

**TRUST BOARD**

<b>Date of Meeting:</b> 05/07/2011	<b>Agenda Item No:</b> 7.4	<b>Enclosure:</b> 8
<b>Intended Outcome:</b>		
<b>For noting</b> ✓	<b>For information</b>	<b>For decision</b>
<b>Title of Report:</b> Standards of Business Conduct		
<b>Aims:</b> The aim of this report is to update the Trust Board on the process for declaring interests, gifts and hospitality, which has been reviewed.		
<b>Executive Summary:</b>		
<p>The Trust has in place a 'Standards of Business Conduct' Policy, which sets out the duties of all employees in relation to gifts, hospitality and general declarations of interest.</p> <p>A review of this policy has been undertaken, including the supporting registers which the Trust should have in place regarding declarations of interests (for all employees not just Directors) and gifts or hospitality received.</p> <p>The review has highlighted that the Trust has in place a robust system for declaring and registering Directors interests and does have a process for registering gifts and hospitality. However, there are a number of improvements which the review has highlighted to strengthen the existing policy and procedure:</p> <ul style="list-style-type: none"> <li>• Updates required to the Standards of Business Conduct Policy in accordance with the relevant Acts of Law.</li> <li>• Ensure the policy links to the Trust's Standing Orders and Standing Financial Instructions.</li> <li>• Further clarity required in the policy in terms of the forms staff should use to complete / register a gift or declare an interest.</li> <li>• Inclusion of the Nolan Principles of Public Life.</li> <li>• The register for recording declarations of interest for all employees needs to be established.</li> <li>• The Trust should strengthen the requirements to ensure staff in positions of particular influence, for example senior managers and clinical leaders should complete a declaration of interest form, including if this is a 'nil' return. This does not detract from the fact that all employees should declare any interests but provides more robust governance on the senior positions across the organisation in addition to the Executive and Non Executive Director declarations of interest.</li> <li>• The register for recording gifts or hospitality requires improvement, in relation to the recording of financial values of such gifts or hospitality and should be reported to the Trust Board on an annual basis.</li> </ul> <p>Accordingly, the above changes have been made and a revised policy and supporting procedure has been developed. Comments have been requested from key staff and staff side representatives on the revised policy which will be incorporated into the final version.</p>		

The Trust's Local Counter Fraud Lead has also been asked to comment on the revised policy.

The new policy will be introduced across the Trust by the end of July 2011.

The existing Gifts and Hospitality register for 2009/10 and 2010/11 is attached at Appendix 1 of this report for information and in accordance with the Trust Boards Cycle of Business.

**Overview of key areas for consideration or noting:**

- Trust's Standards of Business Conduct Policy and supporting Procedures have been reviewed.
- The review has highlighted areas which need to be strengthened and has resulted in the policy being revised.
- The new policy and supporting procedures will be implemented by the end of July 2011.

**Specific implications and links to the Trust's Strategic Aims:**

Ensure we provide high quality, safe and effective care for all our patients including meeting essential standards of safety and quality as set out by the CQC	✓
Develop a viable integrated clinical strategy for secondary care services which is sustainable and affordable	
Develop a new healthcare facility in West Cumbria that is fit for the 21st century	
Achieve sustainable financial balance through the delivery of the Trust's internal Cost Improvement Programme, securing a viable contract income from our GP commissioners and contributing to the system wide cost reductions	
To develop and implement a successful merger or acquisition plan that enables the Trust to become part of an existing NHS Foundation Trust	

**Recommendations:**

That the Trust Board notes the report.

**Prepared by:**  
Ramona Duguid, Company Secretary

**Presented by:**  
Ramona Duguid, Company Secretary

GIFTS AND HOSPITALITY REGISTER  
FINANCIAL YEARS 2009/10 & 2010/11

REF	DATE	NAME & DESIGNATION	GIFT AND DETAILS	HOSPITALITY AND DETAILS	SPONSORSHIP AND DETAILS
2009/01	9 – 13/03/09	Carole Heatly Chief Executive	N/A	Flight, Hotel, Accommodation And Meals Provided	N/A
				<b>NOTE:</b> Invited by Cumbria University to attend trip in Tennessee regarding rural healthcare	N/A
2009/02	20/05/09	Carole Heatly Chief Executive	N/A	Recruitment event At Tate Britain From Odgers, Ray And Berndston	N/A
2009/03	13/07/09	Carole Heatly Chief Executive	£10 gift voucher	/	N/A
			<b>NOTE:</b> Voucher received as a thank you from the Diabetes Group, which was donated to the patient panel		

REF	DATE	NAME & DESIGNATION	GIFT AND DETAILS	HOSPITALITY AND DETAILS	SPONSORSHIP AND DETAILS
2009/04	7/10/09	Dr Denis Burke Associate Medical Director	N/A	N/A	Sponsored By Proctor And Gamble To Attend Gastro Meeting In London (Travel, Accommodation And Registration Covered)
2009/05	16/11/09	Elizabeth Kay Head of Communications	N/A	Lunch with Cumberland News Events Manager regarding awards ceremony.	N/A
2010/1	3/07/10	Alan Davidson Director of Estates and Facilities	N/A	Hospitality from Northern Security Limited at Carlisle Racecourse, which included hospitality and entry to the Race Meeting.	N/A

Updated March 2011

**Ramona Duguid**  
**Company Secretary**