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# Standards of Business Conduct Policy

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<b>Date of Approval:</b>	26/03/2026	<b>Review Date:</b>	26/03/2029	<b>Impact Assessments Completed:</b>	Yes
<b>Classification of Document:</b>	Corporate	<b>Type of Document:</b>	Policy	<b>Approved by:</b>	ARAC and Trust Board
<b>Brief Summary of Document:</b>	The Standards of Business Conduct policy describes the standards and public service values which underpin the work of the Welsh Ambulance Services University NHS Trust. In particular it sets out the specific arrangements for the appropriate declarations of interest, and the acceptance/refusal of offers of gifts, hospitality, and sponsorship.				
<b>Scope:</b>	This policy applies to WAST Non-Executive Directors and employees. For the purpose of this policy the term 'employees' encompasses individuals who are not direct employees of WAST and includes consultants, agency workers, specialist contractors, those who have an honorary contract with WAST, secondees who carry out work for WAST but are not directly employed by it, NHS Wales trainees on placement with WAST, jointly appointed staff and volunteers.				
<b>To be read in conjunction with:</b>	Nolan Principles Code of Conduct for NHS Managers UK Corporate Governance Code Standards for members of NHS boards and CCG governing bodies in England Working Time Policy Families Working Together Policy Working Time Regulations Policy				
<b>Owning Committee</b>	Audit, Risk and Assurance Committee (ARAC)				
<b>Policy Lead:</b>	Lisa Trounce	<b>Job Title:</b>	Head of Compliance and Assurance		
<b>Trade Union Lead:</b>	Damon Turner		Trade Union Partner		
<b>Executive Director:</b>	Trish Mills	<b>Job Title:</b>	Director of Corporate Governance / Board Secretary		

## Version Control Sheet

Version	Date	Author	Summary of Changes
<b>For previous amendments see archived version v3.0</b>			
3.1	05/02/2025	Lisa Trounce	Contents of approved policy 3.0 (dated 23/07/2023) transferred to new WAST policy template in readiness for review.
3.2	16/07/2025	Lisa Trounce	<p>Policy updated to:</p> <ul style="list-style-type: none"> <li>• Reflect the Trust's university status</li> <li>• Reflect appointment of Head of Compliance and Assurance and transfer of some Director of Corporate Governance/Board Secretary responsibilities</li> <li>• Incorporate suggested changes regarding donations to the WAST Charity</li> <li>• All references to the 'Audit Committee' amended to read 'Audit, Risk and Assurance Committee'</li> <li>• Clarification on some elements also sought from key stakeholders.</li> </ul>
3.3	10/11/2025	Lisa Trounce	<p>Amendments made following clarification:</p> <ul style="list-style-type: none"> <li>• 10.4 - Removed as comments referenced DHSC not NHS in Wales. It can be dealt with in the Intellectual Property Policy on an All Wales basis.</li> <li>• 10.5 - Removed as part of usual rules re: secondary employment/declarations of interest. The NHS All Wales Intellectual Property Policy will address nuances.</li> </ul>
3.4	25/11/2025	Lisa Trounce	Updated policy prepared for Policy Group
3.5	03/12/2025	Lisa Trounce	Policy prepared for ELT endorsement
3.6	19/01/2025	Lisa Trounce	Policy prepared for presentation to ARAC and Trust Board for approval



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Version	Date	Author	Summary of Changes
4.0	26/03/2026	Lisa Trounce	Approved policy prepared for publishing on the Trust's intranet 'Siren'

<b>Keywords</b>	Declaration of interest, Gifts, Hospitality, Sponsorship, Conflict of interest
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### Impact Assessment Reviews

Area	Date of Review	Name of Reviewer
Data Protection	19/08/2025	Kelly Holding
EqlA / Welsh Language	17/07/2025	Kathryn Cobley / Melfyn Hughes
Environment	15/08/2025	Chris Davies
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### Policy Approval Route

Meeting Title	Meeting Date	Purpose/Outcome
Policy Group	28/11/2025	Approval Recommended
Executive Leadership Team	14/01/2026	Endorsed
Audit, Risk & Assurance Committee	02/03/2026	Endorsed
Trust Board	26/03/2026	Approved and adopted

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If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the [Amb\\_policies@wales.nhs.uk](mailto:Amb_policies@wales.nhs.uk)

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## 1. INTRODUCTION AND AIM

1.1 The Standards of Business Conduct policy describes the standards and public service values which underpin the work of the Welsh Ambulance Services University NHS Trust (WAST / 'the Trust').

1.2 It is a long and well-established principle that public-sector organisations must be impartial and honest in their business and that their staff must act with integrity. As a publicly funded organisation, we have a duty to set and maintain the highest standards of conduct and integrity. We expect the highest standards of corporate behaviour and responsibility from Board members and all employees in accordance with our WAST behaviours.

1.3 The "Seven Principles of Public Life", or the "Nolan Principles" form the basis of the Standards of Behaviour requirements for WAST staff and Board Members. These are:

**Selflessness** – Individuals should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or friends.

**Integrity** – Individuals should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

**Objectivity** – In carrying out public business, including making public appointments, awarding contracts, recommending individuals for rewards and benefits, choices should be made on merit.

**Accountability** – Individuals are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate for their position.

**Openness** – Individuals should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it.

**Honesty** – Individuals have a duty to declare any private interests relating to their duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

**Leadership** – Individuals should promote and support these principles by leadership and example.

## 2. POLICY STATEMENT

- 2.1 The Trust is committed to ensuring that its staff practice the highest standards of conduct and behaviour. This policy sets out those expectations and provides supporting guidance so that all staff are informed and supported in delivering that aim.
- 2.2 This Policy re-states and builds on the provisions of the Trust's Standing Orders. It reemphasises the commitment of the Trust to ensure that it operates to the highest standards, sets out key roles and responsibilities and the arrangements for ensuring that declarations can be made.

## 3. SCOPE

- 3.1 This policy applies to WAST Non-Executive Directors, employees and workers. For the purpose of this policy this encompasses individuals who are not direct employees of WAST and includes consultants, bank workers, agency workers, specialist contractors, those who have an honorary contract with WAST, secondees who carry out work for WAST but are not directly employed by the Trust, NHS Wales trainees on placement with WAST, jointly appointed staff and volunteers. This policy is relevant to all those persons and for ease of reference they are called 'staff' or 'staff member' in this policy.

### Decision Making Officers

- 3.2 Some staff are more likely than others to have a decision-making role or influence on the use of public money because of the requirements of their role. In the context of this policy, the officers listed below are referred to as 'decision making officers', however additions may be made to this list from time to time:
- (a) Board members (including Non-Executive Directors and Executive Directors);
  - (b) Executive Leadership Team (ELT);
  - (c) Assistant Directors Leadership Team (ADLT);
  - (d) Board and Committee attendees (per Committee terms of reference); and
  - (e) Staff on Band 8 and above not in the above.
- 3.3 Declarations made by decision making officers are published on the Trust's website in accordance with paragraph 9.21.

#### **4. AIM**

- 4.1 The aim of this policy is to ensure that arrangements are in place to support staff to act in a manner that upholds WAST's standards of behaviour as well as setting out specific arrangements for the appropriate declarations of interest and dealings with gifts, hospitality, and sponsorship.

#### **5. OBJECTIVES**

- 5.1 As well as promoting the standards of business conduct expected of public bodies, this policy aims to protect our organisation and staff from any suggestion of corruption, partiality, or dishonesty. It does this by providing a clear framework through which WAST can give guidance and assurance that staff conduct themselves with honesty, integrity, and probity, aligning to the Culture Health and Care Quality Standard 2023. The policy should be read in conjunction with that Standard and all relevant organisational policies, terms and conditions of employment/engagement, and related documents which are set out in the cover sheet.

#### **6. FAILURE TO COMPLY WITH THE POLICY**

- 6.1 Failure to comply with the requirements set out in this policy and any accompanying procedures may result in action being taken in accordance with the Trust's Disciplinary Policy and Procedure.
- 6.2 Where the failure to comply relates to an individual that is not a direct employee of the Trust, action may be taken in accordance with the relevant engagement procedures (e.g. termination of a secondment agreement).
- 6.3 Any financial or other irregularities or impropriety which involve evidence or suspicion of fraud, bribery, or corruption by any staff, will be reported to NHS Counter Fraud Authority or the Trust's Local Counter Fraud Specialists in accordance with its Standing Financial Instructions and the Counter Fraud and Corruption Policy, with a view to an appropriate investigation being conducted and potential prosecution being sought if deemed appropriate.

## 7. RAISING CONCERNS AND REPORTING BREACHES

- 7.1 This policy may be breached innocently, accidentally, or because of deliberate actions. Staff should speak up about any genuine concerns they have in relation to compliance with this policy. These can be raised directly with their own line manager, another senior manager or with the Head of Compliance and Assurance. Alternatively, staff can use the Trust's confidential third party platform for raising concerns known as Work In Confidence, further details of which can be found [here](#).
- 7.2 All reported concerns will be treated with the appropriate confidentiality and investigated in line with WAST policies and procedures.
- 7.3 The Director of Corporate Governance/ Board Secretary will take a report on breaches and responses to the Audit, Risk and Assurance Committee and the Board on an annual basis.

## 8. WHAT ARE CONFLICTS OF INTEREST?

- 8.1 A conflict of interest is a set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of carrying out their role is, or could be, impaired or influenced by another interest they hold.
- 8.2 A conflict of interest may be:
- (a) Actual: there is a relevant and material conflict *now* between one or more interests of the member of staff; or
  - (b) Potential: there is the possibility of a material conflict *in the future* between one or more interests of a staff member.
- 8.3 Staff are expected to act at all times with the utmost integrity and objectivity and in the best interests of the organisation in performing their duties, and to avoid situations where there may be a potential conflict of interest. Staff must not use their position for personal advantage or seek to gain preferential treatment.
- 8.4 Staff are required to declare any actual or potential interests which may be perceived as conflicting with that overriding requirement.

## 9. DECLARATIONS OF INTERESTS

- 9.1 Staff are required to declare interests to ensure that, should they be involved in discussions or decisions that bring that interest into conflict with their role at the Trust, that can be managed appropriately. It also promotes transparency and the highest standards of business conduct. The fact that a staff member has declared an interest, whether that is ownership of a consultancy, a directorship, or a position of authority in a charity, does not assume it will in fact cause a conflict to arise at any stage.
- 9.2 Where a staff member does not hold any interests as set out in this policy, they must in any event return a 'nil declaration'. The form for declaring interests is at Annex 1 and enables staff to make this declaration simply and quickly.
- 9.3 Conflicts can occur because of interests held by the staff member, as well as interests held by a close family member, business partner, close friend, or associate. If staff are aware of material interests (or could reasonably be expected to know about these) then these should be declared. In this context, close family members are defined as:
- (a) spouse or civil partner;
  - (b) any other person with whom the individual cohabits;
  - (c) children or stepchildren;
  - (d) spouse/partners' children or stepchildren;
  - (e) parents;
  - (f) grandparents; and
  - (g) siblings.
- 9.4 Staff may hold interests for which they cannot see any potential conflict. However, caution is always advisable because others may see it differently and may *perceive* an interest. It is important to exercise judgement and to declare such interests where there is otherwise a risk of suggestion of improper conduct. Where there is potential for interests to be relevant and material to the organisation, the interest must be declared. If in doubt, declare and/or seek advice from the Director of Corporate Governance / Board Secretary on the materiality of the interest you hold.

## Categories of Interests Which Could Cause a Conflict

- 9.5 Interests can arise in a number of different contexts. A material interest is one which a reasonable person would take into account when making a decision regarding the use of taxpayers' money because the interest has relevance to that decision and may attract a benefit to the staff member. In this context, a benefit may be a financial gain or avoidance of a loss.
- 9.6 Interests can generally be considered in the following categories, although the examples are not exhaustive:

### a) **Financial Interests**

This is where an individual may get direct financial benefit from the consequences of a decision they are involved in making. Some examples of financial interests you should therefore declare are as follows:

- (i) Directorships, including Non-Executive Directorships held in private companies or public limited companies;
- (ii) Ownership or part-ownership of private companies, businesses, or consultancies likely or possibly seeking to do business with the NHS;
- (iii) Shareholdings and ownership interests in any publicly listed, private or not for profit company, business, partnership, or consultancy which are doing or might reasonably be expected to do business with the NHS. This includes shareholdings, debentures, or rights where the total nominal value is £5,000 or one hundredth of the total nominal value of the issued share capital of the company or body, whichever is the less;
- (iv) Secondary employment (or in the case of a Non-Executive Director who is in employment, the details of that employment);
- (v) Other commercial interests relating to a decision to be taken by the Trust;
- (vi) Being in receipt of a grant or sponsored research;
- (vii) Being in receipt of an honoraria.

## **b) Non-financial Professional Interests**

This is where an individual may obtain a non-financial professional benefit from the consequences of a decision they are involved in making, such as increasing their professional reputation or status or promoting their professional career. Some examples of what you should therefore declare are set out below:

- (i) An advocate for a particular group of patients;
- (ii) A clinician with a special interest;
- (iii) An active member of a particular specialist body;
- (iv) An advisor for a WAST regulator (e.g., HIW).

## **c) Non-financial Personal Interests**

This is where an individual may benefit personally in ways that are not directly linked to their professional career and do not give rise to a direct financial benefit, because of decisions that they are involved in making in their professional career. Some examples of what you should therefore declare are set out below:

- (i) A position of authority in another NHS organisation, commercial, charity trustee, voluntary, professional, statutory, or other body which could be seen to influence their role;
- (ii) A position on an advisory group or other paid or unpaid decision-making forum that could influence how the NHS spends taxpayers' money;
- (iii) Any connection with a private, public, voluntary, or other organisation contracting or likely to contract for NHS services;
- (iv) Membership of a lobbying or pressure group with an interest in health and care;
- (v) Membership of an organisation which might lead to conflict or might be perceived to do so.

### **(d) Indirect Interests**

This is where an individual has a close association (see paragraph 9.3) with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest who would stand to benefit from a decision the staff is involved in making. It could also include a staff member's involvement in the recruitment or management of close family members and relatives and family members who work together.

### **(e) Loyalty Interests**

As part of their role, staff may need to build strong relationships with colleagues across the NHS and in other sectors. These relationships can be hard to define. They are unlikely to be directed by any formal process or managed via any contractual means, however these 'loyalty' interests can influence decision making.

## **Declaring Interests**

9.7 Staff must declare any relevant and material interests on the form at Annex 1. Declarations should be made as soon as is reasonably practicable, and within 28 days after the interest arises.

9.8 Staff are required to make their declarations interests as follows:

<b>Officer Category</b>	<b>Frequency of Mode of Declaration</b>
<b>(a) Members of the Trust Board</b>	<ul style="list-style-type: none"> <li>• On appointment</li> <li>• Annually in March</li> <li>• In formal meetings where an interest is material</li> <li>• In relation to individual procurement exercises or contracts</li> <li>• When potential conflicts are identified</li> </ul> <p>Declarations will be held centrally by the Head of Compliance and Assurance (on behalf of the Director of Corporate Governance / Board Secretary) and placed on a register of declarations of interest.</p>

Officer Category	Frequency of Mode of Declaration
<p><b>(b) Decision-Making Officers</b></p>	<ul style="list-style-type: none"> <li>• On appointment</li> <li>• Annually in March</li> <li>• In formal meetings where an interest is material</li> <li>• In relation to individual procurement exercises or contracts</li> <li>• When potential conflicts are identified</li> <li>• When moving to a new role</li> </ul> <p>Declarations will be held centrally by the Head of Compliance and Assurance (on behalf of the Board Secretary) and placed on a register of declarations of interest.</p> <p>The Head of Compliance and Assurance will provide line managers of decision makers with copies of centrally held declarations.</p>
<p><b>(c) All Other Staff</b></p>	<ul style="list-style-type: none"> <li>• On appointment</li> <li>• Annually (even if a nil declaration is made)</li> <li>• When potential conflicts are identified</li> <li>• When moving to a new role</li> </ul> <p>Declarations are held by line managers and will be made available for inspection on request by the Head of Compliance and Assurance, Director of Corporate Governance / Board Secretary, Internal Audit and Audit Wales</p>

9.9 If staff are in any doubt as to whether they have an interest or whether it is declarable, they should consult their line manager or the Head of Compliance and Assurance who can seek advice from the Director of Corporate Governance/Board Secretary.

## Register of Declared Interests

- 9.10 The register of interests is maintained by the Director of Corporate Governance / Board Secretary who will formally record the declared interests of all staff. Interests will remain on the register for six months after they have expired at which point it will be removed from the register. Records will be kept in line with the Trust's Retention Policy. There may be occasions when a staff member declares an interest which the Board Secretary later agrees is not material. In such an instance the declaration will be recorded but not published.

## Publication of Declarations

- 9.21 The register of interests of decision making officers will be published on the WAST website and updated where new interests arise. The register of interests of Board members and those attending Committees will be published on the WAST website and with the Board and Committee papers at each meeting.
- 9.22 In exceptional circumstances, where the public disclosure of information could give rise to a real risk of harm or is prohibited by law, an individual's name and/or other information may be redacted from the publicly available register. Where a staff member believes that substantial damage or distress may be caused to them or somebody else by the publication of information about them, they may make a request in writing to the Board Secretary. A confidential, un-redacted version of the register will be held securely by Head of Compliance and Assurance (on behalf of the Director of Corporate Governance / Board Secretary).
- 9.23 Staff should be aware that external organisations, e.g. Association of British Pharmaceutical Industries (ABPI), may also publish information relating to commercial sponsorship or other payments. The Trust will review such publications to ensure that appropriate internal declarations have been made in accordance with this policy and will take appropriate action where they have not.

## Managing Conflicts of Interest - General

- 9.24 All declarations of interest must be reviewed by the appropriate line manager, and in the case of decision makers by the Head of Compliance and Assurance in conjunction with the Director of Corporate Governance/Board Secretary, with consideration given to any actions required to mitigate the conflict in the individual circumstances. However, it is not always possible to identify mitigations at the time of declaration.

These are often more appropriately made where the staff member's interests conflict with their role, for example where they are required to make or be involved in a decision. In such cases it may be necessary for the line manager to consider a range of possible actions which may include:

- (a) Deciding that no action is warranted;
- (b) Restricting the staff member's involvement in discussions and excluding them from decision making;
- (c) Removing the staff member from the whole decision-making process;
- (d) Removing the staff member's responsibility for an entire area of work; or
- (e) Removing the staff member from their role altogether if the conflict is so significant that they are unable to operate effectively in the role.

9.25 An audit trail of the actions taken must be maintained by the line manager. The Board Secretary can provide advice on mitigations.

### **Managing Conflicts of Interest – In Meetings**

9.26 All formal meetings, including of the Board and its Committees, must have a standing agenda item at the beginning of each meeting to determine whether there are any conflict of interest to declare in relation to the business to be transacted at the meeting. The Standing Orders and all Committee terms of reference will incorporate this requirement. Any new interests declared at the meeting should be included in the relevant register of interest by the Head of Compliance and Assurance as soon as practicable after the meeting.

9.27 In the event that the chair of the meeting has a conflict of interest, the vice chair is responsible for deciding the appropriate course of action to manage conflicts of interests. If the vice chair is also conflicted, then the remaining non-conflicted voting members of the meeting should unanimously agree how to manage the conflict(s).

9.28 When a member of the meeting (including the chair or vice chair) has a conflict of interest in relation to one or more items of business to be transacted at the meeting, the chair (or vice chair or remaining non-conflicted members where relevant as described above) must decide how to manage the conflict. The appropriate course of action will depend on the particular circumstances, but could include one or more of the following:

- (a) Where the chair has a conflict of interest, deciding that the vice chair (or another non-conflicted member of the meeting if the vice chair is also conflicted) should chair all or part of the meeting;
- (b) Requiring the individual who has a conflict of interest (including the chair or vice chair if necessary) not to attend the meeting;
- (c) Ensuring that the individual does not receive the supporting papers or minutes of the meeting which relate to the matter(s) which give rise to the conflict;
- (d) Requiring the individual to leave the discussion while the relevant matter(s) are being discussed and when any decisions are being taken in relation to those matter(s);
- (e) Allowing the individual to participate in some or all of the discussion when the relevant matter(s) are being discussed but requiring them to leave the meeting when any decisions are being taken in relation to those matter(s);
- (f) Noting the interest and ensuring that all attendees are aware of the nature and extent of the interest but allowing the individual to remain and participate in both the discussion and in any decisions. This is only likely to be an appropriate course of action where it is decided that the declared interest is either not material or not relevant to the matter(s) under discussion;
- (g) Conflicts of interest arising at a Board meeting must be managed in accordance with the requirements of the Standing Orders.

9.29 In all cases a quorum must be present for the discussion and decision.

9.30 All decisions under a conflict of interest must be recorded by the meeting secretariat and clearly reported in the minutes of the meeting. The minutes will include:

- (a) Who has the interest;
- (b) The nature and extent of the conflict;
- (c) An outline of the discussion;
- (d) The actions taken to manage the conflict; and
- (e) Evidence that the conflict was managed as intended.

- 9.31 To support chairs in their role, the secretariat will provide access to details of any conflicts which have already been made by members of the group.

## **10. PATENTS AND INTELLECTUAL PROPERTY**

- 10.1 An All Wales Policy on Intellectual Property is in development and will be the primary policy statement for this area once approved. In the meantime, however, staff are to be guided by the following:
- 10.2 Staff should declare patents and other intellectual property rights they hold (either individually or by virtue of their association with a commercial or other organisation) relating to goods and services which are, or might reasonably be expected to be, procured, or used by the NHS.
- 10.3 Any patents, designs, trademarks or copyright resulting from the work (e.g. research) of a staff member carried out as part of their employment shall be the Intellectual Property of WAST.
- 10.4 Where holding of patents and other intellectual property rights give rise to a conflict of interest, then this must be declared.

## **11. PROCUREMENT**

- 11.1 Conflicts of interest need to be managed appropriately through the whole procurement process. At the outset of any process, the relevant interests of individuals involved should be identified and clear arrangements put in place to manage any conflicts. This includes consideration as to which stages of the process a conflicted individual should not participate in, and in some circumstances, whether the individual should be involved in the process at all.
- 11.2 The Procurement Department (provided by the NHS Wales Shared Services Partnership) will seek to have staff working on a project with the Procurement Department complete a declaration of interest to ensure that there is no opportunity for conflicts to arise.

## **12. GIFTS**

- 12.1 A gift is an item of personal value, given by a third party e.g., a patient or a supplier. This includes prizes in draws and raffles at sponsored events/conferences.

- 12.2 All staff must ensure that they are not placed in a position that risks, or appears to risk, compromising their role or the organisation's public and statutory duties or reputation. Staff should always refuse gifts or other benefits which might reasonably be seen to compromise their personal judgement or integrity.
- 12.3 The Bribery Act 2010 makes it a criminal offence to give or offer a bribe, or to request, offer to receive, or accept a bribe. The Act reformed the criminal law of bribery, making it easier to tackle this offence proactively in both the public and private sectors. It introduced a corporate offence which means that commercial organisations, including NHS bodies, will be exposed to criminal liability, punishable by an unlimited fine, for failing to prevent bribery.
- 12.4 Staff should not ask for or accept gifts, gratuities, or honoraria from any individual or organisation that may be capable of being construed as being able to influence any decision or cast doubt on the integrity of such decisions. Staff are reminded that it may be considered to be a breach of the organisation Disciplinary Policy to solicit gifts. It may also be illegal, under the Bribery Act 2010, and staff that are found to have done so may face disciplinary action and prosecution.
- 12.5 Individuals offering gifts must be advised by the intended recipient that there is a requirement to declare and report such offers.

### **Gifts of Cash or Cash Equivalents**

- 12.6 Under no circumstances should staff accept a personal gift of cash or cash equivalents (e.g., tokens, vouchers, gift cards, lottery tickets or betting slips) regardless of the value.
- 12.7 Such personal gifts are not acceptable and should be politely refused. However, the donor may be informed that should they wish to, they may make a donation to the Welsh Ambulance Service Charity ("the WAST Charity"):

Where cash is left by an unknown donor, and it is not possible to determine who the donor is, the cash should be donated to the WAST Charity.

- (a) Where possible, potential donors should be directed to the Charity's online giving page (<https://ambulance.nhs.wales/charity>).
- (b) If this is not feasible, the donor should be directed to the Charity Team ([amb\\_charity@wales.nhs.uk](mailto:amb_charity@wales.nhs.uk)) to make a donation via cheque or bank transfer.

- (c) In the event that none of the above payment methods are viable, cash donations to the Charity may be accepted but must be stored securely and declared immediately to the Charity Team by emailing [amb\\_charity@wales.nhs.uk](mailto:amb_charity@wales.nhs.uk). The Charity Team will then advise on local arrangements for how to securely deposit cash donations, in accordance with the Code of Fundraising Practice. Cash donations must be paid in as soon as practically possible, within a maximum timeframe of 10 working days.

**Gifts (whether from patients, families, service users, foreign dignitaries, etc., but not suppliers or contractors – see further below)**

- 12.9 Personal gifts of cash may not be accepted. However, as set out in paragraph 12.7 the donor may be directed to the WAST Charity.
- 12.10 The acceptance and declaration of gifts is dependent upon their value. A common sense approach should be applied to the valuing of gifts, using the actual amount if known, or an estimate that a reasonable person would make as to its value.
- 12.11 Gifts valued **up to £25**:
- (a) Staff may accept gifts up to the value of £25 from patients/service users/relatives as a mark of their appreciation for the care that has been provided. This can include items such as chocolates, flowers, cards.
  - (b) There is no requirement to declare such gifts, however multiple gifts from the same source over a 12 month period should be declared where the cumulative value exceeds £25.
- 12.12 Gifts valued at **over £25**:
- (a) Where a gift is offered that is likely to be over £25 in value it should be politely declined.
  - (b) In some cases, the gift may have been delivered and it may be difficult to return it or it may be felt that the bearer may be offended by the refusal. Under such circumstances the gift can be accepted, with the options for its use being agreed with the line manager and communicated to the donor:

- Share the gift with all staff;
- Donate the gift to the WAST Charity, where the Charity may raffle, auction or sell the gift to raise funds for the Charity; or
- Make a personal donation to the WAST Charity and keep the gift. In those circumstances the value of the gift will be agreed with the Director of Corporate Governance/Board Secretary.

(c) The gift must be declared via the form at Annex 2 and instructions set out on that form followed. A clear reason should be recorded as to why it was considered permissible to accept the gift, alongside the way it was used, actual or estimated value and include line manager approval.

12.13 If there is any doubt about the appropriateness of accepting a gift, staff should either politely decline or consult their line manager or the Director of Corporate Governance / Board Secretary.

### **Gifts from suppliers, contractors, customers etc.**

12.14 Gifts from suppliers or contractors the NHS does business with, or is likely to do business with, or customers, should be declined, whatever the value. An exception to this is low cost branded promotional aids (such as calendars and pens) which may be accepted where they are valued at under £6 in total.

12.15 Gifts to a team or directorate of low value such as confectionary (up to £25) intended to be shared by the team or directorate may also be accepted. Gifts accepted from suppliers in accordance with this provision must be declared via the form at Annex 2 and instructions set out on that form followed. A clear reason should be recorded as to why it was considered permissible to accept the gift, alongside the actual or estimated value and include line manager approval.

12.16 Gifts from suppliers, contractors or customers that have been declined in line with this policy should be declared via the form at Annex 2 and instructions set out on that form followed. This will allow WAST to monitor when such organisations are inappropriately offering gifts or potential inducements.

## Legacy in a Will

- 12.17 On occasions staff are left bequests in a service user's will which they become aware of before the service user is deceased or because they have been informed by the deceased service user's legal representative. In such circumstances the member of staff must immediately inform their manager. It should be borne in mind that staff cannot benefit from a bequest by virtue of their position as a Trust staff, undertaking their duties. If a member of staff receives a bequest they should contact the Director of Corporate Governance / Board Secretary.

## Gifts from Dignitaries/Overseas Organisations

- 12.18 There may be occasions when visits are made by dignitaries or overseas organisations who consider it cultural custom and practice to exchange gifts. In such cases staff should seek guidance from the Board Secretary and declare these gifts. A decision will then be jointly made as to the most appropriate way to manage the gift. This will depend on the nature of the gift culture and may include decisions to keep and display in public, donate to an internal user group, auction for charity, etc.

## Publication

- 12.19 The register of gifts, hospitality and sponsorship will be published on the WAST website following its presentation to the Audit, Risk and Assurance Committee annually.

## 13. HOSPITALITY

- 13.1 Hospitality is where there is an offer of food, non-alcoholic drink, accommodation, entertainment or entry into an event or function by a third party, regardless of whether provided during or outside normal working hours.
- 13.2 Hospitality must only be accepted when there is a legitimate business reason and it is proportionate to the nature and purpose of the event.
- 13.3 Staff should exercise discretion in accepting offers of hospitality in case it would, or might appear to place them under any obligation to the individual or organisation making the offer; compromise their professional judgement and impartiality; or otherwise, be improper.

- 13.4 Hospitality should only be accepted on a one-off basis and should not take the form of regular events. It is very important that receiving hospitality does not influence, or is perceived to potentially influence, any decision making or behaviours.
- 13.5 Hospitality might be offered during working visits but may also be offered where:
- (a) There is a genuine need to impart information, or represent WAST at stakeholder or community events which have an association with WAST;
  - (b) Staff are being invited to receive an award or prize in connection with the work of the organisation or their role within it;
  - (c) Staff are invited to a Society or Institute dinner or function which is to be funded by a commercial organisation and where there is a genuine benefit to the professional standing of the individual or WAST.

These types of hospitality must be authorised prior to their acceptance by the Director by completing the form at Annex 2 and instructions set out on that form followed.

- 13.6 Individual offering hospitality must be advised by the intended recipient that there is a requirement to declare and report such offers.

### **Hospitality from Suppliers or Contractors**

- 13.7 Staff in contact with current or potential suppliers or contractors should be particularly mindful of accepting any hospitality that might later be misconstrued as impacting on strict independence and impartiality.
- 13.8 Offers can be accepted if modest and reasonable but must be declared and approved by the line manager.

### **Meals and Refreshments**

- 13.9 Meals and refreshments (food and non-alcoholic drinks) which are equivalent to that offered in similar circumstances by NHS Wales can be accepted and need not be reported (unless it is offered by a supplier or contract – see paragraph 13.8).

- 13.10 Meals and refreshments offered of a value between £15 and £50 may be accepted and must be declared, indicating whether it has been accepted or declined, via the form at Annex 2 and instructions set out on that form followed.
- 13.11 Offers over a value of £50 should be refused unless (in exceptional circumstances) Director approval is given in advance of acceptance. A clear reason should be recorded on the declaration as to why it was permissible to accept hospitality of this value.
- 13.12 A common sense approach should be applied to the valuing of meals and refreshments, using an actual amount, if known, or an estimate.

### **Travel and Accommodation**

- 13.13 Modest offers to pay some or all the travel and accommodation costs related to attendance at events may be accepted but must be declared. Offers which go beyond the type which would be funded by WAST must have Director approval in advance. A clear reason should be recorded on the declaration as to why it was permissible to accept travel and accommodation of this type.
- 13.14 Examples of travel and accommodation which would not normally be funded might include:
- (a) offers of business or first-class travel and accommodation (including domestic travel);
  - (b) offers of foreign travel and accommodation;
  - (c) A holiday or weekend/overnight break;
  - (d) Offers of hotel accommodation when this is not associated with a sponsored source or conference;
  - (e) Use of a company flat or hotel suite.
- 13.15 Where a meeting is funded by the pharmaceutical industry, this must be disclosed in the papers relating to the meeting and in any published minutes or actions. The Department or Directorate organising or hosting the event must ensure that the funding has been approved in line with the requirements set out in the Commercial Sponsorship section of this policy.

## Register of Gifts and Hospitality

13.16 The register of gifts and hospitality is maintained by the Head of Compliance and Assurance (on behalf of the Board Secretary) who will formally record the declarations of all staff. The register is reported to the Audit, Risk and Assurance Committee annually and available for public inspection.

## 14. SPONSORSHIP

### Sponsored Posts

14.1 Staff who are considering entering into an agreement regarding the external sponsorship of a post within NHS Wales must seek formal approval. Staff will be required to demonstrate acceptance of a sponsored post is transparent and does not stifle competition.

14.2 Rolling sponsorship of posts should be avoided unless appropriate checkpoints are put in place to review and confirm the appropriateness of the arrangements continuing.

14.3 There should be written confirmation that the sponsorship arrangements will have no effect on any commissioning or other management decisions over the duration of the sponsorship and auditing arrangements should be established to ensure that this is the case. These written arrangements should set out the circumstances under which we may exit the sponsorship arrangements if conflicts of interest arise which cannot be mitigated.

14.4 Holders of sponsored posts must not promote or favour the sponsor's specific products or organisation and information about alternative suppliers must be provided.

14.5 Sponsors must not have any influence over the duties of the post or have any preferential access to services, materials or intellectual property related to or developed in connection with the sponsored post.

### Sponsored Events

14.6 Sponsorship of events, including courses, conferences, and meetings, by external bodies should only be approved if it can be demonstrated that the event will result in

clear benefits for WAST. Sponsored events require the approval of the relevant Director in advance.

- 14.7 Sponsorship should not in any way compromise decisions or be dependent on the purchase or supply of goods or services.
- 14.8 Sponsors should not have any influence over the content of an event, meeting, seminar, publication, or training event.
- 14.9 WAST will not endorse individual companies or their products or services because of the sponsorship.
- 14.10 During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection (or other) legislation. As a general rule, information which is not in the public domain should not be supplied and no information should be supplied to a company for its commercial gain.
- 14.11 At WAST's discretion, sponsors or their representatives may attend or take part in the event, but they should not have a dominant influence over the content or the main purpose of the event.
- 14.12 The involvement of a sponsor in an event should always be clearly identified in the interests of transparency.
- 14.13 All pharmaceutical companies entering into sponsorship agreements must comply with the Code of Practice for the Pharmaceutical Industry.

### **Sponsored Research**

- 14.14 Funding sources for research purposes must be transparent. Any proposed research must go through the relevant approvals process.
- 14.15 There must be a written protocol and written contract and the sponsoring organisation, which specifies the nature of the services to be provided and the payment for those services. Where the contract includes provision of people this, and accompanying arrangements, must be clearly articulated.
- 14.16 The study must not constitute an inducement to commission any service.

## Declaring Sponsorship

- 14.17 Should there be any doubt about the appropriateness of accepting sponsorship, staff should seek advice from their line manager, Head of Compliance and Assurance or Board Secretary.
- 14.18 Declarations should include the value of the sponsorship. A common-sense approach should be applied to valuing the sponsorship if there is not a contractual value specified, for example a room and refreshments being provided for an event.
- 14.19 Sponsorship secured through, contracted by, paid directly to, or managed through a third party, such as exhibitors at our events sold through a third party or a sponsor paying for catering directly to an event venue should be declared.
- 14.20 Declarations should be made via the form at Annex 2 within 28 day of when the sponsorship was agreed rather than the date of the event. In exceptional circumstances where there are multiple sponsorship arrangements, the sponsorship may be declared within 28 days of the event taking place provided that this is agreed in advance by the relevant Director.
- 14.21 Declarations made in accordance with the policy will be published on the WAST website. In exceptional circumstances the value of the sponsorship may be published in bands where there are multiple sponsors of an event. A complete register will be held by the Head of Compliance and Assurance (on behalf of the Board Secretary).
- 14.22 The register of sponsorship is maintained by the Head of Compliance and Assurance, (on behalf of the Board Secretary) who will formally record the declarations of all staff.

## 15. MISCELLANEOUS PAYMENTS AND HONORARIA

- 15.1 Staff may be invited to give presentations at conferences, provide responses to surveys or attend professional meetings where a one off payment or honoraria is offered. The activity should be reported using a Gifts, Hospitality, Sponsorship and Honoraria Form and it should be authorised by the appropriate Director.

### **Honoraria Received for work undertaken during working hours**

- 15.2 When appropriate authorisation has been granted to permit a staff member to be involved in activity outside their normal contract during working hours, any honoraria paid must be received back to the Trust revenue budget to reimburse the Trust for the staff member's time.
- 15.3 To avoid personal tax implications, staff are urged to request the Honoraria is paid directly to the Trust. This is then seen as reimbursement to the Trust to cover the loss of the staff member's time, and not honoraria. This money will then be transferred into the Trust revenue budget. The staff member who has undertaken the work must not be the budget holder for the budget receiving the funds in lieu of the honorarium due to a conflict of interest.
- 15.4 If the staff member receives the honoraria directly and then reimburses the Trust, the staff member remains liable for the payment of both tax and National Insurance Contributions (NIC), regardless of the final destination of the honoraria.

### **Honoraria received for work undertaken in an individual's own time (out of normal working hours or on authorised annual leave)**

- 15.5 Staff are personally liable for the payment of both tax and NICs on any honoraria payments received. Following their first honoraria declaration staff will be asked to sign a declaration statement confirming that they understand their responsibilities and this will be held on file by the Head of Compliance and Assurance (on behalf of the Director of Corporate Governance/Board Secretary).
- 15.6 If the staff member wishes to suggest a donation may be made to the Trust's Charitable Funds in lieu of an honoraria, this must be received into the Charity's general fund and it is then for the Charity to determine how the donated funds should be used. The basic principle being that the staff member giving their own time should have no influence over how the donation is then used and therefore lessens the risk of this being interpreted as being of any benefit to them as 'income' in any sense.
- 15.7 In cases of doubt, staff should seek advice from the Director of Corporate Governance/Board Secretary and should report any case where an offer of sponsorship or honoraria is pressed which might be open to objection. Instances where honoraria

has been offered and declined should still be declared on the Gifts, Hospitality, Honoraria and Sponsorship Declaration Form.

## **16. SECONDARY EMPLOYMENT (AND CLINICAL PRIVATE PRACTICE)**

- 16.1 All staff (depending on the details of their contract as regards secondary employment and private practice) are required to seek approval from their line manager if they are engaged in or wish to engage in secondary employment in addition to their work with WAST. This approval should be sought even if the staff member is temporarily absent from work e.g., through sickness, maternity leave, or secondment.
- 16.2 Secondary employment or private practice must neither conflict with nor be detrimental to the WAST work of the staff member in question. Examples of secondary employment or private practice which may give rise to a conflict of interest includes, but is not limited to:
- (a) employment with another NHS body;
  - (b) working two roles internally for WAST;
  - (c) employment with another organisation which might be in a position to supply goods/services to the NHS in Wales; and
  - (d) self-employment, including private practice, in a capacity which might conflict with the work of the NHS in Wales or which might be in a position to supply goods/services to NHS in Wales.
- 16.3 Where a risk of conflict of interest is identified, these should be managed in accordance with the guidance provided at paragraph 9.24. WAST reserves the right to refuse permission where it reasonably believes a conflict will arise or that approval would be detrimental to the work of the staff member in question.
- 16.4 In undertaking any secondary employment, staff should have regard to section 'Trading on Official NHS Premises' at paragraph 19.12.
- 16.5 WAST may have legitimate reasons within employment law for knowing about secondary employment of staff, even where this does not give rise to the risk of a conflict of interest. Nothing in this policy prevents such enquiries being made.

## Declaring secondary employment and private practice

- 16.6 All staff must declare any relevant secondary employment or private practice on appointment, and when any new employment arises, in accordance with the guidance above. Declarations should be made by via the form at Annex 1 and instructions set out on that form followed.
- 16.7 The register of secondary employment and private practice is maintained by the Head of Compliance and Assurance (on behalf of the Director of Corporate Governance/Board Secretary) who will formally record the declarations of all staff for the public record.
- 16.8 Managers will hold declarations submitted by staff on local personal files as per the guidance published on Siren.

## 17. CHARITABLE COLLECTIONS

### Charitable Collections Individual

- 17.1 Whilst WAST supports staff who wish to undertake charitable collections amongst immediate colleagues, no reference or implication should be drawn to suggest that WAST is supporting the charity. Permission is not required for informal collections amongst immediate colleagues on an occasion like retirement, marriage, birthday or a new job.

### Charitable Collections - Organisational

- 17.2 The Welsh Ambulance Service Charity is WAST's only official charity. If it is proposed to use the WAST brand as part of fundraising for any other charitable cause, this must be authorised and documented by the appropriate Director in advance and reported to the Director of Partnerships and Engagement.

## 18. POLITICAL ACTIVITY

- 18.1 Any political activity should not identify an individual as a staff member of WAST. Conferences or functions run by a party-political organisation should not be attended in an official capacity, except with prior written permission from the Director of Partnerships and Engagement.

## 19. PERSONAL CONDUCT

### Corporate Responsibility

- 19.1 All staff have a responsibility to respect and promote the corporate or collective decision of WAST, even though this may conflict with their personal views. Staff may comment as they wish as individuals however, if they decide to do so, they should make it clear that they are expressing their personal view and not the view of WAST.
- 19.2 When speaking as a staff member of WAST, whether to the media, in a public forum or in a private or informal discussion, staff should ensure that they reflect the current policies or view of the organisation.
- 19.3 For any public forum or media interview, approval should be sought in advance. In the case of the Board, approval is from the Chairman and/or Chief Executive with advice from the Head of Communications. In the case of all other staff, the Head of Communications will provide the approval. Where this is not practicable, they should report their action to the Chairman (for Board members) and Head of Communications for all others as soon as possible.
- 19.4 All staff must ensure their comments are well considered, sensible, well informed, made in good faith, in the public interest and without malice and that they enhance the reputation and status of WAST.
- 19.5 Staff must follow the guidance for communication with the media; disciplinary action may be taken if this is not followed.

### Use of Social Media

- 19.6 As at the date of revision of this policy an All Wales Social Media Policy is in development. When that policy is adopted by WAST it will take precedence should any element of this policy contradict that All Wales position.
- 19.7 Staff should be aware that social networking websites are public forums and should not assume that their entries will remain private. Staff communicating via social media must comply with the relevant organisational social media and associated policies. Staff must not conduct themselves in a way that brings WAST into disrepute, or disclose information that is confidential to WAST, its staff or patients. Only Trust authorised

applications (including social media and communication applications) may be used to process Trust information.

## Confidentiality

- 19.7 Staff must, at all times, operate in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018, and all internal Information Governance (IG) policies, procedures and guidance. They are required to maintain the confidentiality, integrity and security of all information, including but not limited to patient information, personal information relating to staff, and commercially sensitive data. This duty of confidence is absolute and continues indefinitely, even after staff (however employed) leave WAST. Any breach of this duty may result in disciplinary, regulatory or legal action.
- 19.8 For the avoidance of doubt, this does not prevent the disclosure or information where there is a lawful basis for doing so (e.g., consent). Staff should refer to the suite of WAST Information Governance and Corporate Information Technology policies for detailed information.

## Gambling

- 19.9 No staff member may bet or gamble when on duty or on WAST premises, with the exception of small lottery syndicates or sweepstakes related to national events such as the World Cup or Grand National among immediate colleagues within the same offices where no profits are made or the lottery is wholly for purposes that are not for private or commercial gain.

## Lending and Borrowing

- 19.10 The lending or borrowing of money between staff should be avoided, whether informally or as a business, particularly where the amounts are significant.
- 19.11 It is a particularly serious breach of discipline for any staff member to use their position to place pressure on someone in a lower pay band, a business contact, or a member of the public to loan them money.

### **Trading on WAST Premises**

- 19.12 Trading on official premises is prohibited, whether for personal gain or on behalf of others. This includes but is not limited to flyers advertising services/products in common areas, or catalogues in common areas.
- 19.13 Canvassing within the office by, or on behalf of, outside bodies or firms (including non-WAST interests of staff or their relatives) is also prohibited.
- 19.14 Trading does not include small tea or refreshment arrangements solely for staff.

### **Individual Voluntary Arrangements, County Court Judgment (CCJ), Bankruptcy / Insolvency**

- 19.15 Any staff member who becomes bankrupt, insolvent, has active County or High Court Judgment, or has made an individual voluntary arrangement with an organisation must inform their line manager and the People and Culture Directorate as soon as possible. Staff who are bankrupt or insolvent cannot be employed, or otherwise engaged, in posts that involve duties which might permit the misappropriation of public funds or involve the approval of orders or handling of money.

### **Arrest or Conviction**

- 19.16 A staff member who is arrested, subject to continuing criminal proceedings, or convicted of any criminal offence must inform their line manager and the People and Culture Directorate as soon as is practicably possible.

## **20. ANNUAL ELIGIBILITY REVIEWS**

- 20.1 Board Members will, on appointment and annually, declare that they are eligible to hold the office of Board Member. These declarations extend to members of the Executive Leadership Team who are not voting members of the Board and to Trade Union Representatives on the Board.
- 20.2 All Board members' tenure of appointment will cease in the event that they no longer meet any of the eligibility requirements, so far as they are applicable, as specified in the Membership Regulations. Any member must inform the Chair as soon as is reasonably practicable to do so in respect of any issue which may impact on their eligibility to hold office. The Chair will advise the Minister of Health and Social Services in writing of any such cases immediately.

- 20.3 The Director of Corporate Governance/Board Secretary will undertake annual due diligence checks at the same time as receiving the eligibility declarations. These will include disqualified director and trustee searches, and bankruptcy and insolvency searches. In addition, the Director of Corporate Governance/Board Secretary will ensure that all members have had a DBS and have had or are undergoing their annual appraisal.
- 20.4 Completion of annual eligibility reviews will be reported to the Remuneration Committee.

## 21. ROLES AND RESPONSIBILITIES

- 21.1 The **Chief Executive** is the Accountable Officer with overall responsibility for ensuring that the Trust operates efficiently, economically and with probity. The Chief Executive will ensure a policy framework is set and that arrangements are in place to support the delivery of that framework.
- 21.2 The **Chair** will:
- (a) Ensure that Non-Executive Directors Board are aware of the requirements contained within this Policy;
  - (b) Lead by example and ensure that they personally declare any relevant interest or the offer of gifts, hospitality, or sponsorship;
  - (c) Approve (or not) the acceptance of gifts, hospitality and sponsorship that have been offered to Non-Executive Directors prior to the event.
- 21.3 The **Executive Director of Finance and Corporate Resources** is responsible for ensuring appropriate monitoring arrangements are established to ensure that purchasing decisions are not being influenced by a sponsorship agreement.
- 21.4 The **Director of Corporate Governance/Board Secretary** will:
- (a) Review the content of declarations of interest made by decision makers on receipt;
  - (b) Review the contents of declarations of gifts, hospitality and sponsorship made and the advice subsequently provided by Line Managers to ensure that the recommended action is compliant with Trust policy. The Board Secretary will liaise directly with the relevant Line Manager in instances where this is not considered to be the case;
  - (c) Advise staff on all aspects of this policy;

- (d) Ensure arrangements are in place to prompt staff to complete a Declaration of Interest Form on initial employment with WAST and at periodic intervals thereafter;
- (e) Ensure that a Register of Interests and a Register of Gifts, Hospitality and Sponsorship is established and maintained as a formal record of interests declared by staff;
- (f) Report the content of those registers and the effectiveness of the arrangements in place to the Audit, Risk and Assurance Committee at agreed intervals, including any breaches of this policy.

21.5 The **Head of Compliance and Assurance** will:

- (a) Ensure that the appropriate forms and paperwork for declaring an interest are available on the intranet;
- (b) On behalf of the Director of Corporate Governance/Board Secretary ensure arrangements are in place to prompt staff to complete a Declaration of Interest Form on initial employment with WAST and at periodic intervals thereafter;
- (c) On behalf of the Director of Corporate Governance/Board Secretary, ensure that a Register of Interests and a Register of Gifts, Hospitality and Sponsorship is established and maintained as a formal record of interests declared by staff;
- (d) Published those registers on the WAST Website in accordance with the requirements of the organisation's Freedom of Information Publication Scheme;
- (e) Report the content of those registers and the effectiveness of the arrangements in place to the Audit, Risk and Assurance Committee at agreed intervals, including any breaches of this policy.

21.6 **Directors** will:

- (a) Lead by example and ensure that they personally declare any interests the subject of this policy;
- (b) Approve (or not) the acceptance of gifts, hospitality and sponsorship that have been offered within their Directorate prior to the event;
- (c) Ensure that they review the contents of the Register of Declarations on an annual basis to assist with the verification of the information contained within it.

21.7 **Line Managers** will:

- (a) Ensure that staff are aware of the requirements of this policy and the implications for their work, particularly at annual PADR discussions;
- (b) Support individuals in their declaration applications, seeking advice from other managers or from the Head of Compliance and Assurance or Board Secretary if required;
- (c) Ensure any declarations of interest are managed in accordance with this policy.

21.8 **All staff** will:

- (a) Ensure they are aware of and are compliant with the requirements of this policy, consulting their line manager or appropriate senior manager if they require clarification;
- (b) Declare to WAST any relevant interests, gifts, hospitality, and sponsorship;
- (c) Obtain permission from their line manager/Director before accepting gifts, hospitality, or sponsorship;
- (d) Verbally declare any relevant interest when a potential for conflict arises e.g., at Board and Committee meetings, during procurement process etc;
- (e) Observe the Standing Orders, Standing Financial Instructions and procurement policies and procedures of the Trust.

21.9 An annual training package to raise awareness and understanding of this policy will be included in the WAST training for all staff. All decision making officers will be required to submit an annual attestation that all appropriate declarations required by the policy have been submitted.

## 22. **IMPACT ASSESSMENTS**

### 22.1 **Equality Impact Assessment**

An Equality Impact Assessment initial screening was undertaken on this policy and it was assessed not to be significant from the perspective of the application of the Equality Act 2010, and that no negative impact on the protected characteristics within the legislation were identified. A full Equality Impact Assessment was not required.

## 22.2 Welsh Language Assessment

The Welsh Language (Wales) Measure 2011 has given the Welsh language official status in Wales by introducing Welsh Language Standards for organisations. The duties deriving from the standards mean that the Trust and all of its employees should not treat the Welsh language less favourably than the English language together with promoting and facilitating the use of the Welsh language. The Equality Impact Assessment took account of Welsh Language, and it was found to be neutral/no impact.

## 22.3 Environmental Impact Assessment

This policy will put the relevant requirements in place (such as waste management plan, reduction of CO2 emissions & reduction of carbon footprint) in order to ensure that the Welsh Ambulance Services University NHS Trust's ongoing commitment to reduce its impact on the environment is maintained and to become a more sustainable organisation in line with Trust policy and ISO14001 Environmental Governance System.

## 23. COUNTER FRAUD

The Welsh Ambulance Services University NHS Trust is committed to taking all necessary steps to counter fraud, bribery, and corruption within the Trust. Staff should report suspected incidents of fraud and corruption to the Trust Local Counter Fraud Specialist, who will be happy to discuss any issues or concerns. Alternatively, staff may contact the confidential NHS Counter Fraud Authority, Fraud and Corruption Reporting line on 0800 028 40 60; or via the online reporting facility <https://cfa.nhs.uk/reportfraud> Fraud investigations may lead to disciplinary action and / or prosecution and civil recovery procedures.

## 24. RECORDS MANAGEMENT

The Welsh Ambulance Services University NHS Trust recognises the importance of sound records management arrangements for both clinical and corporate records. The Trust's records are its corporate memory, providing evidence of actions and decisions and representing a vital asset to support daily functions and operations. Records support policy formation and managerial decision-making, protect the interests of the Trust and the rights of patients, staff and members of the public.

## 25. INFORMATION GOVERNANCE

Information Governance (IG) is an overarching term used to describe all aspects of information management.

The Trust and its staff shall ensure that they provide satisfactory assurance to stakeholders as to how the organisation fulfils its statutory and organisational responsibilities in relation to the management of information. It will enable management and staff to make correct decisions, work effectively and comply with relevant legislation and the organisations aims and objectives.

The IG framework ensures that it sets out the high level principles for confidentiality, integrity and availability of information to promote and build a level of consistency across the Trust.

## 26. HEALTH AND SAFETY

The health, safety and well-being of staff, volunteers and contractors who work for the Trust is of paramount importance.

The Management of Health and Safety at Work Regulations 1999 require the Trust to make a suitable and sufficient assessment of the risks to the health and safety of its employees to which they are exposed whilst they are at work and the risks to the health and safety of anyone else affected by the activities of the Trust.

## 27. AUDIT AND MONITORING

Monitoring for compliance with this policy will be by way of:

- (a) Register of Interests publicly available on the Trust website
- (b) Register of Interests reported to the Audit, Risk and Assurance Committee annually
- (c) Register of Gifts, Hospitality and Sponsorship reported to the Audit, Risk and Assurance Committee annually

## 28. REFERENCES

Not Applicable



GIG  
CYMRU  
NHS  
WALES

Ymddiriedolaeth Brifysgol GIG  
Gwasanaethau Ambiwllans Cymru  
Welsh Ambulance Services  
University NHS Trust

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## 29. APPENDICES

Appendix 1	Declarations of Interests Form
Appendix 2	Declarations of Gifts, Hospitality and Sponsorship Form

**APPENDIX 1 - This form should be downloaded separately from the Trust's Intranet [here](#).**

## **DECLARATION OF INTERESTS FORM**

Please review the Standards of Business Conduct Policy for details of interests which may be relevant and material and therefore subject to declaration. The policy can be found on the Trust's Intranet [here](#).

All staff should make a declaration - even where it is a 'nil' declaration i.e., you do not have any interests to declare.

For 'decision making officers' as defined in the policy, this form is reviewed by the Head of Compliance and Assurance (on behalf of the Board Secretary) and provided to your line manager for their review. It is placed on the Register of Interests which is maintained by the Head of Compliance and Assurance (on behalf of the Board Secretary), provided to the Audit Committee annually, and published on the Trust's website.

<b>Full Name</b>	
<b>Position</b>	
<b>Directorate</b>	
<b>Employee Number</b>	
<b>Line Manager's Name and Position</b>	

### **Section A: Nil Declaration:**

I do not hold any of the interests set out below, and have nothing to declare:	<input type="checkbox"/>
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*If you have completed Section A go straight to sign off section C*



GIG  
CYMRU  
NHS  
WALES

Ymddiriedolaeth Brifysgol GIG  
Gwasanaethau Ambiwylans Cymru  
Welsh Ambulance Services  
University NHS Trust

## Section B: Interests to Declare:

Refer to the policy for full details but note that you will not automatically be conflicted just because you hold some of the interests set out below. A conflict may arise where your interests do not align to decisions you are making, or where there is a perception that they do not align. In those circumstances a mitigation plan will be put in place.

Interest Declared that relate to you	Details of Interest including the full name of any organisations/companies/directorships	Date Interest Commenced
<p><b>Financial Interest</b></p> <p>This is where you may get direct financial benefit from the consequences of a decision you are involved in making.</p> <p>This may include but is not limited to:</p> <ul style="list-style-type: none"> <li>• <u>Directorships</u>, including Non-Executive Directorships held in private companies or public limited companies;</li> <li>• <u>Ownership</u> or part-ownership of private companies, businesses, or consultancies likely or possibly seeking to do business with the NHS</li> <li>• <u>Shareholdings</u> and ownership interests in any publicly listed, private or not for profit company, business, partnership, or consultancy which are doing or might reasonably be expected to do business with the NHS</li> </ul> <p><u>Secondary employment</u> (or in the case of a Non- Executive Director who is in employment, the details of that employment)</p>		



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Interest Declared that relate to you	Details of Interest including the full name of any organisations/companies/directorships	Date When Interest Commenced
<ul style="list-style-type: none"> <li>• Other <u>commercial interests</u> relating to a decision to be taken by the Trust</li> <li>• Being in receipt of a <u>grant</u> or <u>sponsored research</u></li> <li>• Being in receipt of an <u>honoraria</u></li> </ul>		
<p><b>Non-Financial Professional Interest</b></p> <p>This is where you may obtain a non-financial professional benefit from the consequences of a decision you are involved in making, such as increasing your professional reputation or status or promoting your professional career.</p> <p>This may include but is not limited to where you are:</p> <ul style="list-style-type: none"> <li>• An advocate for a particular group of patients</li> <li>• A clinician with a special interest</li> <li>• An active member of a particular specialist body</li> <li>• An advisor for a WAST regulator (e.g., HIW)</li> </ul>		
<p><b>Non-financial personal interests</b></p> <p>This is where you may benefit personally because of decisions that you are involved in making.</p> <p>This may include but is not limited to where you are in:</p>		



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Interest Declared that relate to you	Details of Interest including the full name of any organisations/companies/directorships	Date When Interest Commenced
<p>A position of authority in another NHS organisation, commercial, charity, voluntary, professional, statutory, or other body which could be seen to influence your role</p> <p>A position on an advisory group or other paid or unpaid decision-making forum that could influence how the NHS spends taxpayers' money</p> <p>Any connection with a private, public, voluntary, or other organisation contracting or likely to contract for NHS services</p> <p>Membership of a lobbying or pressure group with an interest in health and care</p> <p>Membership of an organisation which might lead to conflict, or might be perceived to do so</p>		



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<p><b>Indirect interests</b></p> <p>This is where you have a close association with an individual (relative/friend/business associate) who has a financial interest, a non-financial professional interest or a non-financial personal interest who would stand to benefit from a decision the officers is involved in making.</p> <p>If you are aware of material interests, or could reasonably be expected to know about these, then they should be declared.</p>	<p><i>Include here the details of the interest of the individual(s) with whom you have a close association and their relevant interests.</i></p>	
<p><b>Interest Declared that relate to you</b></p>	<p><b>Details of Interest including the full name of any organisations/companies/directorships</b></p>	<p><b>Date When Interest Commenced</b></p>
<p><b>Loyalty interests</b></p> <p>As part of you role you may need to build strong relationships with colleagues across the NHS and in other sectors. These relationships can be hard to define. They are unlikely to be directed by any formal process or managed via any contractual means, however these 'loyalty' interests can influence decision making.</p>		



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### Section C: Declaration

I declare that the information I have given on this form is correct and complete and that I will not create a conflict of interest between my NHS employment and an external body/organisation or my personal interests. I understand that if I knowingly provide false information or fail to disclose relevant information, this may result in disciplinary action and I may be liable to prosecution and/or civil proceedings. I acknowledge that the information on this form may be disclosed to the Trust's Auditors for review, and understand the form may be reviewed for the purpose of fraud prevention and detection by NHS Counter Fraud Specialists. I agree to submit further notices in order to bring up to date information given in this notice and will declare any interest I acquire after the date of this notice. I agree to publication of my interests on the public record on the Trust website.

<b>Signature of person making this declaration</b>	
<b>Date of Signature</b>	

As line manager of the person making this declaration I confirm that I have reviewed the declaration. I do not consider that the interests declared (if any) present an immediate conflict and will manage any conflicts that may arise from time to time in accordance with the Standards of Business Conduct Policy

<b>Signature of line manager</b>	
<b>Date of Signature</b>	

**The Line Manager is required to retain these declarations for inspection on request by members of the Executive Team, Internal/ External Audit or the Counter Fraud Officer.**

**APPENDIX 2 - This form should be downloaded separately from the Trust's Intranet [here](#)**

## **DECLARATION OF GIFTS, HOSPITALITY, AND SPONSORSHIP**

Extracts of the gifts, hospitality, and sponsorship section of the Standards of Business Conduct Policy are set out below for context and ease of reference, however staff are requested to review the Policy before completing this form. The policy can be found on the Trust's Intranet [here](#).

Complete the relevant section of this form for declaration of receipt or offer of a gift, hospitality (including travel and accommodation) or sponsorship.

This form must be authorised by your line manager or Director and reviewed and held centrally by the Board Secretary. Your declaration will be placed on the Register of Interests which is maintained by the Board Secretary, provided to the Audit Committee annually, and published on the Trust's website. The Board Secretary can be contacted for advice on the Policy and this form directly or via [amb\\_corporategovernance@wales.nhs.uk](mailto:amb_corporategovernance@wales.nhs.uk).

<b>Full Name</b>	
<b>Position</b>	
<b>Directorate</b>	
<b>Employee Number</b>	
<b>Signature</b>	
<b>Date</b>	

A declaration must be made even where a gift or hospitality has been declined.

### **1. GIFTS**

Staff must not be placed in a position that risks, or appears to risk, compromising their role or the organisation's public and statutory duties or reputation. Staff should always refuse gifts or other benefits which might reasonably be seen to compromise their personal judgement or integrity.

**Staff may accept gifts up to the value of £25** from patients/service users/relatives as a mark of their appreciation for the care that has been provided. These may be items such as chocolates, flowers etc. **There is no requirement to declare these gifts unless** the gift is from a supplier, or multiple gifts from the same source over 12 months have a cumulative value over £25.

**Cash** or cash equivalents (tokens, gift cards, vouchers etc) **of any value must not be accepted.** Where cash has been left by a donor who cannot be traced it may be deposited to the WAST Charity.

**Gifts over £25 should be declined,** but where that is not possible the gift **must be declared on this form.** In some cases, the gift may have been delivered and it may be difficult to return it or it may be felt that the bearer may be offended by the refusal. Under such circumstances the gift can be accepted, with the options for its use being agreed with the line manager in line with section 12 of the Policy.

**Gifts from suppliers or contracts should be declined** whatever the value, other than low cost branded promotional items such as calendars and pens. Any gifts from suppliers, regardless of the

value **must be declared on this form**. Likewise, any offers of gifts *declined* from suppliers or contracts must be declared.

Where a gift is required to be declared in line with the Policy, the following information is required. Your line manager or the Board Secretary can provide advice.

<b>Details of gift including date it was offered</b>	
<b>Estimated value of gift</b>	
<b>Name of donor if known</b>	
<b>Was the gift refused?</b>	
<b>Where gift could not be refused, why it was considered suitable to accept the gift</b>	
<b>How the gift was used</b>	

## 2. HOSPITALITY

Hospitality is where there is an offer of food, non-alcoholic drink, accommodation, entertainment, travel or entry into an event or function by a third party, regardless of whether provided during or outside normal working hours.

**Hospitality must only be accepted when there is a legitimate business reason and it is proportionate to the nature and purpose of the event.**

Staff should exercise discretion in accepting offers of hospitality in case it would or might appear to place them under any obligation to the individual or organisation making the offer; compromise their professional judgement and impartiality; or otherwise, be improper. This is particularly important when it is offered by current or potential suppliers or contractors.

Meals and refreshments which are equivalent to that offered in similar circumstances by NHS Wales can be accepted and need not be declared. This may arise for example as part of a conference.

**Meals and refreshments offered of a value between £15 and £50 may be accepted and must be declared.** This may be signed off by your line manager.

**Offers over a value of £50** should be refused unless (in exceptional circumstances) **Director approval** is given in advance of acceptance. A clear reason should be recorded on the declaration as to why it was permissible to accept hospitality of this value.

Modest offers to pay some or all the **travel and accommodation** costs related to attendance at events may be accepted but must be declared.

<b>Details of hospitality including date</b>	
<b>Estimated total value of hospitality (including a breakdown of costs).</b>  <b>NB: Where the value is over £50 provide reason why accepted.</b>	
<b>Name of provider of hospitality</b>	
<b>Is the provider of the hospitality a current or potential supplier or contract</b>	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not known</b> <input type="checkbox"/>

### 3. SPONSORSHIP

Sponsorship of events, including courses, conferences, and meetings, by external bodies should only be approved if it can be demonstrated that the event will result in clear benefits for WAST. Sponsored events require the approval of the relevant Director in advance.

Sponsorship of a post and of research are dealt with in more detail in the Policy at section 14.

<b>Details of sponsorship including date</b>	
<b>Estimated value of sponsorship</b>	

## LINE MANAGER/DIRECTOR DECLARATIONS

- a. I have reviewed this declaration and consider the action taken by the individual are appropriate.

<b>Full Name</b>	
<b>Position</b>	
<b>Signature</b>	
<b>Date</b>	

**OR**

- b. I have reviewed this declaration and consider the action taken by the individual is not appropriate and I have advised the individual accordingly as set out below.

<b>Reasons for considering offer not appropriate</b>	
<b>Full Name</b>	
<b>Position</b>	
<b>Signature</b>	
<b>Date</b>	

**Once completed and signed this form must be sent to the Head of Compliance and Assurance directly or via [amb\\_corporategovernance@wales.nhs.uk](mailto:amb_corporategovernance@wales.nhs.uk).**

**NB: Please ensure that you have recorded the dates when declared interests commenced. Thank you**