

**PWYLLGOR ARCHWILIO A SICRWYDD RISG
AUDIT AND RISK ASSURANCE COMMITTEE**

DYDDIAD Y CYFARFOD: DATE OF MEETING:	08 May 2025
TEITL YR ADRODDIAD: TITLE OF REPORT:	Report on the Adequacy of Arrangements for Declaring, Registering and Handling Interests, Gifts, Hospitality, Honoraria and Sponsorship 2024/25
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Joanne Wilson, Director of Corporate Governance
SWYDDOG ADRODD: REPORTING OFFICER:	Sian-Marie James, Assistant Director of Corporate Legal Services and Public Affairs

**Pwrpas yr Adroddiad (dewiswch fel yn addas)
Purpose of the Report (select as appropriate)**

Er Sicrwydd/For Assurance

**ADRODDIAD SCAA
SBAR REPORT**

Sefyllfa / Situation

This report is intended to enable the Audit and Risk Assurance Committee (ARAC) to review and to provide assurance to Board regarding the adequacy of arrangements in place within Hywel Dda University Health Board (the Health Board) for declaring, registering and handling Board Members' and staff interests, gifts, hospitality, honoraria and sponsorship during 2024/25.

This is in line with the following paragraphs of the Health Board's Standing Orders 2024:

- 8.4.1 *'The Audit Committee will review and report to the Board upon the adequacy of the arrangements for declaring, registering and handling interests at least annually'*
- 8.7.5 *'The Director of Corporate Governance/ Board Secretary will arrange for a full report of all offers of Gifts, Hospitality and Sponsorship recorded by the LHB to be submitted to the Audit Committee (or equivalent) at least annually. The Audit Committee will then review and report to the Board upon the adequacy of the LHB's arrangements for dealing with offers of gifts and hospitality.'*

Cefndir / Background

Effective arrangements to manage potential risks to decision-making arising from interests, gifts, hospitality, honoraria and sponsorship constitute an important element of the Health Board's governance arrangements. These arrangements are designed to safeguard the principles of selflessness and objectivity, and to provide members of the public with confidence that decisions are being taken in their best interests and not for the benefit of elected or appointed officials or their close personal associates.

In common with other public sector bodies, the Health Board has established arrangements to manage such risks, including:

- A 'Standards of Behaviour' policy that includes the acceptance and declaration of interests, gifts, hospitality, honoraria and sponsorship;

- Maintenance of publicly available registers of Board Members' and staff members' declarations;
- Procedures to record interests, gifts, hospitality, sponsorship and honoraria in the relevant registers;
- Processes to remind Board Members and staff of the policy's requirements; and
- Regular reporting on the adequacy of arrangements in place for declaring, registering and handling interests, gifts, hospitality, sponsorship and honoraria to the Health Board's Audit and Risk Assurance Committee.

Asesiad / Assessment

The Standards of Behaviour Policy

In accordance with its review schedule, the Health Board's [Standards of Behaviour Policy](#) was revised in August 2022 and approved by the People, Organisational Development and Culture Committee (PODCC) on 28 October 2022. The policy has been made available on both the Hywel Dda UHB intranet and internet sites and, in line with its review schedule, is currently subject to consultation and revision before being presented for approval to PODCC on 4 November 2025.¹

The Standards of Behaviour Policy, together with the requirement to submit Declarations of Interests (DoI) and to declare offers and acceptance of gifts, sponsorship, hospitality and honoraria, are highlighted to Board Members and to staff by the following means:

- Reference to the Standards of Behaviour Policy is included within staff Contracts of Employment issued to new employees within 12 weeks of commencing in post², and to all existing employees on a change of role. When signing their contract of employment, all staff must sign to confirm that they accept their appointment on the terms and conditions set out within the contract and contained within the Standards of Behaviour Policy.
- The requirement to declare any interests, and awareness of the Policy, are highlighted to Health Board employees in the Hywel Dda Induction Pack.
- On commencement in post, Independent Members receive a programme of induction and are provided with an Independent Member Handbook referencing the Standards of Behaviour Policy.
- Regular messages, including links to the policy and relevant forms, are circulated via Global E-mail to remind employees and Board Members to report offers and acceptance of gifts, hospitality, sponsorship and honoraria and to declare any interests.
- Advice and awareness-raising regarding standards of behaviour are included on an *ad hoc* basis in the Health Board's Counter-Fraud Newsletter which is circulated to all Health Board staff.
- Meetings with individual teams have been held on request to provide guidance in relation to Standards of Behaviour Policy requirements; for example, acceptance and declaration of gifts received from patients and their families.

¹ As such, some links – eg. to forms – which are included in the current version of the policy are out-of-date and will be removed.

² Where it is referred to as 'The Standards of Business Conduct for NHS Staff'

The contents of the Registers of Interests and Gifts, Hospitality, Honoraria and Sponsorship will be periodically reviewed by the Assistant Director of Corporate Legal Services and Public Affairs on behalf of the Board Secretary to assist with the verification of the accuracy of the information which is recorded.

Review of the Adequacy of Arrangements in Place for Declaring, Registering and Handling Interests of Board Members and Staff

Board Members' Interests

It is a requirement within the Health Board's Standing Orders that all Board Members must declare any personal or business interests they may have which may affect, or be perceived to affect, the conduct of their role as a Board Member and their judgement in the course of conducting the Board's business. Board Members must be familiar with the Standards of Behaviour policy and must notify the Board of any such interests at the time of their appointment and as they arise throughout their tenure.

Provision is made at the beginning of each Public Board and Board Committee meeting for individual Board Members to identify and declare interests relating to any aspect of business included on the meeting agenda in order that appropriate action can be taken in response. All declarations of Members' interests made at a meeting are recorded within the formal minutes.

In line with Standing Orders, a Register of Members Interests (including interests held by family members or persons or bodies with which they are connected) is maintained by the Health Board. This records the interests of Board Members at the time of their appointment, and is updated, as appropriate, to record any new interests or changes to their interests throughout the year. An annual review of interests is undertaken as part of related party transactions/ year-end processes, where each Board Member is required to confirm the accuracy and completeness of the Register relating to their own interests. The Register of Members' Interests for 2025/26 is currently being compiled and will be published on the Health Board's internet site when complete.

The Health Board's Standing Orders 2024 (p.17) require all Board Members to confirm their eligibility to hold office on an annual basis and also require the Chair, Vice Chair and Independent Members (and Associate Members) to confirm their understanding of their indemnity in relation to activity undertaken in their role. In order to record these confirmations, the Declaration of Members' Interests form incorporates annual Declarations of Board Members' Eligibility and Chair and Independent Members' Indemnity.

Staff Interests

Paragraph 8.3.1 of the Standing Orders also requires that '*The Board must ensure that the Director of Corporate Governance/ Board Secretary, on behalf of the Chief Executive, establishes and maintains a system for the declaration, recording and handling of LHB officers' interests in accordance with the Values and Standards of Behaviour Framework.*'

In line with this requirement, a Register of Staff Interests is maintained to formally record Dols made by employees (including any interests held by their spouse, civil partner, partner or other relation). Each declaration made by staff members requires the approval of the relevant Director or Departmental/ Line Manager to confirm that the Dol form has been reviewed and appropriate safeguards have been identified to address any conflicts or potential conflicts of interest. Positive Dols are actively followed up with employees' line managers, to confirm that all necessary and appropriate safeguards are in place, prior to recording the interest on the Register.

In compliance with Standing Orders, the Registers of Members' and Staff Interests are published on the Health Board's website:

[Register of interests, gifts, sponsorship and hospitality - Hywel Dda University Health Board \(nhs.wales\)](https://www.nhs.uk/health-board/hywel-dda-university-health-board/register-of-interests-gifts-sponsorship-and-hospitality)

The Standards of Behaviour Policy specifies 'high risk' groups of employees who are required to complete an annual DoI form; this includes Assistant Directors, Senior and General Managers, senior staff within the Finance Directorate, senior clinical staff, independent prescribers and pharmacy staff, those whose role necessarily brings them into contact with external companies, contractors or suppliers, those who are able to initiate orders and those who are budget holders. Lists of staff included in each of the 'high risk' groups are refreshed annually, using data provided by Workforce and OD teams, to ensure that they are current.

All staff members included in 'high risk' groups are individually contacted by email requesting them to complete a DoI form, even in the case of 'Nil' declarations. During 2024/25, individual requests/reminders were issued to approximately 1,800 staff included in the 'high risk' groups, with a response rate of only 23% (412 out of 1,817). Consideration will, therefore, be given to means to improve this response rate during the current year.

Argymhelliad / Recommendation

The Audit and Risk Assurance Committee is asked to review the adequacy of the arrangements in place for declaring, registering and handling interests, gifts, hospitality, sponsorship and honoraria during 2024/25 for onward assurance to the Board.

Amcanion: (rhaid cwblhau)	
Objectives: (must be completed)	
Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	3.11: To receive annually a full report of all offers of gifts, hospitality, sponsorship and honoraria recorded by the UHB and report to the Board the adequacy of these arrangements.
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	Not Applicable
Parthau Ansawdd: Domains of Quality Quality and Engagement Act (sharepoint.com)	Not Applicable
Galluogwyr Ansawdd: Enablers of Quality: Quality and Engagement Act (sharepoint.com)	Not Applicable
Amcanion Strategol y BIP: UHB Strategic Objectives:	All Strategic Objectives are applicable
Amcanion Cynllunio Planning Objectives	Not Applicable

Amcanion Llesiant BIP: UHB Well-being Objectives: Hyperlink to HDdUHB Well-being Objectives Annual Report 2021-2022	Not Applicable
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**Gwybodaeth Ychwanegol:
Further Information:**

Ar sail tystiolaeth: Evidence Base:	HDdUHB Standards of Behaviour Policy Declaration Registers
Rhestr Termau: Glossary of Terms:	Included within the body of the report
Partion / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Archwilio a Sicrwydd Risg Parties / Committees consulted prior to Audit and Risk Assurance Committee:	Director of Corporate Governance/ Board Secretary Assistant Director of Corporate Legal Services and Public Affairs

**Effaith: (rhaid cwblhau)
Impact: (must be completed)**

Ariannol / Gwerth am Arian: Financial / Service:	Not Applicable
Ansawdd / Gofal Claf: Quality / Patient Care:	Not Applicable
Gweithlu: Workforce:	Not Applicable
Risg: Risk:	Not Applicable
Cyfreithiol: Legal:	Not Applicable
Enw Da: Reputational:	Not Applicable
Gyfrinachedd: Privacy:	Not Applicable
Cydraddoldeb: Equality:	Not Applicable