

# Gifts, Hospitality and Sponsorship Policy

## 2019-2022

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<b>CONTROL RECORD</b>			
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			<b>Directorate</b> Corporate Governance
<b>Title</b>	Gifts, Hospitality and Sponsorship Policy		
<b>Amendments</b>	Updated to v1.3 to update the Review date		
<b>Purpose</b>	To support a culture of openness and transparency in business transactions and to set out the CCG's requirements regarding gifts, hospitality and sponsorship; ensuring that all individuals are aware of their responsibilities.		
<b>Superseded Documents</b>	Gifts, Hospitality and Sponsorship Policy v1.2		
<b>Audience</b>	All employees of Nottingham and Nottinghamshire CCG (including all individuals working within the CCG in a temporary capacity, including agency staff, seconded staff, students and trainees, and any self-employed consultants or other individuals working for the CCG under contract for services), individuals appointed to the Governing Body and its Committees, all member GP practices (single-handed practitioners, practice partners, or their equivalent) and any other individual directly involved with the business or decision-making of the CCG.		
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<b>Date of Issue</b>	August 2019		
<b>Review Date</b>	March 2022		
<p><b>This is a controlled document and whilst this policy may be printed, the electronic version available on the CCG's document management system is the only true copy. As a controlled document, this document should not be saved onto local or network drives.</b></p>			

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## Contents

	<b>Page</b>
<b>1</b> Introduction	4
<b>2</b> Scope of Policy	5
<b>3</b> Purpose	5
<b>4</b> Roles and Responsibilities	6
<b>5</b> Definitions	7
<b>6</b> Gifts	7
<b>7</b> Hospitality	8
<b>8</b> Sponsorship and Collaborative Working with the Pharmaceutical Industry	9
<b>9</b> Gifts, Hospitality and Sponsorship Register	12
<b>10</b> Equality and Diversity Statement	12
<b>11</b> Communication, Monitoring and Review	13
<b>12</b> References and Supporting Documents	14
<b>Appendix A</b> – The Seven Principles of Public Life set out by the Committee on Standards in Public Life (The Nolan Principles)	15
<b>Appendix B</b> – Template Declaration of Gifts, Hospitality and Sponsorship Form	16
<b>Appendix C</b> – Equality Impact Assessment	17

## 1. Introduction

- 1.1. This policy applies to the Nottingham and Nottinghamshire Clinical Commissioning Group, hereafter referred to as 'the CCG'.
- 1.2. All CCGs have a responsibility for ensuring that high standards of business conduct are maintained across their organisations and all Governing Body members are expected to show leadership by example in order to successfully influence the behaviour of staff. As such, members of the Governing Body and its established committees must at all times comply with the expectations set out in the *Standards for members of NHS Boards and Clinical Commissioning Group Governing Bodies in England*.
- 1.3. The CCG's Governing Body determines to ensure that the organisation inspires confidence and trust, avoiding any potential situations of undue bias or influence in decision-making and protecting the NHS, the CCG, and individuals involved from any appearance of impropriety. As such, this policy is aligned with the three crucial public service values that are required to underpin the work of the CCG:
  - **Accountability** - Everything 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 in the use of information acquired in the course of NHS duties.
  - **Openness** - There should be sufficient transparency about NHS activities to promote confidence between the NHS organisation and its staff, patients and the public.
- 1.4. All individuals within the CCG are required to abide by the Seven Principles of Public Life (as set out by the Committee on Standards in Public Life) shown in **Appendix A**, ensuring that:
  - The interests of patients remain paramount at all times.
  - They are impartial and honest in the conduct of their official business.
  - Public funds entrusted to them are used to the best advantage of the service, always ensuring value for money.
  - They do not abuse their official position for personal gain or to the benefit of their family or friends.
  - They do not seek to advantage or further their other interests in the course of their official duties.
- 1.5. In addition, the CCG must ensure that any possibility for fraud, bribery and corruption is eliminated. Organisations must act in accordance with the Bribery Act

2010 and have appropriate policies and procedures in place to mitigate the risk of acts of bribery and corruption committed by persons associated with them, in the course of their work. This policy has been developed as part of the CCG's suite of Standards of Business Conduct policies to achieve compliance with relevant legislation and national guidance and ensure high standards of behaviour throughout the organisation. Other CCG policies that should be read in conjunction with this policy are shown in section 12.

- 1.6. The CCG will comply with the legal requirements and national guidance in the management of gifts, hospitality and sponsorship.

## **2. Scope of Policy**

- 2.1. The CCG requires this policy to be followed by:

- All employees of the CCG (including all individuals working within the CCG in a temporary capacity, including agency staff, seconded staff, students and trainees, and any self-employed consultants or other individuals working for the CCG under contract for services).
- Individuals appointed to the Governing Body and its committees.
- Any other individual directly involved with the business or decision-making of the CCG.

These are collectively referred to as 'individuals' hereafter.

## **3. Purpose**

- 3.1. The purpose of this policy is to support a culture of openness and transparency in business transactions and to set out the CCG's requirements regarding gifts, hospitality and sponsorship, ensuring that all individuals are aware of their responsibilities.
- 3.2. This policy supports the CCG's Constitution, Standing Orders, Scheme of Reservation and Delegation and Prime Financial Policies, which set out the statutory and governance framework in which the CCG operates. All individuals are required to comply with the requirements of the CCG's Constitution, Standing Orders, Scheme of Reservation and Delegation and Prime Financial Policies when carrying out their duties and these shall prevail over the requirements of this policy where conflicting advice is given.
- 3.3. It should be noted that all clinical staff employed by the CCG should also refer to their respective professional codes of conduct relating to the acceptance of gifts, hospitality and sponsorship, and collaborative working with the pharmaceutical industry.

#### 4. Roles and Responsibilities

Roles	Responsibilities
<b>The CCG Governing Body and Committees</b>	The Governing Body and all committees of the Governing Body, are responsible for upholding the principles of good corporate governance and ensuring that the CCG is acting in the best interests of stakeholders at all times.
<b>The Audit and Governance Committee</b>	The Audit and Governance Committee of the CCG is responsible for reviewing the establishment and maintenance of an effective system of integrated governance and internal control. In particular, the Committee is responsible for monitoring compliance with the CCG's Standards of Business Conduct Policies.
<b>The Accountable Officer</b>	The Accountable Officer has overall accountability for the CCG's management of conflicts of interest, which includes the requirements for the management of gifts, hospitality and sponsorship.
<b>The Chief Finance Officer</b>	The Chief Finance Officer is responsible for ensuring the adequacy of the CCG's counter fraud arrangements.
<b>The Associate Director of Governance (supported by the Governance and Assurance Team as appropriate)</b>	The Associate Director of Governance is responsible for: <ul style="list-style-type: none"> <li>• The day-to-day management of matters and queries relating to the application of this policy.</li> <li>• Maintaining the Gifts, Hospitality and Sponsorship Register.</li> <li>• Ensuring that appropriate administrative processes are in place.</li> </ul>
<b>Conflicts of Interest Guardian</b>	The Conflicts of Interest Guardian is in place to further strengthen the scrutiny and transparency of the CCG's decision-making processes (see Conflicts of Interest Policy).
<b>Executive Management and Senior Leadership Team</b>	Members of the Executive Management Team and Senior Leadership Team have an ongoing responsibility for ensuring the application of this policy.
<b>Individuals</b>	All individuals are responsible for complying with this policy and for seeking advice if unsure how it applies to them.

## 5. Definitions

Term	Definition
<b>Gifts</b>	Any item of cash or goods, or any service, which is provided for personal benefit, free of charge or at less than its commercial value.
<b>Hospitality</b>	Offers of meals, refreshments, travel, accommodation and other expenses in relation to attendance at meetings, conferences, education and training events, etc.
<b>Sponsorship</b>	Support (financial or otherwise) of CCG activities by an external body.
<b>Register of Gifts, Hospitality and Sponsorship</b>	The central register on which details of all offers of gifts, hospitality and sponsorship (accepted and declined) are recorded.

## 6. Gifts

### 6.1. Overarching principles

- Individuals should not accept gifts that may affect, or be seen to affect, their professional judgement. This overarching principle should apply in all circumstances.
- Under no circumstances are individuals allowed to accept personal gifts of cash or cash equivalents (eg. gift vouchers, token offers of remuneration to attend meetings whilst in a capacity working for or representing the CCG), whatever their value and whatever their source. All such offers must be declared and recorded on the Register of Gifts, Hospitality and Sponsorship (see section 9 of this policy).
- A common sense approach should be applied to the valuing of gifts (using an actual amount, if known, or an estimate that a reasonable person would make as to its value).
- Individuals should not ask for any gifts.
- Individuals are advised to consult with the Associate Director of Governance if they are unsure as to whether to accept any offers of gifts.

### 6.2. Gifts from suppliers or contractors

- Gifts from suppliers or contractors doing business (or likely to do business) with the CCG should be politely declined and declared on the Register of Gifts,

Hospitality and Sponsorship Register. This does not apply to low cost (less than £6\*) branded promotional aids, which may be accepted and do not require declaring.

- If a gift with an estimated value in excess of the £6 limit arrives without warning, it must be handed over to the Associate Director of Governance who will decide whether the gift should be returned (or passed on to a charity or good cause). In such circumstances, action will be taken to ensure that the donor is informed of what has happened.

*\* The £6 value has been selected with reference to existing industry guidance issued by the Association of the British Pharmaceutical Industry.*

### 6.3. **Gifts from other sources** (eg. patients, families, service users)

- Modest gifts under a value of £50 may be accepted and do not need to be declared.
- Gifts at a value of over £50 should be treated with caution and only be accepted on behalf of the CCG and not in a personal capacity. Such gifts should be declared.
- Multiple gifts from the same source over a 12 month period should be treated in the same way as single gifts over £50 where the cumulative value exceeds £50.

### 6.4. **What should be declared?**

- The staff member/individual's name and their role within the CCG.
- A description of the nature and value of the gift, including its source.
- Date of offer and receipt of the gift.
- Any other relevant information (eg. circumstances surrounding the gift, action taken to mitigate any conflict of interest, details of any approvals given that may conflict with this policy).

## 7. **Hospitality**

### 7.1. **Overarching principles**

- Individuals should not ask for or accept hospitality that may affect, or be seen to affect, their professional judgement.
- Hospitality must only be accepted when there is a legitimate business reason and it is proportionate to the nature and purpose of the event.
- Particular caution should be exercised when hospitality is offered by actual or potential suppliers or contractors. These offers can be accepted if modest and reasonable, but individuals should always obtain approval from a member of the Executive Management and Senior Leadership Team.



- Individuals should never put themselves in a position where there could be any suspicion that their business decisions could have been influenced by accepting hospitality from others. With this in mind, individuals should ask themselves what a member of the public, who may be critical or suspicious, might think.
- Individuals are advised to consult with the Associate Director of Governance if they are unsure as to whether to accept any offers of hospitality.

## 7.2. **Meals and refreshments**

- Under a value of £25 may be accepted and need not be declared.
- Of a value between £25 and £75\* may be accepted and must be declared (*please refer to the overarching principles in section 7.1 before accepting*).
- Over a value of £75 should be refused unless (in exceptional circumstances) approval from a member of the Executive Management and Senior Leadership Team is given. A clear reason for the approval should be recorded on the Gifts, Hospitality and Sponsorship Register.
- Individuals should take a common sense approach to the valuing of meals and refreshments (if actual value is not known) and always adhere to the principles set out in section 7.1.

*\* The £75 value has been selected with reference to existing industry guidance issued by the Association of the British Pharmaceutical Industry.*

## 7.3. **Travel and Accommodation**

- 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 CCG itself would not usually offer (eg. business class or first class travel, offers of foreign travel, etc) need approval from a member of the Executive Management and Senior Leadership Team and should only be accepted in exceptional circumstances. A clear reason for the approval should be recorded on the Gifts, Hospitality and Sponsorship Register.

# 8. **Sponsorship and Collaborative Working with the Pharmaceutical Industry**

## 8.1. **Overarching principle**

Sponsorship of the CCG's events by appropriate external bodies should only be approved if a reasonable person would conclude that the event will result in clear benefits for the CCG.

## 8.2. **Sponsored events**

- 8.2.1. Sponsorship of NHS events by external parties is valued, as such offers can secure their ability to take place and ultimately benefit patients, as well as NHS staff. Without this funding, there may be fewer opportunities for learning, development and partnership working.
- 8.2.2. However, there is the potential for conflicts of interest between the organiser and the sponsor and appropriate safeguards must be in place to prevent this. Please refer to the CCG's Managing Conflicts of Interest Policy or seek advice from the Associate Director of Governance if required.
- 8.2.3. Acceptance of commercial sponsorship should not in any way compromise the CCG's commissioning decisions or be dependent on the purchase or supply of goods or services.
- 8.2.4. If sponsorship is accepted, the following principles must be adhered to:
- During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection rules and legislation.
  - No information should be supplied to the sponsor from which they could gain a commercial advantage, and information which is not normally in the public domain should not normally be supplied.
  - At the CCG'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 must always be clearly identified in the interest of transparency.
  - It must be made clear to sponsors that sponsorship in no way equates to the CCG's endorsement of a company or its products. This should be made visibly clear on any promotional or other materials relating to the event.
- 8.2.5. Individuals must be aware of and ensure that collaborative working with the pharmaceutical industry is in line with the Association of the British Pharmaceutical Industry (ABPI) Code of Practice for the Pharmaceutical Industry.
- 8.2.6. Sponsored events should be declared on the Register of Gifts, Hospitality and Sponsorship.

### 8.3. **Sponsored Research**

- 8.3.1. Funding sources for research purposes must be transparent and any proposed research must go through the relevant health research authority or other approvals process.
- 8.3.2. There must be a written protocol and written contract between staff, the organisation, and/or institutes at which the study will take place and the sponsoring organisation, which specifies the nature of the services to be provided and the payment for those services.
- 8.3.3. The study must not constitute an inducement to prescribe, supply, administer, recommend, buy or sell any medicine, medical device, equipment or service.
- 8.3.4. Involvement with sponsored research should be declared on the Register of Gifts, Hospitality and Sponsorship. This should include other relevant information such as what, if any, benefit the sponsor derives from the sponsorship and details of any approvals given, that may conflict with the requirements set out in this policy.

### 8.4. **Sponsored Posts**

- 8.4.1. External sponsorship of a post requires prior approval from the organisation.
- 8.4.2. Rolling sponsorship of posts should be avoided unless appropriate checkpoints are put in place to review and withdraw if appropriate.
- 8.4.3. 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 if conflicts of interest which cannot be managed arise.
- 8.4.4. Sponsored post holders must not promote or favour the sponsor's products and information about alternative products and suppliers should be provided.
- 8.4.5. 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.
- 8.4.6. Sponsored posts will be included on the Register of Gifts, Hospitality and Sponsorship.

8.4.7. Individuals in sponsored posts should declare any other interests arising as a result of their associated with the sponsor, in line with the CCG's Managing Conflicts of Interest Policy.

## **9. Gifts, Hospitality and Sponsorship Register**

- 9.1. The CCG has established a Gifts, Hospitality and Sponsorship Register, which is maintained and updated by the Governance and Assurance Team.
- 9.2. Individuals are required to report offers of gifts, hospitality and sponsorship, which are made to them in the capacity of their role with the CCG, in accordance with this policy. This is required to be reported at the time such offers are made.
- 9.3. In addition, the Governance and Assurance Team will proactively contact all individuals on a monthly basis to ensure that all offers have been reported centrally.
- 9.4. The following information will be recorded within the Register:
  - The person or organisation making the offer.
  - The individual to whom the offer was made and their position within the CCG.
  - Date of the offer and/or receipt.
  - Details of the gifts, hospitality or sponsorship offered.
  - Whether the offer was accepted or declined.
  - Reasons for accepting or declining the offer.
  - The estimated value of the gift, hospitality or sponsorship.

## **10. Equality and Diversity Statement**

- 10.1. The Nottingham and Nottinghamshire CCG pays due regard to the requirements of the Public Sector Equality Duty (PSED) of the Equality Act 2010 in policy development and implementation, both as a commissioner and as an employer.
- 10.2. As a commissioning organisation, we are committed to ensuring our activities do not unlawfully discriminate on the grounds of any of the protected characteristics defined by the Equality Act, which are age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 10.3. We are committed to ensuring that our commissioning activities also consider the disadvantages that some people in our diverse population experience when accessing health services. Such disadvantaged groups include people experiencing economic and social deprivation, carers, refugees and asylum

seekers, people who are homeless, workers in stigmatised occupations, people who are geographically isolated, gypsies, roma and travellers.

- 10.4. As an employer, we are committed to promoting equality of opportunity in recruitment, training and career progression and to valuing and increasing diversity within our workforce.
- 10.5. To help ensure that these commitments are embedded in our day-to-day working practices, an Equality Impact Assessment has been completed for, and is attached to, this policy.

## **11. Communication, Monitoring and Review**

- 11.1. The CCG will establish effective arrangements for communicating the requirements of this policy to include:
  - The policy being published and communicated to all staff following approval.
  - All new starters being briefed on the requirements of this policy as part of their induction to the CCG.
  - A bi-annual reminder of the existence and importance of this policy via internal communication methods.
- 11.2. Individuals who fail to disclose the receipt of gifts, hospitality or sponsorship, as required by this policy may be subject to disciplinary action, which could ultimately result in the termination of their employment or position within the CCG. If fraud, bribery or corruption is suspected then this should be reported immediately to the CCG's Counter Fraud Specialist (0115 883 5319 / 07464251746).
- 11.3. The implementation of this policy, and the effectiveness of the arrangements detailed within it, will be monitored by the CCG's Audit and Governance Committee on a bi-annual basis. This will include, as a minimum, details of the Gifts, Hospitality and Sponsorship Register being presented for review and scrutiny.
- 11.4. This policy will be reviewed by the Governing Body every three years or in light of any legislative changes or best practice guidance.
- 11.5. The CCG actively encourages individuals with reasonable suspicions of non-compliance with this policy to report them. The CCG's Raising Concerns (Whistleblowing) Policy provides further information on how to raise concerns.
- 11.6. Any individual who has queries regarding the content of this policy, or has difficulty understanding how this policy relates to their role, should contact the CCG's Associate Director of Governance.

## **12. References and Supporting Documents**

12.1. This policy should be read in conjunction with the following corporate documents and supporting national guidance documents:

- The CCG's Constitution (including Standing Orders, Scheme of Reservation and Delegation and Prime Financial Policies).
- Fraud, Bribery and Corruption Policy.
- Raising Concerns (Whistleblowing) Policy.
- Managing Conflicts of Interests Policy.
- Confidentiality and Data Protection Policy.
- Respective Professional Codes of Conduct.
- Standards for members of NHS Boards and Clinical Commissioning Group Governing Bodies in England (November 2012).
- The Healthy NHS Board: Principles for Good Governance (2013).
- Code of Conduct for NHS Managers (2002).
- ABPI Code of Practice for the Pharmaceutical Industry.
- Managing Conflicts of Interest: Revised Statutory Guidance for CCGs (2017).

## Appendix A – The Seven Principles of Public Life set out by the Committee on Standards in Public Life (The Nolan Principles)

<b>Selflessness</b>	Holders of public office 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 their friends.
<b>Integrity</b>	Holders of public office 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.
<b>Objectivity</b>	In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
<b>Accountability</b>	Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
<b>Openness</b>	Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
<b>Honesty</b>	Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
<b>Leadership</b>	Holders of public office should promote and support these principles by leadership and example.

## Appendix B – Template Declaration of Gifts, Hospitality and Sponsorship Form

Recipient Name	Position	Date of Offer	Date of Receipt (if applicable)	Details of Gift / Hospitality / Sponsorship	Estimated Value	Supplier / Offeror Name and Nature of Business	Details of the Officer reviewing and approving the declaration made.  Date	Declined or Accepted?	Reason for Accepting or Declining	Name and details of who approved the declaration made.  Date of approval

*The information submitted will be held by the CCG for personnel or other reasons specified on this form and to comply with the organisation's policies. This information may be held in both manual and electronic form in accordance with the Data Protection Act 2018 Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and published in registers that the CCG holds.*

**Please remember that the CCG is obliged to publish the information that you provide on the CCG's website. If you have any concerns about this, please raise these when returning your declaration and explain why you consider that the information you supply should not be made publicly available.**

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to the CCG as soon as practicable and no later than 28 days after the interest arises. I am aware that if I do not make full, accurate and timely declarations then civil, criminal, professional regulatory or internal disciplinary action may result.

[Hard copy documents to be signed by individual and their line manager, as appropriate. Check boxes to be completed where electronic declarations are completed.]



## Appendix C – Equality Impact Assessment

<b>Date of assessment:</b>	<b>July 2019</b>			
<b>Name of Policy:</b>	<b>Gifts, Hospitality and Sponsorship Policy</b>			
<b>For the policy, and its implementation, please answer the questions against each of the protected characteristic and inclusion health groups:</b>	Has the risk of any potential adverse impact on people in this protected characteristic group been identified, such as barriers to access or inequality of opportunity?	If yes, are there any mechanisms already in place to mitigate the adverse impacts identified?	Are there any remaining adverse impacts that need to be addressed? If so, please state any mitigating actions planned.	Are there any positive impacts identified for people within this protected characteristic group? If yes, please briefly describe.
<b>Age<sup>1</sup></b>	No	N/A	N/A	N/A
<b>Disability<sup>2</sup></b>	No	N/A	N/A	N/A
<b>Gender reassignment<sup>3</sup></b>	No	N/A	N/A	N/A
<b>Marriage and civil partnership<sup>4</sup></b>	No	N/A	N/A	N/A
<b>Pregnancy and maternity<sup>5</sup></b>	No	N/A	N/A	N/A
<b>Race<sup>6</sup></b>	No	N/A	N/A	N/A

<sup>1</sup> A person belonging to a particular age (for example 32 year olds) or range of ages (for example 18 to 30 year olds).

<sup>2</sup> A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

<sup>3</sup> The process of transitioning from one gender to another.

<sup>4</sup> Marriage is a union between a man and a woman or between a same-sex couple.

Same-sex couples can also have their relationships legally recognised as 'civil partnerships'.

<sup>5</sup> Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

<sup>6</sup> Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

## Appendix C – Equality Impact Assessment

<b>Date of assessment:</b>	<b>July 2019</b>			
<b>Name of Policy:</b>	<b>Gifts, Hospitality and Sponsorship Policy</b>			
<b>For the policy, and its implementation, please answer the questions against each of the protected characteristic and inclusion health groups:</b>	Has the risk of any potential adverse impact on people in this protected characteristic group been identified, such as barriers to access or inequality of opportunity?	If yes, are there any mechanisms already in place to mitigate the adverse impacts identified?	Are there any remaining adverse impacts that need to be addressed? If so, please state any mitigating actions planned.	Are there any positive impacts identified for people within this protected characteristic group? If yes, please briefly describe.
<b>Religion or belief<sup>7</sup></b>	No	N/A	N/A	N/A
<b>Sex<sup>8</sup></b>	No	N/A	N/A	N/A
<b>Sexual orientation<sup>9</sup></b>	No	N/A	N/A	N/A
<b>Carers<sup>10</sup></b>	No	N/A	N/A	N/A

<sup>7</sup> Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

<sup>8</sup> A man or a woman.

<sup>9</sup> Whether a person's sexual attraction is towards their own sex, the opposite sex, to both sexes or none. <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

<sup>10</sup> Individuals within the CCG which may have carer responsibilities.