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Bwrdd Iechyd Prifysgol
Bae Abertawe
Swansea Bay University
Health Board



Meeting Date	12 March 2020	Agenda Item	2.9
Report Title	Standards of Business Conduct Policy (Incorporating Declarations of Interest, Gifts and Hospitality and Sponsorship)		
Report Author	Claire Mulcahy, Corporate Governance Officer		
Report Sponsor	Pam Wenger , Director of Corporate Governance		
Presented by	Pam Wenger , Director of Corporate Governance		
Freedom of Information	Open		
Purpose of the Report	The purpose of this report is to present SBUHB's draft Standards of Business Conduct Policy for consideration by the Audit Committee. The final document will be considered at the Senior Leadership Team in April and a final version will be submitted to Audit Committee in May.		
Key Issues	Following review, the Policy has been strengthened in a number of key areas which include: Roles and Responsibilities, Gifts and Hospitality, Secondary Employment & Private Practice.		
Specific Action Required <i>(please choose one only)</i>	Information	Discussion	Assurance
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input checked="" type="checkbox"/>
Recommendations	Members are asked to: <ul style="list-style-type: none"> - CONSIDER the proposed amendments to the Standards of business conduct for consideration at Senior Leadership Team. - NOTE the appended hospitality register. 		

STANDARDS OF BUSINESS CONDUCT POLICY

1. INTRODUCTION

The Audit Committee is asked to consider the amendments made to the Standards of Business Conduct Policy.

2. BACKGROUND

The purpose of the Policy is to ensure that arrangements are in place to support Employees and Independent Members to act in a manner that upholds the Standards of Business Conduct as well as setting out specific arrangements for the appropriate Declarations of Interest and acceptance/refusal and record of Offers of Gifts, Hospitality or Sponsorship.

The Board expects all Employees and Independent Members to practice high standards of corporate and personal conduct, based on the recognition that the needs of patients must come first.

The policy emphasises the commitment of SBUHB to ensure that it operates to the highest standards, the roles and responsibilities of those employed by SBUHB and the arrangements for ensuring that declarations are made.

3. GOVERNANCE AND RISK ISSUES

Following review, the policy has been strengthened in a number of key areas which include; Roles and Responsibilities, Gifts and Hospitality, Secondary Employment & Private Practice.

Minor amendments have also been made to ensure consistency across Health Boards in NHS Wales and to reflect the change from ABMUHB to SBUHB.

3.1 Key Changes

- Section 6.0 – Roles and Responsibilities

The role of Director of Corporate Governance has been strengthened to incorporate recommendations from the recent Capital Assurance Internal Audit Follow-Up Report.

- Section 6.7 – NWSSP Procurement

This section has been strengthened to reflect the responsibility of NWSSP in ensuring that all procurement and health board staff complete declaration of interest forms during procurement exercises.

The health board will also seek assurance on the effectiveness of the checks and controls in place via the bi-monthly STA/SQA report to Audit Committee. The Corporate Governance Team will also annually request the complete declaration of interest forms from NWSSP Procurement.

- Section 9.2 - Gifts from Service Users and Relatives

The following amendments have been made to ensure consistency with NHS England Guidance and NHS Wales.

- The value of gifts that can be accepted has been revised from £100 to £25;
- The value of gift vouchers for acceptance has been removed from £25 to £0.

- Section 18 and Appendix 10 – Secondary Employment

This section has been strengthened following advice from Counter Fraud Service and Workforce colleagues.

Declarations of secondary employment will need to be made to both Workforce and Corporate Governance. Workforce colleagues will require declarations in terms of the statutory requirement of the Working Time Directive and Corporate Governance will require declarations as part of the Declarations of Interest Register. Appendix 10 has been amended to reflect these requirements also.

- Section 23 - Training and Awareness

In line with the recommendation from the Capital Assurance Internal Audit Follow-Up Report, this section has been strengthened to highlight the responsibility of the Units and Departments to ensure all staff are sufficiently aware of their obligations under the policy.

The Director of Corporate Governance will facilitate awareness sessions which will cover the key principles of the policy.

- Section 26 – Distribution

In order to strengthen this area, the following has been added to the policy;

‘On a bi-annual basis, the Director of Corporate Governance will circulate a reminder to staff, together with a link to the policy. Staff will also be reminded during login to their PCs and laptops, the need to read and accept the terms of the Standards of Business Conduct Policy and to declare any interests and report offers of gifts, hospitality, honoraria and sponsorship.’

3.2 Further Work

Further work is required in relation to the recording of Gifts and Hospitality, this has been identified by the Director of Corporate Governance as an area of priority. There will also be some targeted work on the development of an electronic declaration of interest system.

The current hospitality register is attached as **appendix 2** for noting by the committee.

4. FINANCIAL IMPLICATIONS

There are no financial implications.

5. RECOMMENDATION

The Audit Committee is asked to:

- **NOTE** the report;
- **CONSIDER** the proposed amendments to the Standards of Business Conduct for consideration by the Senior Leadership Team;
- **NOTE** the appended Hospitality Register.

Governance and Assurance		
Link to Enabling Objectives (please choose)	Supporting better health and wellbeing by actively promoting and empowering people to live well in resilient communities	
	Partnerships for Improving Health and Wellbeing	<input type="checkbox"/>
	Co-Production and Health Literacy	<input type="checkbox"/>
	Digitally Enabled Health and Wellbeing	<input type="checkbox"/>
	Deliver better care through excellent health and care services achieving the outcomes that matter most to people	
	Best Value Outcomes and High Quality Care	<input checked="" type="checkbox"/>
	Partnerships for Care	<input type="checkbox"/>
	Excellent Staff	<input type="checkbox"/>
	Digitally Enabled Care	<input type="checkbox"/>
	Outstanding Research, Innovation, Education and Learning	<input type="checkbox"/>
Health and Care Standards		
(please choose)	Staying Healthy	<input type="checkbox"/>
	Safe Care	<input type="checkbox"/>
	Effective Care	<input type="checkbox"/>
	Dignified Care	<input type="checkbox"/>
	Timely Care	<input type="checkbox"/>
	Individual Care	<input type="checkbox"/>
	Staff and Resources	<input checked="" type="checkbox"/>
Quality, Safety and Patient Experience		
Ensuring that the health board is open and transparent in providing information is a key factor in the quality, safety and experience of patients receiving care.		
Financial Implications		
No financial implications.		
Legal Implications (including equality and diversity assessment)		
No direct legal implications in considering the report.		
Staffing Implications		
No staffing implications for the committee to be aware of.		
Long Term Implications (including the impact of the Well-being of Future Generations (Wales) Act 2015)		
No implications for the committee to be aware of.		
Report History	This policy will be submitted to the Senior Leadership Team in April 2020 for consideration and a final version will be submitted to Audit Committee in May for approval.	
Appendices	Appendix 1 – Standards of Business Conduct Policy Appendix 2 – Hospitality Register	