as and when they arise, so that it can protect and exploit them properly, and thereby ensure that it receives any rewards or benefits (such as royalties), in respect of work commissioned from third parties, or work carried out by individuals in the course of their NHS duties. Most IPR are protected by statute; eg patents are protected under the Patents Act 1977 and copyright (which includes software programmes) under the Copyright Designs and Patents Act 1988. To achieve this, NHS organisations and employers should build appropriate specifications and provisions into the contractual arrangements which they enter into before the work is commissioned, or begins. They should also seek legal advice if any doubt, in specific cases.

5.13.2 With regard to patents and inventions, in certain defined circumstances the Patents Act gives employees or individuals in the course of their duties a right to obtain some reward for their efforts, and the CCG will see that this is effected. Other rewards may be given voluntarily to employees or other individuals who, within the course of their employment or duties, have produced innovative work of outstanding benefit to the NHS.

5.13.3 In the case of collaborative research and evaluative exercises with manufacturers, the CCG will obtain a fair reward for the input they provide. If such an exercise involves additional work for a CCG employee or individual outside that paid for by the CCG under his or her contract of employment, or sessional arrangements, arrangements will be made for some share of any rewards or benefits to be passed on to the employee(s) or individuals concerned from the collaborating parties. Care will, however, be taken that involvement in this type of arrangement with a manufacturer does not influence the purchase of other supplies from that manufacturer.

5.14 Candidates for appointment

5.14.1 Candidates for any appointment with the CCG must disclose in writing if they are related to, or in a significant relationship with (eg spouse or partner), any Board

member or employee of the CCG. The NHS Jobs application form requests this information and therefore must be disclosed before submission.

5.14.2 A member of an appointment panel which is to consider the employment of a person to whom he/she is related must declare the relationship before an interview is held.

5.14.3 Candidates for any appointment with the CCG shall, when applying, also disclose cases where they or their close relatives or associates have a controlling and/or significant financial interest in a business (including a private company, public sector organisation, other NHS employer and/or voluntary organisation), or in any other activity or pursuit, which may compete for an NHS contract to supply either goods or services to the CCG.

5.15 Canvassing for appointments

It is acknowledged that informal discussions concerning an advertised post can be part of the recruitment process, canvassing or lobbying of CCG employees, Board member or any members of an appointments committee, either directly or indirectly, shall disqualify a candidate. This shall not preclude a member from giving a written reference or testimonial of a candidate's ability, experience or character for submission to an appointments panel. Jobs will be awarded on the merit of the individual candidate and not through any such canvassing or lobbying.

Elected posts – There are a number of elected clinical leadership posts within the CCG for which candidates are able to canvass votes from the Membership body. Any canvassing must be conducted in a manner that is ethical and transparent.

5.16 Trade or discount cards

Trade or discount cards, by which personal benefit is obtained from the CCG's purchase of goods or services at a reduced price are classified as gifts and should be politely declined and/or returned to the sender. The exceptions to this are benefits negotiated by the CCG on behalf of its staff.

5.17 Awards or prizes

Staff should consult their line manager or Chief Finance Officer if they are offered an award or prize in connection with their official duties. They will normally be allowed to receive it, provided:

- there is no risk of public criticism;
- it is offered strictly in accordance with personal achievement;
- it is not in the nature of a gift nor can be construed as a gift, inducement of payment for publication or invention to which other rules apply.

6. RECORDING OF GIFTS, HOSPITALITY AND SPONSORSHIP

6.1 All offers of gifts and hospitality with a value in excess of £10 per item must be declared and recorded. Gifts should be declared if several smaller gifts worth a total of over £100 are received from the same or closely related source in a 12 month period.

6.2 Gifts, hospitality and sponsorship will be recorded in a central Register in accordance with the guidelines. The form provided at Appendix 2 should be completed and returned to the Business Manager within two weeks so that the details can be recorded on the

central Register. Failure to notify the CCG may lead to disciplinary action against a member of staff.

6.3 Where gifts, hospitality or sponsorship are offered, but declined, the offer should still be recorded in the Register using the form attached at Appendix 2.

6.4 It is acknowledged that there may be circumstances where hospitality may be offered by an organisation, as an integral element of a strategic partnership relationship. Acceptance of such hospitality and associated funding agreement will be authorised by the Accountable Officer and recorded in the Register of Hospitality, Gifts and Sponsorship.

7. DECLARATION OF INTERESTS

Where an individual, ie an employee, group member, member of the Board, or its committees has an interest, or becomes aware of an interest which could lead to a conflict of interest in the event of the CCG considering an action or decision in relation to that interest, that must be considered as a potential conflict, and is subject to the provisions of the CCG's Managing Conflicts of Interest Policy.

8. CONFIDENTIALITY

8.1 Employees, group members, member of the Board, or a member of a committee or sub-committee of the CCG or its Board should be particularly careful using or making public, internal information of a confidential nature, particularly regarding details covered under the Data Protection Act 1998 or other legislation whether or not disclosure is prompted by the expectation of personal gain.

8.2 Disclosure of information which counts as "commercial in confidence" and which might prejudice the principle of a purchasing system based on fair competition may be subject to scrutiny and disciplinary or criminal action, or both.

8.3 This does not affect the CCG's grievance or complaints procedures in terms of freedom of expression and is not intended to restrict any of the freedoms protected under Article 10 of the Human Rights Act 1998. It is designed to complement professional and ethical rules, guidelines and codes of conduct on an individual's freedom of expression.

8.4 An employee or individual who has exhausted all the locally established procedures, including reference to the Whistleblowing Policy, and who has taken account of advice which may have been given, may wish to consult their MP or the Secretary of State for Health in confidence. Extreme caution should be exercised by anyone considering contacting the media.

8.5 Section 43B (1) of the Public Interest Disclosure Act 1998 provides protection for disclosure of information where the worker making the disclosure has a reasonable belief that the disclosure is in the public interest, and tends to show that:

- a) a criminal offence has been committed, is being committed or is likely to be committed,

- b) a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject,
- c) a miscarriage of justice has occurred, is occurring or is likely to occur,
- d) the health or safety of any individual has been, is being or is likely to be endangered,
- e) the environment has been, is being or is likely to be damaged, or
- f) information tending to show any matter falling within points a) to e) has been, is being or is likely to be deliberately concealed.

8.6 Disclosure must be made to either the employer or to a prescribed third party, such as the Health & Safety Executive or HM Revenue & Customs. Wider disclosure, for instance to the media, is only protected if the worker believes the information is substantially true, is in the public interest, and not for their own personal gain.

8.7 Any employee, group member, member of the Board, or a member of a committee or sub-committee of the CCG or its Board making a disclosure to the media should be mindful that any information that they provide may be misinterpreted thus undermining their genuine concern and potentially wrongly threatening the reputation of colleagues and the CCG. In addition, if they choose to contact the media and the disclosure is not protected by the Public Interest Disclosures Act 1998, their actions might constitute misconduct and will be considered in accordance with the CCG's Disciplinary Policy and Procedure.

9. USE OF RESOURCES

Under the Code of Conduct for NHS Managers, all managers are required to use the resources available to them in an effective, efficient and timely manner having proper regard to the best interests of the public and patients.

10. FRAUD/THEFT

Staff should not be afraid of raising concerns and will not experience any blame or recrimination as a result of making any reasonable help suspicion known. Further information is available in the Policy in Relation to Fraud and Fraud Response Plan.

11. NON-COMPLIANCE WITH POLICY

Failure to notify the CCG of an appropriate conflict of interest, additional employment or business may lead to disciplinary action against the individual and/or criminal action (including prosecution) under the relevant legislation.

12. LINKED POLICIES/GUIDANCE

Policies:

- CCG Constitution
- Prime Financial Policies, Scheme of Reservation and Delegation
- Managing Conflict of Interest Policy
- Anti-Bribery Policy

- Policy in Relation to Fraud and Fraud Response Plan
- Whistle Blowing

Guidance:

- Standards for members of NHS boards and Clinical Commissioning Group governing bodies in England - <http://www.professionalstandards.org.uk/docs/psa-library/november-2012---standards-for-board-members.pdf?sfvrsn=0>
- Standards of Business Conduct for NHS Staff (HSG (93) 5) – available on the Department of Health website - <http://www.england.nhs.uk/wp-content/uploads/2012/11/stand-bus-cond.pdf>
- Code of Conduct for NHS Managers – http://www.nhsemployers.org/~media/Employers/Documents/Recruit/Code_of_conduct_for_NHS_managers_2002.pdf
- Principles of Public Life drawn up by the Nolan Committee – Appendix 1
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13. FURTHER INFORMATION

Any queries on the content of this policy should be directed to the Business Manager (020 8812 6620 – Sandra.allingham@wandsworthccg.nhs.uk)

APPENDIX 1

THE NOLAN PRINCIPLES ON STANDARDS IN PUBLIC LIFE

The Nolan Committee was set up in 1994 to examine concerns about standards of conduct of all holders of public office, including arrangements relating to financial and commercial activities, and make recommendations as to any changes in arrangements which might be required to ensure the highest standards of propriety in public life. The committee published "*Seven principles of Public Life*", which it believes should apply to all those operating in the public sector. These principles should be adopted by CCG staff and are as follows:

Selflessness

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.

All staff will be expected to adopt these principles when conducting official business for and on behalf of the CCG so that appropriate ethical standards can be demonstrated at all times.

Appendix 2

Wandsworth Clinical Commissioning Group

NOTIFICATION FOR ENTRY ON HOSPITALITY AND GIFTS REGISTER

All employees - including contracted staff, staff on honorary contracts, working members within the NHS and Board and Committee members - are asked to record all gifts, hospitality or material benefits received which in any way relates to their appointment or position. All offers of hospitality and gifts declined or rejected as not being appropriate or might constitute a bribe or other inducement is also to be recorded in the Register

| NOTIFICATION FOR ENTRY ON HOSPITALITY & GIFTS REGISTER | |
|---|--|
| Name: | |
| Contact address: | |
| Contact Tel Number: | |
| Email Address: | |
| Position held: | |
| Directorate: | |
| Borough / Sector: | |
| Name of person / Company offering hospitality / gift or sponsorship: | |
| Type of hospitality / gift / sponsorship: | |
| Meeting / event sponsored (give name & date) | |
| Nature and approximate value of hospitality / gift / sponsorship etc: | |

Standards of Business Conduct Policy

| | | | | |
|--|--|-------------|-----------|------------|
| Has approval been given? (circle response) | | YES | NO | N/A |
| Name of approving Director: | | | | |
| Date of approval / rejection: | | | | |
| If rejected – state reason and how hospitality or gift has been disposed (use comments section) | | | | |
| Comments | | | | |
| Declaration: I declare that the information I have given on this form is a true and accurate record to the best of my knowledge at the time of completion. I understand that if I knowingly provide false information this may result in disciplinary action and I may be liable for prosecution and civil recovery proceedings. I consent to the disclosure of information from this form to and by the NHS body and the NHS Protect for the purpose of verification of this claim and the investigation, prevention, detection and prosecution of fraud | | | | |
| Signed | | Date | | |

Completed forms should be sent to: Wandsworth CCG Business Manager