



PWYLLGOR ARCHWILIO A SICRWYDD RISG AUDIT AND RISK ASSURANCE COMMITTEE

DYDDIAD Y CYFARFOD: DATE OF MEETING:	09 May 2024
TEITL YR ADRODDIAD: TITLE OF REPORT:	Report on the Adequacy of Arrangements for Declaring, Registering and Handling Interests, Gifts, Hospitality, Honoraria and Sponsorship 2023/24
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 2023/24.

This is in line with the following paragraphs of the Health Board's Standing Orders 2023:

- 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 incorporates 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 of 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 will next be reviewed in October 2025, for approval by PODCC.

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 post¹, 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.

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.

¹ Where it is referred to as 'The Standards of Business Conduct for NHS Staff'

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 2024-25 is attached as Appendix 1.

The Health Board's Standing Orders 2023 (pp.17-18) 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 has been expanded to incorporate 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.²

The Standards of Behaviour Policy specifies 'high risk' groups of employees who are required to complete an annual Dol form *ie.* those whose role necessarily brings them into contact with external companies, contractors or suppliers, those who are able to initiate orders or those who are budget holders. All staff members included in 'high risk' groups have been contacted by email during 2023/24 requesting them to complete a Dol form, even in the case of 'Nil' declarations.

² Standing Orders para 8.1.5 *In line with the Board's commitment to openness and transparency, the Director of Corporate Governance/ Board Secretary must take reasonable steps to ensure that the citizens served by the LHB are made aware of and have access to view the LHB's Register of Interests. This may include publication on the LHB's website.*

[Register of interests, gifts, sponsorship and hospitality - Hywel Dda University Health Board \(nhs.wales\)](#)

Lists of staff included in each of the 'high risk' groups have been refreshed in 2023, using data provided by Workforce and OD teams, to ensure that they are current.

Other Developments:

- An electronic (Sharepoint) form has been developed with the assistance of the IT Software Team for the recording of staff acceptance of gifts, hospitality and sponsorship. As is the case for the electronic Staff DoI form developed in 2022/23, completion of the form automatically triggers a notification to review and approve (or not) to the relevant manager, while the data entered automatically populates a Sharepoint list which can be exported to Excel and published online as the Register of Gifts, Hospitality, Sponsorship and Honoraria.
- A Register of Gifts and a Register of Hospitality, Sponsorship and Honoraria are published on the internet: [Register of interests, gifts, sponsorship and hospitality - Hywel Dda University Health Board \(nhs.wales\)](https://www.nhs.uk/healthcare-employees/register-of-interests-gifts-sponsorship-and-hospitality-hywel-dda-university-health-board)
- Wording has been added to the electronic Gifts, Hospitality, Sponsorship and Honoraria Registration form to highlight the need for individual staff members to seek managerial approval *prior* to accepting any items or offers.
- A link to the *Workforce Privacy Notice for Employees* has been added to the electronic Declarations forms for both staff interests and gifts, hospitality, sponsorship and honoraria.
- Global messages have been issued in December 2023 to remind all employees of requirements to declare gifts and in March 2024, notifying staff of the introduction of the electronic form for declarations of gifts, hospitality, sponsorship and honoraria.

Argymhelliad / Recommendation

The Audit & 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 2023/24 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. 3.12 To review and report to the Board annually the arrangements for declaring, registering, and handling interests.
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference & Score:	Not Applicable
Safon(au) Gofal ac Iechyd: Health and Care Standard(s):	Governance, Leadership and Accountability
Amcanion Strategol y BIP: UHB Strategic Objectives:	Not Applicable

Amcanion Cynllunio Planning Objectives	Not Applicable
Amcanion Llesiant BIP: UHB Well-being Objectives:	10. Not Applicable

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 ARAC:	Director of Corporate Governance/ Board Secretary

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

Appendix 1

HDdUHB Register of Board Members Interests 2024-25											
Name	Date Appointed	Appointment Term	Position on Board/Board Champion	Directorships held (inc non executive held in private companies/ plc	Ownership/ part ownership of private companies or consultancies likely or possibly seeking to do business with NHS	Majority or controlling shareholding in an organisation likely or possibly seeking to do business with the NHS	Position of authority in a charity/ voluntary body in the field of health and social care	Connection with a voluntary or other body contracting for NHS Services	Member of any other public bodies including those unconnected with the health service	Interests relating to spouse/ partner or close family member that may relate to the conduct of NHS business	Date received and included on the register
Andrew Carruthers	01.12.2019	N/A	Director of Operations	No	No	No	No	No	No	Partner is an Assistant Director in the NHS Wales Finance Delivery Unit	17.04.2024
Lee Davies	26.04.2021	N/A	Director of Strategy and Planning	No	No	No	No	No	Parent Governor of Ysgol Dewi Sant, Llanelli (Primary School)	Wife is a locum Pharmacist employed by a GP Surgery within HDdUHB	18.04.2024
Rhodri Evans	11.11.2022	14.11.2026	Independent Member (Local Authority)	No	No	No	No	No	Ceredigion County Councillor	Sister works as a Communications Officer for Audit Wales. She has no connection with the auditors and their work.	18.04.2024

Maynard Davies	01.12.2019	30.11.2021 Extended to 30.11.2025	Independent Member (ICT)	A member of the information Governance Review Panel for the SAIL Datatbase in Swansea Uni	No	No	No	Member of the Information Governance review Panel for the SAIL database at Swansea University	No	Son is a Junior Doctor in Northern Ireland	18.04.2024
Lisa Gostling	Interim Director of Workforce & OD 01.08.2014 Substantive Director of Workforce & OD 09.01.2015 Interim Deputy Chief Executive from 01.02.2024 for 12 months	N/A	Interim Chief Executive and Director of Workforce & OD	No	No	No	No	No	Governor at Pembrokeshire College. While not a Health Board, the college runs some courses which are linked and used by the Health Board. Following consultation with the Board Secretary it has been confirmed that no conflict of interests exists; this has also been confirmed in a follow up letter. If a conflict arose, this would be managed.	Director's daughter is employed in the Corporate Governance Team (HDdUHB). Son's partner works in Recruitment (HDdUHB).	18.04.2024
Judith Hardisty	01.04.2016 - Independent Member 01.09.2016 Interim Vice Chair HDdUHB 01.03.2017 Vice Chair HDdUHB Interim Chair 01.11.2023	Extended to 31.05.2024	Independent Member	No	No	No	No	No	Member of Academi Wales Expert Advisory Board.	No	18.04.2024

Philip Kloer (Professor)	01.06.2015	N/A	Medical Director/ Director of Clinical Strategy Interim Chief Executive 01.02.2024		No	No	Trustee of Faculty of Medical Leadership Management	Member of Council of St John, Carmarthen	Honorary Professor, Swansea University, Medical School	No	29.04.2024
Anna Lewis	01.04.2018	31.03.2022 Extended to 31.03.2026	Independent Member (Community)	One of two company directors at TogetherBetter Collaborative Consultancy Ltd.	Co-owns <i>TogetherBetter Collabrative Consultancy Ltd.</i> Its primary client base is the NHS in England and Wales. By mutual consent and in the highest standards of probity this consultancy does not undertake any commercial business with Hywel dda UHB or its close neighbour Swansea Bay UHB.	Co-owns <i>TogetherBetter Collabrative Consultancy Ltd.</i> Its primary client base is the NHS in England and Wales. Via consultancy and Exec coaching business, currently holds contracts with: CTMUHB, HEIW, Affina OD, Royal College of Psychiatrists	No	No	Volunteers with Girlguiding Cymru	No	15.04.2024
Alwena Hughes Moakes	4.01.22	N/A	Communications and Engagement Director.	Dormant company - Indeg PR	No	No	No	No	Board Member/ Trustee with Books Council Wales (appointed April 2021).	Husband is employed by Aberystwyth University	17.04.2024

Ann Murphy	09.01.2020	08.01.2022 Extended to 08.01.2025	Independent Member (Trade Union)	No	No	No	No	No	No	No	17.04.2024
Chantal Patel	01.08.2022	31.07.2026	Independent Member	No	No	No	No	No	1. Associate Professor, Swansea University 2. Sits on Welsh Health specialised Services Committee	No	24.04.2024
Jill Paterson	01.05.2016	N/A	Director of Primary Care, Community & Long Term Care	No	No	No	No	No	No	No	24.04.2024
Delyth Raynsford	01.04.2017	31.03.2018 Extended to 31.03.2021 Extended to 31.03.2025	Independent Member	No	No	No	No	No	No	Member's daughter works with HDdUHB as a communications assistant.	18.04.2024

Huw Thomas	Acting Director of Finance 01.09.2018 Director of Finance 11.12.2018	N/A	Director of Finance	Trustee of the Centre for Local Economic Strategies (a charitable company)	No	No	Trustee of the Centre for Local Economic Strategies (a registered charitable company)	No	Honorary Professor, Aberystwyth University	Director's partner works in the Social Services Department of Carmarthenshire County Council. Sister is a Staff Nurse working in Theatres in Glangwili General Hospital.	24.04.2024
Iwan Thomas	01.05.2021	30.04.2024	Independent Member (Third Sector)	Director of 'Visit Pembrokeshire'	No	No	1. Chief Executive of PLANED. 2. Pembrokeshire College - Chair of Governing Body	No	No	No	18.04.2024
Winston Weir	01.04.2021	31.03.2025	Independent Member (Finance)	Director – Alpha & Omega Management Solutions Ltd.	Alpha & Omega Management Solutions Ltd. Part owned with wife.	No	Legacy West Midlands - well-being charity based in North West Birmingham.	1. Non-Executive Director - Birmingham & Solihull Mental Health Foundation Trust 2. Walsall Housing Group (based West Midlands).	The Mercian Group (12 school multi - Academy Trust) based in Walsall, West Midlands.	Wife is Associate Professor, University of Birmingham. Deputy Programme Director - Health Service Management Centre. Wife runs a number of management development programmes.	18.04.2024
Joanne Wilson	Interim Board Secretary 01.12.2014 Substantive Board Secretary 18.12.2015	N/A	Director of Corporate Governance / Board Secretary	No	No	No	No	No	No	Director's husband is employed by the Health Board (Workforce & OD Directorate)	17.04.2024

Eleanor Marks	01.02.2024	N/A	Vice Chair	Director of Ashburnham Golf Club Ltd	No	No	Trustee on Board of Prime Cymru. Vice Chair of Prime Cymru from March 2024.	No	No	No	18.04.2024
Dr. Ardiana Gjini	01.07.2023	N/A	Director of Public Health	No	No	No	Trustee for the Medevac Frontline Charity https://medevacfrontline.org/	No	No	No	18.04.2024
Michael Imperato	01.09.2023	31.08.2027	Independent Member (Legal)	Director, Taurus Healthcare, Herefordhire	No	No	No	No	Member of Local Democracy and Boundary Commission for Wales. Member of Panel of Chairs of Valuation Tribunal for England.	No	18.04.2024
Mark Henwood	05.02.2024	N/A	Interim Executive Medical Director	Director of West Wales General Surgery Ltd	West Wales General Surgery Ltd	No	No	Clinical Chair of the Werndale hospital, part of Circle Health Group. [This has been noted and discussed within the Remuneration and Terms of Service Committee. Agreed safeguards,	No	Director's wife is also a director of West Wales general surgery Ltd	18.04.2024

								should any issues arise at Werndale Hospital, will be implemented via the Health Board Deputy Medical Director .			
Sharon Daniel	01.01.2024	N/A	Interim Executive Director of Nursing Quality and Patient Experience	No	No	No	No	No	No	No	20.04.2024
James Severs	06.11.2023	N/A	Director of Therapies & Health Sciences	No	No	No	No	No	No	No	17.04.2024
Michael Gray	30.01.2024	1 year	Associate Member	No	No	No	No	No	Director of Social Services for Pembrokeshire Council	No	24.04.2024
Jeremy Hockridge	30.01.2024	1 year	Associate Member	No	No	No	No	No	No	No	30.04.2024