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Health Education and Improvement Wales

Standards of Behaviour Framework (Incorporating Declarations of Interest, Gifts, Hospitality, Honoraria & Sponsorship)

Policy

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1. Purpose

Health Education and Improvement Wales (HEIW) is committed to ensuring that its employees and independent members practice the highest standards of conduct and behaviour. This policy sets out those expectations and provides supporting guidance.

2. Introduction

The [Welsh Government's Citizen-Centred Governance Principles](#) apply to all public bodies in Wales. These principles integrate all aspects of governance and embody the values and standards of behaviour expected at all levels of public services in Wales.

The Board is strongly committed to HEIW being value-driven, rooted in Nolan principles and high standards of public life and behaviour, including openness, customer service standards, diversity and engaged leadership.

The '[Seven Principles of Public Life](#)' (the 'Nolan Principles'), form the basis of HEIW's Standards of Behaviour requirements for its employees and independent members. In support of these principles, employees and independent members must be impartial and honest in how they go about their day-to-day functions. They must remain beyond suspicion at all times. They can achieve the seven principles of public life by:

- ensuring that the interests of service users remain paramount;
- being impartial and honest in the conduct of their official business;
- using public funds to the best advantage of the service and the service users, always seeking to ensure value for money;
- not abusing their official position for personal gain or to benefit family or friends;
- not seeking advantage or to further private business or other interests in the course of their official duties; and
- not seeking or knowingly accepting preferential rates or benefits for private transactions carried out with companies with which they have had, or may have, official dealings on behalf of HEIW.

This policy re-states and builds on the provisions included in HEIW's Standing Orders. It re-emphasises the commitment of HEIW to ensure that it operates to the highest standards, the roles and responsibilities of those employed by HEIW, and the arrangements for ensuring that declarations of interests, gifts, hospitality, honoraria and sponsorship can be made.

The policy is supported by a short guide on the Standards of Behaviour Framework (see Appendix 1) that provides a summary of expected conduct. This Framework is intended to complement the various Professional Codes of Conduct relevant to employees of HEIW.

3. Scope

This policy applies to all HEIW employees and independent members. The term 'employees' includes all those with a contract of employment or honorary contract with HEIW, as well as bank and agency workers.

4. Aims and Objectives

HEIW is committed to ensuring that all employees and independent members practice the highest standards of conduct and behaviour.

This policy aims to ensure that arrangements are in place to support employees and independent members to act in a manner that upholds the Standards of Behaviour Framework. It also sets out specific arrangements for the appropriate declarations of interest and acceptance/refusal and record of offers of gifts, hospitality, honoraria and sponsorship.

5. Roles and Responsibilities

5.1 Chair

The Chair should:

- Ensure independent members are aware of the requirements of this policy and the Standards of Behaviour Framework.
- Approve or decline the acceptance of gifts, hospitality, and sponsorship that have been offered to independent members prior to the event.
- Lead by example and ensure they declare any relevant interest or the offer of gifts, hospitality, or sponsorship.

5.2 Chief Executive

The Chief Executive is the 'Accountable Officer' with overall responsibility for ensuring that:

- HEIW operates efficiently, economically and with probity.
- A policy framework is set and that arrangements are in place to support the delivery of that framework.

5.3 Board Secretary

The Board Secretary has delegated responsibility for ensuring that HEIW receives competent advice and support regarding the contents and application of this policy and the Standards of Behaviour Framework.

The Board Secretary will ensure that:

- A Register of Interests is established and maintained as a formal record of interests declared by employees and independent members.
- Arrangements are in place to prompt specific groups of employees (being Board member, member of the Deans and Deputies Group, staff on grade 8c and above and budget holders – 'the Specific Group') to complete a

declaration of interest submission on initial employment with HEIW and annually thereafter (details of how to submit a declaration of interest are included in Appendix 2). **It is the individual employee's responsibility to make a declaration promptly should their circumstances change within these timescales.**

- Scrutiny is applied to the declaration forms received to ensure appropriate declarations and acceptances have been made in compliance with the Standards of Behaviour Policy.
- A Register of Gifts, Hospitality, Honoraria and Sponsorship, whether accepted or declined, is maintained.
- Arrangements are in place to prompt all employees and independent members to declare an offer of gifts, hospitality or sponsorship at the point it is offered (details of how to submit a Gift, Hospitality and Sponsorship declaration are included in Appendix 3).
- In accordance with the requirements of the Organisation's Freedom of Information Publication Scheme, appropriate information from the Registers of Declarations of Interest and Gifts, Hospitality and Sponsorship is published on the HEIW Website.
- Reports detailing the content of the above Registers and the effectiveness of the arrangements in place are provided to the Audit and Assurance committee annually.

5.4 Executive Directors

Executive Directors will ensure that:

- Employees are aware of the requirements contained within this policy and the Standards of Behaviour Framework.
- They lead by example and ensure that they declare any relevant interest or the offer of gifts, hospitality, honoraria, or sponsorship.
- On an annual basis, they review the contents of the Registers of Declarations of Interest and Gifts, Hospitality, Honoraria, and Sponsorship to assist with verifying the accuracy of the information contained within it.
- During periods of annual leave and prolonged absence, they will ensure that they delegate the responsibilities to their Delegated Officer.
- Approve or decline the acceptance of gifts, hospitality, honoraria, and sponsorship offered to employees for who they are responsible before the event.
- They ensure any acceptance of gifts, hospitality, honoraria or sponsorship complies with the standards outlined in this policy.

5.5 Line Managers

Line managers will ensure that:

- This policy and the Standards of Behaviour Framework is brought to the attention of employees for who they are responsible, and that they are aware of its implications for their work.
- Employees are aware of the requirements to follow and comply with policy and Standards of Behaviour Framework.

- They support their employees in applying the policy and Standards of Behaviour Framework, seeking advice from the Board Secretary or Corporate Governance Manager where necessary.
- They review and authorise (or not) declaration of interests made by employees for who they are responsible and ensure that appropriate safeguards have been put in place to address any conflict of interest that may have been identified.

5.6 All Employees and Independent Members

All employees and independent members will ensure that they:

- Have access to and understand this policy and the Standards of Behaviour Framework, consulting their Line Manager, or in respect of Independent Members the Board Secretary, if they require clarification.
- Declare to HEIW for recording in the Register of Interests any relevant interests (see Appendix 2 for details on how to complete a declaration of interest submission):
 - at the commencement of employment/appointment to the Board;
 - whenever a new interest arises;
 - if asked to do so at periodic intervals by HEIW; and
 - at a minimum on an annual basis
- In respect of the Specific Group submit a nil return, following the above guidance, if there are no interests to declare.
- Are not in a position where their private interests and HEIW duties may conflict. Employees and Independent Members must declare all private interests that could potentially result in personal gain due to their position within HEIW.
- Verbally declare any relevant interest when a potential for conflict arises e.g. at Board and Committee meetings, and at other HEIW meetings as appropriate.
- Declare to HEIW for recording in the Register of Gifts, Hospitality and Sponsorship, any offer of a gift, hospitality or sponsorship which requires recording (details of how to submit a Gift, Hospitality and Sponsorship declaration are included in Appendix 3). Obtain permission from their Executive Director, before accepting a gift, hospitality, honoraria or sponsorship that requires recording.
- Observe the Standing Orders, Standing Financial Instructions and HEIW Financial Control Procedures (FCPs).
- Where employees or independent members wish to engage in any outside employment which may affect their contractual obligations to HEIW, they must first discuss it with their line manager. This will ensure that their position in HEIW is not compromised. Agreements to such outside employment will not be unreasonably refused.

Relevant interests will include:

- Directorships, including Non-Executive Directorships, Directorships held in private companies or public limited companies, likely or possibly seeking to do business with HEIW, with the exception of dormant companies.

- Ownership or part ownership of private companies, businesses, or consultancies likely or possibly seeking to do business with HEIW. This includes shareholdings, debentures, or rights where the total nominal value is more than one-hundredth of the total nominal value of the issued share capital of the company or body.
- Financial and non-financial interests in organisations that may have dealings with the NHS.
- A position of authority in a charity or voluntary body in the field of health and social care and/or education. This includes membership of a professional Committee and third-sector bodies.
- A personal or departmental interest in any educational or academic institution, or part of the pharmaceutical/healthcare industry.
- Sponsorship or funding from a known NHS supplier or associated company/subsidiary.
- Self-employment or employment by any other body where there could be a perceived or actual conflict with NHS duties. This includes the undertaking of private practice, freelance, contractor or agency work.
- Any other connection with a voluntary, statutory, charitable or private body that could create a potential opportunity for conflicting interests.
- Where relevant the declaration will also include details of interests of the employees' spouse/partner and close family members.

When declaring an interest, in each instance, full names of the relevant company should be provided.

It is recommended that where there is doubt, a declaration of interest should be made.

The onus regarding declaration will reside with the individual employee or independent member. It is the individual employee's and independent member's responsibility to update their declaration of interest submission, should their circumstances change.

5.7 Secondary Employment and Private Practice

5.7.1 Secondary Employment (Paid, Unpaid or Self-Employed)

Employees should inform their line manager of any secondary employment and ensure that this does not affect their HEIW employment. There should be no conflict with their normal contractual employment obligations to HEIW, and such work may not involve the use of any confidential or commercial information obtained in the course of their employment with HEIW.

Where employees have or are contemplating other employment, they must ensure this does not compromise their availability or physical or mental fitness to carry out their duties as an employee of HEIW. Employees must also ensure this does not place them in a position where their judgement or actions might be influenced by considerations arising from their other employment.

Employees are responsible for ensuring that their line manager is made aware of any hours worked in order that HEIW fulfils its statutory requirement of the Working Time Directive; this is available via the following link.

<http://www.hse.gov.uk/contact/faqs/workingtimedirective.htm>

Self-employment or employment by any other body where there could be a perceived or actual conflict with HEIW duties should be declared by all staff members through reporting to their line manager. This includes the undertaking of private practice, freelance, contractor or agency work or working for another organisation including another NHS organisation.

5.7.2 Private Practice

There are codes for good private patient practice which clearly include the fact that private practice should not adversely affect NHS duties.

The time spent in private practice does not count towards the 48 hours of the Working Time Directive Regulations. However, health and safety laws indicate that no employee of HEIW should work in a way detrimental to their health and performance.

Failure to notify their line manager of secondary employment and/or private practice may invoke HEIW's Disciplinary Policy.

For medical staff, the amendment to the consultant contract in Wales clarifies the relationship between NHS work, private work and fee-paying work, stating that an NHS consultant's first responsibility is to the NHS. Participation in private medical services or fee-paying services should not result in detriment to NHS patients or services or diminish the public resources available for the NHS.

Employees should:

- Seek prior approval before taking up private practice.
- Submit a declaration of interest to declare where they practice (name of private facility); what they practice (specialty, major procedures); when they practice (identified sessions/time commitment).
- Ensure that, where there would otherwise be a conflict or potential conflict of interest, NHS commitments take precedence over private work.

5.8 NHS Wales Shared Services Partnership (NWSSP) Procurement Services

If an employee is requested to participate in the procurement process, NWSSP will ask them to reaffirm their interests and to confirm that there are no other relevant interests that should be declared.

The NHS Wales Shared Services Partnership (NWSSP) will ensure that all procurement staff complete a declaration of interest form in line with their procedures. NWSSP will advise HEIW, through the Board Secretary, of any such interests impacting on HEIW services.

All employees and independent members in contact with suppliers and contractors, particularly authorised to sign purchase orders or place contracts for goods, materials or services, shall adhere to accepted professional standards i.e. the NHS Wales Shared Services Partnership Procurement Policy and the Standing Orders and Standing Financial Instructions of HEIW.

Senior managers should ensure that no special favour is shown to current or former staff, or their close relatives or associates, in awarding contracts to private or other businesses operated by them or employing them in a senior or relevant managerial capacity.

Contracts may be awarded to such businesses where they are won in fair competition against other tenders, but care must be taken to ensure that the selection process is conducted impartially and that employees and independent members who are known to have a relevant interest play no part in the selection.

6 Registers of Interests

The Board Secretary will maintain a Register of Declaration of Interests and a Register of Gifts, Hospitality, Honoraria and Sponsorship. Appropriate information from these Registers will be available on the HEIW website.

A copy of the Registers, together with the information submitted which is used to inform its contents, will be retained by the Corporate Governance Department.

A summary of the registers will be reported to the Audit and Assurance Committee annually. Any enquiries should be made to the Board Secretary.

7 Declarations of Interest at Meetings

It is a requirement that at the beginning of every HEIW Board, Committee or decision-making/formal HEIW meeting, members and those in attendance be invited to declare their interests in relation to any items on the agenda.

Where a potential conflict is material, or the member has a financial/ pecuniary interest in the matter under discussion, that person shall withdraw from discussions pertaining to that agenda item and shall not vote upon it. The potential conflict and the action will be recorded in the minutes of the meeting and the Register of Interests will be updated if required.

Where it becomes evident part way through a meeting that there may be a potential conflict, the individual must declare their interest immediately. Under certain circumstances, the Chair may choose to waive the need for the individual to leave the meeting. The advice of the Board Secretary should always be sought prior to such a decision being made.

From time to time, employees and independent members may need to declare interests at other NHS organisations or Partnership meetings. Such declarations will be recorded as if it were a Board or Committee meeting, and the individual will

be asked as appropriate to withdraw from discussions pertaining to that agenda item.

8 Gifts, Hospitality, Honoraria, and Sponsorship

8.1 The Bribery Act

Employees and Independent Members have a personal responsibility to volunteer information regarding offers of gifts, hospitality, honoraria and sponsorship, including those offers which have been declined.

Employees should seek approval from their Executive Director prior to accepting any gifts, hospitality, honoraria or sponsorship. Independent members should seek approval from the Chair. These details must be recorded and details of how to submit a Gift, Hospitality and Sponsorship declaration are included in Appendix 3.

In determining whether to accept gifts, hospitality, honoraria and sponsorship, it is not always possible to make explicit a situation in which these may be considered acceptable as each offer should be considered independently. In determining whether any offer of a gift, hospitality, honoraria or sponsorship should be accepted, the following principles should be considered:

- **Openness:** it has been openly offered, and the offer will not be construed as any form of inducement and will not put the individual under any obligation to those offering it.
- **Legitimate interest:** regard should be paid to the reason for the contact on both sides and whether it is a contact that is likely to benefit HEIW i.e. further the aims of the organisation.
- **Relationship:** consideration should be given as to whether HEIW is likely to enter into a contractual relationship with the organisation/individual making the offer.
- **Value:** gifts and benefits of a trivial or inexpensive seasonal nature, e.g. diaries/ calendars, are more likely to be acceptable and can be distinguished from more substantial offers. Similarly, hospitality in the form of a working lunch would not be treated in the same way as more expensive social functions, travel or accommodation.
- **Frequency:** acceptance of frequent or regular invitations, particularly from the same source would breach the required standards of conduct.
- **Reputation:** if the body concerned is known to be under investigation by, or has been publicly criticised by, a public body, regulators or inspectors, acceptance of a gift or hospitality might be seen as supporting the body or affecting in some way the investigation or negotiations. As such it should always be declined.

Employees and independent members must be impartial and honest in the conduct of business and remain beyond suspicion. It is an offence under the Bribery Act 2010 for an employee to accept a bribe in his or her official capacity, or to corruptly show favour or disfavour in the handling of contracts or other business. Employees need to be aware that a breach of the

provisions of this Bribery Act may render them liable to prosecution and disciplinary action.

The Bribery Act introduced a new criminal offence in 2011 where an individual or organisation offers or receives a bribe to bring about or reward the improper performance of a function or activity. Broadly, the Act defines bribery as 'Giving or receiving a financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith.'

Bribery has the potential to impact upon an employees or independent members standard of behaviour, particularly in regard to the acceptance of gifts, hospitality, honoraria or sponsorship, although guidance on the Act indicates that only 'lavish' hospitality, or hospitality that is otherwise 'inappropriate' would normally fall under the bribery definition.

The Bribery Act also introduced a 'corporate offence' of failing to prevent bribery by the organisation not having adequate preventative procedures in place. This is not a standalone offence, but always follows from a bribery and/or corruption offence committed by an individual associated with the company or organisation in question.

However, an organisation can avoid conviction if it can show that it had procedures and protocols in place to prevent bribery. The provisions within this Standards of Behaviour Policy in terms of prohibiting the giving or acceptance of inappropriate gifts, hospitality, honoraria and sponsorship complies with the requirements of the Bribery Act and subsequent guidance.

Employees and independent members are therefore expected to:

- Report any issues relating to fraud, bribery or corruption to HEIW's Local Counter Fraud Specialist.
- Declare any external interest which may result in the employee or independent member, or persons known to the employee or independent member gaining direct or indirect financial advantage as a consequence of their work, which could influence any decisions made by the employee or independent member, or which could interfere with contractual obligations to the organisation.
- Ensure the interests of service users are paramount and that the use or management of any public funds ensures value for money.
- Check each payslip as soon as possible following receipt to ensure that the amount paid is correct, with any queries raised with the line manager. If an individual believes that they have been overpaid, they must declare it without delay. Where employees or independent members do not understand their payslip, they should contact the Payroll Department.

The risks of breaching the Bribery Act include the following:

- criminal justice sanctions against independent members and Executive Directors and other senior staff;
- damage to the organisation's reputation;
- conviction of bribery or corruption may lead to the organisation being precluded from future public procurement contracts;

- potential diversion and/or loss of resources;
- unforeseen and unbudgeted costs of investigations and/or defence of any legal action; and
- negative impact on service user/stakeholder perceptions.

Guidance regarding the types of gifts, hospitality and sponsorship, which may or may not be accepted, is provided below:

8.2 Gifts

A 'gift' is defined as any item of cash or goods, or any service, which is provided for personal benefit by a third party, e.g. a trainee supplier. The definition includes prizes in draws and raffles at sponsored events/conferences.

It is an offence to accept any money, gift, or consideration as an inducement or reward from a person or organisation holding or seeking to hold, a contract with HEIW. Such gifts should be refused, and if they have already been received, they should be returned clearly advising why they cannot be accepted. The appropriate Line Manager, Executive Director and the Corporate Governance Manager should be advised immediately. In respect of an Independent Member, the Chair should be advised.

The Standards of Behaviour Policy excludes gifts between staff members, for example, birthday presents or leaving gifts.

8.3 Gifts from Suppliers, Contractors and Commercial Organisations

Low cost branded or promotional gifts may be accepted where they are under the value of £25 in total and need not be declared, other than where several small gifts are received to the value of £25 from the same or closely related source in a twelve-month period. All other gifts from suppliers, contractors or commercial organisations should be politely but firmly declined.

Whilst it is unnecessary to declare branded or promotional gifts of low intrinsic value, all other offers of gifts should be declared. This will allow HEIW to monitor when such organisations are inappropriately offering gifts or potential inducements.

Under some circumstances, suppliers may send gifts to all of their clients as custom, and practice e.g. hampers at Christmas. Whilst such practices should be discouraged, and it is not acceptable for staff to personally accept these gifts, following discussion with the supplier/commercial organisation and the appropriate line manager, it may be considered appropriate to accept the gift and utilise it for the benefit of charitable funds. The Board Secretary will provide advice regarding the mechanism for receipting such items.

Employees in contact with contractors should be on their guard against offers of gifts which might later be misconstrued as hampering their strict independence and impartiality. Where pressed to accept an offer, the employee to whom the offer has been made should seek further advice from

their manager, who may contact the Corporate Governance Manager or Board Secretary where appropriate.

8.4 Gifts from Dignitaries / Overseas Organisations

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

8.5 Hospitality

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

Employees and independent members should refuse hospitality which may compromise or may be seen to compromise their professional judgement or integrity, or which seeks to exert influence to obtain a preferential consideration.

Employees and independent members in contact with contractors should be particularly mindful of accepting any hospitality that might later be misconstrued as impacting on strict independence and impartiality. Where pressed to accept an offer, the employee or independent member to whom the offer has been made should seek further advice from their manager who may contact the Board Secretary.

Hospitality must be authorised by the individuals Executive Director, and in respect of an independent member hospitality should be authorised by the Chair. Prior to their acceptance, a declaration must be made through the Gifts, Hospitality, Sponsorship and Honoraria declaration process. The hospitality should be proportionate i.e. it should not be of significant value and only the minimum number of staff members to represent the organisation should attend.

Offers that go beyond modest or are of a type that the organisation might not usually offer should only be accepted in exceptional circumstances and must be declared.

8.6 Acceptable Hospitality

Employees and independent members may accept the occasional offer of hospitality provided that it is ‘modest and proportionate’ and similar in scale to that offered by the NHS. For example, acceptance of food and non-alcoholic

refreshment during the working day will generally be considered acceptable and do not need to be declared.

Hospitality must be secondary to the purpose of the meeting. The level of hospitality offered must be appropriate and not out of proportion to the occasion. The costs involved must not exceed the level the recipients would normally adopt when paying for themselves or the NHS could reciprocate. It should not extend beyond those whose role makes it appropriate for them to attend the meeting.

Other hospitality may be accepted where it furthers the aims of HEIW provided it is normal and reasonable in the circumstances. For example, lunches in the course of working visits. A declaration should be made when the value is estimated to be over £25.

Other hospitality that may be accepted but will need to be declared includes instances where:

- There is a genuine need to impart information or represent the organisation at stakeholder events, e.g. local authorities or charitable organisations which have an association with HEIW.
- An employee or independent member has been invited to receive an award or prize in connection with the work of the organisation or their role within it.
- An employee or independent member is invited to a society or institute dinner or function, which is to be funded by a commercial organisation and where there is a genuine benefit to the professional standing of the individual or HEIW.
- An event is part of the life of the stakeholder community or where the organisation should be seen to be represented.
- A function or event hosted for both employees and non-staff, or independent members which adds benefit and value to HEIW and the wider NHS.
- A function or event is hosted externally for staff or independent members only for the purposes of training or organisational development.

8.7 Unacceptable Hospitality

Unacceptable hospitality includes the following examples as general guidance:

- A holiday or weekend/overnight break.
- Offers of hotel accommodation when this is not associated with a sponsored course or conference (see below).
- Use of a company flat or hotel suite.
- Attendance at a function or event restricted to employees or independent members, which is not for the purposes of training or organisational development.
- Lunch or dinner provided by a private company or their representative, which does not form part of a training or development event.
- Entertainment and/or tickets/hospitality at sporting and other corporate entertainment events.

If employees are not clear whether an offer falls into one of these categories, advice should be sought from their line manager or the Board Secretary and in respect of an independent member from the Chair. Employees and independent members should report any case where an offer of hospitality is made, which may be open to objection. They should also declare any offers of hospitality which are declined.

8.8 Sponsorship

Sponsorship is an offer of support (funding in general) to an individual, team or to HEIW from an external source, whether in cash, goods, services or benefits and usually involves a reciprocal benefit.

Organisations sometimes provide sponsorship to allow employees to attend conferences. It may also include sponsorship of posts and research and development.

Employees may be offered sponsorship in the form of sponsored research, including publishing, an operational post, training, costs associated with meetings, conferences, or a working visit. Sponsorship may cover some or all of the costs.

No sponsorship should be accepted without the prior agreement of the appropriate Executive Director. A Gifts, Hospitality Honoraria and Sponsorship declaration should also be completed prior to the acceptance of any sponsorship. If sponsorship is inappropriately offered and/or declined this should also be declared. In cases of doubt, advice from the Corporate Governance Manager or Board Secretary should be sought.

Some health-related companies provide commercial sponsorship to the NHS, including sponsoring equipment, employees and training events. In accordance with the All-Wales Code of Conduct (Business) for NHS staff, all employees must fully consider the implications of a proposed sponsorship deal before entering into any arrangement. Only Directors or Senior Managers with the necessary authority can sign up to, or enter into, any advertising contract or agreement with a company or its representatives. Employees must not allow unauthorised advertising on HEIW premises or documentation.

More detail is provided below regarding the many forms that sponsorship may take. This list is not exhaustive and offers of other sponsorship will need to be considered on a case-by-case basis.

8.9 Commercial Sponsorship for Attendance at Courses/ Conferences

Employees may accept commercial sponsorship for attending relevant conferences and courses but only where attendance would further the aims of HEIW and where the employee seeks permission from their line manager and Executive Director in advance. The sponsorship should only be extended to the number of employees who would have normally attended if funded by HEIW. The Executive Director must be satisfied that acceptance will not compromise decisions in any way.

8.10 Commercial Sponsorship to attend Demonstrations/Technical Evaluations

Employees may be invited to view products or equipment at another location. There may be occasions when it is appropriate to visit a supplier's reference site to observe equipment in operation as part of a procurement exercise. Such sponsorship is not usually considered appropriate and HEIW will normally meet the costs of such a visit to protect the integrity of subsequent purchasing decisions. Arrangements, whereby the company meets all or part of the cost of such a visit, must be approved by the appropriate Executive Director following consideration of the implications for the integrity of subsequent purchasing decisions.

8.11 Commercial Sponsorship for Sponsored Posts ("Linked Deals")

Pharmaceutical companies and other suppliers for example, may offer to sponsor wholly or partially, a post or equipment for HEIW.

HEIW will not enter into such arrangements, unless it has been made clear to the company concerned that the sponsorship will have no effect on purchasing decisions with HEIW.

Where such sponsorship is accepted, the Finance Director shall establish appropriate monitoring arrangements to ensure that the sponsorship agreement is not influencing purchasing decisions.

Under no circumstances may 'linked deals' be agreed upon, whereby sponsorship is linked to purchasing particular products or supplies from particular sources.

Sponsored posts are funded, in whole or part, by organisations external to the NHS. Sponsored posts can offer benefits to the delivery of care, providing expertise, extra capacity and capability that might not otherwise exist if funding was required to be used from the NHS budget. However, safeguards are required to ensure that the deployment of sponsored posts does not cause a conflict of interest between the aims of the sponsor and the aims of the organisation, particularly in relation to procurement and competition.

The following should be considered when sponsored posts are offered:

- external sponsorship of a post requires prior approval from the relevant Executive Director;
- rolling sponsorship of posts should be avoided unless appropriate checks are put in place to review and withdraw if appropriate;
- sponsorship of a post should only happen where there is written confirmation that the arrangements will have no effect on purchasing decisions or prescribing and dispensing habits. This should be audited for the duration of the sponsorship. Written agreements should detail the circumstances under which organisations have the ability to exit sponsorship arrangements should conflicts of interest which cannot be managed arise;

- sponsored post holders must not promote or favour the sponsor's products, and information about alternative products and suppliers should be provided;
- sponsors should not have any undue influence over the duties of the post or have any preferential access to services, materials or intellectual property relating to or developed in connection with the sponsored posts.

The relevant Executive Director or manager should declare any posts sponsored by external organisations through the Gifts, Hospitality, Sponsorship and Honoraria declaration process which will be recorded on the register.

8.12 Sponsorship of Events in the Context of Partnership Arrangements with the Pharmaceutical Industry or other Commercial Organisations

The pharmaceutical industry and allied commercial sector representatives may organise meetings, conferences, or an activity in support of specific functions or specialties within the healthcare sector. Under such arrangements, they are permitted to fund the hiring of accommodation, meet any reasonable actual costs that may have been incurred, and provide appropriate hospitality. If no hospitality is required, there is no obligation or right to provide it or any benefit of equivalent value.

The Pharmaceutical Industry is expected to adhere to the ABPI Code of Practice for the Pharmaceutical Industry, which clearly specifies what is and what is not acceptable; this is available via the following link: [2021-abpi-code-of-practice.pdf \(pmcpa.org.uk\)](https://pmcpa.org.uk/2021-abpi-code-of-practice.pdf)

An example of hospitality which would not be acceptable under these circumstances is where a company takes the attendees, on the conclusion of a course, for a meal in a restaurant.

8.13 Sponsorship for Events Hosted Wholly or Partly by HEIW

Where HEIW receives or invites offers of sponsorship for events which are hosted wholly or partly by HEIW, the Executive Director must consider whether it is appropriate to accept the offer.

For all offers, whether accepted or declined, a declaration must be made through the Gifts, Hospitality, Sponsorship and Honoraria process which will be recorded on the register.

The following guiding principles should apply:

- 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 for HEIW and the NHS;
- 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;
- at the organisation'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;
- the involvement of a sponsor in an event should always be clearly identified;

- members of staff within the organisation 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;
- members of staff arranging sponsored events must declare this to the organisation. Whilst it is recognised that sponsorship can provide a useful source of funding for particular events or activities, it can also present risks and in considering whether to accept sponsorship, the following principles should be adhered to:
 - sponsorship should be sought in an open and even-handed manner with opportunities being offered as widely as possible;
 - benefits should be for HEIW (not an individual) and should be proportionate;
 - arrangements must not compromise the standing or image of HEIW i.e. be ethical;
 - sponsorship should be for a specific activity or event and not a general endorsement;
 - the sponsorship must not imply HEIW endorses particular products, services or companies and organisations;
 - sponsorship should not be accepted from inappropriate sources, such as companies with dubious or doubtful backgrounds or who have poor financial or business practices;
 - any arrangements which could bring adverse publicity to the event or HEIW.

Particular care should be taken when considering sponsorship from companies or organisations for which HEIW has, or could have, contractual business arrangements. The above principles should be adhered to, and any sponsorship arrangements should not influence a renewal or an award of a contract.

A sponsor would normally expect to receive a reciprocal benefit that may be beyond a modest acknowledgement, and companies may seek sponsorship for several legitimate business reasons. These include:

- to raise the company's image and profile;
- to improve public/community relations;
- to generate public exposure and media coverage;
- to differentiate the company from its competitors;
- to increase profit/market share.

Careful consideration should always be given to understanding what a sponsor might gain from the arrangement and these should be in-keeping with the principles listed above.

Employees and independent members may, on occasion, be asked to provide an endorsement of an event, conference or training course that they have attended which a third party organised. Caution should be exercised in these circumstances as citing such an endorsement may not be appropriate. It is also important to consider any potential future conflict for example, where the third party may be in the process of re-tendering for the work or be seeking commercial gain from the endorsement.

HEIW may also receive unsolicited sponsorship proposals that are not in response to any action that HEIW has taken. HEIW should carefully consider such offers and ensure that the proposal meets HEIW's requirements, standards and principals. HEIW will need to ensure there are no conflicts of interest or that better value for money cannot be obtained by testing wider market interest.

The appropriate Executive Director should approve all sponsorship arrangements.

8.14 Miscellaneous Payments/Honoraria

An honorarium is an ex-gratia payment, i.e. one which would not usually be expected to be provided.

Employees may be invited to give presentations at conferences, provide responses to surveys or attend professional meetings, where a one-off payment or honoraria is offered. If this activity is to be undertaken during hours when the employee is contracted to work for HEIW, the payment should be made to HEIW.

Individuals may accept payment for activities that they undertake in their own time, subject to the provisions regarding outside employment contained within various employee Contracts and Terms of Service. The activity should be reported through the Gifts, Hospitality and Sponsorship process and the appropriate Executive Director should authorise it.

There are tax and National Insurance contribution implications relating to honoraria that should be considered as set out below:

- Honoraria received for work undertaken during HEIW hours - when appropriate authorisation has been granted to permit an employee to be involved in activity outside their normal contract during HEIW hours, any honoraria paid must be received back to HEIW's revenue budget to reimburse HEIW for the employee's time. To ensure good governance, the honoraria must be paid into a revenue budget that is not managed by the employee who has provided their services during HEIW time. To avoid personal tax implications, the employee is strongly advised to request the honoraria is paid directly to HEIW. This is then seen as reimbursement to cover the loss of employee time, and not honoraria. This money will then be transferred into HEIW revenue budget. The employee who has undertaken the work must not be the budget holder for the budget receiving the funds in lieu of the honorarium to avoid any conflict of interest. Where the employee receives the honoraria directly and then reimburses HEIW, the employee remains liable for the payment of both tax and National Insurance Contributions (NIC), regardless of the final destination of the honoraria.
- Honoraria received for work undertaken in an individual's own time (out of normal working hours or on authorised annual leave) - individuals are personally liable for the payment of both tax and NICs on any honoraria payments received for work undertaken in their own time. In cases of doubt, employees should seek advice from the Corporate Governance Manager or the Board Secretary and should report any case where an offer of sponsorship or honoraria is pressed which might be open to objection. Instances where

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

9 Confidentiality

Employees and independent members may have access to confidential information about, staff or health service business. No such information must be divulged to anyone who is not authorised to receive it. Confidentiality of information must be preserved at all times whether at or away from work. Any breach of such confidentiality is considered a serious disciplinary offence, which may be liable to dismissal and/or prosecution under current statutory legislation (The Data Protection Act/ General Data Protection Regulations (2016) or any subsequent legislation to the same effect) and HEIW's Disciplinary Policy. Any breach of confidentiality may lead to disciplinary action and may be regarded as gross misconduct justifying summary dismissal.

10 Research and Development

All research and development sponsored by commercial companies, including those sponsored by the pharmaceutical industry must be approved by the appropriate mechanisms. It will be governed by specific policies and procedures.

11 Use of the HEIW Logo

Permission needs to be obtained from the Head of Communications and Engagement on all occasions where approaches are made by an outside organisation seeking to use HEIW's logo in connection with an event or function. Permission should also be sought by any member of staff wishing to use the logo in connection with any non HEIW related matter/event.

12 Failure to Adhere to Standards of Behaviour Framework

Disciplinary action may follow if any HEIW employee or independent member fails to declare an interest or gift, hospitality, honoraria or sponsorship, as defined within this policy, the Standards of Behaviour Framework or the guidance that will be published to support it and then:

- participates in a decision making process where special favour is shown to unfairly award a contract; or
- abuses their official position or knowledge for the purpose of benefit to themselves, their family or friends.

The action taken will depend on the individual circumstances and will be in accordance with the appropriate disciplinary policy. Under some circumstances failure to follow this Policy could be considered gross misconduct, which could lead to dismissal.

In addition to any potential disciplinary action being taken, if there is any suspicion that fraud, corruption and/or bribery has been or is being committed, then all such cases must be reported at the earliest possible opportunity to HEIW's Local

Counter Fraud Specialist (LCFS). This is also extended to include the inappropriate acceptance of any gifts, hospitality or sponsorship.

Furthermore, if an employee or independent member breaches the Standards of Behaviour Policy or Framework, this could in certain circumstances result in notification/ reporting to the appropriate professional codes of conduct/ registration/ membership. This could lead to registrations being revoked and employees no longer continuing to be employed in their current position within HEIW.

The Chair will report failure to declare a relevant interest by an independent member of HEIW to the Cabinet Secretary for Health and Social Services, Welsh Government.

13 Equality Impact Assessment

HEIW is committed to ensuring that, as far as is reasonably practicable, the way it provides services to the public and the way it treats its employees and independent members reflects their individual needs and does not discriminate against individuals or groups.

HEIW has undertaken an Equality Impact Assessment to establish whether there are any possible or actual impacts that this policy may have on any groups in respect of gender (including maternity and pregnancy as well as marriage or civil partnership issues), race, disability, sexual orientation, Welsh language, religion or belief, transgender, age or other protected characteristics.

The assessment did not identify any negative impacts.

14 Audit and Monitoring

The Finance Directorate and Board Secretary are responsible for monitoring this policy and its formal review every three years.

The Board Secretary will arrange for relevant information from the Declarations of Interest Register and Gifts, Hospitality, Honoraria and Sponsorship Register to be presented to the Audit and Assurance Committee annually. Managers will review the operation of the Policy within their areas as part of their monitoring processes.

Audit Wales and Internal Audit may also review the arrangements from time to time and their findings are also reported to the Audit and Assurance Committee.

15 Distribution

The Policy and Standards of Behaviour Framework will be available via HEIW intranet and internet sites. Employees must ensure that they have access to a copy of this Policy. Managers also have a responsibility to bring this policy to the attention of their staff. New staff members will be made aware of this policy at the commencement of their employment.

Appendix 1

Standards of Behaviour Framework

The Board has described those values that underpin the way that services are provided within HEIW. To support this, all employees and independent members must ensure that they carry out their roles with dedication and commitment to HEIW and its core values.

All employees and independent members must have the highest standards of corporate and personal conduct and behave in an exemplary manner based on the following seven principles:

1. **Selflessness** – individuals should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or friends;
2. **Integrity** – individuals should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties;
3. **Objectivity** – in carrying out public business, including making public appointments, awarding contracts, recommending individuals for rewards and benefits, choices should be made on merit;
4. **Accountability** – individuals are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate for their position;
5. **Openness** – individuals should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it;
6. **Honesty** – individuals have a duty to declare any private interests relating to their duties and to take steps to resolve any conflicts arising in a way that protects the public interest, and;
7. **Leadership** – individuals should promote and support these principles by leadership and example.

To uphold these principles you must:-

- a. ensure that the interests of patients, students, trainees and the public remain paramount;
- b. be impartial and honest in the conduct of your official business;
- c. use NHS resources to the best advantage of the service and the patients, always seeking to ensure value for money;
- d. not abuse your official position for personal gain or to benefit your family or friends;
- e. not seek advantage or to further private business or other interests in the course of your official duties, and;
- f. not seek or knowingly accept preferential rates or benefits in kind for private transactions carried out with companies, with which they have had, or may have, official dealings on behalf of HEIW.

The Standards of Behaviour Policy outlines the arrangements within HEIW to ensure that employees comply with these requirements, including recording and declaring potential conflicts of interest and handling of gifts, hospitality, honoraria

and sponsorship (even if these are declined). It is your responsibility to ensure that you are familiar with the requirements of the policy and supporting guidance. The relevance of this information will vary depending on your role within HEIW and your interests outside of your employment.

In summary:

Do:

- Make sure that you are not in a position where your private interests and NHS duties may conflict.
- Declare any relevant interests. These include:
 - Directorships, including Non-Executive Directorships, Directorships held in private companies or public limited companies, likely or possibly seeking to do business with HEIW, with the exception of dormant companies.
 - Ownership or part ownership of private companies, businesses, or consultancies likely or possibly seeking to do business with HEIW. This includes shareholdings, debentures, or rights where the total nominal value is more than one-hundredth of the total nominal value of the total nominal value of the issued share capital of the company or body.
 - Financial and non-financial interests in organisations that may have dealings with the NHS.
 - A position of authority in a charity or voluntary body in the field of health and social care and/or education. This includes membership of a professional Committee and third-sector bodies.
 - A personal or departmental interest in any educational or academic institution, or part of the pharmaceutical/healthcare industry.
 - Sponsorship or funding from a known NHS supplier or associated company/subsidiary.
 - Self-employment or employment by any other body where there could be a perceived or actual conflict with NHS duties. This includes the undertaking of private practice, freelance, contractor or agency work.
 - Any other connection with a voluntary, statutory, charitable or private body that could create a potential opportunity for conflicting interests.
 - Where relevant the declaration will also include details of interests of the employees' spouse/partner and close family members.
 - In respect of independent members employment by another NHS Wales organisation.

If in doubt declare it!

- Remember that the need to declare an interest also includes those of your close family and possibly friends.
- Seek your manager's permission before taking any outside work, in accordance with employment terms and conditions.
- Obtain your Line Managers permission before accepting any commercial sponsorship or hospitality;
- All employees need to declare offers of gifts, hospitality or sponsorship using the appropriate form where required.

Do not:

- Accept any gifts from suppliers or commercial organisations unless they are of low value e.g. pens, diaries;
- Accept any gifts over the value of £25 from students, trainees or their relatives, these should be politely declined;
- Accept any inappropriate hospitality or sponsorship from suppliers or commercial organisations;
- Abuse your position to obtain preferential rates for private deals;
- Unfairly advantage one competitor over another or show favouritism in your dealings with commercial organisations;
- Use NHS resources for your own private use.

If you need any further guidance, please contact the Corporate Governance Manager or Board Secretary.

Appendix 2 Declaration of Interest



Declarations of Interest Form

Full Name: (Please Print)	
Contact Address: (Please Print)	
Tel No:	
Position Held in HEIW:	
Directorate:	
Department:	
Date Form Returned:	
Interests to Declare:	
Third Party Declaration e.g. Spouse/Partner (Yes/No)	
HEIW Address:	
HEIW Telephone No:	

I certify that I have read and understood the Standards of Behaviour Framework Policy Incorporating Declaration of Interest, Gifts, Hospitality and Sponsorship (please tick) ☐

In accordance with the Code of Conduct and Accountability, Standing Orders and Standing Financial Instructions. I list below my relevant interests and those of my family for inclusion in the Register of Members' Interests. **If in doubt, declare! Proceed to section h) after noting section i) if you have nothing to declare.**

Declaration	Nature of Relationship - Please ensure that, where relevant, the name of the employer or company is provided in full.	Period of Involvement (include start and, where relevant, end date)	Financial /Other salary, honoraria (amount not necessary)	Benefits e.g. (amount not necessary)
a) DIRECTORSHIPS (including Non-Executive Directorships) Company directorships in private companies or PLCs.	Personal:			
	Spouse/Partner or other Relationship Specific to a Contract or Series of Contracts			
b) INTEREST IN COMPANIES AND SECURITIES - Substantial interest in ownership or part ownership, more than 1/100 th (i.e. share) of private companies, businesses or consultancies	Personal:			
	Spouse/Partner or other Relationship Specific to a Contract or Series of Contracts			
c) OTHER POSITIONS OF AUTHORITY (Not included in a. above) A position of authority (i.e. Director, Chairman. Trustee etc.) in a charity or voluntary body in the field of health and social	Personal:			
	Spouse/Partner or other Relationship Specific to a Contract or Series of Contracts			

care			
d) PERSONAL OR DEPARTMENTAL SPONSORSHIP - a personal or departmental interest in any education or academic institution, or part of the pharmaceutical/healthcare industry or Sponsorship or funding from a known NHS supplier or associated company/subsidiary, e.g. funding research, staff or equipment.	Personal:		
	Spouse/Partner or other Relationship Specific to a Contract or Series of Contracts		
e) EMPLOYMENT/SELF EMPLOYMENT - by any other body where there could be a perceived or actual conflict with NHS duties. This includes the undertaking of private practice, freelance, contractor or agency work. In respect of independent members only – declaration shall include working for another NHS organisation.	Personal:		
	Spouse/Partner or other Relationship Specific to a Contract or Series of Contracts		
f) ANY OTHER INTEREST - Any other connection with a voluntary, statutory, charitable or private body that could create a potential opportunity for conflicting interests	Personal:		
	Spouse/Partner or other Relationship Specific to a Contract or Series of Contracts		
g) I undertake to notify HEIW of any changes which may occur within four weeks from the date of the change, in writing to Corporate Governance Manager . Please return completed forms to sarah.griffiths18@wales.nhs.uk			
h) I confirm that the list accurately reflects my interests and those of my close family and understand that these declarations will be included in the Register which is available for public inspection			
Signed:		Date:	
i) I confirm a nil declaration			
Signed:		Date:	
j) Authorisation – To be authorised by relevant line manager/head of service/director as appropriate. (a countersignature is included to confirm that this form has been reviewed by the line manager or unit director and that appropriate safeguards have been identified to address any conflict of interest that may have been identified)			
Signed:		Date:	

Appendix 3



Gifts, Hospitality Honoraria and Sponsorship - Declaration

It is a requirement that staff advise HEIW if they accept or are offered any gifts, hospitality, honoraria or sponsorship in accordance with HEIW's Standards of Behaviour Framework Incorporating Declarations of Interest, Gifts, Hospitality Honoraria & Sponsorship Policy by completing the following form. Once approved by the Executive Director, the form should be forwarded to the Board Secretary and Corporate Governance Manager for inclusion in the Register of Gifts, Hospitality Honoraria and Sponsorship.

Please note: Tax Implications of Honoraria:

I. Honoraria received for work undertaken during HEIW hours

When **appropriate authorisation** has been granted to permit an employee to be involved in activity outside their normal contract **during HEIW** hours, any honoraria paid must be received back to the HEIW revenue budget to reimburse HEIW for the employee's time.

To ensure good governance, the honoraria must be paid into a revenue budget that is **not** managed by the employee who has provided their services during HEIW time.

To avoid personal tax implications, the HEIW employee is urged to request the Honoraria is paid **directly to HEIW**. This is then seen as reimbursement to HEIW to cover the loss of employee time, and not honoraria. This money will then be transferred into the HEIW revenue budget. The HEIW employee who has undertaken the work must not be the budget holder for the budget receiving the funds in lieu of the honorarium due to a conflict of interest.

If the employee receives the honoraria directly and then reimburses HEIW, the **employee remains liable for the payment of both tax and NIC**, regardless of the final destination of the honoraria.

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

Individuals are **personally liable for the payment of both tax and NICs** on any honoraria payments received.

**Health Education and Improvement Wales
Form for Registering Gifts, Hospitality, Sponsorship and Honoraria**

This form should be completed by all employees and independent members when a gift, hospitality, sponsorship or honoraria is offered. The Standards of Behaviour Policy should be referred to for further guidance on gifts and hospitality.

Name:	
Position/Job Title:	
Directorate/Department:	

Gift <input type="checkbox"/>	Hospitality <input type="checkbox"/>	Sponsorship <input type="checkbox"/>	Honoraria <input type="checkbox"/>
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Accepted <input type="checkbox"/>	Declined <input type="checkbox"/>
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Description:			
Sponsor/Doner:			
Event Details (if applicable)	Title:		
	Location:		
	Date(s):		
Value:	£	Approximate <input type="checkbox"/>	Exact Cost <input type="checkbox"/>

Study Leave Required:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Study Leave Form Completed	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Annual Leave Required	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Applicant:	<i>Signature</i>
	<i>Date:</i>

Executive Director Approval:	<i>Print Name:</i>
	<i>Signature:</i>
	<i>Date:</i>

Please return the fully completed approved declaration via email to the Board Secretary and the Corporate Governance Manager.

