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STANDARDS OF BEHAVIOUR POLICY

Policy Statement

This Standards of Behaviour Policy and the Procedures which accompany it describe the standards and public service values which underpin the work of Cardiff and Vale University Health Board (the UHB) and reflects current guidance and best practice which all those working in NHS Wales must follow.

It is a long and well-established principle that public-sector organisations must be impartial and honest in their business and that their officers must act with integrity.

As a publicly funded body the UHB has a duty to set and maintain the highest standards of conduct and integrity. The Board expects all Independent Members and officers of the UHB to demonstrate and maintain the highest standards of corporate and personal conduct, based on the recognition that the needs of patients must come first.

As well as promoting the standards of business conduct expected of public bodies, this policy aims to protect the UHB and its officers from any suggestion of corruption, partiality or dishonesty by providing a clear framework through which the UHB can provide guidance and assurance that its officers conduct themselves with honesty, integrity and probity.

Policy Commitment

The UHB is committed to ensuring that its employees and Independent Members practice the highest standards of conduct and behaviour. This Policy and the accompanying procedure set out those expectations and provide guidance so that all employees and Independent members are supported in delivering that requirement.

Independent Members and employees are expected to act at all times with the utmost integrity and objectivity and in the best interests of the organisation in performing their duties, and to avoid situations where there may be a potential conflict of interest. Officers must not use their position for personal advantage or seek to gain preferential treatment. Any actual or potential interests which may be perceived as conflicting with that overriding requirement must be declared.

Independent Members and employees should ensure that they are not placed in a position that risks, or appears to risk, compromising their role or the organisation's public and statutory duties or reputation. Officers must not, or be perceived to, secure valuable gifts and hospitality by virtue of their role. Any gifts, hospitality or sponsorship which could be perceived in this way must be declared and recorded.

Outside employment or private practice must neither conflict with nor be detrimental to the NHS work of the officer in question.

Any political activity should not identify an individual as an employee of the UHB. Conferences or functions run by a party political organisation should not be attended in an

official capacity, except with prior written permission of the Chief Executive and Chair.

All Independent Members and Employees have a responsibility to respect and promote the corporate or collective decision the UHB, and to act in accordance with the UHB Values and Behaviours. They may comment as they wish as individuals however, if they decide to do so, they should make it clear that they are expressing their personal view and not the view of the UHB.

When speaking as a member of the UHB, whether to the media, in a public forum or in a private or informal discussion, officers should ensure that they reflect the current policies or view of the organisation. For any public forum or media interview, approval should be sought in advance:

- in the case of the Board, from the Chairman and/or Chief Executive or their nominated deputies, and Communications Team;
- in the case of all other employees, the Communications Team

Independent Members and employees should be aware that social networking websites are public forums and should not assume that their entries will remain private. Employees communicating via social media must comply with the UHB [Social Media Policy](#). Individuals must not conduct themselves in a way that brings the UHB into disrepute or disclose information that is confidential to the UHB, staff or patients.

Employees at all times, be aware of the importance of maintaining confidentiality and security of information gained by you during the course of your duties. This will, in many cases, include access to personal information relating to service users. You must treat all information, whether corporate, staff or patient information, in a discreet and confidential manner in accordance with the provisions of Data Protection Legislation and organisational policy.

Any Board Member (Executive or Independent Member) who becomes bankrupt, insolvent, has active CCJ, or made individual voluntary arrangements with organisations must advise the Director of Corporate Governance without delay. Employees who are bankrupt or insolvent cannot be employed, or otherwise engaged, in posts that involve duties which might permit the misappropriation of public funds or involve the approval of orders or handling of money.

From time to time situations may arise where a personal relationship exists between employees or prospective employees of the UHB. It is expected that where a personal relationship exists, employees will behave responsibly and not put themselves into a situation where their relationship may impact adversely on their work or the UHB.

Adherence to this Policy

All employees have a role to play in ensuring compliance with this Policy and the accompanying procedure, and the following roles and responsibilities are important in achieving this:

- The Chief Executive is the “Accountable Officer” with overall responsibility for ensuring that the UHB operates efficiently, economically and with probity and will ensure a policy framework is set and that arrangements are in place to support the its delivery.

- The Director of Corporate Governance has delegated responsibility for ensuring that the UHB is provided with competent advice and support regarding the contents and application of this Policy and the accompanying Procedures
- Executive Directors and Clinical Boards are responsible for ensuring that employees are aware of the requirements contained within this Policy. They are expected to lead by example and ensure that they personally declare any relevant interest or the offer of gifts, hospitality or sponsorship.
- Line Managers are responsible for ensuring that this Policy and the accompanying Procedures are brought to the attention of all individuals for whom they are responsible, and that they are aware of their obligation to comply with it and any implications for their work.
- Line Managers are encouraged to discuss this Policy and accompanying Procedures at Individual Performance Reviews, Consultant Appraisals and as part of the Consultant Job Plan Reviews as appropriate. They are expected to support individuals in the application of the Policy and accompanying Procedures, seeking advice from other managers or from the Directorate of Corporate Governance/Corporate Governance Team if required.
- Employees are responsible for ensuring they are aware of and are compliant with the requirements of this Policy and the accompanying procedures and for ensuring that the appropriate declarations are made in a timely fashion
- Independent Members are responsible for ensuring they are aware of and are compliant with the requirements of this Policy and the accompanying procedures and for ensuring that the appropriate declarations are made in a timely fashion

Failure to comply with the requirements set out in this Policy and the accompanying Procedures may result in action being taken in accordance with the UHB's Disciplinary Policy and Procedure. Such disciplinary action may include termination of employment (where applicable). Where the failure to comply relates to an individual that is not a direct employee of the UHB, this may result in action being taken in accordance with the relevant engagement procedures (e.g. termination of a secondment agreement).

Any financial or other irregularities or impropriety which involve evidence or suspicion of fraud, bribery or corruption by any employee, will be reported to NHS Counter Fraud Authority in accordance with Standing Financial Instructions and the Counter Fraud and Corruption Policy, with a view to an appropriate investigation being conducted and potential prosecution being sought.

This Policy may be breached innocently, accidentally, or because of deliberate actions. Members of the Board and employees of the UHB should speak up about any genuine concerns they have in relation to compliance with this Policy. These can be raised directly with their own line manager, another senior manager or with the Director of Corporate Governance. Alternatively employees can contact the Freedom to Speak Up Helpline on 02921846000 or F2SUCAV@wales.nhs.uk, or the Governance Directorates Standards of Behaviour inbox, CAV.Declarations@wales.nhs.uk. All reported concerns will be treated with the appropriate confidentiality and investigated in line with the UHB's policies and

procedures.

The Director of Corporate Governance will take a report on breaches and responses to the Audit and Assurance Committee and the Board on an annual basis.

Supporting Procedures and Written Control Documents

This Policy and the accompanying Procedures have been developed to set out:

- The Standards of Behaviour expected from UHB employees, particularly in relation for declarations of interest, gifts/hospitality etc, and secondary employment
- The responsibilities of those working for the UHB and the arrangements in place to support Independent Members and Employees to uphold it.
- Arrangements for the appropriate declarations of interests
- Arrangements for the acceptance / refusal and record of offers of Gifts, Hospitality or Sponsorship.
- Declarations of outside employment and private practice
- Political activities and personal conduct that fall within the scope of this Policy

Other supporting documents are:

- Standing Orders.
- Scheme of Reservation and Delegation
- Standing Financial Instructions.
- Procedure for NHS Staff to Raise Concerns
- Social Media Policy
- Working Times Policy
- Data Protection Act Policy
- Dignity at Work Policy
- Disciplinary Policy and Procedure
- Information Governance Policy

Scope

All Independent Members and Employees of the UHB including those working for its hosted organisations are, without exception, within the scope of this Policy.

In the context of this policy the term 'employees' refers to all staff of the UHB and

- Consultants;
- Agency workers;
- Specialist Contractors;
- Those who have an honorary contract with the UHB;
- Seconded who carry out work for the UHB but are not directly employed by it;
- NHS Trainees on placement with the UHB;
- Jointly appointed staff

In addition, some individuals who work with, but are not employed by the UHB are required to comply with this policy, for example members of the UHB's advisory groups, such as its Stakeholder Reference Group and volunteers.

Equality and Health Impact Assessment	An Equality and Health Impact Assessment (EHIA) has no impact.
Policy Approved by	UHB Board
Group with authority to approve procedures written to explain how this policy will be implemented	Health System Management Board
Accountable Executive or Clinical Board Director	Director of Corporate Governance
<p><u>Disclaimer</u> If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the Governance Directorate.</p>	

Summary of reviews/amendments			
Version Number	Date Review Approved	Date Published	Summary of Amendments
1	N/A	08/07/11	New policy to replace Trust Version 20
1.1	02/12/14	15/01/2015	Interim review approved by Audit Committee to take account of changes to role titles and amendments to Section 6.2.2 as follows:- Removal of Clinical Directors, Directorate and Assistant Directorate Managers, Lead Nurses or equivalent as a group of staff. Remove Internal Audit and Procurement staff as this group is employed by another organisation. Reference to change of role titles for Director of Governance and Divisional Teams (see below).
2	26/09/19	06/12/2019	Policy discussed and reviewed with Stakeholder Reference Group and then approved by Board. New policy required as result of 'limited assurance' internal audit report.