

# NATIONAL QUALITY IMPROVEMENT & CLINICAL AUDIT NETWORK



## Policy on Interests & Hospitality

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### 1 Objectives

- 1.1 NQICAN members need to be confident that all business is conducted in an open and honest way that is beyond reproach. It is the responsibility of all NQICAN members to ensure that they are not placed in a position which risks, or appears to risk, conflict between their NQICAN duties and other personal interests, or those of their employing organisation.
  
- 1.2 When considering any offers of hospitality, sponsorship or gifts, NQICAN members need to be mindful of the following
  - 1.2.1 Seven principles of public life, Nolan Committee (May 1995)
  - 1.2.2 Bribery Act (2010)
  - 1.2.3 Standards of business conduct for staff, HSG(93)5
  - 1.2.4 Commercial sponsorship: ethical standards for the NHS, DH (Nov 2000)
  
- 1.3 This policy aims to ensure that potential conflicts of interest or accusations of inappropriate behaviour are avoided.

### 2 Register of Interests

- 2.1 NQICAN members should declare any relevant interests or positions of responsibility which they hold in their 'host' health and social care organisation, and outside of this (i.e. personal interests). An interest is defined as any personal or financial interest in an outside organisation, including a private company, public sector organisation, NHS employer or

voluntary organisation which may compete for a contract to supply either goods or services in relation to the business of clinical audit. It is important that for all declarations, the name of the company or organisation is clearly stated, together with the nature of the relationship.

## **2.2 Procedure**

- 2.2.1** A register of interests will be maintained by the General Secretary.
- 2.2.2** A record should be maintained on an ongoing basis for each member in the format at Appendix 1. Each member will be asked to notify the network of any new conflicts of interest at the start of each network meeting.
- 2.2.3** Returns should be made electronically via email to simplify the process and facilitate easy compilation of information. The email return should be sent from the email address of the person completing the form, which will serve as a signature.
- 2.2.4** The General Secretary will be required to provide assurances to NQICAN on an annual basis that the Register of Interests has been updated. This would normally be done at the March meeting, covering the Register of Interests for the previous financial year.
- 2.2.5** The Register of Interests will be published on the NQICAN webpage as part of NQICAN's commitment to transparency in all its dealings.

## **3 Register of Gifts and Hospitality**

### **3.1 Offers of Gifts and Hospitality**

- 3.1.1** Members of NQICAN should not accept gifts, trips or hospitality from outside bodies that might be construed as an inducement to act in the interest of that body. Articles of low value need not necessarily be refused. Modest hospitality, such as working lunches, may be acceptable. Articles of low value such as diaries or calendars, or small tokens of gratitude need not necessarily be refused.

### **3.2 What to Declare**

- 3.2.1** NQICAN members should declare any hospitality for regional network events as follows
- 3.2.2** Offers of meeting rooms at reduced rates by organisations other than the employing NHS trusts/care provider of network members.
- 3.2.3** Offers of hospitality at reduced rates by organisations other than the employing NHS trusts of network members.
- 3.2.4** NQICAN members should declare any gifts offered or received in their capacity as a member of NQICAN with a monetary value greater than £25.

### **3.3 Procedure**

- 3.3.1** A Register of Hospitality will be maintained by the General Secretary.
- 3.3.2** A record should be maintained on an ongoing basis in the format at Appendix 2. Each member will be asked to keep a record of any hospitality received and submit this to the General Secretary on an annual basis.
- 3.3.3** If there is any doubt about the appropriateness of accepting any hospitality, this should be discussed with the General Secretary at the time, and preferably prior to acceptance, i.e. NQICAN members have a personal responsibility to highlight any matters where there is doubt, and not simply leave these until the time of the annual return.
- 3.3.4** If the General Secretary has any cause for concern about reported hospitality, this will be discussed with the Chair.
- 3.3.5** Returns should be made electronically via email to simplify the process and facilitate easy compilation of information. The email return should be sent from the email address of the person completing the form, which will serve as a signature.
- 3.3.6** The General Secretary will be required to provide assurances to NQICAN on an annual basis that the Register of Hospitality has been completed. This would normally be done at the March meeting, covering the Register of Hospitality for the previous financial year.
- 3.3.7** The Register of Hospitality will be published on the NQICAN webpage as part of NQICAN's commitment to transparency in all its dealings.
- 3.3.8** If a member leaves NQICAN, he or she is expected to complete and submit an updated Register of Hospitality up to the date of their leaving.

## **4 Invitations to speak at national and regional events**

### **4.1 What to declare**

- 4.1.1** Any invitations to speak at national or regional events in their capacity as a member of NQICAN.

### **4.2 Procedure**

- 4.2.1** All plans for members to present in their capacity as a member of NQICAN should be agreed by a majority of NQICAN members, along with any associated expenses and gratuity.
- 4.2.2** Where it is not possible, due to time constraints, to gain the approval of the wider network, the chair may make an executive decision.

## **5 Responsibilities of the General Secretary & Chair**

- 5.1** The General Secretary will remind members of the above requirements on a regular basis (at least annually). He or she will discuss the contents of the Registers of Interests and Hospitality with the chair prior to publication on the

website. If anything declared appears inappropriate, it is the responsibility of the Chair to take appropriate action.

## **6 Responsibilities of all members**

- 6.1** It is the responsibility of all members of NQICAN to be aware of and act in accordance with this policy.



# Appendix 1. Declaration of Interests Form

**Name:**

**Region Represented:**

The following are judged to be material interests. Please indicate any that apply, or have applied in the last year, and give brief details in the box below:

\*Organisations are defined as HQIP; Royal Colleges; NICE; Clinical Audit Support Centre; Healthcare Quality Quest, and other similar organisations

<input type="checkbox"/>	1	Work as paid adviser to above organisations.
<input type="checkbox"/>	2	In receipt of lecture fees of £150 in the last year from above organisations.
<input type="checkbox"/>	3	In receipt of equipment or support staff funded, all or in part from above organisations.
<input type="checkbox"/>	4	In receipt of educational/research grant for self or department from above organisations.
<input type="checkbox"/>	5	In receipt of travel and similar expenses for self or department from above organisations.
<input type="checkbox"/>	6	Received gifts, benefits or sponsorship of any kind, whether refused or accepted worth over £25 or several small gifts worth a total of over £100 from the above or closely related organisations within the last twelve months.
<input type="checkbox"/>	7	Any other interest (other than personal or family medical conditions) which could be seen as influencing the actions of NQICAN.
Please give brief details of any declared material interest		
<input type="checkbox"/>	8	I have no material interest to declare

<b>Signature:</b>	
<b>Date:</b>	

Any interests declared in this document will be added to the NQICAN Declaration of Interests, and published on the NQICAN website.

National Quality Improvement and Clinical Audit Network

Hospitality Register

Name:

<i>Date hospitality received</i>	<i>Name of NQICAN member</i>	<i>Person or Body making the offer</i>	<i>Nature/value of gift/ hospitality offered/given/received</i>	<i>Circumstances in which offer was made</i>