

THE WHITTINGTON HOSPITAL NHS TRUST HOSPITALITY POLICY

Contents

1. Introduction

2. Objective of this Policy

3. Policy for Officers receiving hospitality

4. Policy for Officers providing hospitality

5. Declaration Form for Trust Officers who receive Hospitality, Gifts or Benefits

Appendix 1. Staff Hospitality/Gift/Benefit Declaration Form

1. Introduction

The purpose of this policy is to set out The Whittington Hospital NHS Trust policy for:

- Employees who **receive** hospitality, gifts or other benefits while acting as an officer of the Trust
- Employees who **provide** hospitality to external organisations or individuals

This policy applies to all employees, agents, contractors and subcontractors who have entered into a contractual relationship with the Trust and who are acting as officers of the Trust.

The Whittington Hospital NHS Trust is a public body that is subject to public scrutiny and accountability for all of its actions. As such it has a duty to ensure that all its dealings are conducted to the highest standards of integrity and probity and that all its employees, agents and contractors or others, when acting for the Trust in their official capacity, meet these standards.

2. Objective of this Policy

This policy aims to provide clear guidance to Trust officers who provide hospitality or receive hospitality, gifts or personal benefits on behalf of the Trust.

In particular the policy outlines:

- Circumstances when hospitality, gifts or benefits may be accepted,
- Circumstances when hospitality, gifts or benefits must be declined
- Circumstances when a declaration must be made in the Trust Hospitality Register.

Under the Prevention of Corruption Act 1916 any money, gift or consideration received by an employee of the Trust from a person or organisation seeking to obtain a contract is deemed by the court to have been received corruptly unless the employee proves to the contrary.

In your capacity as an Officer of the Trust, you may come into contact with patients and patient relatives who are very appreciative of the quality of care they have received. In such circumstances, a gift is occasionally made to an individual, a ward or department by the former patient and/or relatives for the collective benefit of the staff providing the service. At certain times (e.g. at Christmas) it is quite common for staff to receive gifts from grateful former patients, current patients or families of both. Where such gifts have a financial value of less than the limits specified in this policy, then the value of these gifts do not have to be declared. It should be noted that this policy is not intended to prevent such good staff/patient relationships nor is it intended to place a limit on the value received since the value is determined by the giver of the gift.

If the value of the gift offered is excessive for the purpose of maintaining good customer or supplier relationships, or given with the aim of securing a commercial contract, then it should be declined.

3. Policy for Officers receiving hospitality

- a. If the value of the hospitality, gift or benefit offered is excessive for the purpose of maintaining good customer or supplier relationships or is given with the aim of securing a commercial contract or commercial advantage then it should be declined.
- b. Where you are offered and receive hospitality, gifts or benefits from any external body whilst you are at work, or outside work when you are acting in the capacity of employee of the Trust (e.g. on courses, seminars, teaching training days, company sponsored events, etc) you are required to declare this if the value exceeds £50.00 on each occasion. Such gifts may be given to the individual member of staff or to the Trust as a corporate body.
- c. If you are unsure to the exact value received, e.g when a meal is purchased for you and you do not have sight of the bill, if you expect the cost of that hospitality, gift or benefit to exceed the threshold of £50.00, then it should be declared.
- d. The threshold applies to each item of hospitality, gifts or benefit received plus any collective items which, prior to dividing up, exceeded the £50.00 threshold limit, e.g. a case of spirits which is worth £150.00 but individual bottles are valued at £12.50 each.
- e. Where you are in receipt of more than one item of hospitality, gifts or benefits from the same individual/organisation on the same occasion then you are required to declare each item (even if it does not exceed the £50.00 single item declaration limit) e.g. two items of £49.99 each would require a hospitality declaration.
- f. All staff are required to declare all items of hospitality, gifts or benefit received either individually and collectively where the value exceeds £50.00. The Trust officer who receives the benefit, gift or hospitality must complete and submit a hospitality declaration form (Section 5 of this policy). If in doubt, consult your Line Manager, Director of Finance or the Director of Human Resources and Corporate Affairs.
- g. Examples of hospitality, gifts or benefit where a declaration may be necessary include the following:
 - meals and drinks,
 - crate and bottles of wine or spirits,
 - tickets for cricket/rugby/football matches
 - tickets to the races/theatre tickets
 - events where the cost of your accommodation is paid for by a research company,
 - national and international seminars where your placement has been paid for by the company organising the seminar,
 - sponsored golf events,
 - lecture trips (national/international),
 - site visits to prospective supplies of goods and services where hospitality, gifts or benefit is provided or loaned.
 - gifts of equipment by drug companies

(The above list is not exhaustive, but it will give an indication of the types of items that may need to be declared).

- h. The hospitality that is received must benefit the patient, staff welfare or the Trust's aims and objectives or its business activity. The receiver or giver of the hospitality, must ensure that these purposes are taken into account

Failure to comply with this policy may result in disciplinary action.

4. Policy for Officers providing hospitality

- a. Trust employees are not empowered to offer and/or give gifts or benefits to any outside body. This applies to individuals, companies, corporate bodies, voluntary organisations etc.
- b. Trust Directors may have occasions when there is a need to offer hospitality by way of food and refreshments, to maintain good business and public relations with the outside world. Such hospitality will be allowed and must not exceed the limits of £50.00 per person - this must be approved by the budget holder and must benefit the Trust's aims and objectives.

Failure to comply with this policy may result in disciplinary action.

5 . Declaration Form for Trust Officers who receive Hospitality, Gifts or Benefits.

- a. The attached declaration (*Appendix 1*) must be completed when a Trust Officer receives hospitality, gifts or benefits over £50.00.
- b. The completed declaration should be promptly submitted to the Trust Office. The Hospitality Register will contain all completed declarations and will be filed in date order.
- c. Before filing, the declaration will be examined and followed up if necessary by an Officer nominated for this purpose in the Trust Office. The purpose of this declaration is to monitor good practice and adherence to accepted standards. The limit of £50.00 is determined to exercise a measure of control relevant to this hospitality policy and does not prevent the giver offering a higher value of hospitality. It is the intention of the giver and its application, which is important. The receiver or giver, may wish to add to the declaration what use is made of the gift or hospitality in the case of significant items.

Failure to comply with this procedure may result in disciplinary action.

