

Gifts and Hospitality Policy
Policy Reference: MECCG041

Target Audience	All CCG Personnel and GPs from member practices, or practice staff, who perform a CCG role or are involved in CCG business.
Brief Description (max 50 words)	The purpose of this policy is to provide guidance to staff on the action that should be taken in the event that they are offered gifts and/or hospitality. There is a limited set of exceptions and this policy sets out the standards and procedures that staff should follow to protect both them and the organisation.
Action Required	To be approved and then disseminated to all staff

Document Information

Version Number	5.3
Accountable Director	Director of Governance & Performance
Responsible Officer	Head of Corporate Governance
Approved by Audit Committee	4 September 2019
Adopted by the Board:	26 September 2019
Review Date	March 2022 (Agreed at Audit Committee 23 Feb 2021 to extend the review date for this policy to March 2022)
Stakeholders engaged in development/review	Director of Governance & Performance, Head of Corporate Governance, Audit Committee and Local Counter Fraud Specialist.
Equality Impact Assessment	EQUALITY IMPACT ASSESSMENT This document has been assessed for equality impact on the protected groups, as set out in the Equality Act 2010. This Policy is applicable to the Board, every member of staff within the CCG irrespective of their age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, marriage or civil partnership, and those who work on behalf of the CCG

Amendment History

Version	Date	Reviewer Name(s)	Comments
1.0	November 2013	Nikki Dowling	Update provided on the previous adopted PCT policy to produce a CCG policy – version 1.0 for recommendation for adoption.
2.0	November 2013	Kerry Franklin	Updated following Audit Committee discussion to incorporate additional references in relation to reporting under 3.2.2. Updated in relation to the stakeholder input to include Audit Committee and Quality and Governance Committee members. Updated to include contact details of the CCG Board secretary.
3.0	November 2013	Kerry Franklin	Updated the NMC entry under 3.3 to reflect latest code.
4.0	August 2016	Viv Barnes	Full policy refresh to reflect revised statutory guidance for CCGs on Managing Conflicts of Interest. Sponsorship section transferred to Conflicts of Interest policy.
4.1	19 August 2016	C Roberts, Local Counter Fraud Specialist	Policy amended to take account of LCFS comments.
5.0	25 August 2017	S O'Connor, Head of Corporate Governance and final review by Director of Corporate Services	Amended to reflect revised statutory guidance for CCGs on Managing Conflicts of Interest, June 2017.
5.1	31 July 2018	S O'Connor, Head of Corporate Governance	Minor amendments to reflect changes to job titles, revised Anti-Fraud and Bribery Policy and updated Gifts & Hospitality Declaration form
5.2	28 August 2018	Audit Committee	Approved, subject to minor amendments.
5.3	28 August 2019	S O'Connor, Head of Corporate Governance and Eleni Gill, LCFS	Annual Review – minor amendments.

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1. Purpose

- 1.1 The purpose of this policy is to provide guidance to CCG Board and Committee members, staff and GPs from member practices, or practice staff, who perform a CCG role or are involved in CCG business, on the action that should be taken in the event that they are offered gifts and/or hospitality. There is a limited set of exceptions and this policy sets out the standards and procedures that staff should follow to protect both them and the organisation

2. Policy Statement

- 2.1 This policy supports a culture of openness and transparency in the CCG's business transactions. The policy should be read in conjunction with the following documents, which also set out generic guidelines and responsibilities for NHS organisations in relation to gifts and hospitality:

- The national guidance contained in HSG 93(5) Standards of Business Conduct for NHS Staff
- Standing Orders, Reservation and Delegation of Powers and Standing Financial Instructions
- Code of Conduct for NHS Managers
http://www.nhsemployers.org/~media/Employers/Documents/Recruit/Code_of_conduct_for_NHS_managers_2002.pdf
- Commercial Sponsorship – Ethical Standards For The NHS
- The Bribery Act 2010
- The Association of the British Pharmaceutical Industry (ABPI) Code of Professional Conduct relating to hospitality/gifts from pharmaceutical/external industry.
- Principles of Public Life drawn up by the Nolan Committee
<https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>
Revised statutory guidance for CCGs on Managing Conflicts of Interest June 2017 <https://www.england.nhs.uk/wp-content/uploads/2017/06/revised-ccg-coi-guidance-jul-17.pdf>

3. Scope

- 3.1 The policy applies to all employees of the CCG and any staff who are seconded to the CCG, members of the Mid and South Essex CCG Joint Commissioning Team who are employed by Mid Essex CCG, contract and agency staff and any other individual working on CCG premises, or working on behalf of the CCG, including GPs and other staff within CCG member practices in connection with a CCG role

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they may have, or their involvement with the CCG

- 3.2 The policy also applies to members of the Board and its Committees.
- 3.3 Staff employed by the CCG, and GPs from member practices, should also refer to their respective professional codes of conduct relating to the acceptance of gifts and hospitality.
- 3.4 A breach of this policy may lead to formal disciplinary action, which may include dismissal. A breach of the Bribery Act 2010 could lead to legal action being taken.

4. Legal Framework

- 4.1 The Bribery Act 2010 came into effect on 1 July 2011 and its provisions apply to all MECCG business.

The Act strengthens previous UK anti-bribery legislation and creates an offence which can be committed by organisations which fail to have adequate provisions in place to prevent bribery from occurring.

Bribery involves offering, promising or giving a payment or benefit in order to influence someone’s decision or action. This can take the form of ‘a financial or other advantage’ – it does not have to be cash. Offering and requesting constitutes an offence – it does not have to be paid. It does not have to go directly to the person being influenced – it can be a donation to a chosen organisation. It does not have to be substantial – there is no materiality threshold in the Act.

In addition to the corporate offence, there are three offences which individuals could be found guilty of.

A summary of the offences is as follows:

	Section	Offence	Detail	Sanction
Individuals	Section 1	Bribing another person	Offering, promising or giving a bribe in the UK or abroad, in the public or private sector.	Individuals could face a 10 year prison sentence and unlimited fines.
	Section 2	Receiving a bribe	Requesting, agreeing to receive or accepting of a bribe in the UK or abroad, in the public or private sector.	
	Section 6	Bribery of foreign public officials	Bribery of a foreign public official in order to obtain or retain	

	Section	Offence	Detail	Sanction
			business.	
Organisations	Section 7	Failure to prevent bribery	Failure by an organisation to prevent a bribe being paid by those who perform services for, or on behalf of the organisation (“associated persons”).	Organisations could face unlimited fines and reputational damage could be significant.

5.2 In certain circumstances, these offences could be committed as a result of a gift being accepted by a friend or relative as well as by a member of staff.

5. Roles and Responsibilities

Accountable Officer

5.1 The Accountable Officer has overall accountability and responsibility for implementation of this policy.

Executive Directors

5.2 Executive Directors must ensure that staff within their directorate are made aware of and implement the provisions set out within the policy, in particular:

- Ensuring all employees are aware of their responsibilities, the law and the CCG’s policy on acceptance of Gifts and Hospitality.
- Ensuring that breaches of policy are dealt with in a fair and consistent manner.

Director of Governance and Performance/Head of Corporate Governance

5.3 The Director of Governance & Performance, assisted by the Head of Corporate Governance, is responsible for:

- The day-to day management of gifts and hospitality and queries;
- Maintaining the CCG’s register(s) of gifts and hospitality;

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- Providing advice, support, and guidance on how offers of gifts and hospitality should be managed;
- Prior approval of hospitality in excess of the limitations referred to in this policy where there are rare and exceptional circumstances for acceptance; and
- Ensuring that appropriate administrative processes are put in place.

Audit Committee Chair

- 5.4 The Audit Committee Chair, as the CCG's Conflict of Interest Guardian, will act as a conduit for any individuals who have concerns in relation to this policy and provide support and advice on its application.

Employees

- 5.5 All staff are responsible for:

- Following the policy.
- Declaring any offer and/or receipt of gifts or hospitality covered within the confines of this policy.
- Reporting any concerns they may have in relation to potential or actual breaches of this policy.

- 5.6 GPs of Member Practices and Practice Staff

CCG member practices have a contractual responsibility to maintain a register of any gifts received of a value of £100 or more and to make a copy of the register available to the CCG on request. However individual GPs or practice staff who work for the CCG or are members of its Board or committees are expected to comply with the requirements of this policy in respect of any offers of gifts or hospitality that are, or may be, connected to their CCG role or involvement with the CCG.

- 5.7 Local Counter Fraud Specialist

The CCG's Local Counter Fraud Specialist (LCFS) is responsible for investigating allegations of Fraud and Bribery at the CCG. If fraud and /or corruption are suspected, the matter must be reported immediately to the CCG's Local Counter Fraud Specialist (LCFS) or the Chief Finance Officer immediately, unless the LCFS or the Chief Finance Officer is implicated. If that is the case, they should report it to the NHS Fraud and Corruption Reporting Line (FCRL) on freephone 0800 028 4060 or at <https://cfa.nhs.uk/home>, who will decide on the action to be taken. Any suspected fraud or bribery can also be reported to NHS Protect using the NHS Fraud and Corruption Reporting Line on 08000284060 or by filling in an online form at <https://cfa.nhs.uk/reportfraud>

6. Gifts and Hospitality: Refusal and Acceptance

6.1 Gifts and Hospitality - Refusal

6.1.1 A 'gift' is defined as any item of cash or goods, or any service, which is provided for personal benefit, free of charge or at less than its commercial value.

6.1.2 CCG staff should not ask for any gifts. CCG staff should also not accept any unsolicited offers of gifts or hospitality that may affect, or be seen to affect, their professional judgement.

6.1.3 All offers of gifts must be refused where they are made by suppliers or contractors linked (currently or prospectively) to the CCG's business. The exception is low cost branded promotional aids may be accepted and not declared where they are under the value of the common industry standard of £6.

6.1.4 Offers of any of the following must be refused under all circumstances:

- Cash or cash equivalents (including but not limited to vouchers, tokens, cryptocurrency, offers of remuneration to attend meetings whilst in a capacity working for or representing the CCG) whatever their value and whatever their source
- Alcohol, tobacco and tobacco products;
- Hospitality of a value above £75 unless (in exceptional circumstances) senior approval is given (a clear reason should be recorded on the gifts & hospitality register as to why it was permissible to accept)

6.15 All offers of gifts and hospitality falling within the above criteria, must be declared to the Head of Corporate Governance for recording in the register of gifts and hospitality.

6.2 Other Gifts or Offers of Gifts

6.2.1 Items of low value such as diaries, calendars, stationery and other gifts acquired from meetings, events or conferences and modest gifts such as flowers and small tokens of appreciation from patients, families and members of the public to staff for work well done may be accepted where the notional value is under £50. These gifts do not have to be declared.

6.2.2 Gifts valued at over £50 should be treated with caution and only be accepted on behalf of the CCG (i.e. to contribute towards a team event or providing gifts for an organisational raffle) not in a personal capacity and must be declared.

6.2.3 If the actual value of a gift is unknown, a common sense approach should be

applied to the valuing of such gifts, by using an estimated amount that a reasonable person would make as to its value. Multiple gifts from the same source over a twelve month period should be treated in the same way as single gifts over £50 where the cumulative value exceeds £50.

6.2.4 Gifts offered from other sources should be politely declined if accepting them might give rise to perceptions of bias or favouritism, and a common sense approach should be adopted as to whether or not this is the case. All such gifts should be declared to a Line Manager, or the Head of Corporate Governance, who will recommend refusal or acceptance.

6.2.5 If refusal of a gift is recommended, then arrangements should be made for the gift to be politely declined (if offer is made in advance) or returned (if an unsolicited gift is received), at the earliest opportunity with an appropriate explanation. An unsolicited gift might include an item with an estimated value of more than £6 received in the post without any prior notification.

6.2.6 Regardless of whether the gift/offer of gift is refused or accepted, staff/Office Holders must submit a declaration to the Head of Corporate Governance for inclusion in the Gifts and Hospitality Register. This form can be found at **Appendix 1**.

6.3 Hospitality/Offers of Hospitality, including Travel & Accommodation

6.3.1 A blanket ban on accepting or providing hospitality is neither practical nor desirable from a business point of view. However, individuals should be able to demonstrate that the acceptance or provision of hospitality would benefit the NHS or CCG and, if any doubt, should contact the Director of Governance and Performance/Head of Corporate Governance for advice.

6.3.2 Hospitality means offers of meals, refreshments, travel, accommodation and other expenses in relation to attendance at meetings, conferences, education/training or other events.

6.3.3 CCG staff, or others working on behalf of the CCG, 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.

6.3.4 Modest hospitality, under the value of £25, provided in normal and reasonable circumstances may be acceptable, although it should be on a similar scale to that which the CCG might offer in similar circumstances (e.g. tea, coffee, light refreshments at meetings). A common sense approach should be adopted as to whether hospitality offered is modest or not. Hospitality of this nature does not need to be declared nor recorded on the register, unless it is offered by suppliers or

contractors linked (currently or prospectively) to the CCG's business.

6.3.5 With the exception of the modest hospitality referred to in paragraph 6.3.4, all offers of hospitality of a value between £25 and £75 may be accepted but must be declared to the Head of Corporate Governance. The receiver should seek evidence to retain that the value of the hospitality is under £75. If in any doubt, the receiver must declare the offer.

6.3.6 If hospitality over £75 is offered arrangements should be made for the hospitality to be refused at the earliest opportunity with an appropriate explanation, subject to exceptional circumstances and senior approval of acceptance as per paragraphs 6.1.4 above and 6.3.8 below

6.3.7 Regardless of whether hospitality over £25 is refused or accepted, staff/Office Holders must submit a declaration to the Head of Corporate Governance for inclusion in the Gifts and Hospitality Register (**Appendix 1**).

6.3.8 There may be some rare and exceptional circumstances where the limitations on accepting hospitality referred to in this policy may be contemplated. Express prior approval should be sought from a senior member of the CCG (e.g. Director of Governance and Performance) before accepting such offers, and the reasons for acceptance should be recorded in the CCG's register of gifts and hospitality. Hospitality of this nature should be declared to the Head of Corporate Governance and recorded on the register, whether accepted or not. In addition, particular caution should be exercised where hospitality is offered by suppliers or contractors linked (currently or prospectively) to the CCG's business. Offers of this nature can be accepted if they are modest and reasonable but advice should always be sought from a senior member of the CCG (e.g. the CCG governance lead or equivalent) as there may be particular sensitivities, for example if a contract re-tender is imminent. All offers of hospitality from actual or prospective suppliers or contractors (whether or not accepted) should be declared and recorded.

7. Register of Gifts and Hospitality

7.1 The Register of Gifts and Hospitality is maintained by the Head of Corporate Governance and will, as a minimum, contain the following information:

- Recipient's name;
- Current position(s) held by the individual (within the CCG);
- Date of offer
- Date of receipt;
- Details of the gifts of hospitality
- The estimated value of the gifts or hospitality
- Details of the supplier/offeree (e.g. their name, contact details and the nature of

- their business);
- Details of previous gifts and hospitality offered or accepted by this offeror/supplier;
 - Details of the officer reviewing/approving the declaration made and date;
 - Whether the offer was accepted or not; and
 - Reasons for accepting or declining the offer.

7.2 The template for recording declarations of interest is attached at **Appendix 2**.

7.3 The CCG will publish its Register of Gifts and Hospitality on its website and within its Annual Report and Annual Governance Statement.

8. Raising Concerns or Breaches

8.1 It is the duty of every CCG employee, governing body member, committee or sub-committee member and GP practice member to speak up about genuine concerns in relation to the administration of the CCG's policy on gifts and hospitality and to report these concerns. These individuals should not ignore their suspicions or investigate themselves, but rather speak to the designated CCG point of contact for these matters.

8.2 Anyone who wishes to report a suspected or known breach of the policy, who is not an employee or worker of the CCG, should also ensure that they comply with their own organisation's whistleblowing policy, since most such policies should provide protection against detriment or dismissal.

8.3 Often a concern can be easily resolved upon raising it formally or informally with someone such as a line manager. However, if this does not resolve matters, or the individual does not feel able to raise it with them, the designated CCG point of contact for these matters in the first instance is the CCG's Head of Corporate Governance (Tel.01245 398731 or email: sara.oconnor@nhs.net).

8.4 If the individual still remains concerned after this, s/he can contact:

- The CCG's Director of Governance and Performance, who is also the Executive Director for Whistleblowing, (Tel. 01245 398139, or email: viv.barnes@nhs.net).
- The CCG's Conflicts of Interests Guardian (Lay Member for Governance, John Gilham) - tel. 07710 206001 or e-mail: john.gilham@nhs.net.
- The CCG's Local Counter Fraud Specialist, Eleni Gill, eleni.gill@nhs.net Mobile: 07827 308906.
- Providers, patients and other third parties can also make a complaint to NHS Improvement in relation to a commissioner's conduct under the NHS (Procurement Patient Choice and Competition (No.2) Regulations 2013

- 8.5 On receipt, the concern will be recorded and acknowledged within two working days. The central record will record the date the concern was received, whether you have requested confidentiality, a summary of the concerns and dates when updates or feedback have been provided.
- 8.6 Where a concern cannot be resolved quickly, for example by discussion with a line manager, a proportionate investigation will be undertaken using someone suitably independent (usually from a different part of the organisation) and properly trained.
- 8.7 It may be decided that the concern would be better looked at under another process, for example, the CCG's disciplinary policy, in which case the individual who raised the concern will be notified.
- 8.8 The individual who raised the concern will be informed how long the investigation is expected to take and kept up to date with its progress. Wherever possible, the full investigation report will be made available to the individual who raised the concern (while respecting the confidentiality of others).
- 8.9 Where it is determined that an individual has failed to disclose any relevant gifts/hospitality or has otherwise breached the CCG's rules and policies relating to the receipt of gifts and hospitality, will be subject to disciplinary action. CCG staff, governing body and committee members in particular should be aware that the outcomes of such action may, if appropriate, result in the termination of their employment or position with the CCG.
- 8.10 Statutorily regulated healthcare professionals who work for, or are engaged by, the CCG are under professional duties imposed by their relevant regulator to act appropriately with regard to gifts and hospitality. The CCG will report statutorily regulated healthcare professionals to their regulator if they believe that they have acted improperly, so that these concerns can be investigated. Statutorily regulated healthcare professionals should be made aware that the consequences for inappropriate action could include fitness to practise proceedings being brought against them, and that they could, if appropriate, be struck off by their professional regulator as a result.
- 8.11 Anonymised details of confirmed breaches of the Gifts and Hospitality policy will be published by the Head of Corporate Governance on the CCG's website, for the purposes of learning and development, and reported to NHS England.

9. Fraud and Corruption

- 9.1 If fraud and /or corruption are suspected, the matter must be reported immediately to the CCG's Local Counter Fraud Specialist or the Chief Finance Officer, as per the local Anti-fraud, Bribery and Corruption policy (Policy Ref MECCG008), or via

the NHS Counter Fraud Hotline (Tel: 0800 028 40 60 or on-line at <https://cfa.nhs.uk/reportfraud>).

10. Associated Policies and Guidance

- CCG Constitution (particularly Standing Orders and Standing Financial Instructions)
- Managing Conflicts of Interest: Statutory Guidance for CCGs <https://www.england.nhs.uk/commissioning/wp-content/uploads/sites/12/2016/06/revsd-coi-guidance-june16.pdf>
- Conflicts of Interest Policy (MECCG003) <http://midessexccg.nhs.uk/about-us/the-library/policy-library/1788-meccg003-conflicts-of-interest-policy-v5-6/file>
- Anti-Fraud and Bribery Policy (MECCG008) <http://midessexccg.nhs.uk/about-us/the-library/policy-library/1796-meccg008-anti-fraud-and-bribery-policy-v3/file>
- Whistleblowing Policy (MECCG012) <http://midessexccg.nhs.uk/about-us/the-library/policy-library/1797-meccg012-whistleblowing-policy-1-2/file>
- Procurement Policy (MECCG042) <http://midessexccg.nhs.uk/about-us/the-library/policy-library/1919-meccg042-procurement-policy/file>
- Standards of Business Conduct Policy (MECCG112) <http://midessexccg.nhs.uk/about-us/the-library/policy-library/1849-meccg112-standards-of-business-conduct-policy/file>
- Close Personal Relations at Work Policy (MECCG122) <http://midessexccg.nhs.uk/about-us/the-library/policy-library/1854-meccg122-personal-relationships-at-work-policy/file>

11. Training

- 11.1 The CCG will ensure that training is offered to all employees, governing body members, members of CCG committees and sub-committees and practice staff with Involvement in CCG business on the management of gifts and hospitality. This is to ensure staff and others within the CCG understand what conflicts are and how to manage them effectively.

12. Monitoring of Compliance and Effectiveness

- 12.1 The Director of Governance and Performance will be responsible for monitoring compliance with and the effectiveness of this policy via an annual audit of conflicts of interest management as part of the CCG's internal audit plan.

13. Review of Policy

13.1 This policy will be reviewed annually.

14. Appendices

Appendix 1: Declaration of Gifts and Hospitality form

Appendix 2: Register of Gifts and Hospitality template

Appendix 1: Declarations of gifts and hospitality form

Name of member of staff offered gift(s) or hospitality:				Email Address:			
				Tel No:			
Position within, or relationship with, the CCG (or NHS England in the event of joint committees):							
GIFT(S) AND/OR HOSPITALITY – please see table below for guidance on what can be accepted or must be refused, and what must be declared.							
Date of Offer	Date of Receipt (if applicable)	Details of Gift / Hospitality	Estimated Value (£)	Supplier / Offeror Name and Nature of Business	Details of Previous Offers or Acceptance by this Offeror/ Supplier	Declined or Accepted?	Reason for Accepting or Declining

REVIEW BY HEAD OF SERVICE	
Name and Position of Manager reviewing and signing-off acceptance/rejection of gift or hospitality.	
Reason for recommending acceptance/rejection, where applicable (see guidance below).	
Signature of Manager	
Date:	

Fair Processing Statement

The information submitted will be held by the CCG for personnel or other reasons specified on this form and to comply with the organisation's policies. This information may be held in both manual and electronic form in accordance with the Data Protection Act 1998. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and published in registers that the CCG holds. The Data Protection Officer can be contacted via the CCG's Head of Corporate Governance.

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I confirm that the information provided above is complete and correct. I acknowledge that any changes in this declaration must be notified to the CCG as soon as practicable and no later than 28 days after I am aware that changes are required. I am aware that if I do not make full, accurate and timely declarations then civil, criminal, professional regulatory or internal disciplinary action may result.

I do / do not (delete as applicable) object to this information being included on registers that the CCG holds and publishes on its website.
NB: *If you are raising an objection, please give reasons and a decision will be made by the CCG's Conflict of Interests Guardian whether to redact this information from the publicly available register(s).*

Signed: _____ **Date:** _____

Please return completed and signed form to Head of Corporate Governance.

GUIDANCE ON ACCEPTING, REFUSING AND DECLARING GIFTS & HOSPITALITY

Gifts

A 'gift' is defined as any item of cash or goods, or any service, which is provided for personal benefit, free of charge or at less than its commercial value. CCG staff should not ask for any gifts. CCG staff should also not accept any unsolicited offers of gifts or hospitality that may affect, or be seen to affect, their professional judgement. The rules for accepting, refusing and declaring gifts and hospitality are summarised below.

If the actual value of a gift is unknown, a common sense approach should be applied to the valuing of such gifts, by using an estimated amount that a reasonable person would make as to its value. Multiple gifts from the same source over a twelve month period should be treated in the same way as single gifts over £50 where the cumulative value exceeds £50. For further information, please refer to the [Gifts & Hospitality \(G&H\) Policy](#).

Hospitality

'Hospitality' means offers of meals, refreshments, travel, accommodation and other expenses in relation to attendance at meetings, conferences, education/training or other events. CCG staff, or others working on behalf of the CCG, 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.

Relevant Paragraph within G&H Policy	Types of Gifts and Hospitality and thresholds for acceptance/refusal.	Accept or Refuse?	Must I Declare the Offer/Gift/Hospitality?
6.1.3	Gifts made by suppliers or contractors linked (currently or prospectively) to the CCG's business. However, see exception below.	Refuse	Yes – all such offers must still be declared.
6.1.3	Low cost branded promotional aids from suppliers or contractors may be accepted and not declared where they are under the value of a common industry standard of £6.	Acceptable	No
6.1.4	Cash or cash equivalents (including vouchers, tokens, offers of remuneration to attend meetings whilst in a capacity working for or representing the CCG) whatever their value and whatever their source;	Refuse	Yes – all such offers must still be declared.
6.1.4 and 6.3.6	Hospitality of a value above £75 unless (in exceptional circumstances) senior approval is given (a clear reason should be recorded on the gifts & hospitality register as to why it was permissible to accept).	Refuse (unless approved in exceptional circumstances)	Yes – all such offers must still be declared.
6.2.1	Items of low value such as diaries, calendars, stationery and other gifts acquired from meetings, events or conferences and modest gifts such as flowers and small tokens of appreciation from patients, families and members of the public to staff for work well done may be accepted where the notional value is under £50. These gifts do not have to be	Acceptable	No

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Relevant Paragraph within G&H Policy	Types of Gifts and Hospitality and thresholds for acceptance/refusal.	Accept or Refuse?	Must I Declare the Offer/Gift/Hospitality?
	declared.		
6.2.2	Gifts offered from other sources (i.e. other than suppliers or contractors) and valued at over £50 should be treated with caution and only be accepted on behalf of the CCG (i.e. to the CCG's charitable funds) not in a personal capacity and must be declared.	Acceptable (but treat with caution)	Yes – all such offers must still be declared.
6.2.4	Gifts offered from other sources (i.e. other than suppliers or contractors) should be declined <u>if accepting them might give rise to perceptions of bias or favouritism</u> , and a common sense approach should be adopted as to whether or not this is the case. All such gifts should be declared to a Line Manager, and the Head of Corporate Governance, who will recommend refusal or acceptance.	Refuse if there could be a perception of bias/favouritism.	Yes – all such offers must still be declared.
6.3.4	Modest hospitality, under the value of £25, provided in normal and reasonable circumstances may be acceptable, although it should be on a similar scale to that which the CCG might offer in similar circumstances (e.g. tea, coffee, light refreshments at meetings). A common sense approach should be adopted as to whether hospitality offered is modest or not.	Acceptable	Yes – if offered by suppliers or contractors linked (currently or prospectively) to the CCG's business No – if offered from other sources.
6.3.5	Offers of hospitality of a value between £25 and £75.	Acceptable	Yes – all such offers must still be declared.

Appendix 2: Template Register of gifts and hospitality

Name	Position	Date of Offer	Declined or Accepted?	Date of Receipt (if applicable)	Details of Gift /Hospitality	Estimated Value	Supplier / Offeror Name and Nature of business	Reason for Accepting or Declining