

Policy - Register of Interests, Gifts and Hospitality

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Document Abstract
<p>In accordance with the Trust’s governing documents, it is the responsibility of all governors, directors and staff of the Trust to ensure that their personal interests do not conflict with those of the Trust, and that they do not abuse their official positions for personal gain or to the unfair benefit of their family or friends.</p> <p>It is the responsibility of all governors, directors and staff 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 NHS staff i.e. those who commit NHS resources directly (e.g. by the ordering of goods and services) or those who do so indirectly.</p> <p>This Policy expands on the provisions set out in Foundation Trust Constitution for addressing potential conflicts of interest, demonstrating transparency and probity in business transactions, and upholding appropriate standards of business conduct. It includes provisions for governors, directors and staff to declare and allow for the appropriate management of their interests, and also sets out the process for managing offers of gifts, hospitality and sponsorship. It alerts staff to the implications of the Bribery Act 2010.</p>

¹ Divide number of words (1226) by 240 for average reading time and add 25% for specialist content.

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05/04/2012	1.1	Trust Secretary	Major	Updated Policy to reflect Bribery Act 2010 and Monitor policy provisions.
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04/04/2017	3.1	Trust Secretary	Minor	Minor amendments following consultation with Senior Leadership Team
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Policy Summary

Adhering to this policy will help to ensure that we use NHS money wisely, providing best value for taxpayers and accountability to our patients for the decisions we take.

As a member of staff you should...	As an organisation we will...
<ul style="list-style-type: none"> • Familiarise yourself with this policy and follow it. Refer to the guidance for the rationale behind this policy https://www.england.nhs.uk/wp-content/uploads/2017/02/guidance-managing-conflicts-of-interest-nhs.pdf • Use your common sense and judgement to consider whether the interests you have could affect the way taxpayers' money is spent • Regularly consider what interests you have and declare these as they arise. If in doubt, declare. • NOT misuse your position to further your own interests or those close to you • NOT be influenced, or give the impression that you have been influenced by outside interests • NOT allow outside interests you have to inappropriately affect the decisions you make when using taxpayers' money 	<ul style="list-style-type: none"> • Ensure that this policy and supporting processes are clear and help staff understand what they need to do. • Identify a team or individual with responsibility for: <ul style="list-style-type: none"> ○ Keeping this policy under review to ensure they are in line with the guidance. ○ Providing advice, training and support for staff on how interests should be managed. ○ Maintaining register(s) of interests. ○ Auditing this policy and its associated processes and procedures at least once every three years. • NOT avoid managing conflicts of interest. • NOT interpret this policy in a way which stifles collaboration and innovation with our partners

1. Introduction

- 1.1 Public sector bodies such as the NHS, which are accountable to the public at large, must be impartial and honest in the conduct of their business. In turn, their staff members and board members should undertake their duties with the highest standards of probity and remain beyond suspicion.

- 1.2 It is the responsibility of all directors (Executive and Non-Executive), governors, and staff 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 applies to those who commit NHS resources directly (e.g. by ordering of goods) and those who do so indirectly (e.g. by recommending items to be ordered or by the prescribing of medicines).
- 1.3 The Trust Board of Directors has a legal obligation to act in the best interests of the Trust in accordance with the Trust's governing document², and to avoid situations where they may be a potential for conflict of interest. There is also a requirement for the Trust Board of Directors to adopt appropriate standards of conduct and to be open and transparent in their decision-making and the manner in which conflicts of interests are managed. These obligations are extended to governors, directors and staff³
- 1.4 The Trust Board of Directors has a legal obligation to act, and be seen to act with integrity and in the best interests of the organisation, in accordance with the trust's governing documents, and to avoid situations where there may be a potential conflict of interest.
- 1.5 All those outlined in para 1.1 must conduct themselves and the business of the Trust in an open and transparent way that commands public confidence in their decision-making and the manner in which conflicts of interest are managed.
- 1.6 In addition, The Board must ensure that the Trust's governors, directors and staff are familiar with the Trust's policy for registering and managing interests, gifts and hospitality. It is essential therefore that there are clear and robust systems in place for identifying and managing real and potential conflicts of interest of governors, directors and staff to protect the reputation and tangible assets of the Trust, as well as the reputation of individual staff.
- 1.7 The Trust Secretary is required to draw up a register of interests declared by staff, members of the Board and governors and to report on this annually in the public part of the Trust Board meeting. The returns will be maintained in a register which will be open for inspection and accessible under the Freedom of Information Act 2000.
- 1.8 The Bribery Act 2010 came into effect on 1 July 2011. The Act makes it a criminal offence to give, promise or offer a bribe, and to request, agree to receive or accept a bribe. The maximum penalty for bribery will be ten years imprisonment for individuals engaging in bribery and an unlimited fine for the hospital.
- 1.9 If you are found to have accepted, or given, any bribe or inducement that is in breach of Trust policy, and/or the Bribery Act 2010 you will face action which may include an investigation by the Local Counter Fraud Specialist that could result in criminal and/or disciplinary action being taken against you.
- 1.10 The Code of Conduct and Accountability (July 2004) reinforces principles of probity and honesty and the Trust's Standing Orders and Standing Financial Instruction reflect these principles.

² The Foundation Trust Constitution and Trust Standing Orders

³ Including full time and part time employees on a substantive or fixed-term contract and to associated persons such as secondees, agency staff contractors and others employed under a contract of service

1.11 See Appendix A for a summary of the legal framework and general principles.

2. Purpose and Scope

2.1 The purpose of this Policy is to set out the minimum standards required of all governors, and staff in relation to identifying, declaring and managing potential conflicts of interest and acts of bribery or other corruption.

2.2 This policy applies to all board members, governors and staff (permanent/temporary/contracted staff [including honorary contract holders]). It also applies to individuals seeking employment with the Trust. It is particularly applicable to those occupying positions where a potential for conflict of interest exists; i.e. staff able to exercise discretion on issues which affect patient care or financial arrangements.

3. Definitions

3.1 *Relevant and Material Interests*

(a) Staff may hold interests for which they cannot see potential conflict. However, caution is always advisable because others may see it differently and perceived conflicts of interest can be damaging. All interests should be declared where there is a risk of perceived improper conduct. The Foundation Trust Constitution establishes that relevant and material interests may include but may not be limited to the following:

- (i) directorships, including non-executive directorships held in private companies or PLCs (with the exception of those of dormant companies);
- (ii) ownership or part-ownership or directorships of private companies, businesses or consultancies likely or possibly seeking to do business with the NHS;
- (iii) majority or controlling shareholdings in organisations likely or possibly seeking to do business with the NHS;
- (iv) a position of authority in a charity or voluntary organisation in the field of health and social care;
- (v) any connection with a voluntary or other organisation contracting for or commissioning NHS services;
- (vi) any connection with an organisation, entity or company considering entering into or having entered into a financial arrangement with the Trust, including but not limited to, lenders or banks;
- (vii) research funding/grants that may be received by an individual or their department;
- (viii) interests in pooled funds that are under separate management.

3.2 *Conflicts of interest*

(a) Conflicts arise when the interests of directors⁴ or ‘connected persons’⁵, are incompatible or in competition with the interests of the trust. Such situations present a risk that directors may make decisions based on these external influences, rather than the best interests of the organisation. Decisions made under a conflict of interest may be challenged and could result in personal liability for individual directors.

(b) The most common types of conflicts of interest include:

Financial interests: Where an individual may get direct financial benefit⁶ from the consequences of a decision they are involved in making.

Non-financial professional interests: 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 promoting their professional career.

Non-financial personal interests: Where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit, because of decisions they are involved in making in their professional career.

Indirect interests: Where an individual has a close association⁷ with another individual who has a financial interest, a non-financial professional interest or a non-financial personal interest and could stand to benefit from a decision they are involved in making.

⁴ This extends to other officers involved in or having influence over transactions.

⁵ A ‘connected person’ is defined as:

- a. members of the directors’ family (spouse or civil partner; any other person with whom the director lives as a partner in an enduring family relationship, and that partners’ children or step-children under 18 years of age; children or step-children of the director and their partner or spouse; directors’ parents)
- b. a body corporate with which the director is connected
- c. a person acting in his capacity as a trustee of a trust – i) the beneficiaries of which include the director or a person who by virtue of (a) or (b) is connected with him, or ii) the terms of which confer a power on the trustees that may be exercised for the benefit of the director or any such person, other than a trust for the purposes of an employees’ share scheme or pension scheme;
- d. a person acting in his capacity as a partner – i) of the director, or ii) of a person who by virtue of (a) to (c) is connected with that director
- e. a firm that is a legal person under the law by which it is governed and in which –
 - i) the director is a partner,
 - ii) a partner is a person who by virtue of (a) to (c) is connected with the director, or
 - iii) a partner is a firm in which the director is a partner

⁶ This may be a financial gain, or avoidance of a loss.

⁷ A common sense approach should be applied to the term ‘close association’. Such an association might arise, depending on the circumstances, through relationships with close family members and relatives, close friends and associates, and business partners.

3.3 *Direct Financial Interests*

- (a) The most easily recognisable conflict of interest arises when a director obtains a direct financial benefit over and above the agreed remuneration and terms of service package agreed by the Remuneration Committee. Examples include:
 - (i) the award of a contract to a company or other business with which a director is involved; or,
 - (ii) the sale of assets at below market value to a director.

3.4 *Indirect Financial Interests*

- (a) This arises when a close relative of a director benefits from the Trust. Directors will benefit indirectly if their financial affairs are bound with those of the relative in question through the legal concept of ‘joint purse’, as would be the case if the relative were the spouse, partner, dependent child of the director, or directly connected in some other way.

3.5 *Non-financial or personal conflicts*

- (a) These occur where directors receive no financial benefit, but are influenced by external factors.
- (b) For instance:
 - (i) to gain some other intangible benefit or kudos, or,
 - (ii) awarding contracts to friends or personal business contacts.

3.6 *Conflict of loyalties*

- (a) Loyalty interests should be declared by decision making staff where they:
 - (i) Hold a position of authority in another NHS organisation or commercial, charity, voluntary, professional, statutory or other body which could be seen to influence decisions they take in their NHS role;
 - (ii) Sit on advisory groups or other paid or unpaid decision making forums that can influence how an organisation spends taxpayers’ money;
 - (iii) Are, or could be, involved in the recruitment or management of close family members and relatives, close friends and associates, and business partners; or
 - (iv) Are aware that their organisation does business with an organisation in which close family members and relatives, close friends and associates, and business partners have decision making responsibilities.
- (b) Conflicts of interest may present problems in the form of:
 - (i) inhibiting free discussion;
 - (ii) resulting in decisions or actions that are not in the interests of the trust; and,
 - (iii) risking the impression that the trust has acted improperly.

3.7 Patents

- (a) 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), including where applications to protect have started or are ongoing, which are, or might be reasonably expected to be, related to items to be procured or used by the Trust.
- (b) Staff should seek prior permission from the organisation before entering into any agreement with bodies regarding product development, research, work on pathways etc, where this impacts on the Trust's own time, or uses its equipment, resources or intellectual property.
- (c) Where holding of patents and other intellectual property rights give rise to a conflict of interest then the general management actions outlined in this policy should be considered and applied to mitigate risks.

3.8 Gifts, hospitality, sponsorship

- (a) This category may include:
 - (i) a gift of money, goods or services (including hospitality and sponsorship) or combination of these – ‘Goods’ include food, drink, gifts, furnishings, furniture, vehicles or any type of equipment. ‘Services’ includes invitations to events, hospitality, entertainment, travel, accommodation, sponsorship or work carried out;
 - (ii) a loan of money, goods or services or combination of these;
 - (iii) the receipt of beneficial terms or personal gain that is not generally available regarding the purchase or lease of goods or services;
 - (iv) the acceptance of pro bono services or sponsorship (i.e. services or sponsorship offered for no payment);

3.9 Bribery

- (a) The Bribery Act 2010 describes offences which organisations could be accused of committing if they fail to prevent persons associated with them from offering or accepting bribes⁸
- (b) The Bribery Act 2010 clarifies that bribery is offering an incentive to someone to do something which they wouldn't normally. It sets out four offences:
 - (i) Section 1 – Offering, promising or giving a bribe to another person to perform a relevant ‘function or activity’ improperly, or to reward a person for the improper performance of such a function or activity (‘Active’ bribery);
 - (ii) Section 2 – Requesting, agreeing to receive or accepting a bribe to perform a

⁸ An organisation that can prove it has adequate procedures in place to prevent persons associated with it from bribing or accepting bribes may have a defence against some or all of these offences.

function or activity improperly, irrespective of whether the recipient of the bribe requests or receives it directly or through a third party, and irrespective of whether it is for the recipient's benefit ('Passive' bribery);

- (iii) Section 7 – Failure of a commercial organisation to prevent bribery (the corporate offence). This is a 'strict liability'⁶ offence and an Individual can be found guilty of 'attempted' or 'actual' bribery on the organisation's behalf. It should be noted that section 1 or section 6 needs to be proven for a section 7 offences to apply;
- (iv) Section 14 – Offering or receiving a bribe or bribing a foreign official. This section applies if an offence under sections 1, 2 or 6 is committed by a body corporate.
- (c) The offence of bribery refers to accepting, as well as offering, so that if you offered a bribe in order to encourage someone to purchase goods or services from the Trust, or one of its hosted or associated bodies you would also be guilty of an offence.
- (d) The Trust will have to show that it has implemented 'adequate control activities or procedures' designed to prevent individuals associated with the trust from engaging in bribery in order to avoid liability. Adequate procedures are defined as the relevant compliance protocols and procedures⁹ that the Trust can put in place to prevent bribery by individuals associated with it.

4 Identification, declaration and review of interests

4.1 All staff should identify and declare material interests at the earliest opportunity (and in any event within 28 days). If staff are in any doubt as to whether an interest is material then they should declare it, so that it can be considered. Declarations should be made:

- (a) On appointment with the Trust;
- (b) When staff move to a new role or their responsibilities change significantly;
- (c) At the beginning of a new project/piece of work; or
- (d) As soon as circumstances change and new interests arise (for instance, in a meeting when interests staff hold are relevant to the matters in discussion).

A declaration of interest(s) form is available at :

<http://workspaces/sites/Boards/CorporateGovernance/Registers/Lists/Register%20of%20Interests/NewForm.aspx>

4.2 After expiry, an interest will remain on register(s) for a minimum of 6 months and a private record of historic interests will be retained for a minimum of 6 years.

5 Dealing with breaches

5.1 Staff who are aware about actual breaches of this policy, or who are concerned that there has been, or may be, a breach, should report these concerns to the Trust Secretary.

5.2 To ensure that interests are effectively managed staff are encouraged to speak up about actual or suspected breaches. Every individual has a responsibility to do this. For further information

⁹ This might include training, a risk assessment, or briefing.

about how concerns should be raised please refer to the Trust's Speaking Out Policy.

- 5.3 The Trust will investigate each reported breach according to its own specific facts and merits, and give relevant parties the opportunity to explain and clarify any relevant circumstances.
- 5.4 Following investigation the Trust will:
- (a) Decide if there has been or is potential for a breach and if so the what severity of the breach is;
 - (b) Assess whether further action is required in response – this is likely to involve any staff member involved and their line manager, as a minimum;
 - (c) Consider who else inside and outside the Trust should be made aware; and
 - (d) Take appropriate action as set out in the next section.
- 5.5 Action taken in response to breaches of this policy will be in accordance with the disciplinary procedures of the Trust and could involve organisational leads for staff support (e.g. Human Resources), fraud (e.g. Local Counter Fraud Specialists), members of the management or executive teams and organisational auditors.
- 5.6 Breaches could require action in one or more of the following ways:
- (a) Clarification or strengthening of existing policy, process and procedures.
 - (b) Consideration as to whether HR/employment law/contractual action should be taken against staff or others.
 - (c) Consideration being given to escalation to external parties. This might include referral of matters to external auditors, NHS Protect, the Police, statutory health bodies (such as NHS England, NHS Improvement or the CQC), and/or health professional regulatory bodies.
- 5.7 Inappropriate or ineffective management of interests can have serious implications for the Trust and staff. There will be occasions where it is necessary to consider the imposition of sanctions for breaches.
- 5.8 Sanctions should not be considered until the circumstances surrounding breaches have been properly investigated. However, if such investigations establish wrong-doing or fault then the organisation can and will consider the range of possible sanctions that are available, in a manner which is proportionate to the breach. This includes:
- (a) Employment law action against staff, which might include
 - a. Informal action (such as reprimand, or signposting to training and/or guidance).
 - b. Formal disciplinary action (such as formal warning, the requirement for additional training, re-arrangement of duties, re-deployment, demotion, or dismissal).
 - (b) Reporting incidents to the external parties described above for them to consider what further investigations or sanctions might be.
 - (c) Contractual action, such as exercise of remedies or sanctions against the body or staff which caused the breach.
 - (d) Legal action, such as investigation and prosecution under fraud, bribery and corruption legislation.
- 5.9 Reports on breaches, the impact of these, and action taken will be considered by the Audit Committee at least annually.
- 5.10 To ensure that lessons are learnt and management of interests can continually improve,

anonymised information on breaches, the impact of these, and action taken will be prepared and made available for inspection by the public upon request.

6. Duties, Roles and Responsibilities

6.1 Council of Governors

- (a) The Foundation Trust Constitution requires that if a Governor has a pecuniary, personal or family interest, whether that interest is actual or potential and whether that interest is direct or indirect, in any proposed contract or other matter which is under consideration or is to be considered or is likely to be considered by the Council of Governors, the Governor shall disclose that interest to the members of the Council of Governors as soon as he/she becomes aware of it.
- (b) The Standing Orders for the Council of Governors make provision for the disclosure of interests and arrangements for the exclusion of a Governor declaring any interest from any discussion or consideration of the matter in respect of which an interest has been disclosed.
- (c) If Governors have any doubt about the relevance of an interest, this should be discussed with the Chair or the Trust Secretary.

6.2 Trust Board of Directors

- (a) The Foundation Trust Constitution requires that if a Director has a pecuniary, personal or family interest, whether that interest is actual or potential and whether that interest is direct or indirect, in any proposed contract or other matter which is under consideration or is to be considered or is likely to be considered by the Board of Directors, the Director shall disclose that interest to the members of the Board of Directors as soon as he/she becomes aware of it.
- (b) The Standing Orders of the Board of Directors make provision for the disclosure of interests and arrangements for the exclusion of a Director declaring any interest from any discussion or consideration of the matter in respect of which an interest has been disclosed.
- (c) If Directors have any doubt about the relevance of an interest, this should be discussed with the Chair or the Trust Secretary.

6.3 Chief Executive

- (a) In addition to the responsibilities associated with Board members, the Chief Executive shall ensure that a Register of Interests is established to record formally declarations of interests of Board Directors. In particular, the Register will include details of all directorships and other relevant and material interests which have been declared by both Executive and Non-Executive Directors, as defined in Standing Orders.

6.4 Senior Leadership Team

- (a) The Senior Leadership Team is responsible for implementing this policy across Clinical Divisions and Trust Headquarters.

6.5 Divisional Management Boards

- (a) Divisional Management Boards are responsible for ensuring compliance with this policy within their Divisions and for maintaining a Register of Interests of Senior Managers and Clinicians.
- (b) This Register shall be kept up to date by means of an annual review of the Register in which any changes to interests declared during the preceding twelve months will be incorporated. The Register will be available to the public in accordance with the Foundation Trust Constitution.

6.6 Departmental Directors

- (a) Trust Services Directors (e.g. Finance, Human Resources, Information Technology, etc.) are responsible for ensuring that all senior managers are aware of their responsibilities with regard to declarations of interest.
- (b) A Trust Services Register of Interests shall be maintained by the Secretariat.

6.7 Decision Making Staff

- (a) Some staff are more likely than others to have a decision making influence on the use of taxpayers' money, because of the requirements of their role. For the purposes of this policy these people are referred to as 'decision making staff.'
- (b) The Foundation Trust Constitution requires that the following staff groups have a duty to ensure that declaration of interests are made which could materially affect the outcome of decisions made by them:
 - (i) Executive and non-executive directors who have decision making roles which involve the spending of taxpayers' money;
 - (ii) All senior managers and clinicians (at band 8d and above);
 - (iii) Members of staff who have the power to enter into contracts on behalf of the Trust;
 - (iv) Members of advisory groups which contribute to direct or delegated decision making on the commissioning or provision of taxpayer funded services; and
 - (v) Administrative and clinical staff involved in decision making concerning the commissioning of services, purchasing of good, medicines, medical devices or equipment, and formulary decisions

Where in doubt, all senior managers and clinicians should contact their respective Directors or the Trust Secretary for clarification.

6.8 Trust Secretary

- (a) The Trust Secretary shall maintain a Register of Interests for the Council of Governors and Trust Board of Directors
- (b) This Register shall be kept up to date by means of an annual review of the Register in which any changes to interests declared during the preceding twelve months will be incorporated. The Register will be available to the public in accordance with the Foundation Trust Constitution.

6.9 All Staff

- (a) All staff (howsoever engaged by the Trust) are required to comply with the provisions of this policy.
- (b) The Trust's Whistle-blowing Policy is the appropriate route for staff to raise concerns about conflicts of interest and other financial integrity or business conduct issues that cannot be dealt with satisfactorily through line-management in the first instance.
- (c) Staff witnessing any perceived bribery or corruption are encouraged to report their concerns about conduct that could potentially breach the Act, confidentially, to the Local Counter Fraud Unit on telephone 0117 342 0838 or email lcfsu@nhs.net.

6.10 Responsibility for Monitoring Compliance

- (a) The Registers of Interest, Gifts, Hospitality and Sponsorship will be reviewed by the Trust Secretariat twice per annum. The Trust Secretary will oversee the publication of the relevant Registers in accordance with the Trust Publication Scheme.
- (b) Staff will be reminded periodically of their requirement to declare gifts and hospitality provided/accepted/declined in accordance with this Policy.
- (c) The Trust Board of Directors will monitor changes in declarations of interest at each meeting of the Board, and through an annual review of Registers of Interest.
- (d) The Audit Committee will monitor compliance with this policy through regular reporting on counter fraud and whistle-blowing, as well as an annual review of the Registers of Interest, Gifts, Hospitality and Sponsorship.

7. Policy Provisions

The following Policy provisions are to be read in conjunction with the Foundation Trust Constitution, Trust Standing Orders and Standing Financial Instructions.

7.1 Declarations of Interest – Governors and Board Members

- (a) The Chairman, all Governors and all Directors are required to comply with the provisions for declarations of interest as set out in the Foundation Trust Constitution; these will not be reiterated in this Policy. [A Declaration of Interests form \(online only\)](#) is provided for this purpose. Governors and Directors should approach the Trust Secretary for confidential guidance if necessary.
- (b) Interests will be recorded on the Trust's Register of Interests, which will be maintained by the Secretariat on behalf of the Chief Executive, is open for public inspection, and is published in the Annual Report.

7.2 Declarations of Interest – All Staff

- (a) All staff (howsoever engaged by the Trust) are required to declare and record financial or personal interest in any organisation with which they deal, and must be prepared to withdraw from those dealings if required, thereby ensuring that their professional judgement is not influenced by such interests.

- (a) All staff must update their declarations in March of each year and at other times when their interests change using the form provided at “[Declaration of Interest Form \(online only\)](#)”.

7.3 *Declarations of Interest – Strategic Decision Making Groups*

- (a) The Trust uses a variety of different groups to make key strategic decisions which may include :
- (i) Entering into (or renewing) large scale contracts.
 - (ii) Awarding grants.
 - (iii) Making procurement decisions.
 - (iv) Selection of medicines, equipment, and devices.
- (b) The interests of those who are involved in these groups should be well known so that they can be managed effectively. Further information on managing interests is available from the Trust Secretary.
- (c) Staff involved in procurement exercises for and on behalf of the Trust should keep records that show a clear audit trail of how conflicts of interest have been identified and managed as part of procurement processes. At every stage of procurement steps should be taken to identify and manage conflicts of interest to ensure and to protect the integrity of the process.

7.4 *Gifts, hospitality and sponsorship*¹⁰

- (a) As outlined in the Trust’s Standing Orders all offers of gifts, hospitality or entertainment which create a sense of obligation and can be perceived as a bribe, under the definitions on page 9 should be declined. The test should be whether a fair minded member of the public, knowing all the facts, would see anything improper or suspicious in the receipt or offer of hospitality. All staff (howsoever engaged by the Trust) are required to:
- (i) refuse gifts, benefits, hospitality or sponsorship of any kind which might reasonably be seen to compromise their personal judgement or integrity;
 - (ii) immediately declare and register gifts, hospitality or sponsorship worth £50¹¹ or more, whether the offer was refused or accepted;
 - (iii) 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 Trust itself might not usually offer, need approval by the Divisional Director, should only be accepted in exceptional circumstances, and must be declared. A clear reason should be recorded on the Trust’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:
 - (iv) offers of business class or first class travel and accommodation (including domestic travel) offers of foreign travel and accommodation.
 - (v) meals or refreshments of a value between £25 and £75¹² - may be accepted and must be declared.

¹⁰ Sponsorship limited to funding of minor costs such as travel, not including “commercial sponsorship” (see “Commercial Sponsorship” at 5.7 below).

¹¹ This sum is in line with the NHS on Guidance on Conflicts of Interest

¹² The £75 value has been selected with reference to existing industry guidance issued by the ABPI

- (vi) meals or refreshments over a value of £75 - should be refused unless (in exceptional circumstances) Line Manager approval is given. A clear reason should be recorded on the Trust'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 a reasonable estimate).
 - (vii) not misuse or dishonestly abuse their official position of trust or information acquired in the course of their official duties, to further their private interests or the private interests of others;
 - (viii) ensure that their professional registration (if applicable) and/or status are not used in the promotion of commercial products or services;
 - (ix) beware of bias generated through sponsorship, where this might impinge on professional judgement and impartiality;
 - (x) neither agree to practice under any conditions which compromise professional independence or judgement, nor impose such conditions on other professionals;
 - (xi) avoid any activities that might be construed as either offering or accepting any form of bribe, whether 'active' or 'passive' as described at 3.9 'Bribery', above.
- (b) Where gifts or hospitality are declined on the basis that they create a sense of obligation the Trust Secretary must be notified.

7.5 Outside Employment and Private Practice

- (a) Clinical consultants are permitted to carry out private practice subject to national terms and conditions and their individual contracts of employment and ensure where there would otherwise be a conflict or potential conflict of interest, NHS commitments take precedence over private work.¹³
- (b) Not accept direct or indirect financial incentives from private providers other than those allowed by Competition and Markets Authority guidelines: https://assets.publishing.service.gov.uk/media/542c1543e5274a1314000c56/Non-Divestment_Order_amended.pdf
- (c) Other staff may undertake private practice or work provided that:
 - (i) either the work is conducted at the request or with the approval of the Trust, or,
 - (ii) the work is conducted outside of the time they are contracted to the Trust, does not conflict with their NHS work and is not detrimental to it.
- (d) Any external work undertaken by staff under either (a) or (b) above must be declared and agreed in writing with line managers before it is undertaken.
- (e) Clinical consultants working as self-employed individuals may accept gifts or hospitality relating directly to their self-employed work. However, in the spirit of openness and transparency, it is recommended that such gifts are declared in accordance with this policy to avoid any potential conflicts arising in a private capacity.

<http://www.pmcpa.org.uk/thecode/Pages/default.aspx>

¹³ These provisions already apply to Hospital Consultants by virtue of Paras.5 and 20, Sch. 9 of the Terms and Conditions – Consultants (England) 2003: https://www.bma.org.uk/-/media/files/pdfs/practical_advice_at_work/contracts/consultanttermsandconditions.pdf

- (f) Hospital Consultants should not initiate discussions about providing their Private Professional Services for NHS patients, nor should they ask other staff to initiate such discussions on their behalf.

7.6 Cash and donations

- (a) Under no circumstances may staff accept cash or vouchers, even below the £50.00 threshold. Where cash is offered as a charitable donation, a receipt should be issued and the cash banked through the Trust's cashier's office. Under these circumstances, a declaration form does not need to be submitted.
- (b) ^(v) Where such a donation is offered by a present or past supplier, the employee's manager must be satisfied that this does not affect the Trust's impartiality to the contractor. Should any doubt remain, the donation should be politely declined and the matter referred to the relevant Divisional Manager or the Trust Secretary.
- (c) Staff should not actively solicit charitable donations unless this is a prescribed or expected part of their duties for the Trust, or is being pursued on behalf of the Trust's own registered charity or other charitable body and is not for their own personal gain.
- (d) Staff must obtain permission from the Trust if in their professional role they intend to undertake fundraising activities on behalf of a pre-approved charitable campaign for a charity other than the Trust's Charities.
- (e) Donations, when received, should be made to a specific charitable fund (never to an individual) and a receipt should be issued.
- (f) Staff wishing to make a donation to a charitable fund in lieu of receiving a professional fee may do so, subject to ensuring that they take personal responsibility for ensuring that any tax liabilities related to such donations are properly discharged and accounted for.
- (g) Each Division must hold a receipt book for the purposes of recording cash donations.

7.7 Commercial Sponsorship

- (a) Commercial sponsorship refers to all funding from sources external to the NHS. It includes funding of all or part of the cost of a member of staff, NHS research (see separate policy on research), training, pharmaceuticals, equipment, meeting rooms, costs associated with meetings, hotel and transport costs, and provision of speakers or premises.
- (b) Any sponsorship offered over the value of £50.00 or more must be declared regardless of whether it is declined or accepted.
- (c) Staff may accept commercial sponsorship subject to seeking permission from the appropriate Divisional Manager or Executive Director in advance and ensuring that purchasing or other relevant decisions will not be compromised in any way.
- (d) Where it is necessary for staff to travel to inspect equipment for possible purchase, the Trust will consider meeting the cost itself to avoid purchasing decisions being

compromised. Where contractors meet the cost it must be made clear that this does not create an obligation.

- (e) The Trust will not enter into any arrangements regarding the commercial of a post unless it has been made clear to the sponsor that the arrangements will no effect on purchasing decisions.
- (f) All pharmaceutical companies entering into sponsorship agreements must comply with the Code of Practice for the Pharmaceutical Industry 2014¹⁴. Those sponsorship agreements valued in excess of £500 will require advice from Medical Director or Chief Pharmacist.
- (g) Sponsorship of events by appropriate external bodies will only be approved if a reasonable person would conclude that the event will result in clear benefit the Trust and the NHS. The department organising or hosting the event must ensure that the receipt of funding is approved by an Executive Director and recorded in the Register of Gifts, Hospitality and Sponsorship in advance and ensure the following conditions are adhered to:
 - (i) During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection rules and legislation;
 - (ii) No information should be supplied to the sponsor from whom they could gain a commercial advantage, and information which is not in the public domain should not normally be supplied;
 - (iii) At the Trust'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;
 - (iv) The involvement of a sponsor in an event should always be clearly identified;
 - (v) Staff within the Trust involved in securing sponsorship of events should make it clear that sponsorship does not equate to endorsement of a company or its products and this should be made visibly clear on any promotional or other materials relating to the event; and
 - (vi) Staff arranging sponsored events must declare this to the Trust.

7.8 Gifts and hospitality offered by the Trust

- (a) Staff must be mindful that the value of all gifts and hospitality offered by the Trust are sourced from public funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.
- (b) In exceptional circumstances it may be appropriate for the Trust to provide a gift of up to £50.00¹⁵ in value, for example:
 - (i) providing a bouquet of flowers to a seriously ill employee, or to a longstanding employee who is retiring;
 - (ii) giving book or gift tokens to someone who spoke at a Trust conference free of charge.

¹⁴ <http://www.pmcpa.org.uk/thecode/Documents/PMCPA20Code202014.pdf>

¹⁵ This sum is in line with a provisions within the NHS England guidance on managing conflicts of interest

- (c) It is acceptable for the Trust to provide modest hospitality in the way of working lunches and/or dinners to existing and potential contractors and stakeholders subject to a genuine business reason.

8. Standards and Key Performance Indicators

The minimum standard and performance indicators for this Policy are:

8.1 Applicable Standards

- (a) Members of the Trust Board of Directors (including Non-executive Directors and the Chair) are required to abide by the standards of conduct set out in the Code of Conduct and Code of Accountability in the NHS.
- (b) Executive Directors, managers and staff are required to abide by the standards of conduct set out in the Code of Conduct for NHS Managers.
- (c) All governors, directors and senior managers are required to make a declaration of interest at the beginning of their appointment, including a nil return, and again in March of each year.
- (d) All staff are required to declare offers of gifts, hospitality and sponsorship.

8.2 Measurement and Key Performance Indicators

- (a) Registers of Interest, Gifts, Hospitality and Sponsorship are maintained for public inspection throughout the year.
- (b) Governors', Directors' and where pertinent, Senior Managers' declared interests are published in the Annual Report.

9 Application of the Policy

9.1 Applicants to UHB

- (a) Prior to employment, all applicants will be required to declare any potential conflict of interest.
- (b) All successful applicants will be sent a form with their contract of employment requiring them to indicate any involvement either direct or indirect with any organisation which to their knowledge has a contract with the Trust.
- (c) This form will be passed to the personnel manager who will refer it to the applicant's prospective line manager. The line manager must sign the form to acknowledge that they are aware of the conflict.
- (d) Where there is uncertainty about whether a conflict exists or how to manage a potential conflict, the relevant executive director will be informed. The director will decide, in consultation with other relevant staff whether or not a conflict of interest exists and if so whether appropriate safeguards can be put in place. In the case of Trust board members, the chairman will make the final decision, and in the case of executive directors, the

chairman and the chief executive will make the final decision.

- (e) Where a conflict of interest is found to exist and appropriate safeguards can be implemented the employment can proceed. The form is copied to the company secretary for declaration to the Trust board and filing in the register of interests.
- (f) Where appropriate safeguards cannot be implemented the candidate must be invited to give up their outside interests or make arrangements to remove the potential conflict. These arrangements will have to be approved by the chief executive and recorded on the register.
- (g) If it is discovered after appointment that such information has been withheld then this may lead to the individual being dismissed.

9.2 Existing employees

- (a) Existing employees must declare all private interests which could potentially result in personal gain or provide advantage to themselves or their family as a consequence of the employee's position in the Trust. Interests that might appear to be in conflict should also be declared. Declarations should be made as soon as possible after the conflict is discovered.
- (b) The company secretary will hold a register of declared interests for employees within the Trust. The register will be reviewed and reported to the Trust Board annually and will be available for inspection by relevant organisations and the public.

10 Publication of the Register of Interests and Gifts and Hospitality Register

- 10.1 The Trust will publish the interests declared by decision making staff in the Register of Interests and Register of Gifts and Hospitality on the Trust website annually.
- 10.2 If decision making staff have substantial grounds for believing that publication of their interests should not take place then they should contact the Trust Secretary to explain why.
- 10.3 In exceptional circumstances, for instance where publication of information might put a member of staff at risk of harm, information may be withheld or redacted on public registers. However, this would be the exception and information will not be withheld or redacted merely because of a personal preference.
- 10.4 The Trust fully supports wider transparency initiatives in healthcare, and we encourage staff to engage actively with these. Relevant staff are strongly encouraged to give their consent for payments they receive from the pharmaceutical industry to be disclosed as part of the Association of British Pharmaceutical Industry (ABPI) Disclosure UK initiative. These "transfers of value" include payments relating to:
 - Speaking at and chairing meetings
 - Training services
 - Advisory board meetings
 - Fees and expenses paid to healthcare professionals
 - Sponsorship of attendance at meetings, which includes registration fees and the costs of accommodation and travel, both inside and outside the UK
 - Donations, grants and benefits in kind provided to healthcare organisations

Further information about the scheme can be found on the ABPI website:

11 Trust Speaking Out Policy

11.1 The Trust's Speaking Out Policy is the appropriate route for staff to raise legitimate and genuine concerns about conflicts of interest and other financial integrity or business conduct issues. The policy can be found on the Document Library.

12. References

The following references apply:

- University Hospitals Bristol NHS Foundation Trust Constitution
- University Hospitals Bristol NHS Foundation Trust Standing Orders and Standing Financial Instructions
- Bribery Act 2010
- Code of Practice for the Pharmaceutical Industry 2014
- University Hospitals Bristol NHS Foundation Trust Whistle Blowing Policy
- NHS Code of Conduct and Accountability (July 2004)
- Chartered Institute of Purchasing and Supply: Ethical Code of the Chartered Institute of Purchasing & Supply (March 2009)
- Freedom of Information Act 2000
- ABPI: The Code of Practice for the Pharmaceutical Industry (2014)
- ABHI Code of Business Practice

13. Associated Documentation

Staff should refer to the Counter Fraud Policy for guidance on identifying questionable business conduct.

14. APPENDIX A - Legal Framework and General Principles

Code of Conduct and Code of Accountability

The Code of Conduct and Code of Accountability emphasise three crucial public service values which must underpin the work of the health service:-

- **Accountability** – Everything that is done by those who work in the NHS must be able to stand the test of parliamentary scrutiny, public judgements on propriety and professional codes of conduct.
- **Probity** – There should be an absolute standard of honesty in dealing with the assets of the NHS; integrity should be the hallmark of all personal conduct in decisions affecting patients, staff and suppliers, and any news or information acquired in the course of NHS duties.
- **Openness** - There should be sufficient transparency about NHS activities to promote confidence between the NHS Authority or Trust and its staff, patients and the public.

If any member of staff is unclear as to whether or not a proposed activity is governed by this policy they should seek advice from the company secretary.

Fraud Act 2006

The Fraud Act 2006 states that a person is guilty of fraud if he is in breach of any section listed within the Act, namely:

- Fraud by false representation;
- Fraud by failing to disclose information;
- Fraud by abuse of position.

If following an investigation a person is guilty of fraud they may liable on summary conviction, to imprisonment for a term not exceeding 12 months or to a fine not exceeding the statutory maximum (or both) (on conviction on indictment to imprisonment for a term not exceeding 10 years or to a fine [or both]).

Bribery Act 2010

The Bribery Act 2010 clarifies that bribery is offering an incentive to someone to do something which they would not normally do. It sets out four offences:

- Section 1 - Offering, promising or giving a bribe to another person to perform a relevant, „function or activity“ improperly, or to reward a person for the improper performance of such a function or activity („Active“ bribery);
- Section 2 - Requesting, agreeing to receive or accepting a bribe to perform a function or activity improperly, irrespective of whether the recipient of the bribe requests or receives it directly or through a third party, and irrespective of whether it is for the recipient’s benefit, (Passive bribery);
- Section 7 - Failure of a commercial organisation to prevent bribery (the corporate offence). This is a „strict liability*“ offence and an Individual can be found guilty of „attempted or „actual bribery on the organisation’s behalf. It should be noted that section 1 or section 6 needs to be proven for a section 7 offence to apply;

- Section 14 – Offering or receiving a bribe or bribing a foreign official. This section applies if an offence under sections 1, 2 or 6 is committed by a body corporate;
Strict liability offences do not require proof of intention or recklessness – in other words, it is not necessary for the prosecution to show that the company intended to make the bribe in bad faith, or that it was negligent as to whether any bribery activity took place.

15. Appendix B – Monitoring Table for this Policy

Provision	Monitoring	How	When
The Registers of Interest, Gifts, Hospitality and Sponsorship will be reviewed by the Trust Secretariat twice per annum.	Trust Secretariat	The Trust Secretary will review the Registers prior to publication in accordance with the Trust Publication Scheme.	April and October
All governors, directors and senior managers are required to make a declaration of interest at the beginning of their appointment, including a nil return, and again in March of each year.	Trust Secretariat	The Trust Secretariat will advise governors, directors and senior managers of this requirement.	At beginning of tenure (for Directors and Governors), and in March and September for senior managers
Staff will be reminded periodically of their requirement to declare gifts and hospitality provided/accepted/declined in accordance with this Policy.	Senior Leadership Team	Dissemination of an email alert by the Trust Secretariat and Divisional Boards.	March and September
The Trust Board of Directors will monitor changes in declarations of interest at each meeting of the Board, and through an annual review of Registers of Interest.	Trust Secretariat	Preparation of the annual review for the Trust Board of Directors.	April
The Audit Committee will monitor compliance with this policy through regular reporting on counter fraud and whistle-blowing, as well as an annual review of the Registers of Interest, Gifts, Hospitality and Sponsorship.	Trust Secretariat	Preparation of the annual review for the Audit Committee.	December

16. Appendix C – Dissemination, Implementation and Training Plan

The following table sets out the dissemination, implementation and training provisions associated with this Policy.

Plan Elements	Plan Details
The Dissemination Lead is:	Trust Secretary
This document replaces existing documentation:	Yes
Existing documentation will be replaced by:	Amendment of existing published version.
This document is to be disseminated to:	Trust Board of Directors, Senior Leadership Team, Divisional Management Boards
Training is required:	No
The Training Lead is:	Not applicable

Additional Comments
None

17. Appendix D – Document Checklist

The checklist set out in the following table confirms the status of ‘diligence actions’ required of the ‘Document Owner’ to meet the standards required of University Hospitals Bristol NHS Foundation Trust Procedural Documents. The ‘Approval Authority’ will refer to this checklist, and the Equality Impact Assessment, when considering the draft Procedural Document for approval. All criteria must be met.

Checklist Subject	Checklist Requirement	Document Owner’s Confirmation
Title	The title is clear and unambiguous:	Yes
	The document type is correct (i.e. Strategy, Policy, Protocol, Procedure, etc.):	Yes
Content	The document uses the approved template:	Yes
	The document contains data protected by any legislation (e.g. ‘Personal Data’ as defined in the Data Protection Act 2000):	Not Applicable
	All terms used are explained in the ‘Definitions’ section:	Yes
	Acronyms are kept to the minimum possible:	Yes
	The ‘target group’ is clear and unambiguous:	Yes
	The ‘purpose and scope’ of the document is clear:	Yes
Document Owner	The ‘Document Owner’ is identified:	Yes
Consultation	Consultation with stakeholders (including Staff-side) can be evidenced where appropriate:	Yes
	The following were consulted:	Senior Leadership Team
	Suitable ‘expert advice’ has been sought where necessary:	Yes
Evidence Base	References are cited:	Yes
Trust Objectives	The document relates to the following Strategic or Corporate Objectives:	All compliance objectives, probity, business conduct.
Equality	The appropriate ‘Equality Impact Assessment’ or ‘Equality Impact Screen’ has been conducted for this document:	Yes
Monitoring	Monitoring provisions are defined:	Yes
	There is an audit plan to assess compliance with the provisions set out in this procedural document:	Yes
	The frequency of reviews, and the next review date are	Yes

Checklist Subject	Checklist Requirement	Document Owner's Confirmation
	appropriate for this procedural document:	
Approval	The correct 'Approval Authority' has been selected for	Yes – Senior Leadership Team April

Additional Comments
None

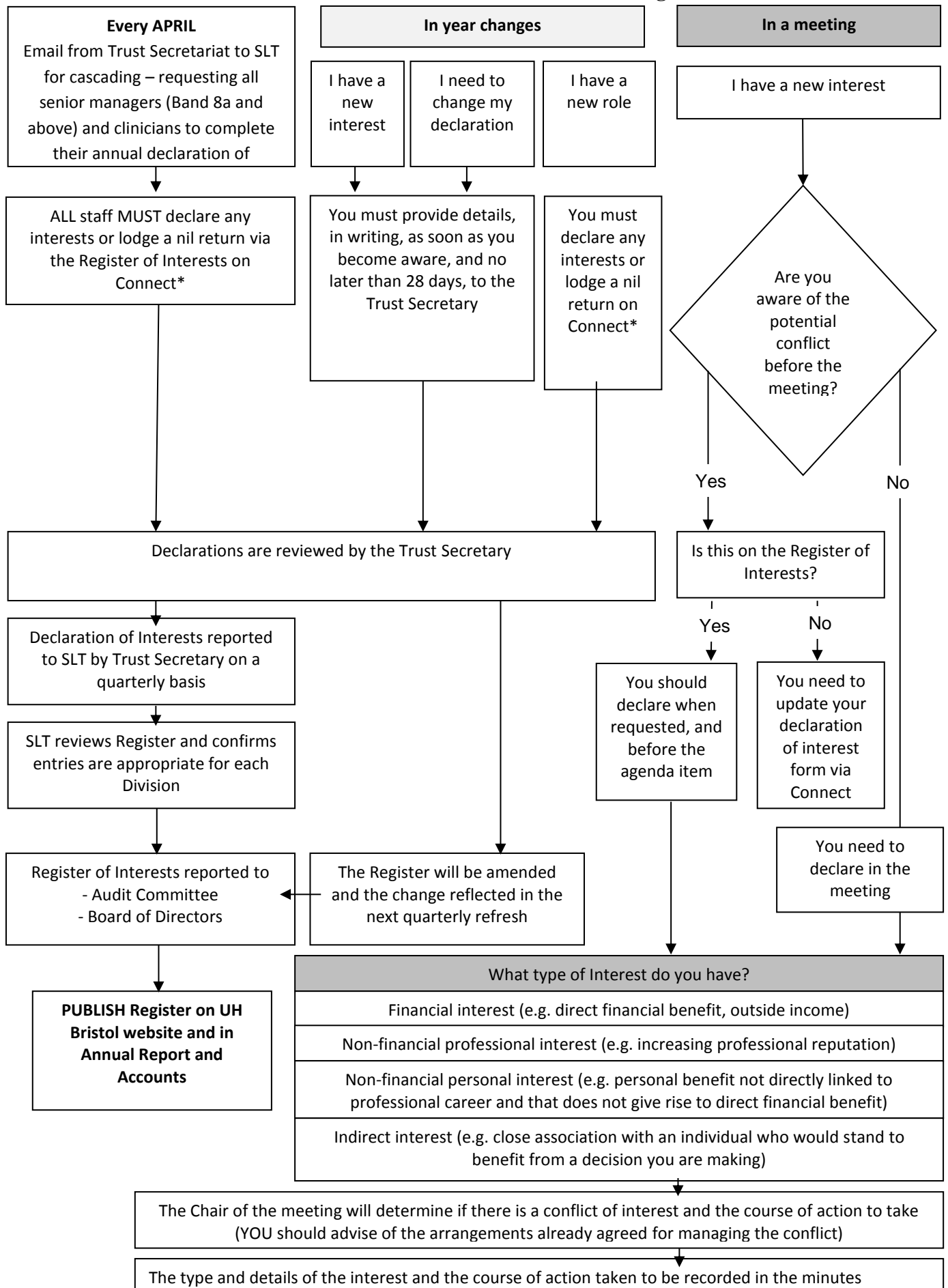
18. Appendix E - Online Declaration Forms

18.1 *Declaration of {Interest Form}*

18.2 *Declaration of Interest { Nil Returns Form}*

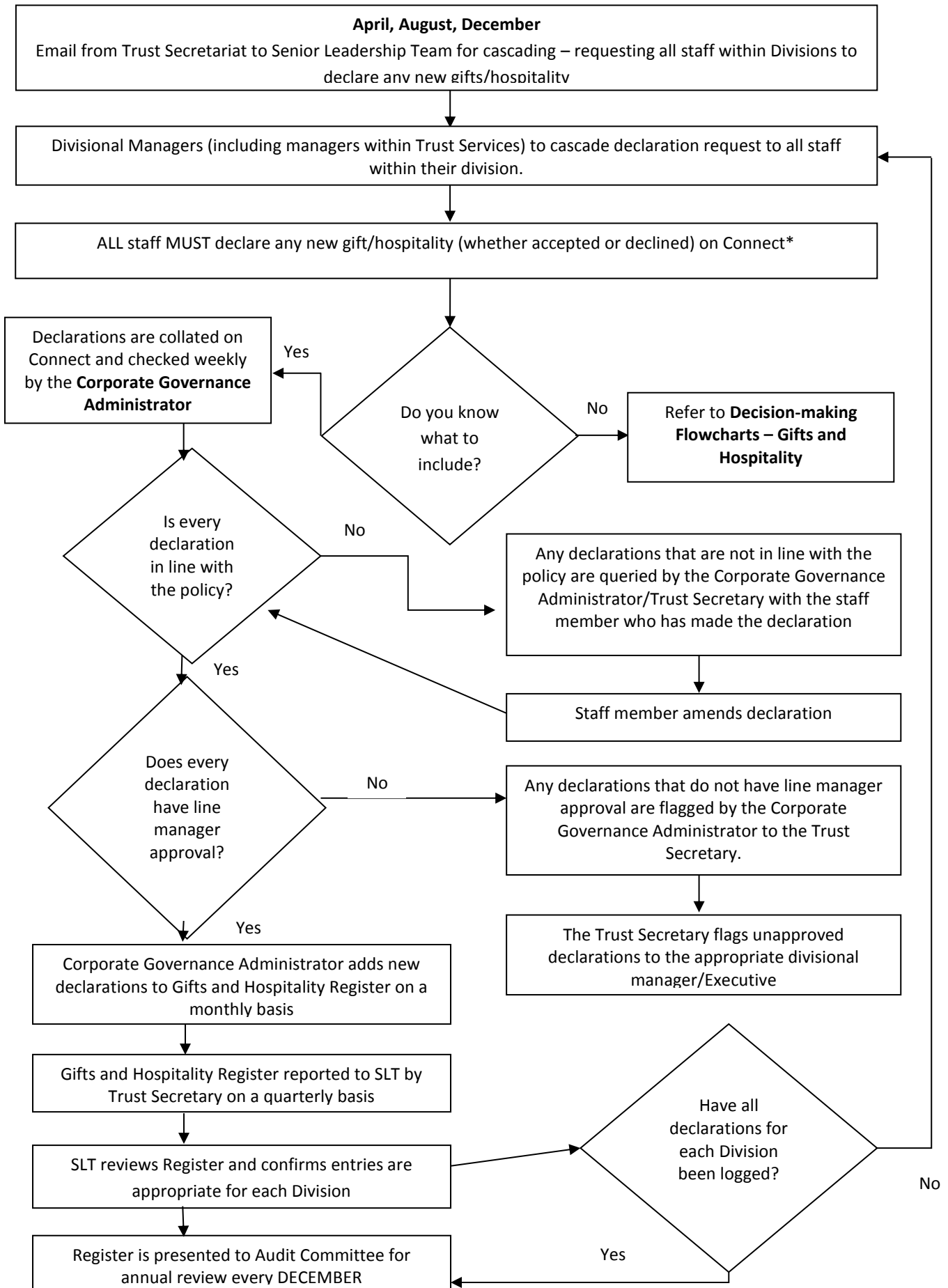
18.3 *Declaration of {Gifts and Hospitality Form}*

18.4 Declaration of Interests Flowchart for senior managers and clinicians



*Staff without access to Connect must request a blank form via trust.secretariat@uhbristol.nhs.uk

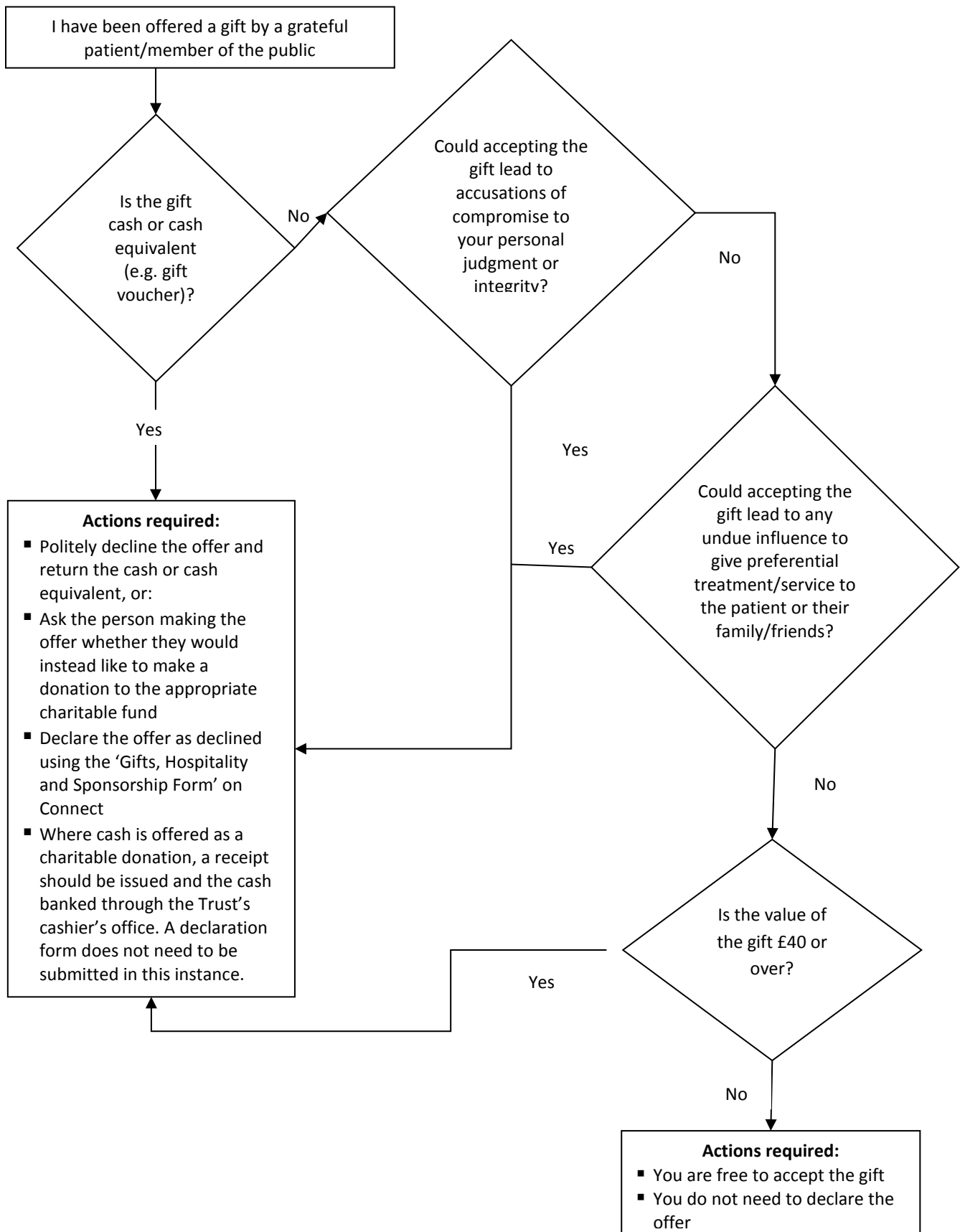
18.5 Declaration of Gifts and Hospitality Flowchart for all staff



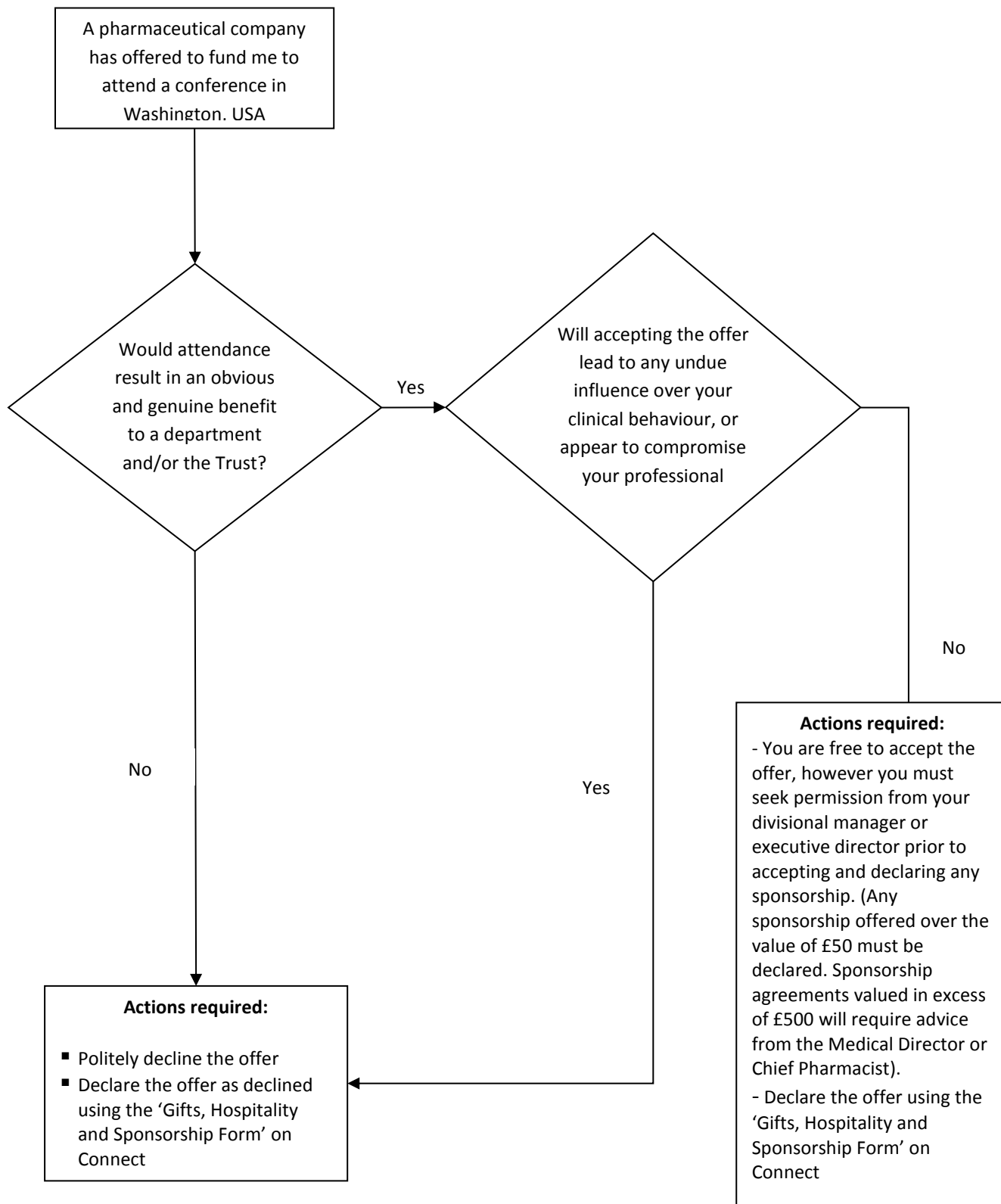
*Staff without access to Connect must request a blank form via trust.secretariat@uhbristol.nhs.uk

18.6 Flowcharts to assist in decision-making (Gifts and Hospitality)

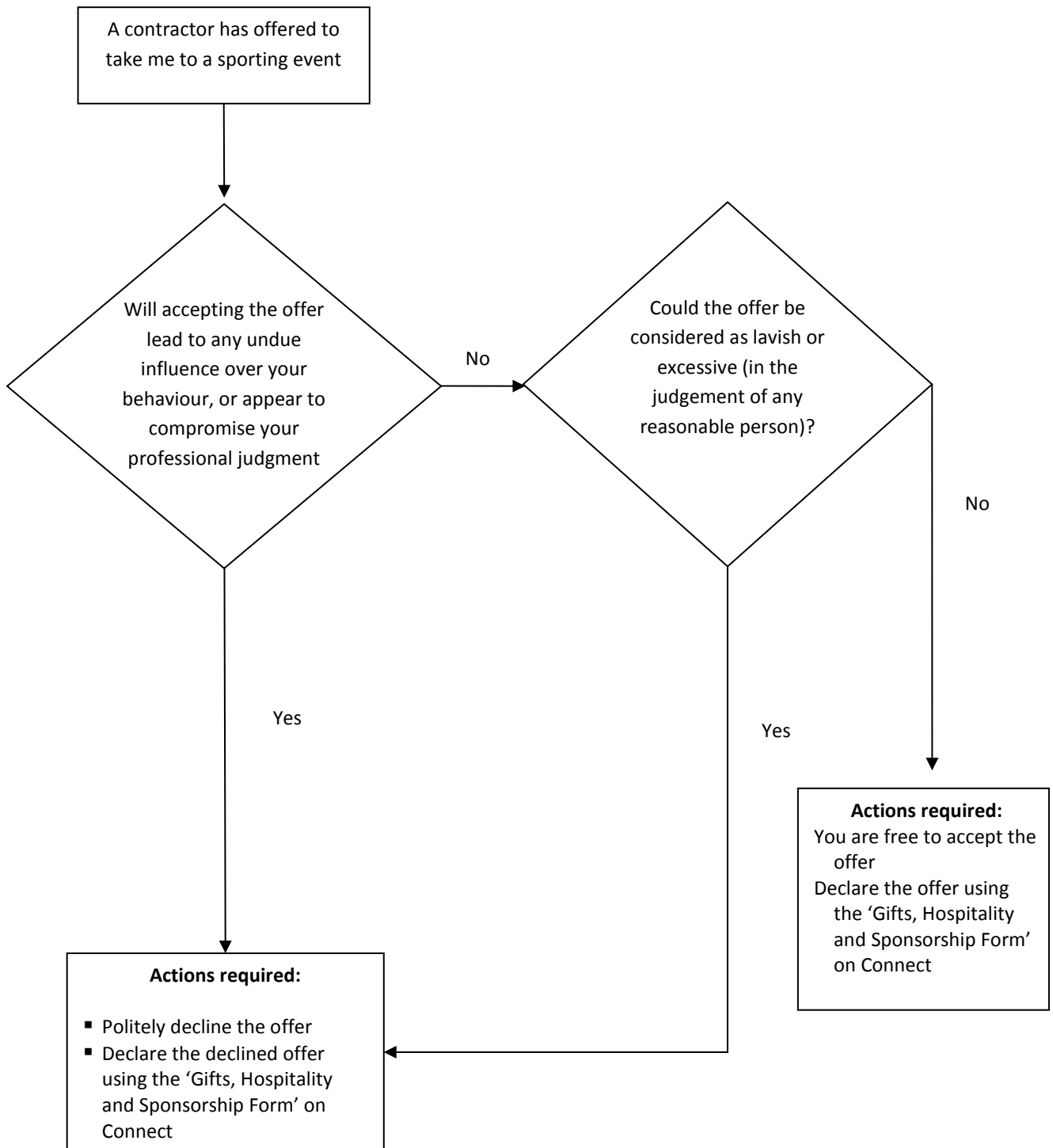
Flowchart 1: Gifts



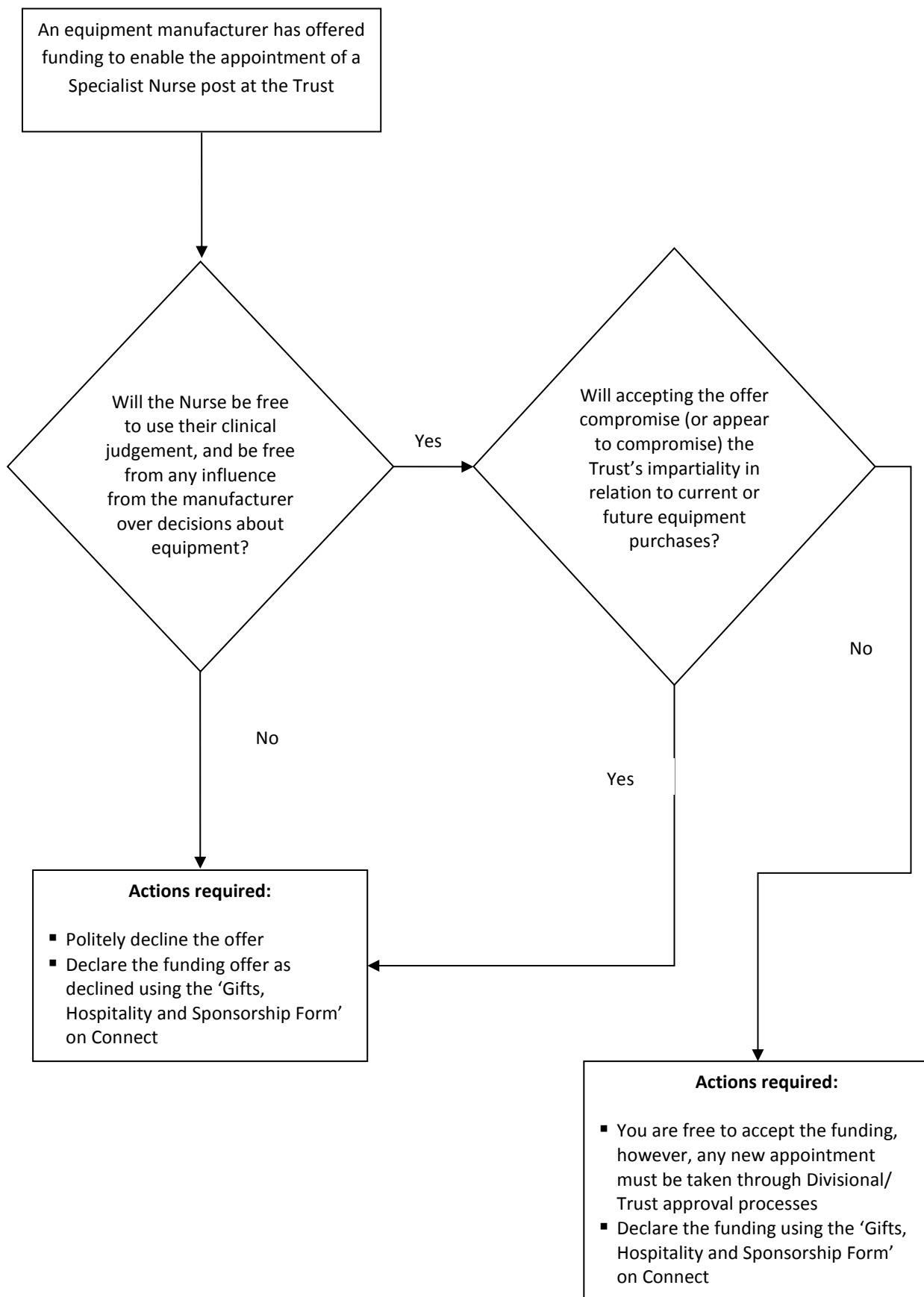
Flowchart 2: Sponsorship (to attend a conference)



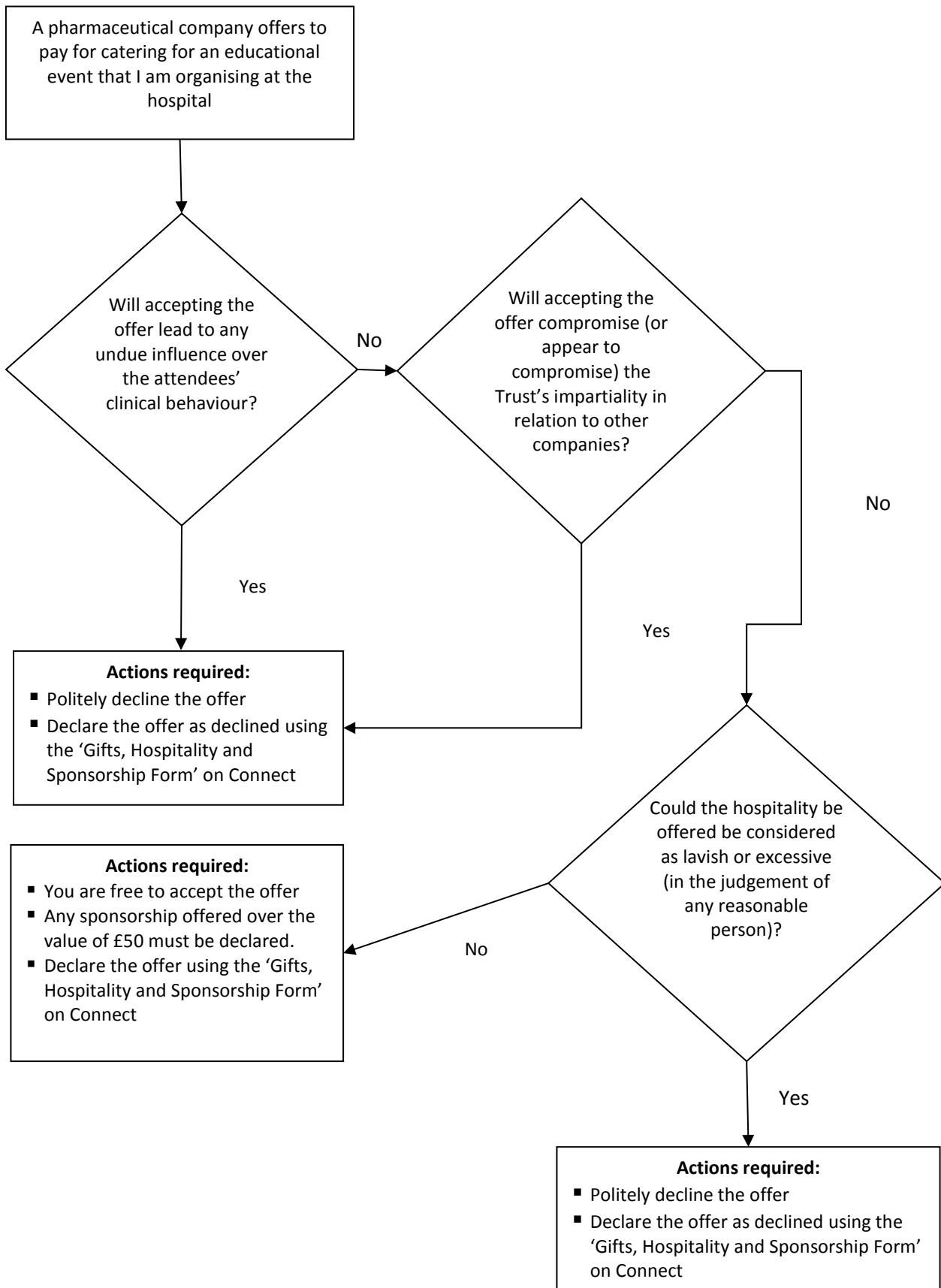
Flowchart 3: Invitation to attend an event



Flowchart 4: Sponsorship (to fund a post)



Flowchart 5: Sponsorship (event catering)



Date Received	Description of Gift or Hospitality	Did you Accept this	Value of Gift or Hospitality	Type of Gift or Hospitality
14/06/2017	£1800 donated from Macmillan Cancer Support to fund a UWE course: Level 7 Executive Coaching and Mentoring.	Yes	£ 1,800.00	Commercial Sponsorship
09/06/2017	Summer Drinks Event	Yes	£ 30.00	Hospitality
09/06/2017	Summer Drinks Event	No	£ 30.00	Hospitality
26/05/2017	Afternoon hospitality at Bath Races	Yes	£ 60.00	Hospitality
04/05/2017	x2 tickets to Joseph musical at Bristol Hippodrome Patient is part of the production and mother got the tickets free and I don't think she had to pay for	Yes	£ 60.00	Gifts
19/04/2017	£200 Donation	Yes	£ 200.00	Cash and Donations
18/04/2017	Discussion dinner	Yes	£ 45.00	Hospitality
06/04/2017	A letter of thanks was received from a patient my self and a fellow Tech had been treating on the HDU and WA800. The letter was sent via royal mail to the physiotherapy department , I opened the letter and there was hand written letter of thanks and 2 marks and Spencers gift cards for my self and my colleague. The gift cards have not been used as I am aware we are unable to accept them.	No	£ -	Gifts
06/04/2017	Plant	Yes	£ 20.00	Gifts
06/04/2017	Plant	Yes	£ 20.00	Gifts
30/03/2017	Two Hundred Pounds	Yes	£ 200.00	Cash and Donations
30/03/2017	Sponsorship to attend World Congress on Controversies in Ophthalmology	Yes	£ 800.00	Commercial Sponsorship
23/03/2017	Devolution discussion with dinner	Yes	£ 40.00	Hospitality
14/03/2017	Nursing and Midwifery Scholarship Award 2017	Yes	£ 2,500.00	Cash and Donations
10/03/2017	A bunch of flowers from a male patients wife	Yes	£ 20.00	Gifts
08/03/2017	Lunch provided for approx 15 members of Pharmacy staff	Yes	£ 75.00	Hospitality
19/01/2017	Lunch provided for approx 15 members of Pharmacy staff	Yes	£ 75.00	Hospitality
21/12/2016	Small Christmas gift box from SBW, the Trust's advertising company, containing 4 small gifts.	Yes	£ 15.00	Gifts
19/12/2016	box of chocolates and box of biscuits	Yes	£ 8.00	Gifts
19/12/2016	box of biscuits	Yes	£ 5.00	Gifts
18/12/2016	Small Christmas gift box from SBW, the Trust's advertising company, containing 4 small gifts.	Yes	£ 15.00	Gifts

15/12/2016	tin of biscuits	Yes	£	6.00	Gifts
15/12/2016	chocolates and biscuits	Yes	£	7.00	Gifts
13/12/2016	tub of chocolates	Yes	£	5.00	Gifts
13/12/2016	chocolates	Yes	£	5.00	Gifts
03/12/2016	hampers X2 michael accepted the gift	No	£	30.00	Gifts
15/11/2016	Had registration fee for ASPiH conference waived by the conference organisers for writing and co-presenting a pre-conference workshop to delegates	Yes	£	315.00	Gifts
10/11/2016	Lunch provided for approx 15 members of Pharmacy staff	Yes	£	75.00	Hospitality
27/10/2016	Lunch provided for approx 15 members of Pharmacy staff	Yes	£	75.00	Hospitality
24/10/2016	Travel Expenses - Euro PCR - PCR Programme Committee	Yes	£	29.80	Commercial Sponsorship
20/10/2016	Travel Expenses St Jude NYC Conference	Yes	£	107.50	Commercial Sponsorship
17/10/2016	Travel Expenses - BCS - Mayo Course, London	Yes	£	57.50	Commercial Sponsorship
14/10/2016	Airport Parking Expenses	Yes	£	40.00	Commercial Sponsorship
06/10/2016	Lunch provided for approx 15 members of Pharmacy staff	Yes	£	75.00	Hospitality
20/09/2016	Travel Expenses for PCR London Valves Meeting 18-20 Sept 2016	Yes	£	213.00	Commercial Sponsorship
15/09/2016	£50 boots voucher	Yes	£	50.00	Gifts
12/09/2016	£50 Boots Gift Card	Yes	£	50.00	Gifts
12/09/2016	£50 Boots Gift Card	Yes	£	50.00	Gifts
09/09/2016	Lunch provided for approx 15 members of Pharmacy staff	Yes	£	75.00	Hospitality
05/09/2016	Euro PCR Meeting - Paris	Yes	£	29.80	Commercial Sponsorship
28/08/2016	Lunchtime drug rep meeting for 20 members of Pharmacy staff	Yes	£	75.00	Hospitality
27/08/2016	European Society of Cardiology Convention - Rome	Yes	£	63.38	Commercial Sponsorship
27/08/2016	travel and accomodation to attend the European Society of Cardiology meeting in Rome where i was a prresenter	Yes	£	800.00	Hospitality
28/07/2016	Lunch provided for approx 15 members of pharmacy staff	Yes	£	75.00	Hospitality
11/07/2016	Reebok exercise bike for use with adult CF patients in the Bristol Adult CF Centre, BRI	Yes	£	300.00	Gifts

30/06/2016	Travel Expenses for Euro PCR Board - 28/29 June 2016	Yes	£ 59.80	Commercial Sponsorship
30/06/2016	Consulting Service	Yes	£ 2,390.00	Commercial Sponsorship
24/06/2016	On 24 June 2016, Intersurgical Ltd paid the Bristol Medical Simulation Centre £200 to be able to present their training materials/equipment throughout the day when the Adult ODP Course was running	Yes	£ 200.00	Commercial Sponsorship
24/06/2016	On 24 June 2016. Intersurgical Ltd paid the Bristol Medical Simulation Centre £200 to be able to present their training materials/equipment throughout the day when the Adult ODP course was running	Yes	£ 200.00	Commercial Sponsorship
22/06/2016	2 x Reebok Exercise Bikes for use with adult CF patients in the Bristol Adult CF Centre, BRI	Yes	£ 600.00	Gifts
07/06/2016	Lunch provided for approximately 15 members of pharmacy staff	Yes	£ 75.00	Hospitality
01/06/2016	Honorarium for the production of a lecture at MRI study day arranged in the Cheltenham Nuffield Hospital	Yes	£ 500.00	Commercial Sponsorship
27/05/2016	iPad Mini 2	Yes	£ 219.00	Gifts
25/05/2016	Travel Expenses for UK TAVI Steering Group Meeting, London	Yes	£ 217.70	Commercial Sponsorship
23/05/2016	Unsolicited educational grant to support attendance at European Haematology Association Symposium in Copenhagen June 9th to 12th 2016.	Yes	£ 500.00	Commercial Sponsorship
23/05/2016	Unsolicited educational grant to support attendance at European Haematology Association Symposium June 9th to 12th in Copenhagen.	Yes	£ 250.00	Commercial Sponsorship
20/05/2016	payment of £250 received for speaking at a meeting sponsored by Bayer. Meeting related to a treatment being given in BHOC called Radium 223	Yes	£ 250.00	Commercial Sponsorship
19/05/2016	Travel Expenses to Euro PCR, Paris	Yes	£ 204.97	Commercial Sponsorship
18/05/2016	BRACELET	Yes	£ 10.00	Gifts
17/05/2016	box of chocolated	Yes	£ 5.00	Gifts
17/05/2016	box of chocolated	Yes	£ 5.00	Gifts
11/05/2016	None	No	£ -	Gifts
11/05/2016	Orchid plant delivered to the office	Yes	£ 15.00	Gifts
11/05/2016	NUTRICIA clinical care paid for my travel from bristol to London at their recent paediatric symposium - hot topics in paediatric growth	Yes	£ 203.00	Commercial Sponsorship
10/05/2016	Sponsorship of an educational event for the emergency nurse praticitioner team by Bristol Squibbs Myers, met th ABPI guidance	Yes	£ 250.00	Commercial Sponsorship
10/05/2016	iPad Mini 2	Yes	£ 219.00	Gifts
10/05/2016	I attended an evening reception which involved a meal at the Guildhall in London in order to accept an award on behalf of the Trust as part of the CHKS Top Hospitals ceremony.	Yes	£ 100.00	Hospitality
09/05/2016	21 items of exercise equipment 2 wheelchairs	Yes	£ 1,880.46	Gifts

27/04/2016	Lunch provided for approx 15 members of pharmacy staff	Yes	£ 75.00	Hospitality
22/04/2016	Travel expenses for Cangrelor Ad Board	Yes	£ 76.00	Commercial Sponsorship
21/04/2016	Perfume set "Prada Candy", given by patient "hidden" in a bag - realised what was inside only after patient went home. Will return the gift at next appointment (due on 9th June).	No	£ 60.00	Gifts
20/04/2016	earings and necklace	Yes	£ 5.00	Gifts
20/04/2016	Funded by Activa (a dressing company) to go to the cardiff Tissue Viability conference, a 2 day event.	Yes	£ 625.00	Commercial Sponsorship
15/04/2016	Enlighten retinal Conference. Barcelona.	Yes	£ 500.00	Commercial Sponsorship
11/04/2016	Travel Expenses for VITAL LIFE meeting, Paris	Yes	£ 30.00	Commercial Sponsorship
09/04/2016	Free ticket (worth £45) to Gala Charity Ball.	Yes	£ 45.00	Gifts
08/04/2016	Payment for consulting about inotuzumab	Yes	£ 700.00	Commercial Sponsorship
05/04/2016	B.S.N POINTS Accumulated on products ordered used to pay for 2 plaster technicians to go to conference x 2 members of staff £300 each.	Yes	£ 740.00	Commercial Sponsorship
23/03/2016	Travel Expenses for China Interventional Meeting, Beijing	Yes	£ 423.22	Commercial Sponsorship
22/03/2016	Honorarium for chairing and arranging a one day meeting on the consensus approach to the treatment of advanced HCC	Yes	£ 1,500.00	Commercial Sponsorship
21/03/2016	Travel Expenses - Astra Zeneca Webinar (London)	Yes	£ 139.50	Commercial Sponsorship
17/03/2016	HPN and IF workshop Paris 17/3/16 - 19/3/16. Fees, travel and accomodation paid for educational 2 day workshop in Paris. Subject is home parenteral nutrition and intestinal failure which is very relevent to my role.	Yes	£ 522.00	Commercial Sponsorship
10/03/2016	Consulting for Pfizer	Yes	£ 1,981.00	Commercial Sponsorship
29/02/2016	Travel expenses - Euro PCR Meeting, Paris - 29 Feb-2 March	Yes	£ 57.99	Commercial Sponsorship
26/02/2016	Subsidised dinner and drinks at Consultant leaving do, via general industry sponsorship.	Yes	£ -	Hospitality
25/02/2016	Visit to Central Middlesex Hospital to observe their scanning techniques for liver elastography, hosted by Siemens, included lunch	Yes	£ 10.00	Hospitality
19/02/2016	2 metal candlesticks, drinks mats, 35cl bottle of Turkish liqueur.	Yes	£ 20.00	Gifts
31/01/2016	£320 received by me in January 2016 from UCB Pharmaceuticals for attendance at Annual European Congress of Rheumatology, Rome, June 2015. Monies channeled through Above and Beyond but only received by me 6 months after the study leave	Yes	£ 320.00	Commercial Sponsorship
27/01/2016	Lunch provided for approx 15 members of staff	Yes	£ 75.00	Hospitality
27/01/2016	Well known patient to department under routine surveillance. On this visit brought in home made chocolate cake with tangerine drizzle.	Yes	£ -	Gifts
22/01/2016	Travel Expenses to European Society of Cardiology Board Meeting 22/24 January 2016	Yes	£ 78.10	Commercial Sponsorship

15/01/2016	payment for consulting with Basilea	Yes	£ 228.00	Commercial Sponsorship
13/01/2016	Help to cover the accommodation expenses of one the conferences I did, January 2016, in Fl, USA.	Yes	£ 500.00	Hospitality
05/01/2016	2016 DIARY	Yes	£ 2.00	Gifts
22/12/2015	International Congress of Interventional Cardiology - ICE 2015 - Program - Athens (Travel Expenses)	Yes	£ 68.32	Commercial Sponsorship
21/12/2015	Travel expenses for Gulf PCR - Dubai	Yes	£ 120.00	Commercial Sponsorship
19/12/2015	Two bottles of wine & a box of biscuits	Yes	£ 20.00	Gifts
16/12/2015	Meal hosted by PWC for Non-Executive Directors of NHS organisations in the South West.	Yes	£ 50.00	Hospitality
15/12/2015	Sponsorship to attend Euroecho meeting 2015.	Yes	£ 921.25	Commercial Sponsorship
13/12/2015	market research on acute pain practice, PCA use. completion of adverse events costing document and follow up calls with ICON to resolve data queries	Yes	£ 700.00	Commercial Sponsorship
10/12/2015	BBraun provided food to the UHBristol nutrition team on 10/12/15 but of less value than the value permitted in the 'Policy - Register of Interests, Gifts and Hospitality'. Probably not needed to declare it but I have to ensure transparency.	Yes	£ 15.00	Hospitality
30/11/2015	Travel expenses for Symposium - UK BVS Cambridge (26/27 November)	Yes	£ 138.20	Commercial Sponsorship
30/11/2015	UK TAVI Group - NICOR Meeting - Travel costs	Yes	£ 74.30	Commercial Sponsorship
30/11/2015	Second hand Trombone	Yes	£ -	Gifts
25/11/2015	Lunch provided for approx 15 members of Pharmacy staff	Yes	£ 75.00	Hospitality
12/11/2015	Association of Teaching Hospital Pharmacists Autumn Meeting jointly funded by six Pharmaceutical Companies (Allergan, Astellas, Menarini, Merck, Pfizer and Sanofi); meeting commenced 11th November at Radisson Blu Hotel Liverpool, overnight stay and for 12th November. All educational content was professional practice sharing by NHS (no pharma company content). Delegates are Chief Pharmacists of UK Teaching Hospitals and about 40 attended.	Yes	£ 150.00	Commercial Sponsorship
04/11/2015	Attendance at the BBH Awards in London which included train travel and the lunch at the awards ceremony.	Yes	£ 200.00	Hospitality
04/11/2015	National wound care conference harrogate-WOUNDS UK, access to conference, transport and accomodation	Yes	£ 450.00	Commercial Sponsorship
28/10/2015	Lunch provided for approximately 15 members of pharmacy staff	Yes	£ 75.00	Hospitality
27/10/2015	Speaker fee at an international conference for behavioural science in veterinary medicine.	Yes	£ 150.00	Commercial Sponsorship
27/10/2015	Speaker fee & Expenses (trainfare only) at Healthcare Events Conference - Clinical Audit for Improvement, Wednesday 7 October 2015	Yes	£ 150.00	Commercial Sponsorship
22/10/2015	Esaso retinal conference. Barcelona	Yes	£ 350.00	Commercial Sponsorship

15/10/2015	Unsolicited educational grant from Gilead to support attendance at the British Oncology Pharmacy Association Conference in Telford.	Yes	£ 500.00	Commercial Sponsorship
09/10/2015	Lunch Meeting	Yes	£ 10.00	Hospitality
08/10/2015	Sponsorship at attend BIT 7th Annual Congress of Cardiology 4-6 December 2015 Shanghai	Yes	£ 1,300.00	Commercial Sponsorship
05/10/2015	Association Forum Travel Expenses	Yes	£ 60.60	Commercial Sponsorship
30/09/2015	Lunch provided for approx 15 members of Pharmacy staff	Yes	£ 75.00	Hospitality
29/09/2015	Ad board payment from Basilea	Yes	£ 1,450.00	Commercial Sponsorship
28/09/2015	Meeting room and working dinner for Bristol health system leaders	Yes	£ 40.00	Hospitality
22/09/2015	PCR Valves - Berlin Travel Expenses	Yes	£ 56.90	Commercial Sponsorship
18/09/2015	Alexion-sponsored Hypophosphatasia Masters meeting in Amsterdam, 18-19 Sept 2015. Covering travel and accommodation expenses	Yes	£ 500.00	Commercial Sponsorship
16/09/2015	Sponsorship to attend EURETINA annual congress 16-19 September 2016	Yes	£ 850.00	Commercial Sponsorship
16/09/2015	Euretina Conference Nice.	Yes	£ 750.00	Hospitality
11/09/2015	Lunch Meeting	Yes	£ 25.00	Hospitality
04/09/2015	- Registration at SSIEM 2015 annual symposium in Lyon, France paid/provided for approx. 550 euro. - Return flights to Lyon, France from Bristol provided. - Accommodation and 3 evening meals at symposium provided. Unknown value of above so price below is approximation. Shire provided not as a gift but a grant (educational)	Yes	£ 800.00	Commercial Sponsorship
27/08/2015	Hotel and Travel to European Society of Cardiology meeting in London 29th August to 2nd Sept	Yes	£ 500.00	Hospitality
20/08/2015	Lunch provided for 15 members of Pharmacy staff	Yes	£ 75.00	Hospitality
04/08/2015	£700 to fund two pharmacist to attend the UKCPA conference in November 2015	Yes	£ 960.00	Commercial Sponsorship
30/07/2015	Working dinner for Bristol health system leaders.	Yes	£ 55.00	Hospitality
29/07/2015	Lunch provided by Bristol Meyers Squibb (Apixaban) for approx 15 members of Pharmacy staff	Yes	£ 75.00	Hospitality
20/07/2015	£350 for one pharmacist to attend the UKCPA conference in November 2015	Yes	£ 350.00	Commercial Sponsorship
11/07/2015	American Society of Retinal Surgeons Conference	Yes	£ 2,000.00	Commercial Sponsorship
01/07/2015	Nil		£ -	Gifts
30/06/2015	Travel Parking	Yes	£ 516.45	Hospitality
29/06/2015	Travel	Yes	£ 60.00	Commercial Sponsorship

26/06/2015	Enlighten Conference 2015. Paris	Yes	£ 750.00	Hospitality
26/06/2015	Consultancy fee (£1149) in relation to attendance at UK meeting to discuss potential development of new diagnostic radiopharmaceutical plus expenses (£139)	Yes	£ 1,288.00	Commercial Sponsorship
24/06/2015	Sponsorship to attend educational/ professional meeting including flights, accomodation and registration- CSI Frankfurt 24/06/15-28/06/15..	Yes	£ 1,000.00	Commercial Sponsorship
22/06/2015	Travel and accomodation at Europace conference in Milan.	Yes	£ -	Commercial Sponsorship
20/06/2015	Support to attend a meeting (Masterclass 2015) in Barcelona 20-21st of March 2015. Flights and one night accommodation were covered.	Yes	£ -	Commercial Sponsorship
19/06/2015	Travel Car Parking	Yes	£ 118.06	Commercial Sponsorship
18/06/2015	Meal at a restaurant after attending conference	Yes	£ 25.00	Hospitality
17/06/2015	Bursary place accepted at education session provided by Pharmacy Management Academy (funded and attended by representatives of Novartis, Shire Pharmaceuticals and Amdipharm) Lunch was provided as part of the study day	Yes	£ -	Commercial Sponsorship
15/06/2015	Travel Accommodation	Yes	£ 633.90	Hospitality
15/06/2015	Attend a 4 day course on gamma knife Icon in Stockholm Sweden, including flights, transfers, hotels and meals. Cost is estimated.	Yes	£ 1,000.00	Commercial Sponsorship
12/06/2015	Box of chocolates	Yes	£ 5.00	Gifts
10/06/2015	Lunch provided by Boehringer Ingelheim (Tiotropium) for approx 15 members of Pharmacy staff	Yes	£ 75.00	Hospitality
10/06/2015	Flowers and bottle of wine	Yes	£ -	Gifts
09/06/2015	Dinner meeting at marco's Olive Branch to discuss the sale of Medway back to System C	Yes	£ 25.00	Hospitality
09/06/2015	Dinner meeting at Marco's Olive Branch to discuss the sale of Medway back to System C.	Yes	£ 25.00	Hospitality
09/06/2015	Dinner meeting at Marco's Olive Branch to discuss the sale of Medway back to System C.	Yes	£ 25.00	Hospitality
09/06/2015	Dinner/drinks on average every other month after departmental meeting, provided by sponsoring pharmaceutical companies.	Yes	£ 200.00	Hospitality
08/06/2015	Hosting of NHS Radiology Insourcing Focus Group operated by an independent market research company. Monetary incentive offered according to Market Research Society Code of Conduct	Yes	£ 350.00	Commercial Sponsorship
05/06/2015	Patient information leaflets and posters regarding the health risks of smoking when you have Rheumatoid Arthritis and are taking biologic therapy. We provided the Trust logo to be added to the materials and the telephone number of the local stop smoking service. The leaflets were already designed by the pharmaceutical company in conjunction with the charity National Rheumatoid Arthritis Society.	Yes	£ 3,000.00	Commercial Sponsorship
03/06/2015	Training course, Minneapolis to implant leadless pacemakers. Travel and accomodation	Yes	£ -	Commercial Sponsorship
03/06/2015	chocolates	Yes	£ 10.00	Gifts

02/06/2015	As a member of the paediatric Chief Pharmacists group we get quarterly sponsorship for our meetings which consists of a meal in exchange for the representative or company informing us about a new medicinal product, medicine supplier or electronic medicines safety solution products.	Yes	£ 600.00	Commercial Sponsorship
01/06/2015	Cambodian silk table cloth	Yes	£ 30.00	Gifts
30/05/2015	At Confed Conference dinner hosted by Boston Consulting Group and drinks hosted by KMPG.	Yes	£ -	Commercial Sponsorship
20/05/2015	Meal hosted by PWC, attended by other Non-executive Directors from NHS organisations in the South West.	Yes	£ 50.00	Hospitality
12/05/2015	Sponsorship to attend an international conference (Meeting of the Heart Rhythm Society 12-16th of May) in Boston USA.	Yes	£ -	Commercial Sponsorship
07/05/2015	Colgate sponsored lunch at BDA conference	Yes	£ 30.00	Hospitality
28/04/2015	Study day organised by Helapet on current issues in aseptic manufacture	Yes	£ 10.00	Commercial Sponsorship
27/04/2015	Refreshments provided by company during discussions regarding future developments. This took place during the ESTRO radiotherapy conference.	Yes	£ 20.00	Hospitality
26/04/2015	Lecture & update on the capability of the equipment provided by the manufacturer, accompanied by refreshments (buffet). This learning opportunity was very valuable.	Yes	£ 20.00	Commercial Sponsorship
22/04/2015	Clinical Observer Programme at World renowned University teaching hospital in Amsterdam, for inflammatory bowel disease	Yes	£ 250.00	Commercial Sponsorship
21/04/2015	Investigator clinical trial meeting in Milan. All flights and accomodation paid	Yes	£ 600.00	Hospitality
18/04/2015	Sponsored to attend 2 day Symposium, 'Gastrointernational' - to learn more about functional bowel disease	Yes	£ 250.00	Commercial Sponsorship
02/04/2015	Attended ARVO Conference in Denver, USA.	Yes	£ 3,000.00	Commercial Sponsorship
24/03/2015	Meal at Hotel Du Vin paid for by Laing O'Rourke to mark end of P21 contract.	Yes	£ 50.00	Hospitality
24/03/2015	Meal at Hotel Du Vin paid for by Laing O'Rourke to mark end of P21 Contract.	Yes	£ 50.00	Hospitality
24/03/2015	Dinner	Yes	£ 50.00	Hospitality
24/03/2015	Dinner	Yes	£ 50.00	Hospitality
23/03/2015	Pacemaker conference, Munich	Yes	£ -	Commercial Sponsorship
22/03/2015	EAPCI Summit - Travel & Accom	Yes	£ 330.70	Commercial Sponsorship
20/03/2015	Contribution towards travel costs, accomodation and registration at an educational meeting: Stroke prevention in Non-Valvular Atrial Fibrillation Masterclass meeting- Barcelona.	Yes	£ 400.00	Commercial Sponsorship
19/03/2015	AF conference in Paris. Travel and accomodation sposored.	Yes	£ -	Commercial Sponsorship
11/03/2015	Pharmaceutical company support to attend European neuroendocrine tumour meeting in Barcelona. They paid for flights, transfers and hotel accomodation as well as meeting registration fees.	Yes	£ 600.00	Commercial Sponsorship

11/03/2015	Dinner provided evening prior to regional user forum to network with representative from other Trust.	Yes	£ 40.00	Hospitality
26/02/2015	Support to attend a medical meeting (LIVE subcutaneous ICD day) at University Hospital Oxford NHS foundation trust.	Yes	£ -	Commercial Sponsorship
20/02/2015	Travel	Yes	£ 125.66	Commercial Sponsorship
18/02/2015	Investigator meeting for a clinical trial in Athens. Flights and accomodation, travel expenses and travel insurance paid	Yes	£ 600.00	Commercial Sponsorship
13/02/2015	Travel - Euro CTO Study	Yes	£ 1,435.00	Commercial Sponsorship
10/02/2015	sponsorship to Tandem BMT meetings in San Diego, CA Part of airfare	Yes	£ 1,305.00	Commercial Sponsorship
10/02/2015	Drinks event hosted by Hunter Healthcare for NHS Chairs and Vice Chairs	Yes	£ -	Hospitality
04/02/2015	Attended the Outpatient Efficiency Action Plan conference as a speaker in Manchester. Conference organised by SBK: Healthcare:Regional and topical conferences and courses.	Yes	£ 82.90	Hospitality
03/02/2015	Dinner hosted by Deloitte with Paul Street from Monitor and other NEDs/ local organistions in attendance.	Yes	£ -	Hospitality
28/01/2015	Dinner at Hotel du Vin Bristol hosted by KPMG	Yes	£ -	Hospitality
28/01/2015	Dinner for Bristol health system leaders	Yes	£ 50.00	Hospitality
19/01/2015	AC1 2015 - Travel & Accom	Yes	£ 85.50	Hospitality
17/12/2014	Box of Cadbury chocolates - value £35	Yes	£ 35.00	Gifts
05/12/2014	NFIC 2014, Poland - Travel & Accom	Yes	£ 65.00	Commercial Sponsorship
05/12/2014	780g tub of Cadbury's Heroes chocolates	Yes	£ 5.00	Gifts
01/12/2014	Gulf PCR Mtg Dubai - Travel & Accom	Yes	£ 31.50	Commercial Sponsorship
27/11/2014	IVCC - Travel & Accom	Yes	£ 90.10	Commercial Sponsorship
27/11/2014	Hotel and Evening meal provided by Drager Medical Ltd to rectify error by Drager in listing two day training course as one and thus adding extra cost to the Trust.	Yes	£ 102.00	Hospitality
24/11/2014	Working dinner for Chief Executives on 5 Year Forward View	Yes	£ 40.00	Hospitality
21/11/2014	Voucher for overnight stay for 2 and breakfast at the Royal Marriott Hotel, College Green, Bristol. Voucher redeemed on 12th December 2014.	Yes	£ 139.00	Hospitality
18/11/2014	Posaconazole Ad Board	Yes	£ 2,000.00	Commercial Sponsorship
13/11/2014	Blinatumamab Ad Board	Yes	£ 1,480.00	Commercial Sponsorship
12/11/2014	Posaconazole Ad Board	Yes	£ 1,200.00	Commercial Sponsorship
05/11/2014	Talk to SW microbiologists	Yes	£ 1,800.00	Commercial Sponsorship

29/10/2014	Invitation to Kingsley Manning Event	Yes	£ -	Hospitality
20/10/2014	Supported attendance of UEGW conference in Vienna	Yes	£ 300.00	Commercial Sponsorship
20/10/2014	Paid by novartis pharmaceuticals to attend bopa conference, flights and hotels and transfers.	Yes	£ 600.00	Commercial Sponsorship
13/10/2014	Voriconazole Ad Board and talk Romania	Yes	£ 3,000.00	Commercial Sponsorship
12/10/2014	Support to attend a meeting (Future of CRT) in Berlin on 12th and 13th of October 2014. Flights and one night accommodation were covered.	Yes	£ -	Commercial Sponsorship
06/10/2014	Advisory Board - Travel & Accom	Yes	£ 362.25	Commercial Sponsorship
04/10/2014	Invitation to wedding	Yes	£ -	Hospitality
02/10/2014	Autumn Council Mtg - Travel & Accom	Yes	£ 394.50	Commercial Sponsorship
01/10/2014	payment of conference fees for Paediatric Intensive Care conference 2014	Yes	£ 250.00	Commercial Sponsorship
01/10/2014	Voriconazole Ad Board	Yes	£ 2,000.00	Commercial Sponsorship
28/09/2014	PCR London Valves - Travel	Yes	£ 249.39	Commercial Sponsorship
26/09/2014	Sponsorship for travel and registration for ESMO 2014	Yes	£ 1,000.00	Commercial Sponsorship
18/09/2014	Educational grant to attend academic meeting: European Society for Paediatric Endocrinology 2014 in Dublin I was able to attend and present research data.	Yes	£ 687.00	Commercial Sponsorship
16/09/2014	Talk for Pfizer re voriconazole trials	Yes	£ 1,800.00	Commercial Sponsorship
14/08/2014	Site visit to White Tree Dental Centre in Bristol to evaluate OPG Lift from BRI to Westbury Park and back	Yes	£ 3.00	Hospitality
15/07/2014	Review of production factory for current dynamic mattress supplier and promotional developments/wishes from future products	Yes	£ 300.00	Commercial Sponsorship
11/07/2014	Fellows Course - Travel & Accom	Yes	£ 326.41	Commercial Sponsorship
01/07/2014	AC1 2015 Prog Planning Mtg - Travel	Yes	£ 177.60	Commercial Sponsorship
28/06/2014	ESC Task Force	Yes	£ 270.55	Commercial Sponsorship
25/06/2014	Gulf PCR Programme - Travel	Yes	£ 28.00	Commercial Sponsorship
18/06/2014	Working Group	Yes	£ 35.90	Hospitality
17/06/2014	invited to chair evening educational teaching session on pain medication	Yes	£ 500.00	Hospitality
17/06/2014	Evening Meal during talk on Tapentadol	Yes	£ 30.00	Hospitality
16/06/2014	Overnight stay in London Hotel and gift for attendance at an advisory board meeting on use of Lofexidine	Yes	£ 800.00	Hospitality

13/06/2014	Hosted at regional awards ceremony by construction partner Laing O'Rourke. Evening included meal and drinks.	Yes	£	50.00	Hospitality
09/06/2014	Dinner with McKesson's at Marco's Restaurant	Yes	£	50.00	Hospitality
23/05/2014	Wound care conference in Salfrod	Yes	£	150.00	Commercial Sponsorship
22/05/2014	Invited speaker at Toshiba Ultimax-i Study Day in Reading Gave presentation on the transition from image intensifiers to flat panel detectors in fluoroscopy Travel by train reimbursed, along with lunch and refreshments at the study day itself Value below is train fare (£93.80) plus my estimate for remainder	Yes	£	123.80	Commercial Sponsorship
19/05/2014	Invited speaker at Toshiba Ultimax-i Study Day in Manchester Gave presentation on the transition from image intensifiers to flat panel detectors in fluoroscopy Travel by train reimbursed, accommodation and dinner provided the night before (all speakers and delegates invited) along with lunch and refreshments at the study day itself Value below is for train fare (£80.90) plus my estimate for remainder	Yes	£	255.90	Commercial Sponsorship
15/05/2014	invited to teach GP's on pain management - honorarium fee provided	Yes	£	400.00	Commercial Sponsorship
07/05/2014	Sponsorship to attend international medical conference (Meeting of the Heart Rhythm Society) in San Francisco, USA. May 7-10th 2014.	Yes	£	-	Commercial Sponsorship
06/05/2014	Flight and accomodation at Heart Rhythm Society conference, San Francisco, USA, 5-10th may.	Yes	£	2,000.00	Commercial Sponsorship
02/05/2014	Ticket to watch rugby match and pre-match buffet	Yes	£	55.00	Hospitality
01/05/2014	Euro PCR 2014	Yes	£	261.61	Commercial Sponsorship
25/04/2014	The Clinical Pharmacy Congress http://www.pharmacycongress.co.uk/	Yes	£	100.00	Commercial Sponsorship
25/04/2014	Sponsored to attend KetoPAG conference and study day	Yes	£	150.00	Commercial Sponsorship
11/04/2014	VITAL 11 Mtg, Paris	Yes	£	261.62	Commercial Sponsorship
09/04/2014	Invitation to attend a course (CARTO NAVIGATION COURSE) in Hamburg 9-10 April 2014. Flight and one night stay covered.	Yes	£	-	Hospitality
09/04/2014	Site visits to Royal Bournemouth Hospital and Salisbury Hospital to evaluate CR equipment Travel plus sandwich lunch at hospital	Yes	£	40.00	Hospitality
08/04/2014	Site visit to Torbay Hospital to evaluate CR equipment Travel plus sandwich lunch in hospital	Yes	£	40.00	Hospitality
03/04/2014	provided with flight and hotal accommodation to attend user group meeting in vienna on 04/04/2014	Yes	£	500.00	Hospitality
02/04/2014	Train fare to London to attend training course in new Bone Anchored Hearing Aid technique	Yes	£	100.00	Commercial Sponsorship
02/04/2014	Travel, meals and accommodation during Tokyo meeting where I chaired a Research Investigator Meeting and chaired a scientific debate.	Yes	£	1,500.00	Commercial Sponsorship

01/04/2014	Travel and Registration for American College of Cardiology Meeting	Yes	£ 1,000.00	Commercial Sponsorship
31/03/2014	After being put forward by the trust resuscitation department. I was invited to attend an educational event in Rotterdam by Vidacare the manufacturer of the intraosseous access device that is currently in use in the adult and children's emergency department. This event examined the scientific principles of intra-osseous access and there was the opportunity to insert the device into cadavers. Travel, accomodation and an evening meal was provided to me by Vidacare.	Yes	£ 300.00	Commercial Sponsorship
28/03/2014	December 2013-Site visit to St. Peter's Hospital, Chertsey to view Cardiac Cath Lab equipment. Transport and lunch provided by Siemens.		£ 100.00	Commercial Sponsorship
28/03/2014	Lunch for candidates of One Lung course paid for by Abbvie. They paid for Pizzas.	Yes	£ 120.00	Hospitality
24/03/2014	Nothing to declare		£ -	Gifts
24/03/2014	Travel Funding for dietitians meeting from Vitaflo UK	Yes	£ 37.00	Commercial Sponsorship
19/03/2014	Dinner at ICM conference	Yes	£ 50.00	Hospitality
18/03/2014	Offered to pay for registration and accomodation at the European Breast Cancer Conference in Glasgow.	Yes	£ 500.00	Commercial Sponsorship
18/03/2014	When attending the quarterly Neonatal and Paediatric Pharmacist group committee meetings I am paid for travel, overnight stay and a meal. I also have half my conference fee's paid in return for helping facilitate the day to day running of the event.	Yes	£ 850.00	Commercial Sponsorship
14/03/2014	Travel	Yes	£ 525.20	Hospitality
14/03/2014	2 or 3 times a year I go to the Haemophilia Data Managers Forums which are held nationally and any meals within the meeting are provided, together with an overnight stay if appropriate (sometimes it is over 2 days). These are sponsored by outside companies - so far always one of the factor provider companies. The cost is borne by them direct. The latest being thurs 13th to fri 14th March when I was overnight in a Birmingham Conference hotel with meals provided thurs lunch, dinner, and fri breakfast and lunch.	Yes	£ 200.00	Hospitality
12/03/2014	Travel, hotel accomodation and food for a workshop on ECP in Vienna	Yes	£ 500.00	Hospitality
10/03/2014	I attended a scientific session run by one of the valve companies which included supper.	Yes	£ 25.00	Hospitality
10/03/2014	Overnight accomodation and dinner, to allow me to attend a surgical meeting.	Yes	£ 150.00	Hospitality
06/03/2014	PCR Inustry Board Mtg	Yes	£ 261.62	Commercial Sponsorship
05/03/2014	Agreement to pay travel expenses to Neonatal Nutrition meeting in Nottingham. (Not yet rreceived but verbally approved)	Yes	£ 143.00	Commercial Sponsorship
05/03/2014	overnight and 1 day conference	Yes	£ 200.00	Hospitality
05/03/2014	Sponsored meal at an educational event out of hours	Yes	£ 20.00	Hospitality
05/03/2014	Coffee	Yes	£ 2.50	Hospitality

01/03/2014	Sponsorship of external meeting that I organised	Yes	£ 250.00	Commercial Sponsorship
13/02/2014	Travel	Yes	£ 317.49	Commercial Sponsorship
12/02/2014	Drug rep provided sandwich lunch for Monthly palliative care team teaching session	Yes	£ 2.00	Hospitality
11/02/2014	Part sponsorship of South West Nuclear medicine meeting in Dorchester. As a result meeting costs were covered and only cost to the Trust was travel.	Yes	£ 40.00	Commercial Sponsorship
06/02/2014	Provision of accomodation / meals at International networks in Anaesthesia meeting in Prague.	Yes	£ 250.00	Hospitality
05/02/2014	return train fare to Birmingham from Bristol . Lunch	Yes	£ 150.00	Commercial Sponsorship
28/01/2014	Offered to pay for registration and accomodation at British Thoracic Oncology Group annual Conference in Dublin	Yes	£ 800.00	Commercial Sponsorship
23/01/2014	Attendance at ASCO GI in San Fransisco - paid for educational event	Yes	£ -	Commercial Sponsorship
07/01/2014	Sponsorship to cover expenses incurred in attending the European society for Paediatric Endocrinology Annual conference in Milan (September 18th-22nd September 2013	Yes	£ 700.00	Commercial Sponsorship
05/01/2014	Gold ring. Estimated value	No	£ 40.00	Gifts
17/12/2013	Support to fund travel to attend an dietitian's networking group meeting	Yes	£ 100.00	Commercial Sponsorship
09/12/2013	Travel and overnight accomodation for attendence at training event run by Vidacare:	Yes	£ 200.00	Commercial Sponsorship
05/12/2013	Attendance at The 19th Novo Nordisk Paediatric Endocrine Workshop	Yes	£ -	Commercial Sponsorship
29/11/2013	contribution to part fund attendance at an oncology nutrition study day in london	Yes	£ 100.00	Commercial Sponsorship
28/11/2013	Attended Association of Teaching Hospital Pharmacists Autumn 2 day meeting in Leeds, part sponsored by 7 Pharmaceutical Companies	Yes	£ 40.00	Commercial Sponsorship
28/11/2013	Sponsored to attend Inherited Metabolic Dietitian conference and study day	Yes	£ 100.00	Commercial Sponsorship
21/11/2013	Sponsorship to attend Society of Neuro-oncology annual meeting	Yes	£ 3,000.00	Commercial Sponsorship
15/11/2013	Invitation to attend and particpate in the the Lung Summitt	Yes	£ -	Commercial Sponsorship
01/11/2013	Contribution towards attendance at educational Conference: British Society of Paediatric Endocrinology and Diabetes Annual Meeting.	Yes	£ 250.00	Commercial Sponsorship
23/10/2013	Dinner	Yes	£ 50.00	Hospitality
23/10/2013	I was attending an international meeting and the company provided dinner for me	Yes	£ 50.00	Hospitality
22/10/2013	I was attending an international meeting and the company provided dinner for me	Yes	£ 50.00	Hospitality
18/10/2013	Sponsorship (flights, transfers, accomodation and entrance fee) to attend the British Oncology Pharmacy Association Annual conferance in Edinburgh from 18-20 Oct 2013	Yes	£ 600.00	Commercial Sponsorship
13/10/2013	Three nights accomodation at Heart rhythm UK meeting. Birmingham	Yes	£ 200.00	Hospitality

18/09/2013	Educational Grant as contribution towards attendance at educational Conference: European Society of Paediatric Endocrinology Annual Meeting	Yes	£ 500.00	Commercial Sponsorship
18/09/2013	Travel costs for LSD Pharmacist Training Day in Birmingham funded by Shire Pharmaceuticals.	Yes	£ 100.00	Commercial Sponsorship
09/09/2013	Invitation to attend teh European Thoracic Society - Barcelona. This covered flights, registration and accommodation. No payment made.	Yes	£ -	Commercial Sponsorship
02/09/2013	Support for travel, accomodation and congress fees given by Actelion for attending the ICIEM metabolic congress in Barcelona.	Yes	£ 1.00	Commercial Sponsorship
02/09/2013	ICIEM Conference in Barcelona - return flight from UK; accommodation and conference registration	Yes	£ 1,000.00	Commercial Sponsorship
01/09/2013	Sponsorship to attend European Society of Cardiology Meeting in Amsterdam includes Registration, travel and hotel	Yes	£ 700.00	Commercial Sponsorship
29/07/2013	Speaker fee for talk in GP surgery (Whitchurch Health Centre) on 'Pain in Practice'.	Yes	£ 200.00	Commercial Sponsorship
10/07/2013	Travel costs for an IMD Pharmacist Training Day in Birmingham covered by Orphan Europe.	Yes	£ 100.00	Commercial Sponsorship
09/07/2013	funded place to attend ESPGHAN international nutrition conference in london for 3 days with my boss and include in a focus group	Yes	£ 300.00	Commercial Sponsorship
25/06/2013	Educational Grant as contribution towards attendance at educational Conference: International Conference on Children's Bone Health	Yes	£ 916.35	Commercial Sponsorship
19/06/2013	Provision of refreshments at Brachytherapy Radiographers meeting, London	Yes	£ 200.00	Commercial Sponsorship
31/05/2013	Sponsorship to attend American Society of Clinical Oncology Meeting	Yes	£ 3,000.00	Commercial Sponsorship
17/05/2013	Invitation to attend and present papers in the American Thoracic Society Conference	Yes	£ -	Hospitality
09/05/2013	Receipt of Textbook for the department	Yes	£ 135.50	Gifts
26/04/2013	Train fare and hotel accomodation to attend The British Society for Rheumatology conference in Birmingham (over 3 days).	Yes	£ 275.00	Commercial Sponsorship
22/04/2013	Educational grant to attend International Myeloma Workshop	Yes	£ 2,000.00	Commercial Sponsorship
11/04/2013	Attended Association of Teaching Hospital Pharmacists Spring Meeting (London 10th/11th April 2013) which was partially sponsored by 4 Pharmaceutical Companies	Yes	£ 40.00	Commercial Sponsorship
05/03/2013	The fees for attendance at The British Society for Rheumatology Conference in Birmingham were paid by Pfizer pharmaceutical company.	Yes	£ 171.60	Commercial Sponsorship