



Section C - Annex

Supporting guidance for staff on the registering of interests, gifts & hospitality under the Standards of Business Conduct

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1.0 Introduction

This guidance supports the Standards of Business Conduct for NHS Staff.

It is important that NHS Ayrshire & Arran and its employees maintain strict ethical standards in the conduct of NHS business and are protected from allegations of conflict of interest, acting improperly or breach of impartiality.

The Standards of Business Conduct for NHS Staff states

“All NHS staff who commit NHS resources directly or indirectly must be impartial and honest in their conduct of business and all employees must remain beyond suspicion. It is an offence under the Prevention of Corruption Act 1906 and 1916 for any employee to accept any inducement or reward for doing, or refraining from doing, anything in his or her official capacity, or corruptly showing favour, or disfavour, in the handling of contracts. [MEL\(1994\)48](#) details the principles for codes of conduct and accountability in situations where there is potential conflict between the private interests of NHS staff and their NHS duties and requires the establishment of a local code of conduct.

The Standards also include responsibilities to comply with the [Bribery Act 2010](#). The Standards of Business Conduct for NHS Staff states

“The Board and all those who work in it have a duty to follow the good practice procedures set out in the Bribery Act, 2010. Specifically the Board operates a zero tolerance policy of bribery. The Bribery Act 2010 has brought further obligations on the Board and its staff.”

Staff should be aware that breach of the provisions of these Acts renders them liable to prosecution and may also lead to a potential disciplinary action and the loss of their employment and superannuation rights in the NHS.

If you are in any doubt at all as to what you can or cannot do, you should seek advice from your Line manager/Head of Department/Director/Head of Corporate Governance.

This guideline should be read in conjunction with the Standards of Business Conduct for NHS Staff (Section C of the NHS Ayrshire & Arran Code of Corporate Governance).

2.0 Purpose

This document provides guidance and instruction on acceptance of gifts and/or hospitality and declaration of interests to ensure that all NHS employees in Ayrshire and Arran are aware of their duties under the MEL and comply with the Standards of Business Conduct for NHS Staff to declare and register gifts and hospitality and any registerable interests. It also provides guidance on maintaining Registers and submission for annual review by Audit and Risk committee.

3.0 Scope

This guideline is applicable to all employees of NHS Ayrshire & Arran, including holders of honorary contracts, to independent contractors when they are working on behalf of NHS Ayrshire & Arran and to NHS Ayrshire & Arran employees working within the Health and Social Care Partnerships.

NHS Ayrshire & Arran Board Members and Senior Managers also have additional responsibilities under the Code of Conduct for Members of Devolved Bodies and a separate register is compiled, maintained and published for Board members' and Directors' interests.

4.0 Definition of Terms

Gifts	Any goods or services of value that you are offered.
Hospitality	Generally defined as attendance at a social or leisure event or conference (or an occasion which could be perceived as such an event) where the attendance is being funded by a third party.
A registerable Interest	Any personal interest which may have a bearing on, or might reasonably be deemed by others to have a bearing on a staff member's impartiality in any matter relevant to his/her duties.
The Standards	Standards of Business Conduct for NHS Staff
Register	A register which records any declared interest or gift and hospitality offered and declined or accepted for staff and board members.
Undertaking	A body corporate or partnership; or an unincorporated association carrying on a trade or business with or without a view to a profit.

5.0 Roles & Responsibilities

Chief Executive is responsible as Accountable Officer to ensure a register of gifts and hospitality and register of interests is maintained.

Directors are responsible to ensure that a Register of gifts, hospitality and interests is maintained for staff within their department and there is a "named person" who maintains the Directorate register. Directors' annual assurance letter to the Chief Executive will include an assurance statement that the Standards of Business Conduct for NHS Staff is being applied in their Directorate and a Register maintained. The Director will provide a copy of the Registers annually to the Head of Corporate Governance.

Directorate Named Person will maintain the Directorate's register of gifts and hospitality and interests.

Director of Finance is responsible for the monitoring and scrutiny of the register and will be vigilant for perceived conflicts of interest.

Audit and Risk Committee will receive assurance from the Head of Corporate Governance annually that registers have been reviewed and are available for internal and external auditors.

Head of Corporate Governance is responsible for establishment of a process to deliver the Register(s) and that this is communicated to the organisation. The Head of Corporate Governance will review Directorate registers annually and provide assurance to the Audit and Risk committee.

Managers must adhere to this guidance and ensure that their staff are aware of and comply with The Standards. Managers must approve declarations of interest, gifts and hospitality in accordance with this guideline

All employees of NHS Ayrshire & Arran have a personal responsibility to declare any gifts and/or hospitality offered or accepted and declare any registerable. It is the responsibility of staff to ensure that they do not place themselves in a position which risks or appears to risk conflict between their private interests or behaviour and the correct performance of their NHS duties. This primary responsibility applies to all NHS staff.

6.0 Acceptance of Gifts

Staff in the NHS offer support during significant events in people's lives. For this work they may sometimes receive gifts as a legitimate expression of gratitude. We should be proud that our services are so valued. But situations where the acceptance of gifts could give rise to conflicts of interest should be avoided. Staff and organisations should be mindful that even gifts of a small value may give rise to perceptions of impropriety and might influence behaviour if not handled in an appropriate way.

Employees of NHS Ayrshire & Arran must not accept gifts which may be, or be capable of being, construed as being able to influence a purchasing decision or cast doubt on the integrity of such decisions. Gifts which could place an individual in a position of conflict between their private interests and their NHS duties must be politely but firmly declined.

The acceptance of cash or cash equivalents, including gift vouchers of any value is not acceptable under any circumstances. If you are offered a cash gift or gift vouchers, these must be politely but firmly declined. Where there is an offer to clinical or ward staff, those offering the gift should be directed towards the ward/area endowment fund or the Board's endowment fund, [Ayrshire and Arran Health Board Charity](#), where financial donations can be received.

Casual gifts offered by contractors or others must also be politely declined except where they are deemed to be of low intrinsic value (below £15). MEL(1994)48 notes that staff may accept such gifts of low intrinsic value, such as diaries or calendars or small tokens of gratitude from patients or their relatives. Gifts offered but declined must also be declared if the value is deemed to be above £15.

A common sense approach should be applied to the valuing of gifts (using an actual amount, if known, or an estimate that a reasonable person would make as to its value) Staff must never ask for gifts. Where it is difficult to decide whether a gift should be accepted or not, advice should be sought from your Line Manager or respective executive Director. Appendix 7 provides Directorate authorisers for Declaration Forms as contacts for advice.

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A “quick guide” to acceptance of Gifts is provided below:

Gifts	Acceptable	Approval of line manager required	Declarable
Low value promotional gifts such as Diaries/Calendars under £15	Yes*	No	No
Token gifts given at a courtesy visit/VIP visit	Yes*	No	Yes
Biscuits, chocolates, flowers from patients or relatives/ friends of patients	Yes*	No	Only if considered greater than £15 in value
Gifts to friends / relatives of NHS Ayrshire & Arran staff	No – to be declined**	Should be declined	Yes, regardless of value
Casual gifts offered by contractors and/or potential suppliers under £15	Yes*	Yes	Yes
Gifts/equipment offered by contractors/potential suppliers over £15, including concert / sporting event tickets	No – to be declined**	Should be declined	Yes
Other promotional gifts	In some situations	Yes	Yes
Gifts of cash or gift vouchers (any amount) Persons offering cash should be advised of the existence of the local ward/team Endowment Fund or the Ayrshire and Arran Health Board Charity as an alternative means of donating	No – to be declined**	Should be declined	Yes, regardless of value
* Acceptable only where the gift does not create a sense of obligation or constitute an incentive or bribe.			
** Where it is felt that declining the gift will cause offence, seek advice from your line manager on how best to handle receipt of the gift - for example by submitting it to a team endowment fund or raffling the gift with subsequent donation to a team endowment fund or the Ayrshire and Arran Health Board Charity. Under such circumstances the fear of causing offence should not create a conflict of interest for the recipient.			

7.0 Acceptance of Hospitality

Delivery of services across the NHS relies on working with a wide range of partners (including industry and academia) in different places and, sometimes, outside of ‘traditional’ working hours. As a result, staff will sometimes appropriately receive hospitality. Staff receiving hospitality should always be prepared to justify why it has been accepted, and be mindful that even hospitality of a small value may give rise to perceptions of impropriety and might influence behaviour

Hospitality is generally defined as attendance at a social or leisure event or conference (or an occasion which could be perceived as such an event) where the attendance is being funded by a third party. The Standards provides that modest hospitality is an accepted courtesy of a business relationship. The recipient should not allow themselves to reach a position whereby he or she might be deemed by others to have been influenced in making a business decision as a consequence of accepting such hospitality. The frequency and scale of hospitality accepted should not be significantly greater than NHS Ayrshire & Arran would be likely to provide in return.

Staff may accept modest hospitality provided it is normal and reasonable under the circumstances, for example a lunch or refreshments provided in the course of a working visit, meeting conference etc. It is not necessary to report the provision of team / coffee / biscuits etc or to declare modest hospitality received as part of the normal programme of a course of conference.

In reference to meals and refreshments:

- If under a value of £25, may be accepted and does not need to be declared, unless from a pharmaceutical company when it must be declared.
- If of a value between £25 and £75¹, may be accepted and must be declared.
- If over a value of £75, should be refused unless (in exceptional circumstances) senior approval is given. A clear reason should be recorded on the Register of Interest return as to why it was permissible to accept.

A common sense approach should be applied to the valuing of meals and refreshments (using an actual amount, if known, or an estimate that a reasonable person would make as to its value).

In reference to travel and accommodation:

- Modest offers to pay some or all of the travel and accommodation costs related to staff attendance at events may be accepted and must be declared.
- Offers which go beyond modest, or are of a type that the organisation itself might not usually offer, need prior approval by senior staff, should only be accepted in exceptional circumstances, and must be declared. A clear reason should be recorded on the Register of Interest return as to why it was permissible to accept. travel and accommodation of this type. A non-exhaustive list of such examples includes:

of _____

¹ The £75 value has been selected with reference to existing industry guidance issued by the Association of the British Pharmaceutical Industry [Clause 10.7 Events/Meetings and Hospitality](#)

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- offers of business class or first-class travel and accommodation (including domestic travel);
- offers of foreign travel and accommodation.

Staff should not ask for or accept hospitality that may affect, or be seen to affect, their professional judgement. Hospitality must only be accepted when there is a legitimate business reason and it is proportionate to the nature and purpose of the event.

Particular caution should be exercised when hospitality is offered by actual or potential suppliers or contractors or commercial sponsors/third parties – these can be accepted if modest and reasonable but only where acceptance will not and cannot be seen as compromising a purchasing or other decision in any way, individuals should always obtain senior approval and must declare these.

Commercial sponsorship - Employees must pay particular attention to the circumstances in which hospitality is offered. For example, the provision of hospitality by an individual or organisation during a tendering process, where a contract is shortly to end, where performance of the contract is in question or in any other circumstances where acceptance might compromise the position of the employee or of NHS Ayrshire & Arran, is not acceptable.

Where it is difficult to decide whether hospitality offered should be accepted or not, advice should be sought from your Line Manager or respective executive Director.

A “quick guide” to acceptance of hospitality is provided below

Hospitality	Acceptable	Approval of line manager required	Declarable
Meals and refreshments offered as part of attendance at a course/ conference	Yes	No	Only if considered greater than £25 in value
Infrequent working breakfast	Yes*	No	Only if considered greater than £25 in value
Infrequent working lunch	Yes*	No	Only if considered greater than £25 in value
Formal dinners/evenings	In some situations	Yes	Yes
Travel & accommodation (if modest in nature)	In some situations	Yes	Yes
Visits to view equipment paid for by outside companies	In some situations	Yes	Yes

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Hospitality	Acceptable	Approval of line manager required	Declarable
Other forms of commercial sponsorship including drug company sponsorship for example to attend a conference, study leave	In some situations	Yes	Yes
Holiday accommodation	No – to be declined**	Should be declined	Yes
Invitations to sporting or cultural events	No – to be declined***	Should be declined	Yes
* Acceptable only where the gift does not create a sense of obligation or constitute an incentive or bribe.			
** Where it is felt that declining the offer of hospitality will cause offence, approval should be sought on how best to handle the offer. Under such circumstances, the fear of causing offence should not create a conflict of interest for the recipient.			
*** Acceptable only where attendance is to represent Ayrshire and Arran NHS Board in an official capacity, for instance at a civic, ceremonial or memorial event, where prior approval has been granted by an executive Director.			

8.0 How to declare gifts and hospitality – a step by step guide

Step 1: If offered a gift or hospitality decide whether to accept or decline based on this guidance.

Step 2: If you remain unsure whether you can accept a gift or if this needs declared, discuss with your Line Manager in the first instance. If further advice is required contact your relevant Executive Director or the Head of Corporate Governance.

Step 3: Consider if the gift or hospitality is linked to Joint Working with a Pharmaceutical Company or something else. Refer to section 11.0 Guidelines on working with the Pharmaceutical industry.

Step 4: If you have accepted or declined a gift or hospitality, which is declarable under this guideline, complete the appropriate form.
Appendix 3 for those linked to Joint Working with Pharmaceutical companies or Appendix 4 for all other gifts/hospitality. These forms are also available on the Intranet

Step 5: Pass the completed form to your Declaration Form Authoriser for approval. See Appendix 7.

Step 6: Once approved, pass the form to either the Pharmacy Directorate or your Directorate Named person. See Appendix 7.

Notes:

1. Declarations should be made as soon as is practically possible and no later than one month following receipt.
2. One form should be submitted per employee, for example if a gift is received for three members of staff, a separate form should be completed by each of the three employees and authorised by their Declaration Form Authoriser, before submission to the Pharmacy Directorate or Directorate Named Person to update the Directorate Register.

Appendix 1 provides a flow chart for declaring and recording gifts or hospitality, whether accepted or declined.

9.0 Declaration of staff interests

To avoid conflicts of interest and to maintain openness and accountability, employees are required to register all interests that may have any relevance to their NHS Ayrshire & Arran duties and responsibilities. These include any financial interest in a business or any other activity or pursuit that may compete for an NHS contract to supply either goods or services to the NHS or in any other way could be perceived to conflict with the interests of the Ayrshire and Arran NHS Board.

This primary responsibility applies to all NHS staff, but is of particular relevance to those who commit NHS resources directly (e.g. by the ordering of goods) or those who do so indirectly (e.g. by the prescribing of medicines). A further example would be staff who may have an interest in a private nursing home and who are involved with the discharge of patients to residential facilities

9.1 When to register an Interest

The test to be applied when considering appropriateness of registration of an interest is to ask yourself whether a member of the public acting reasonably might consider the interest you have could potentially affect your responsibilities to the organisation and/or influence your actions. If in doubt if you should register an interest, advice should be sought from your Line Manager or respective executive Director.

9.2 What needs to be declared

Interests that may be appropriate to register include

1. Other paid employments. The amount of any related remuneration does not need to be disclosed;
2. Directorships, including Non-Executive Directorships, held in private companies or public limited companies (whether remunerated or not);
3. Ownership of, or an interest in, private companies, partnerships, businesses or consultancies that are likely to be relevance to the work of Ayrshire and Arran NHS Board;

4. Shareholdings in organisations likely or possibly seeking to do business with the NHS (the value of the shareholdings need not be declared);
5. Ownership of, or interest in, land or buildings which may be significant or relevant to the work of Ayrshire and Arran NHS Board;
6. Any position of authority held in another public body, trade union, charity or voluntary body
7. Any connection with a voluntary or other body that has a contract with NHS Ayrshire & Arran under which services or goods are to be provided (you must register a description of the nature and duration, but not the price of, of any such contract); and
8. Any involvement in joint working arrangements with Clinical (or other) Suppliers

This list above is not exhaustive and should not preclude the registration of other forms of interest where these may give rise to a potential conflict of interests upon the staff member's employment with NHS Ayrshire & Arran. You may also have to register the interest of any close family members, partner or civil partner, close relative or persons living with you as part of a family unit, who have or are likely to have, transactions or business with the Board.

9.3 Declaring an Interest at Meetings

In addition to registering the interest, it is the responsibility of each member of staff to declare any relevant interest to the Chair of any Standing Committee / Professional Advisory Committee / decision-making group that they sit on, so that the Chair is aware of any conflict which may arise on any related agenda item. A declaration of Interest will be recorded in the minute of the respective meeting. Where a conflict is declared, the person must not participate in the meeting for that section of the agenda.

10.0 How to declare an interest – a step by step guide

Step 1: Staff member identifies a potential interest or conflict based on this guidance.

Step 2: If you remain unsure discuss with your line manager in the first instance. If further advice is required contact your Executive Director or the Head of Corporate Governance.

Step 3: Consider if the interest is linked to Joint Working with a Pharmaceutical Company. Refer to section 11.0 regarding declaration of Interests in the pharmaceutical industry.

Step 4: If you have an interest or conflict to declare complete the appropriate declaration form. Appendix 3 for those linked to Joint Working with Pharmaceutical companies or Appendix 4 for all other interest/conflicts. These forms are also available on the Intranet.

Step 5: Pass the completed form to your Declaration Form Authoriser for approval.

Step 6: Once approved, pass the form to either the Pharmacy Directorate or your Directorate Named person.

Appendix 2 provides a flow chart for declaring and recording interests.

11.0 Guidelines on working with the Pharmaceutical industry

NHS Ayrshire & Arran has a Code of Practice for Medicines Governance. Section 23a, b and c of the Code of Practice provides policy and guidance on Joint Working with the Pharmaceutical Industry and declaration of gifts and hospitality and interests.

From June 2016, pharmaceutical companies have been required to publish details of payments they make (in cash or 'in kind') to individual healthcare professionals for services they provide. These services include sponsorship, consultancy and associated fees relating to their participation in events such as 'Pharmaceutical Advisory Boards'. Information is available through a publicly searchable database on the [Association of British Pharmaceutical Industry \(ABPI\) website](#).

NHS Ayrshire & Arran has an obligation to record all payments, donations, grants or benefits in kind received from Pharmaceutical companies on the Board's Gifts and Hospitality Register and to compare the payments with the information published on the ABPI website.

Any Gifts and Hospitality offered or accepted or any Interest related to Joint Working with the Pharmaceutical Industry must be declared in line with the Code of Practice for Medicines Governance policy and guidance (Section 23).

Any and all staff who are offered Gifts and Hospitality, or who have an interest NOT related to the Joint Working guidelines MUST follow guidance within this document and a declaration made where appropriate.

The Head of Corporate Governance will liaise with Pharmacy Directorate colleagues to reconcile declarations made in the Pharmacy Register against information provided by Pharmaceutical companies.

See Appendix 3 - Declaration of Interests in the Pharmaceutical Industry – useful links:

- [Section 23\(a\) – Declaration of Interests in the Pharmaceutical Industry](#)
- [Section 23\(b\) – Joint Working with the Pharmaceutical Industry](#)
- [Section 23\(c\) – Policy for Pharmaceutical Representatives](#)

12.0 Registers of interests, gifts and hospitality

Each Directorate will hold a Staff Register of Gifts and Hospitality and Interests for their Directorate staff.

The Pharmacy Directorate will hold Registers to record all declarations related to Joint Working with the Pharmaceutical Industry. This covers any and all staff who have a declared interest or gift or hospitality related to Joint Working with the Pharmaceutical Industry.

The Head of Corporate Governance will hold a Board Members' Register to record all declarations of interests or gifts or hospitality from Board Members and Board Directors. The register will be open to public scrutiny and is published on the organisation's website.

The Registers are maintained annually and must be finalised in line with the financial year to 31 March. Directorate Registers must be completed and a copy sent to the Head of Corporate Governance as soon as possible following year end. The Head of Corporate Governance must finalise the Board Members' Register in April each year and send a copy to Finance for annual accounts reporting and sharing with the external auditor.

The completed Registers will be reviewed annually by the Head of Corporate Governance, as the officer identified by the Director of Finance and agreed by the Audit and Risk Committee. The review will give the opportunity to identify trends and challenge unwanted behaviours. The Head of Corporate Governance will submit an assurance paper to Audit and Risk Committee annually following this review. The timescales for submission to Audit and Risk Committee will be agreed in line with the Audit and Risk Committee meeting schedule.

Access to the Staff Registers will be restricted to senior officers and internal and external audit. All Registers may also be subject to Freedom of Information (FOI) requests.

An example register is shown at Appendix 5.

Reminders and frequency

The Named Person for each Directorate should will issue regular reminders to their Directorate at least twice a year to remind all staff of the need to declare gifts, hospitality and interests in line with The Standard and this guideline, so that changes can be recorded on the Directorate Register.

Targeted groups

Directors have identified higher risk teams within their Directorates as noted in Appendix 7. Staff within these groups must be issued with an individual register for completion on joining the organisation, this must include Nil returns where this is the case. Staff must be asked to review and sign their individual register on an annual basis.

Directorate Named Persons are responsible to manage this process and will issue individual registers. Targeted reminders will be issued in line with the twice-yearly reminders to all staff.

13.0 Corporate records management for declaration forms and registers

Those responsible for maintaining Directorate registers must retain related Corporate Records in line with national retention periods – this is 6 years after an interest was registered.

- All approved Declaration forms received, so that these can be compared against the Registers held.
- All Individual Staff and Directorate Registers

Board Members' registers are held in accordance with the Code of Conduct for Ayrshire & Arran Board members

14.0 Related Documents

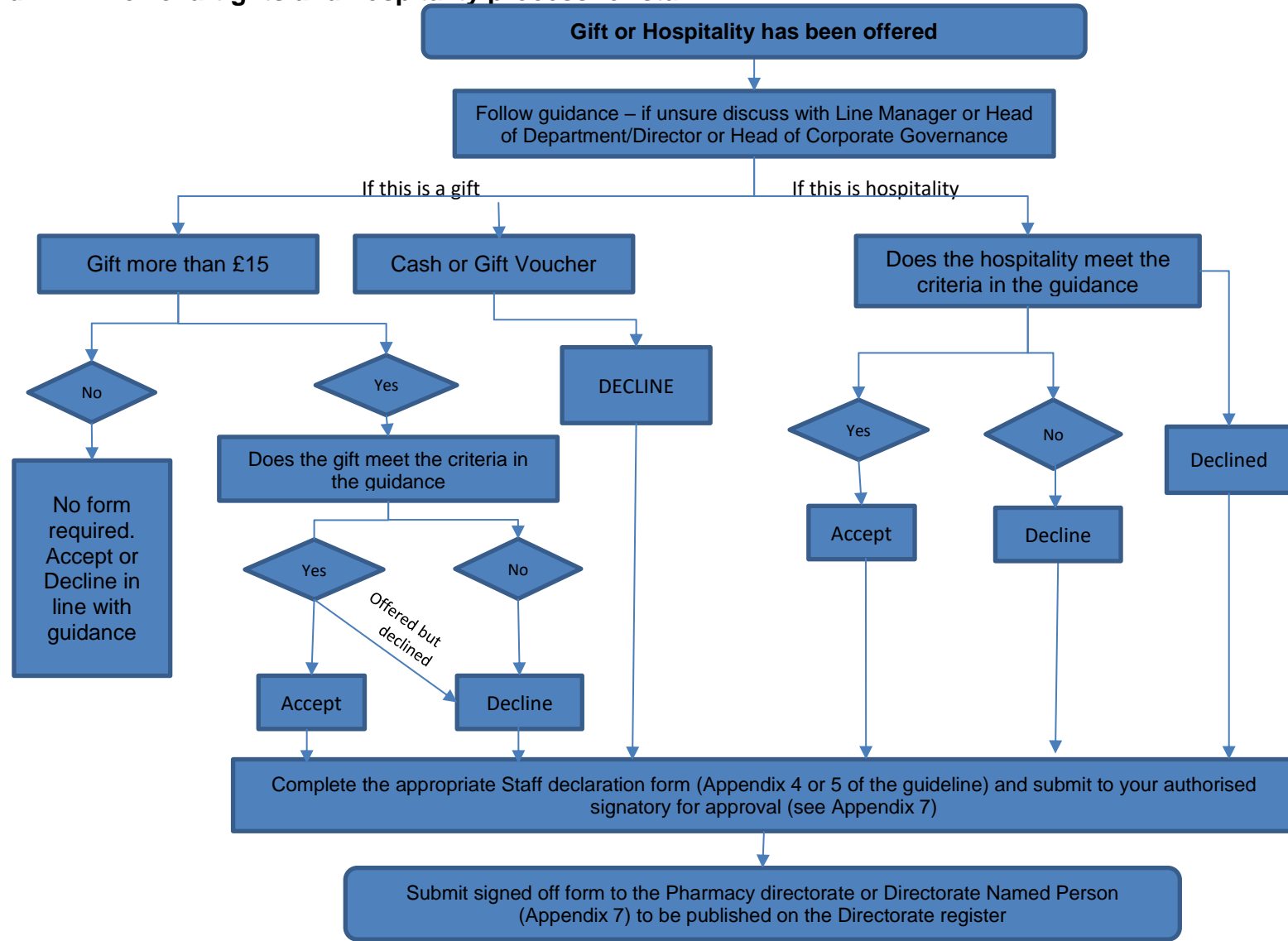
- (a) [NHS Ayrshire & Arran Code of Corporate Governance](#)
- (b) [NHS Circular MEL \(1994\) 48](#): Standards of Business Conduct for NHS Staff
- (c) [NHS Circular MEL \(1994\) 80](#): Supplementary guidance
- (d) [The Bribery Act 2010](#)
- (e) [Code of Practice of Medicines Governance](#)

15.0 Appendices

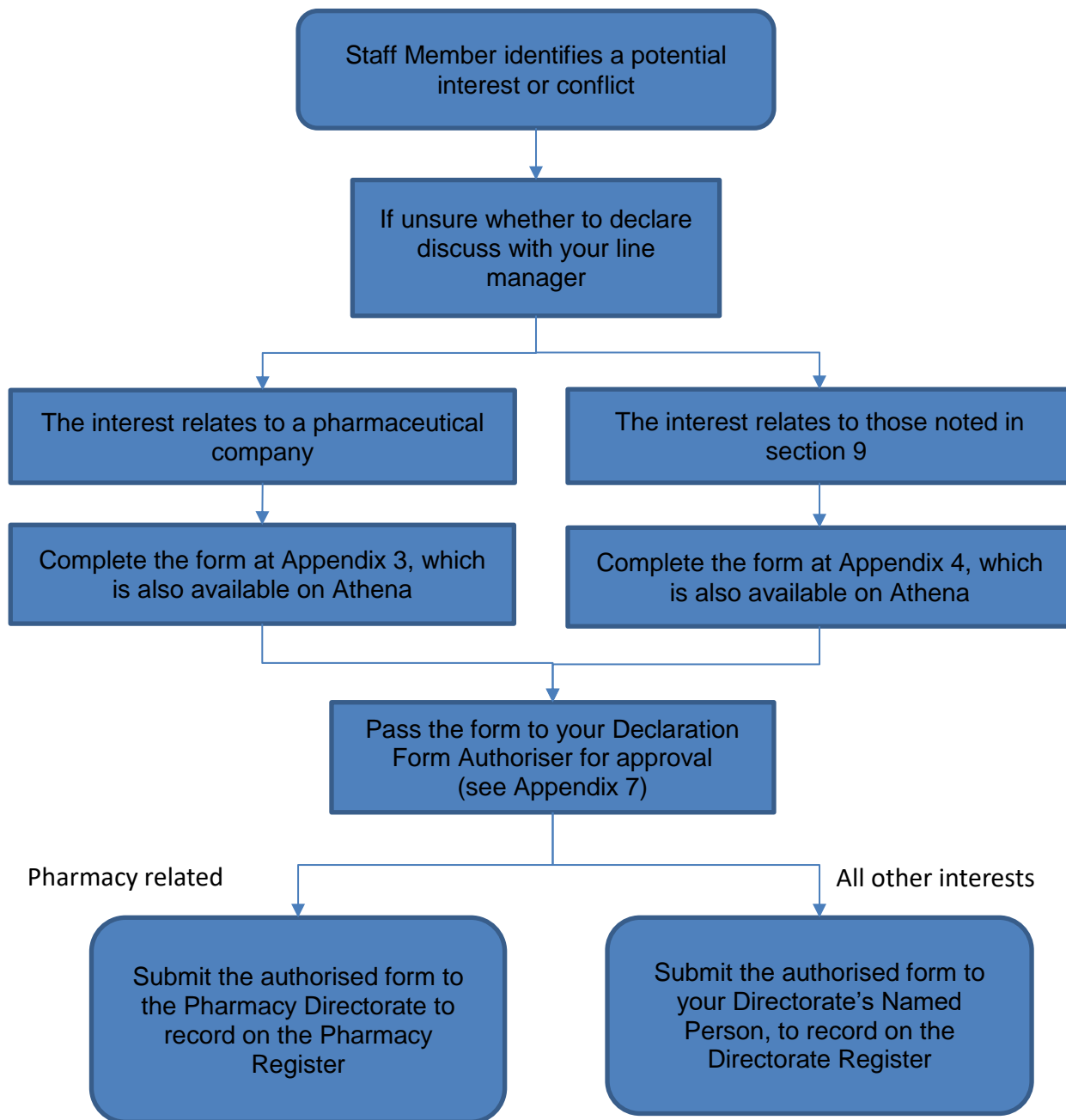
- Appendix 1 - Gifts and Hospitality Flow chart
- Appendix 2 - Interests Flow Chart
- Appendix 3 - Joint Working with Pharmaceuticals – declaring an interest or gift/hospitality
- Appendix 4 - Form for Staff Declaration for Gift/Hospitality or Interest
- Appendix 5 - Example of Directorate register
- Appendix 6 - Example of Individual register
- Appendix 7 - Directorate Authorisers, Named Persons and Targeted Groups

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Appendix 1 – Flowchart gifts and hospitality process for staff



Appendix 2 – Flowchart - declaring an interest process for staff



Appendix 3 - Declaration of Interests in the Pharmaceutical Industry

Guidance on Joint working with the Pharmaceutical Industry and declaration forms are held on AthenA and managed by the Pharmacy Directorate.

NHS Ayrshire & Arran Code of Practice for Medicines Governance
Available on Athena at <http://athena/adtc/Pages/COP.aspx>

- **[Section 23\(a\) – Declaration of Interests in the Pharmaceutical Industry](#)**
 - [Appendix 1 – Form - Register of Interests Form for use by ADTC and its subgroups](#)

- **[Section 23\(b\) – Joint Working with the Pharmaceutical Industry](#)**
 - [Appendix 1 – Model Framework for Joint Working with Clinical Suppliers - Guidance Notes on use of the framework](#)
 - [Appendix 2 – Registration Form](#)

- **[Section 23\(c\) – Policy for Pharmaceutical Representatives](#)**

Appendix 4 - Declaration Form for registering Staff interests, Gifts and/or Hospitality

Full Name:	
Job title:	
Department / Directorate:	

I wish to declare the following (* - Please delete as appropriate)

Declared item	Description (please provide all relevant details that will allow assessment of whether or not the declared item could have a bearing on a specific matter)
Offer of Gift and/or Hospitality (Details of gift/hospitality and the donor) Date Offered: Estimated Value: £..... I have accepted this offer Y/N* I have notified my Line Manager and been given approval Y / N*	
Interests	
1. Remuneration: Other employments. The amount of any related remuneration does not need to be disclosed	
2. Related undertaking - Directorships, including Non-Executive Directorships, held in private companies or public limited companies (whether remunerated or not); - Ownership of, or an interest in, private companies, partnerships, businesses or consultancies that are likely to be relevance to the work of the Board.	
3. Contracts Any connection with a voluntary or other body that has a contract with NHS Ayrshire & Arran under which services or goods are to be provided (you must register a description of the nature and duration, but not the price of, of any such contract);	

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4. Houses, land or buildings Ownership of, or interest in, land or buildings which may be significant or relevant to the work of Ayrshire and Arran NHS Board;	
5. Shares and securities Shareholdings in organisations likely or possibly seeking to do business with the NHS (the value of the shareholdings need not be declared);	
6. Gifts and hospitality	See above
7. Non-financial interests Any connection with a voluntary or other body that has a connection to the work of Ayrshire and Arran NHS Board	
8. Any involvement in joint working arrangements with Clinical (or other) Supplier	

Recipient Declaration: The Bribery Act 2010 makes it a criminal offence to request, agree to receive or to accept a bribe. In making this declaration you are confirming compliance with the NHS Ayrshire & Arran Standards of Business Conduct for NHS staff and associated guideline.	
Staff member signature	Date:

Form Authoriser

Name of approver (please print):	
Job Title:	
Signature:	Date
Any additional comments below:	

For Office Use only – Directorate register updated:

Name (please print):	
Job Title:	
Date added to register:	

Appendix 5 – Example of Staff Register for interests, gifts and/or hospitality

**NHS Ayrshire & Arran
 Register of Interests and Gifts and Hospitality – 1 April ## to 31 March ##**

Directorate: Acute, Corporate Support Services, Public Health etc

Name	Designation	Department	Date	Accepted (Yes/No)	Description of Gift, Hospitality or Interest Declared – include Category
Eg. John Smith	Consultant Anaesthetist	Acute	12/08/2019	NA	2 - Consulting agreement for Training and Education in the field of ?? surgery – add name of company
Eg. Mike Donnat	Estates officer	Estates	07/07/2019	Yes	6 – Evening dinner as guest of W Greig Builders at end of building contract.

Appendix 6 – Example of Individual Register

**NHS Ayrshire & Arran
Register of Interests and Gifts and Hospitality – 1 April ## to 31 March ##**

Name:

Job Title:

1. Remunerated interests

Name of public body, company, charity, voluntary organisation or professional body:	Nature of the organisation	Your role within the organisation	Regularity of the work (IF trade/ profession or vocational work)	Do you receive any allowances in relation to your role? (Yes/No)

2. Related undertakings

Name of public body, company, charity, voluntary organisation or professional body:	Name of subsidiary, parent company or other undertaking	Nature of the business	Relationship to the company or other undertaking of which you are a director and receive remuneration.

3. Contracts

Name of public body, company, charity, voluntary organisation or professional body:	Description of the contract your firm or undertaking has made with the NHS.	Duration of the contract.

4. Houses, land and buildings

Details of houses, land and buildings that you own or have a right or other interest in which may be of relevance to the work and operation of NHS Ayrshire & Arran.

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5. Shares and securities

Details of interests in shares which constitute a holding in a company or organisation which may be of relevance to the work and operation of NHS Ayrshire & Arran.

6. Gifts and hospitality

Date Gift or Hospitality Offered	Description of Gift or Hospitality Offered	Organisation Offering Gift or Hospitality

7. Non-Financial interests

Name of public body, company, charity, voluntary organisation or professional body:	Nature of the organisation.	Your role within the organisation.

8. Joint working

Describe any involvement in joint working arrangements with Clinical (or other) Supplier

Certification: I certify that the above information is correct and accurate to the best of my knowledge and is existing information.

Print Name: _____

Signed: _____

Date: _____

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Appendix 7 – Directorate Declaration Authoriser, Named Person for Register, Targeted Groups

Directorate	Declaration Form Authoriser	Named person	Targeted groups – section 12 refers
Acute	Your line/service manager from the list below: Site Directors Divisional General Managers Head of Health Records Services Chief Nurses Ayr and Crosshouse Associate Medical Directors	Personal Assistant to Director of Acute Services	Nil
Infrastructure and Support Services	Line Managers	Admin Service Lead / Personal Assistant to Director of Infrastructure and Support Services	Nil
Finance	Assistant Directors of Finance	Executive Assistant to Director of Finance	Nil
Medical Directorate	Medical Director	Office Manager, Medical Director's Team	Directors Heads of Service
Nurse Directorate	Deputy Nurse Director Director of Allied Health Professions Director of Midwifery Director of Infection Prevention and Control Director of Clinical and Care Governance Associate Nurse Director - Public Protection	Nurse Director Business Manager	Nil
OHRD	Deputy HR Director Assistant Director, Occupational Health & Safety Head of Resourcing & Planning Head of Learning, OD & Employee Engagement	Executive Assistant to HR Director	Nil

Code of Corporate Governance – Section C annex
Supporting guidance for staff on the registering of interests, gifts & hospitality

Directorate	Declaration Form Authoriser	Named person	Targeted groups – section 12 refers
Pharmacy	Band 8b pharmacist and above for all pharmacy staff Band 6 technician and above for technical staff, pharmacy support workers and admin & clerical staff.	Team Based Pharmacy Department Secretary UHC Pharmacy Department Secretary UHA Pharmacy Department Secretary Eglinton House	Pharmacy staff and members of ADTC and subgroups Already in place through Pharmacy
Public Health	Director of Public Health	Executive Assistant to Director of Public Health/Head of Admin Services	Nil
Transformation & Sustainability	Director for Transformation and Sustainability)	Transformation and Sustainability Business Manager	Nil
East Ayrshire Health and Social Care Partnership (NHS staff only)	Senior Manager	Secretary to Director of East Ayrshire Health and Social Care Partnership	Primary Care Contracting & Support Team
North Ayrshire Health and Social Care Partnership (NHS staff only)	Senior Manager and Principal Manager/Head of Service	Administrative Officer, North Ayrshire Health and Social Care Partnership	Nil
South Ayrshire Health and Social Care Partnership (NHS staff only)	Senior Manager	Senior Manager Planning and Performance, South Ayrshire Health and Social Care Partnership	Nil