



Shropshire, Telford
and Wrekin



Integrated
Care System
Shropshire, Telford and Wrekin

Declaration of Gifts, Hospitality & Sponsorship – Anti-Bribery Policy

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1 Introduction

- 1.1 NHS Shropshire, Telford and Wrekin (NHS STW) is committed to the anti-bribery procedures as laid out in this policy.
- 1.2 This document sets out NHS Shropshire, Telford and Wrekin Integrated Care Board's (ICB) policy and procedure for ICB employees, Board and Committee members and contractors to declare gifts, hospitality, commercial sponsorship to ensure the requirements of the Bribery Act 2010 dealing with the requirements of the Bribery Act 2010. This document should be read in conjunction with the Conflicts of Interest Policy.
- 1.3 The Bribery Act 2010 came into force on 1st July 2011. This Act replaces the previous criminal laws of bribery and corruption. This Act makes it a criminal offence, not just for individuals to engage in acts of bribery and corruption, as explained later, but also for commercial organisations (which includes NHS bodies) to fail to prevent bribery by not having in place a range of predetermined processes, as outlined in Section 6 below. In the event that an offence of bribery is committed by a member of the ICB, Board or Committee/sub committee member or an employee, in the course of their role or employment, then the appointing/employing organisation can be prosecuted for failing to have adequate preventative measures in place.
- 1.4 Bribery is broadly defined as “requesting, agreeing to receive or accept (either directly or through any other party), a financial or other advantage in connection with the improper performance of a relevant function, that expected to be reformed impartially and in good faith, irrespective of whether the recipient of the bribe is the same as the person who is to perform, or has performed, the relevant function. The act of bribery can be committed in the United Kingdom or abroad”.
- 1.5 Bribery does not have to involve cash or an actual payment exchanging hands and can take many forms such as a gift, lavish treatment during a business trip or tickets to an event.
- 1.6 Organisations which fail to take appropriate steps to avoid (or at least minimise) the risk of bribery taking place will face large fines and this could include the imprisonment of the individuals involved and those who have turned a “blind eye” to the problem.
- 1.7 NHS Shropshire, Telford and Wrekin is committed to the prevention, deterrence and detection of bribery and has a zero-tolerance towards those responsible for bribery and corruption. The ICB aims to maintain complete anti-bribery compliance as part of its NHS business activities and will ensure that the prescribed preventative measures are embedded in its daily activities. This will include such measures as ensuring that reference to the ICB's Anti-Bribery approach is made in its legal contracts, both internally across the NHS and externally with other contractors.
- 1.8 The Bribery Act does create an offence of bribing a foreign public official, but this is not summarised as it is unlikely to impact upon the provision of local healthcare services.

- 1.9 The ultimate aim of the policy is to protect NHS Shropshire, Telford and Wrekin and its employees and ensure it meets the obligations placed on it by the Bribery Act 2010.

2 Scope

- 2.1 This policy applies to all ICB members, ICB Board and committee/subcommittee members and employees of NHS Shropshire, Telford and Wrekin and should also be used by interim, agency staff, contractors, volunteers or others performing any role on behalf of NHS Shropshire, Telford and Wrekin .
- 2.2 NHS Shropshire, Telford and Wrekin expects that all those acting on its behalf will act honestly and with integrity at all times.
- 2.3 This policy is also intended to contribute to maintaining the highest standards of business conduct and ensure compliance with the 7 principles of public life drawn up by the Nolan Committee (see **Appendix 1**).
- 2.4 This policy should be considered alongside the ICB's other organisational policies:
- NHS Shropshire, Telford and Wrekin ICB Constitution and Governance Handbook
 - NHS Shropshire, Telford and Wrekin ICB Standing Orders, Scheme of Reservation and Delegation of Powers and Prime Financial Polices
 - Policy and Guidance for Joint Working with the Pharmaceutical Industry (including rebate schemes) & Commercial Sponsorship of Meetings/Training Events
 - Raising Concerns at Work Policy
 - Other relevant HR policies

3 Policy Statement

- 3.1 NHS Shropshire, Telford and Wrekin is absolutely committed to maintaining an honest, open culture within the ICB, so as to best fulfil the objectives of the NHS Shropshire, Telford and Wrekin .
- 3.2 NHS Shropshire, Telford and Wrekin is, therefore, also committed to the elimination of any form of bribery or corruption within the . The ICB is also committed to the rigorous investigations of any such allegations and to taking appropriate sanctions against those individuals when bribery or corruption is identified, including possible criminal prosecution. This would also include undertaking steps to recover any assets lost as a result of bribery or corruption.
- 3.3 It is the responsibility of each ICB member, ICB Board and committee/subcommittee member and employee to report any reasonable suspicions to the nominated Local Counter Fraud Specialist for NHS Shropshire, Telford and Wrekin . No individual will suffer any detrimental treatment as a result of reporting reasonably held non malicious suspicions.

4 Bribery Act 2010

4.1 This Act makes it a criminal offence to:

- offer, promise or give a bribe to another person (Section 1)
- request, agree to receive, or accept a bribe (Section 2)

(A simple example would include a candidate for a job offering the interviewer tickets to an event in order to secure the position. Under the Bribery Act 2010, two offences would

be committed; one by the person offering the bribe and one by the person receiving the bribe.)

- failure to prevent bribery by persons working on behalf of a commercial organisation (a corporate offence) - (Section 7)

(Two simple examples would be:

a) Where an act of bribery has occurred, for a director, manager or officer of an organisation ignoring an act or acts of bribery within the organisation. Under the Bribery Act 2010, the corporate offence would have been committed.

b) Where an act of bribery has occurred, it was subsequently established that the organisation employing the individual failed to have adequate procedures in place to identify and prevent the act of bribery by its employee. Again, under the Bribery Act 2010, the corporate offence would have been committed.)

4.2 However, an organisation will have a defence against prosecution if it can show that they have adequate procedures in place to prevent bribery – see Section 5.

4.3 The Department of Health lawyers have advised that the Bribery Act 2010 applies to all NHS organisations including, s for the purpose of the Act are deemed to be “commercial organisations”.

4.4 Under the Bribery Act 2010, the term “a trade or profession” is also considered to be a “commercial organisation”. This means that independent healthcare contractors working in association with any NHS organisations are also subject to and personally liable under the Act.

4.5 A comprehensive version of the Bribery Act 2010 can be accessed via:-

<http://www.justice.gov.uk/guidance/docs/bribery-act-2010-guidance.pdf>

5 Penalties for failing to comply with the Act

5.1 The penalties for breaches of the Bribery Act 2010 are potentially very severe. There is no upper limit on the level of fines that can be imposed. An individual convicted of an offence will face a prison sentence of up to 10 years. If a bribery offence by a staff member is proved to have been committed with the consent or connivance of an director, manager or other similar person, that person (as well as

the commercial organisation) is also guilty of the offence and liable to be prosecuted and fined or imprisoned accordingly.

The penalties if found guilty of an offence under sections 1, 2 or 7 are as follows:

- Upon conviction in a magistrates court, to imprisonment for a maximum term of 12 months, or to a fine not exceeding £5,000, or to both.
- Upon conviction in a crown court, to imprisonment for a maximum term of ten years, or to an unlimited fine, or both.
- NHS Shropshire, Telford and Wrekin, if convicted under sections 1 or 2 will also face the same level of fines and, if guilty of an offence under section 7, is liable to an unlimited fine.

6 Anti-Bribery Procedures

6.1 An organisation will have a defence against prosecution if it can show that they have the following adequate procedures in place to prevent bribery.

6.2 The Secretary of State has outlined six principles that are expected from commercial organisations to address the risk of bribery occurring within its business activities. These six principles if adopted amount to a defence from prosecution. The six principles are:

Proportionality

NHS Shropshire, Telford and Wrekin must have procedures in place to prevent bribery by persons associated with it. These are proportionate to the bribery risks faced by the organisation and to the nature, scale and complexity of the organisation's activities. They are also clear, practical, accessible, effectively implemented and enforced.

Top Level Commitment

NHS Shropshire, Telford and Wrekin's Chief Executive and its Directors should demonstrate that they are committed to preventing bribery by persons associated with the ICB. They will foster a culture within the organisation in which bribery is never acceptable.

Risk Assessment

There are periodic and documented assessments undertaken of the nature and extent of the 's exposure to potential external and internal risk of bribery on its behalf by persons associated with it is periodically assessed. This includes financial risks but also other risks such as reputational damage.

Due Diligence

NHS Shropshire, Telford and Wrekin takes a proportionate and risk based approach, in respect of persons who perform or will perform services for or on its behalf, in order to mitigate identified bribery risks.

Communication (including training)

NHS Shropshire, Telford and Wrekin seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training that is proportionate to the risks it faces.

Monitoring and Review

NHS Shropshire, Telford and Wrekin will monitor and review that its procedures designed to prevent bribery by persons associated with the and make improvements to minimise the risk where necessary.

7 Gifts

- 7.1 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.
- 7.2 Transparency is so important these days and therefore those acting on behalf of NHS Shropshire, Telford and Wrekin should never put themselves in a position where there could be any suspicion that their business decisions could have been influenced by accepting hospitality from others. If in doubt about the wisdom of accepting a gift or hospitality offered, it is recommended that advice is sought beforehand and a record is made in the register, of the offer or acceptance of hospitality.
- 7.2 All gifts of any nature (cash, goods, services) offered to ICB staff, Board members, committee members and partner members by suppliers or contractors linked currently or prospectively to the ICB’s business, must be declined, whatever their value (subject to this, low cost branded promotional aids may be accepted and not declared where they are under the value of a common industry standard of £6). The person to whom the gifts were offered should also declare the offer (even if it is declined) on a declaration form and give to the Director of Corporate Affairs who has designated responsibility for maintaining the register of gifts, hospitality and sponsorship onto which this will be recorded.
- 7.3 Gifts offered from other sources other than suppliers or contractors (eg conferences, events, patients, families and service users) should also be declined if accepting them might give rise to perceptions of bias or favouritism and a declaration made. The only exceptions to the presumption to decline gifts relates to items of modest financial value (i.e. less than £50) such as diaries, calendars, stationary and other gifts acquired from meetings, events and conferences. Gifts of this nature do not need to be declared to the Director of Corporate Affairs or added to the register of gifts, hospitality and sponsorship.
- 7.4 Gifts valued at over £50 should be treated with caution and only be accepted on behalf of an organisation (i.e. to an organisation’s charitable funds), not in a personal capacity. These should be declared by staff;
- 7.5 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); Multiple gifts from the same source over a 12 month period should be

treated in the same way as single gifts over £50 where the cumulative value exceeds £50.

- 7.6 Any personal gift of cash or cash equivalents (e.g. vouchers, tokens, offers of remuneration to attend meetings whilst in a capacity working for or representing the ICB) must always be declined, whatever their value and whatever their source, and the offer which has been declined must be declared to the Director of Corporate Affairs.
- 7.7 Both acceptance of gifts and where gifts are declined must be formally declared on the appropriate form (see **Appendix 2** for guidance and declaration form) and submitted to the Director of Corporate Affairs for inclusion in the register.

8 Hospitality

- 8.1 When accepting hospitality, individuals must be able to demonstrate that the acceptance or provision of hospitality would benefit the NHS or ICB.
- 8.2 Modest hospitality provided in normal and reasonable circumstances is acceptable, although it should be on a similar scale to that which the ICB might offer in similar circumstances (e.g. tea, coffee, light refreshments at meetings). Hospitality of this nature does not need to be declared to the Director of Corporate Affairs nor recorded on the register, unless it is offered by suppliers or contractors linked (currently or prospectively) to the ICBs business in which case all such offers (whether accepted or not accepted) should be declared and recorded on the register.
- 8.3 Where offers of hospitality go beyond modest or of a type that the ICB itself might offer, they should be politely declined. A non exhaustive list includes:

Meals and Refreshments:

- Under a value of £25 may be accepted and need not be declared;
- Of a value between £25 and £75 may be accepted and must be declared;
- Over a value of £75 should be refused unless (in exceptional circumstances) senior approval is given. A clear reason should be recorded on an organisation's register(s) of interest 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).

Travel and Accommodation:

- Modest offers to pay some or all of the travel and accommodation costs related to attendance at events may be accepted and must be declared;
- Offers which go beyond modest, or are of a type that the ICB itself might not usually offer, need approval by senior staff (e.g. the ICB's Director of Corporate Affairs or equivalent), should only be accepted in exceptional circumstances, and must be declared. A clear reason should be recorded on an organisation's register(s) of interest as to why it was permissible to accept travel and accommodation of this type;
- A non-exhaustive list of examples includes:

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

8.4 There may be some limited and exceptional circumstances where accepting the types of hospitality referred to in this paragraph may be contemplated. Express prior approval should be sought from a Director or in the case of the Chief Executive, the Chair before accepting such offers, and the reasons for acceptance should be declared and recorded in the ICBs register of gifts, hospitality and sponsorship. Particular caution should be exercised where hospitality is offered by suppliers or contractors linked (currently or prospectively) to the ICBs business. Offers of this nature can be accepted if they are modest and reasonable but advice should always be sought from the Director of Corporate Affairs as there may be particular sensitivities for example if a contract retender is imminent.

8.6 Declarations of hospitality must be formally declared on the appropriate form (see **Appendix 2** for guidance and declaration form) and submitted to the Director of Corporate Affairs for inclusion in the register.

9 Commercial Sponsorship

9.1 ICB staff, Board and committee members, and partner members may be offered commercial sponsorship for courses, conferences, post/project funding, meetings and publications in connection with the activities which they carry out for and on behalf of the ICB. All such offers (whether accepted or declined) must be declared so that they can be included in the register of gifts, hospitality and sponsorship.

9.2 NHS Shropshire, Telford and Wrekin employees may only accept commercial sponsorship for attendance at relevant conferences and courses, post/project funding, meetings and publications if they have obtained permission in advance from a senior manager. The manager should be satisfied that acceptance will not compromise purchasing decisions in any way.

9.2 Commercial sponsorship of regular or one-off in-house events such as meetings, conferences and training events should only be accepted if the lead manager concerned is satisfied that acceptance will not compromise future decisions relating to the future use of the commercial sponsors products or services by NHS Shropshire, Telford and Wrekin . Sponsors should not have any influence over the content of an event, meeting, seminar, publication to training event. The ICB should not endorse individual companies or their products. It should be made clear that the fact of sponsorship does not mean that the ICB endorses a company's products or services. During dealings with sponsors there should be no breach of patient or individual confidentiality or data protection legislation. Furthermore no information should be supplied to a company for their commercial gain unless there is clear benefit to the NHS. As a general rule that information which is not in the public domain should not normally be supplied.

9.3 Declarations of sponsorship must be formally declared on the appropriate form (see **Appendix 2** for guidance and declaration form) and submitted to the Director of Corporate Affairs for inclusion in the register which will be published on the ICB website.

10 Declaration of Private Interests

- 10.1 The ICB has a separate policy that governs Conflicts of Interest and this policy can be found on the ICB's website: www.shropshiretelfordandwrekin.nhs.uk

It is the responsibility of ICB members, ICB Board and committee/subcommittee members and employees of NHS Shropshire, Telford and Wrekin (Including interim, agency staff, contractors, volunteers or others performing any role on behalf of NHS Shropshire Telford and Wrekin) to ensure that they are not placed in a position which risks, or appears to risk, conflict between their private interests and their NHS duties. This primary responsibility applies to ALL staff, Board and Committee members i.e. those who commit NHS resources directly (by ordering goods/services) or those who do so indirectly (by the prescribing of medicines). The declaration and management of conflicts of interest are detailed in the Conflicts of Interest Policy.

- 10.2 NHS Shropshire, Telford and Wrekin must be made aware of all cases where an employee, or his or her close relative or associate, has a position of authority/influence including a significant financial interest in a business (including private sector, public sector or voluntary sector organisation) or in any other activity or pursuit, which may compete for an NHS contract to supply either goods or services to NHS Shropshire, Telford and Wrekin.

- 10.3 All ICB members, ICB Board and committee/subcommittee members and employees of NHS Shropshire, Telford and Wrekin (Including interim, agency staff, contractors, volunteers or others performing any role on behalf of NHS Shropshire, Telford and Wrekin) should declare such interests to the NHS Shropshire, Telford and Wrekin , either on starting or on acquisition of the interest, in order that it may be known to and in no way promoted to the detriment of either the NHS Shropshire, Telford and Wrekin or the patients whom it serves.

- 10.4 Declarations of private interests must be formally declared on the appropriate form which can be found as an appendix to the Conflicts of Interest Policy and is available on the ICB's website: www.shropshiretelfordandwrekin.nhs.uk

When the declaration is made it will be added to a publicly held register of interests which can also be found on the ICB website:
www.shropshiretelfordandwrekin.nhs.uk

11 Staff Responsibilities

- 11.1 All NHS Shropshire, Telford and Wrekin employees and others acting on behalf of the , must apply the following principles:

- Not accepting gifts, hospitality or benefits of any kind from a third party which might be perceived as compromising their personal judgement or integrity;
- Not using their official position to further their private interests or those of others;
- Declare any private interests relating to their public bodies;

- Base all procurement decisions and negotiations of contracts solely on achieving best value for money for the tax payer;

Refer to their line manager or the Chair when faced with a situation for which there is no adequate guidance;

If in any doubt, seek advice from the Director of Corporate Affairs.

11.2 The policy requires that **all** gifts, hospitality, sponsorship and the declaration of interests are recorded in registers which are maintained by the NHS Shropshire, Telford and Wrekin Director of Corporate Affairs. The Director of Corporate Affairs will be provided with details of what gift / hospitality / sponsorship have been received, or in the case of a declaration of an outside interest, the nature of the interest. The Director of Corporate Affairs will provide details to the NHS Shropshire, Telford and Wrekin Audit Committee of any declarations made.

11.3 The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all those working or acting for the NHS Shropshire, Telford and Wrekin or under its control. All ICB members, ICB Board and committee/subcommittee members and employees of NHS Shropshire, Telford and Wrekin are required to adhere to the Bribery Act 2010 and report their suspicions or concerns to or through the following means:

- The ICB's Chief Finance Officer
- The Local Counter Fraud Specialist, Mr Paul Westwood
Telephone 07545 502400
Email paul.westwood@cwaudit.org.uk
or secure email pwestwood@nhs.net
- Through the ICB's Raising Concerns at Work Policy
- The NHS Counter Fraud Authority (NHSCFA) Reporting Line Number - **0800 028 4060**
- Online via NHS Counter Fraud Authority (NHSCFA) website – <https://cfa.nhs.uk/reportfraud>

11.4 All reports of bribery or corruption will be investigated in accordance with the NHS Shropshire, Telford and Wrekin Fraud, Bribery and Corruption Policy

11.5 As well as the possibility of civil action and/or criminal prosecution, ICB members, ICB Board and committee/subcommittee members and employees of NHS Shropshire, Telford and Wrekin who breach this policy may face disciplinary action in accordance with the NHS Shropshire, Telford and Wrekin Disciplinary Policy, which could result in dismissal for gross misconduct.

12 Monitoring and Review

12.1 The Director of Corporate Affairs for NHS Shropshire, Telford and Wrekin is appointed as the named officer to oversee the implementation of NHS Shropshire, Telford and Wrekin's responsibilities under the Bribery Act 2010.

- 12.2 The Director of Corporate Affairs will receive and review all declarations of Gifts, Hospitality, Sponsorship and the Declaration of Interests, to determine if there is a need to seek an explanation about this declaration from the member or employee concerned.
- 12.3 The Director of Corporate Affairs will report to the NHS Shropshire, Telford and Wrekin Audit Committee all instances of the receipt of any Gifts, Hospitality, Sponsorship has been declared.
- 12.4 In the event that the Director of Corporate Affairs has an immediate concern about the appropriateness of any declaration, this should be brought to the attention of the Chief Finance Officer or Conflicts of Interest Guardian as soon as practicable.

13 Conclusion

- 13.1 All ICB members, ICB Board and committee/subcommittee members and employees of NHS Shropshire, Telford and Wrekin employees of NHS Shropshire, Telford and Wrekin, have a duty to follow the Public Service Values and ensure in particular that they maintain the standards of honesty and accountability.
- 13.2 All ICB members, ICB Board and committee/subcommittee members and employees of NHS Shropshire, Telford and Wrekin should at all times comply with NHS Shropshire, Telford and Wrekin's internal control systems and procedures and report any reasonable non malicious suspicions of bribery or corruption.

14 Policy Appendices

Appendix 1

The seven Nolan Principles of Public Life (taken from *First Report of the Committee on Standards in Public Life (1995)*)

Selflessness - Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family or their friends.

Integrity - Holders of public office should not place themselves under any financial obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty - Holders of public office have a duty to declare any private interests relating to their public duties and take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership - Holders of public office should promote and support these principles by leadership and example.

Appendix 2: Template Declarations of gifts, hospitality and sponsorship

Recipient Name	Position	Date of Offer	Date of Receipt (if applicable)	Details of Gift / Hospitality /Sponsorship	Estimated Value	Supplier / Offeror Name and Nature of Business	Details of Previous Offers or Acceptance by this Offeror/ Supplier	Details of the officer reviewing and approving the declaration made and date	Declined or Accepted?	Reason for Accepting or Declining	Other Comments

The information submitted will be held by the ICB 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 ICB holds.

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to the ICB as soon as practicable and no later than 28 days after the interest arises. 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) give my consent for this information to published on registers that the ICB holds. If consent is NOT given please give reasons:

Decision making staff should be aware that the information provided in this form will be added to the ICB’s registers which are held in hardcopy for inspection by the public and published on the ICB’s website. Decision making staff must make any third party whose personal data they are providing in this form aware that the personal data will held in hardcopy for inspection by the public and published on the ICB’s website and must inform the third party that the ICB’s privacy policy is available on the ICB’s website. If you are not sure whether you are a ‘decision making’ member of staff, please speak to your line manager before completing this form.

Signed: **Date:**

Signed: **Position:** **Date:**

(Line Manager or a Senior ICB Manager)

Please return to The Director of Corporate Affairs, NHS Shropshire, Telford and Wrekin

Appendix3:

Template: Register of gifts, hospitality and sponsorship

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