

BOARD
PART I
MEETING ON 23rd December 2015

Title of Report:	Standards of Business Conduct Policy
Board Sponsor:	Mandy Ansell, (Acting) Interim Accountable Officer
Prepared by :	Nicola Meeks, Head of Corporate Governance
Committees previous consulted:	Integrated Governance Group, October and November 2015 Audit Committee, 10 th November 2015
Executive Summary:	<p>Officers and members of public bodies including NHS clinical commissioning groups are subject to the provision of special legislation, guidelines and codes of conduct designed to protect the public interest and public confidence, which has been set out within the Health and Social Care Act 2012, CCG Regulations 2012 and other NHS guidance such as:</p> <ul style="list-style-type: none"> ▪ NHS Code of Conduct and Code of Accountability (2004, revised 2013) ▪ Department of Health circular HSG (93) 5 'Standards of Business Conduct for NHS Staff'(amended in part by the Bribery Act 2010) ▪ The Code of Conduct for NHS managers (Department of Health – October 2002) ▪ Professional Standards Authority: Standards for members of NHS Boards and CCG Governing bodies in England (2012); ▪ Companies Act 2006 – Directors Duties (The duty not to accept benefits from third parties: Section 176) ▪ The ABPI Code of Professional Conduct relating to hospitality / gifts from pharmaceutical / external industries. ▪ Business Services Authority: Standards of Business Conduct Procedure, 2010. <p>The historic CCG Conflicts of Interest Policy provided guidance on conflicts of interest as well as gifts, hospitality and commercial sponsorship. The Conflicts of Interest Policy has been revised so that it provides only guidance on conflicts. A separate Standards of Business Conduct Policy has been created for gifts, hospitality and commercial sponsorship and now also includes other guidance on 'conduct.</p> <p>The purpose of this [Standards of Business Conduct] policy is to provide a central reference guide to staff setting out the principles of conduct that should be followed when working on behalf of the CCG that will enable them to meet the duties set out in legislation and guidance referred to above. The policy also sets out the framework for dealing with gifts, hospitality and commercial sponsorship, which often present 'grey' areas where staff can fall foul of the principles set out within this policy.</p>



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Financial / Resource Implications:	None	
Fit with CCG strategy/objectives:	Well Led Organisation: Establish and operate appropriate integrated governance arrangements to enable not only compliance with legislation and regulation, but to facilitate all appropriate partnership arrangements to deliver the CCG vision of an integrated health and care system operating close to home.	
Risks identified / Outcome / Link to BAF:		BAF Ref:
Actions Required:	If approved, communicate to staff and publish on CCG Intra and Internet.	When By: 31 st January 2016
Recommendation to the Committee:	The Board are asked to consider and approve the Standards of Business Conduct Policy.	

* Delete as appropriate