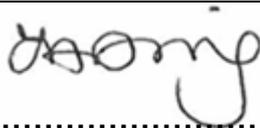


**POLICY ON STANDARDS OF BUSINESS CONDUCT
 FOR NHS STAFF**

Author	Human Resources
Sponsor	Director of Human Resources and Organisational Development
Responsible committee/individual	Staff Consultative Forum / Human Resources.
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Signed on behalf of the Trust:
Tracy Dowling, Chief Executive



Signed on behalf of Staff Side:
Shona Greig, Staff Side Secretary

VERSION CONTROL SHEET

Version	Date	Author	Comments
1.0	October 2005	Elaine Bailey	Ratified.
2.0	Sep 2010	Elaine Bailey	Updated and revised to incorporate new guidance. Also includes feedback from counter fraud. Ratified by Executive Team and Finance & Business Risk Committee.
2.1	Feb 2011	Integrated Governance	Minor amendments made
3.0	Oct 2012	Rachel King	Amended to reflect the new Secondary Employment (including Private Practice) Policy & Procedure as follows: <ul style="list-style-type: none"> • Section 10 updated with new process for outside employment and referring staff to the Secondary Employment Policy • Section 11 amended to include declarations for all staff, referring to the new Secondary Employment Policy • Section 20 to include the Secondary Employment Policy
3.1	Oct 2013	Rachel King	Amendments to Policy following recommendations from Counter Fraud Change of Business Risk Committee to Quality & Performance Executive Section 1.6 – Definition of Bribery included Addition of sections 2.4 and 2.5 regarding provision of policy to individuals of the Trust Section 4.2 – Addition of maximum amount for hospitality Section 5.1 (bullet point 3) – Additional information on refusing a gift Section 7.1 second paragraph – requirement for budget holders to submit a return, returns to be submitted when circumstances change as well as on an annual basis and requirement to submit nil return. Section 10.3 added on working whilst on sick leave Section 11.3 added on working whilst on sick leave

			<p>Section 18 – 18.1 removed and replaced with 18.1 – 18.4 to separate out the reporting lines.</p> <p>Section 20 – Addition of the Open Practice Policy and Counter-Fraud, Financial Irregularities & Corruption Policy</p> <p>Appendix 3 – Addition of Declaration.</p>
3.2	31 March 2018	Rachel King	JCNP agreed to extend the review date to 31.3.18
3.3	April 2018	Rachel King	JCNP agreed to extend the review date to 31.5.18

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1. INTRODUCTION

1.1 It is a long established principle that public sector bodies, including the NHS, must be scrupulously impartial and honest in the conduct of their business and that their employees should remain beyond suspicion. The Trust believes it is the responsibility of all staff to ensure that they are not placed in a position which risks, or appears to risk, conflict between their private interests and their NHS duties. It applies both to staff who commit resources directly (for example by ordering goods), or those who do so indirectly (for example by prescribing medicines or arranging the discharge of service users to residential facilities). The Trust expects all staff to:-

- ensure that the interests of service users remains paramount at all times;
- be impartial and honest in the conduct of their official business;
- use the public funds entrusted to them to the best advantage of the service, always ensuring value for money.

1.2 It is also the responsibility of staff to ensure that they do not:-

- abuse their official position for personal gain to their benefit, or that of their family or friends;
- seek to advantage or further their private business interests in the course of their official duties.

1.3 This policy is based on the Department of Health Circular HSG (93)5 and “Code of Conduct for NHS Managers 2002” and replaces all former guidelines. It should be read in conjunction with the Trust’s Standing Orders and must be regarded as an integral part of the Trust’s Standing Financial Instructions. Both must be observed at all times. Areas covered by this policy include:-

- acceptance of hospitality
- acceptance of casual gifts
- declaring business interests
- outside employment and private practice
- intellectual property rights
- purchasing and contracting for goods and services

1.4 In all these areas the guiding principles are to ensure that the interests of service users are put first, and for staff to seek advice from their line manager, if they are in any doubt about a particular situation.

1.5 Any staff that are found to be in breach of any aspect of this policy may be subject to disciplinary and/or criminal investigation, including possible summary dismissal for gross misconduct. In certain cases, staff may also be subject to criminal proceedings.

1.6 The Bribery Act 2010, which repeals existing corruption legislation, has introduced the offences of offering and or receiving a bribe. It also places specific responsibility on organisations to have in place sufficient and adequate procedures to prevent bribery and corruption taking place. Under the Act, Bribery is defined as "Inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other privileges". Corruption is broadly defined as the offering or the acceptance of inducements, gifts, favours payments or benefit in kind which may influence the improper action of any person; corruption does not always result in a loss. The corrupt person may not benefit directly from their deeds; however, they may be unreasonably using their position to give some advantage to another. To demonstrate the organisation has sufficient and adequate procedures in place and to demonstrate openness and transparency all staff are required to comply with the requirements of Standing Financial Instructions and Standing Orders policy. For a more detailed explanation see the Standards of Business Conduct and Conflicts of Interest Policy. Should members of staff wish to report any concerns or allegations they should contact either their Senior Compliance Officer (Director of Finance) or the Local Counter Fraud Specialist.

2. DUTIES AND RESPONSIBILITIES

2.1 Board level responsibility for this policy lies with the Director of Finance and Performance and the Director of Human Resources & Organisational Development. The Head of Human Resources is responsible for the implementation of the policy.

2.2 All Managers are responsible for ensuring the adherence and application of the policy.

2.3 All staff are responsible for adhering to the standards of practice set out in this policy.

2.4 Standards of Business Conduct set down within this policy must be adhered to by all employees' paid or unpaid, volunteers of the Trust whether whole or part-time. They also apply equally to all contractors and sub-contractors who have entered into a contractual relationship or association with the Trust for the provision and supply of goods and/or services to the Trust.

2.5 A copy of this policy will be provided to all new employees upon commencement of employment with the Trust, and to all contractors, sub-contractors and volunteers, where practicable and appropriate..

3. PUBLIC SECTOR VALUES

3.1 The Trust endorses the seven Fundamental Public Service Values specified in the Nolan Report, as listed below:-

3.1.1 **Selflessness:** Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their families or their friends.

3.1.2 **Integrity:** Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that may influence them in the performance of their official duties.

3.1.3 **Objectivity:** 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.

3.1.4 **Accountability:** 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.

3.1.5 **Openness:** Holders of public office should be as open as possible about all their decisions and the actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

3.1.6 **Honesty:** 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.

3.1.7 **Leadership:** Holders of public office should promote and support these principles by leadership and example.

Appendix 1 provides a summary of the key issues to be considered by all staff.

4. ACCEPTANCE OF GIFTS AND HOSPITALITY

4.1 In general, whilst articles of low intrinsic value, such as calendars and diaries, may be accepted, the offer of gifts from contractors or others should be politely and firmly declined and recorded. It should be explained to the person that the receipt of gifts is not permissible under the Terms and Conditions of Employment.

4.2 Modest hospitality, provided it is normal and reasonable in the circumstances, may be acceptable (e.g. lunches in the course of working visits), though it should be similar to the scale of hospitality which the Trust, as an employer, would also be likely to offer. **The maximum recommended amount is £25.00.** Staff should decline all other offers of gifts, hospitality, entertainment, or consideration of any kind. If in doubt, they should seek advice from their line manager.

4.3 Subject to the provisions of Section 5 below, whenever a member of staff is offered, or accepts a gift or hospitality from a contractor or other party, this must be reported to the relevant Director, who will in turn advise the Director of Finance, who will maintain a register containing details of offers made, and gifts,

hospitality etc. received. The register will also record details of hospitality provided by Trust employees and the register must be made accessible.

5. ACCEPTANCE OF GIFTS FROM SERVICE USERS, RELATIVES AND CARERS

5.1 It would be a sad day if it was felt that small tokens of gratitude from service users could not be accepted. There is, however, a question of degree. Ideally, those who wish to express their gratitude in this way should be encouraged to make a donation to the appropriate Trust charitable fund. Where a patient, relative, or carer wishes to present a personal gift to an individual, however, certain key principles should be followed:-

- gifts of cash or vouchers, of any value, must always be declined;
- gifts to the value of £10 or less can be accepted;
- gifts with a value of more than £10 should be declined tactfully, but firmly. It is recognised that refusal to accept a gift may cause offence, and/or the gift may be left for the individual in spite of the refusal to accept it. Where practicable the relevant line manager should be contacted in advance and the decision to accept is recorded as it not being given to influence improper behaviour or performance. All gifts received will form the basis of the decision making process prior to disposal. Permission should also be obtained in advance of offering gifts, again recording that such is not intended to influence improper behaviour or performance

6. WILLS

6.1 In the event that a member of staff is made aware of the fact that a patient or client intends to include in their will a bequest to them of money or property, the member of staff should discourage such action or, at least, ask that the Trust's Charitable Funds be made the beneficiary of the bequest. This should be reported through her/his Line Manager and in turn, to the relevant Director.

6.2 Where a member of staff receives any benefits from a bequest, this must be reported through her/his line manager to the relevant Director.

7. DECLARING BUSINESS INTERESTS

7.1 The Trust must be aware of all cases where an employee, or someone closely associated with her/him, has a significant financial interest, directly or indirectly, or holds a position of authority, in any business, voluntary or charitable body, or in any other activity or pursuit, which may compete for a contract to supply goods or services to the Trust, or be in any way in conflict or competition with the Trust.

All Directors, senior staff (employees whose salary is above Band 8a) and budget holders, will be required to complete a Declaration of Interests form on starting employment (see Appendix 3) and on an annual basis thereafter, or

earlier should the need arise. To ensure consistency and minimise the risk of fraud occurring it is advisable that Directors, senior staff and budget holders are required to submit nil declarations. Guidance for completion of the declaration is included in Appendix 4. A copy of this form should be held by the Line Manager on the personal file, together with a copy being sent to the Trust Secretary, Elizabeth House, Fulbourn Hospital, Fulbourn, Cambridge.

7.2 Those staff who are not required to make a formal declaration (staff whose salary is below Band 8a) are still required to declare their interests when a potential conflict could arise.

7.3 If in doubt, employees should ask themselves the following questions:-

- Am I, or might I be, in a position where I, my family or friends could gain from the connection between my private interests and my employment?
- Do I have access to information which could influence purchasing decisions?
- Could my outside interests be in any way detrimental to the NHS, or to service users' interests?
- Do I have any other reason to think I may be risking a conflict of interest?

7.4 An example, would be where a member of staff is responsible for the discharge of service users to a private nursing home, in which he or she or their immediate family have an interest. The appropriate course of action would be for the employee to withdraw completely from any further involvement in the particular issue.

7.5 Employees not required to make a formal declaration should declare any interests to their Line Manager using the form in Appendix 3, who will record it and forward a copy to the Trust Secretary. Elizabeth House, Fulbourn Hospital, Fulbourn, Cambridge

8. PREFERENTIAL TREATMENT IN PRIVATE TRANSACTIONS

8.1 Many staff enjoy the benefits of schemes such as the NHS Benefits Scheme, where concessionary agreements have been negotiated with local or national companies. However, individual staff must not seek or accept preferential rates for private transactions with companies with which they have had, or may have, dealings on behalf of the Trust.

9. PRIVATE USE OF EQUIPMENT AND MATERIALS

9.1 Staff must obtain prior permission from their Line Manager before making private use of the Trust's vehicles, computers, telephones, photocopy facilities and any other Trust equipment or materials.

10. OUTSIDE EMPLOYMENT

- 10.1 Staff should not engage in outside employment which may conflict with their Trust employment, or be detrimental to it and could lead to a disciplinary and/or criminal investigation being commenced. Staff should seek the permission of their Line Manager, by completing the application form, before taking on outside work.
- 10.2 If in doubt, the employee should discuss the proposed employment with their Line Manager, prior to making the application. This must also be in line with the Working Time Regulations (see Trust Policy). For further details, please refer to the Trust's Policy on Secondary Employment (including Private Practice)

10.3 Staff are reminded that they are not permitted to undertake work elsewhere whilst on sick leave from the Trust. Any employee suspected of undertaking work elsewhere whilst on sick leave may be referred to the Trust's Local Counter Fraud Specialist (LCFS) for further investigation. Where appropriate, disciplinary or criminal proceedings may sought

11. PRIVATE PRACTICE

- 11.1 All staff are required to declare any private practice, details of how to declare can be found in the Secondary Employment (Including Private Practice) Policy & Procedure
- 11.2 There are special conditions relating to Hospital, Medical and Dental Staff, as specified in the relevant terms and conditions and national circulars. Specific guidance can be obtained from the Medical Services Department.

11.3 Any employee suspected of undertaking undeclared private practice or employment during their contracted hours may be referred to the Trust's Local Counter Fraud Specialist (LCFS) for further investigation. Where appropriate, disciplinary or criminal proceedings may sought.

12. INTELLECTUAL PROPERTY RIGHTS

- 12.1 If at any time during a member of staff's normal duties he/she:-
- makes or discovers any invention (or participates in making or discovering any invention);
 - makes an improvement or addition to any invention (or participates in making an improvement or adding to any invention);
 - Creates any design (whether registerable or not), or other work in which copyright may exist. However, at the discretion of the Trust, copyright may be vested in another body (e.g. publisher).

They must report this immediately to the relevant Director. The invention, design or other work, as appropriate, shall belong absolutely to the Trust.

13. CONTRACTING FOR GOODS AND SERVICES

- 13.1 All staff who sign purchase orders, or place contracts for goods and services, are expected to adhere to the Standards of Conduct as detailed in the attached Ethical Code of the Institute of Purchasing and Supply (see Appendix 2). In addition, such staff are expected to conform to all NHS and Trust Standing Orders and Standing Financial Instructions, plus the EU Remedies Directive.
- 13.2 Disposal of the Trust's assets should also comply with Standing Orders and Standing Financial Instructions regarding 'Protected Assets'. No favouritism should be shown in these types of transactions.
- 13.3 These require that no advantage should be given to any potential contractors, nor any special favour to employees, current or former, their close relatives or associates, when contracts are awarded to companies run by them or employing them in a senior capacity. Impartiality and fair competition must be paramount at all times.
- 13.4 Potential contractors should be warned of the consequences of any corrupt practices involving NHS employees, by the inclusion of a notice in the tender documentation.

14. COMMERCIAL SPONSORSHIP/FUNDRAISING

- 14.1 Offers of commercial sponsorship for courses, conferences and funding of posts should not compromise purchasing decisions in any way. Staff should always seek the permission of the relevant Director, before accepting sponsorship and any sponsorship involving overseas travel must be approved by the Chief Executive.
- 14.2 Similarly, staff should always obtain the prior permission of the relevant Director, before seeking donations of cash, goods or services from the business community, as part of fund-raising activity.

15. INSPECTION OF EQUIPMENT

- 15.1 When it is considered necessary for staff to inspect equipment prior to purchase at locations other than those of the Trust, all expenses must be paid for by the Trust. Offers from suppliers must be declined, on the basis that acceptance could jeopardise the integrity of the purchasing decision.
- 15.2 Any overseas visits must be approved by the Chief Executive.

16. STAFF APPOINTMENTS

- 16.1 The Trust's Standing Orders state that all applicants for employment shall disclose in writing whether they are related to any Director or senior employee.
- 16.2 In addition, all Directors and senior employees whose salary is above Band 8a should report to the Human Resources Department, the candidacy of any

relative of which they are aware. Relationships to which this applies are spouse or partner and their sons, daughters, grandsons, granddaughters, brothers and sisters, nephews and nieces, stepchildren and other step-relations. Clearly the Director or employee must not participate in the selection process.

16.3 Directors and employees are, however, not precluded from giving a written reference or testimonial in support of the candidate's ability, experience or character.

17. CONFIDENTIALITY

17.1 Staff must not disclose the private affairs, or confidential information, of the Trust to any unauthorised person and must not use for his/her own purposes any information acquired in relation to the Trust's business. In particular, information about the Trust's service users/clients, and information which may be described as 'commercial in confidence', such as details of the Trust's service contracts, budgets and business/strategic plans, must not be divulged or used by staff.

17.2 Any member of staff who breaches this duty of confidentiality may be subject to disciplinary action, including possible summary dismissal for gross misconduct.

18. RAISING A CONCERN

18.1 All suspicions of fraud should be reported at the earliest opportunity to either the Trust's Local Counter Fraud Specialist (LCFS) or Director of Finance. The LCFS will investigate the allegations as appropriate.

18.2 All suspicions of offences committed under the Bribery Act should be reported to either the Trust's LCFS or Senior Compliance Officer (Director of Finance). Further investigation will be undertaken as appropriate.

18.3 All suspicions of theft from the Trust should be reported to the Trust's Local Security Management Specialist (LSMS) or Director of Finance. The LSMS will undertake further investigation as appropriate'.

18.4 All contact details can be obtained from either the Trust intranet or from the Finance Department.

19. MONITORING

19.1 Managers are required to monitor this locally within their teams. The Trust Secretary will monitor the declaration of business interests. Occasional audits will be carried out to monitor full implementation of the policy.

20. LINKS TO OTHER DOCUMENTS

- Disciplinary Policy
- Secondary Employment (including Private Practice) Policy & Procedure
- Counter-Fraud, Financial Irregularities & Corruption Policy

- Open Practice (Including Whistleblowing) Policy

A FINAL WORD TO ALL STAFF:

IF IN ANY DOUBT, ALWAYS SEEK ADVICE FROM YOUR LINE MANAGER.

APPENDIX 1

SUMMARY OF GUIDANCE FOR STAFF ON THE STANDARDS OF BUSINESS CONDUCT

DO:-

- Make sure you understand the Trust Policy and Guidelines on Standards of Business Conduct, and consult your Line Manager if you are not sure;
- Make sure you are not in a position where your private interests and NHS duties may conflict;
- Declare to your employer any relevant interests;
- Adhere to the ethical code of the Institute of Purchasing and Supply, if you are involved in any way with the acquisition of goods and services (see Appendix 2);
- Seek your employer's permission before taking on outside work, if there is any question of it adversely affecting your NHS duties (special guidance applies to doctors);
- Obtain your employer's permission before accepting any commercial sponsorship.

IF IN DOUBT - DECLARE IT!

DO NOT:-

- Accept any gifts, inducements or inappropriate hospitality;
- Abuse your past or present official position to obtain preferential rates for private deals;
- Unfairly advantage one competitor over another or show favouritism in awarding contracts;
- Misuse or make available official "commercial in confidence" information.

APPENDIX 2

INSTITUTE OF PURCHASING AND SUPPLY - ETHICAL CODE (Reproduced by kind permission of IPS)

1. INTRODUCTION

The code set out below was approved by the Institute's Council on 26 February 1977 and is binding on I.P.S. members.

2. PRECEPTS

Members shall never use their authority, or office, for personal gain and shall seek to uphold and enhance the standing of the Purchasing and Supply profession and the Institute by:-

- a) Maintaining an unimpeachable standard of integrity in all their business relationships, both inside and outside the organisations in which they are employed.
- b) Fostering the highest possible standards of professional competence amongst those for whom they are responsible.
- c) Optimising the use of resources for which they are responsible, to provide the maximum benefit to their employing organisation.
- d) Complying both with the letter and the spirit of:-
 - i) The law of the country in which they practice;
 - ii) Such guidance on professional practices, as may be issued by the Institute from time to time;
 - iii) Contractual obligations.
- e) Rejecting any business practice which might reasonably be deemed improper.

3. GUIDANCE

In applying these precepts, members should follow the guidance set out below:-

- a) Declaration of interest. Any personal interest which may impinge, or might reasonably be deemed by others to impinge, on a member's impartiality in any matter relevant to his or her duties should be declared.

- b) Confidentiality and accuracy of information. The confidentiality of information received in the course of duty, should be respected and should never be used for personal gain; information given in the course of duty should be true and fair and never designed to mislead.
- c) Competition. While bearing in mind the advantages to the member's employing organisation of maintaining a continuing relationship with a supplier, any relationship which might, in the long term, prevent the effective operation of fair competition should be avoided.
- d) Business Gifts. Business gifts, other than items of very small intrinsic value, such as business diaries or calendars, should not be accepted.
- e) Hospitality. Modest hospitality is an accepted courtesy of a business relationship. However, the recipient should not allow himself or herself to reach a position, whereby he or she might be deemed by others to have been influenced in making a business decision, as a consequence of accepting such hospitality; the frequency and scale of hospitality accepted, should not be significantly greater than the recipient's employer would be likely to provide in return.
- f) When it is not easy to decide between what is and is not acceptable in terms of gifts or hospitality, the offer should be declined or advice sought from the member's superior.

APPENDIX 3

REGISTER OF INTEREST

- 1 NAME:**

- 2 OFFICE HELD:**

- 3 OTHER EMPLOYMENT:**

- 4 RELEVANT INTERESTS IN BUSINESS FIRMS, PARTNERSHIPS, LIMITED COMPANIES:**

- 5 RELEVANT MEMBERSHIP OF VOLUNTARY AND CHARITABLE ORGANISATIONS:**

- 6 OTHER:**

I declare that the information I have given on this form is correct and complete. I understand that if I knowingly provide false information this may constitute an offence of fraud under the Fraud Act 2006 and that subsequently I may be liable for prosecution and/or civil recovery proceedings. I consent to the disclosure of information from this form to and by the Trust and NHS Protect for the purpose of verification and the investigation, prevention, detection and prosecution of fraud'

SIGNED: DATE:

A copy of this form should be sent to the Trust Secretary, Elizabeth House, Fulbourn Hospital, Cambridge, CB21 5EF and a copy to be held by the Line Manager on the personal file.

APPENDIX 4

REGISTER OF INTEREST - DIRECTORS AND SENIOR STAFF

NOTES FOR COMPLETION

1 OTHER EMPLOYMENT

Please list any other employers you may have. Please also list any employers of your immediate family (i.e. spouse/partner, sons and daughters).

2 RELEVANT INTERESTS IN BUSINESS FIRMS, PARTNERSHIPS, LIMITED COMPANIES

Please list your own interests, and those of your immediate family, (as defined in Section 4) in the following:-

- Directorships in all limited companies
- Proprietorship of business firms doing business, or possibly seeking to do business, with the NHS
- As a partner of any business or professional partnership doing business, or possibly seeking to do business, with the NHS
- Shareholdings in companies doing business, or possibly seeking to do business, with the NHS. In addition shareholdings need not be disclosed if:-

the total nominal value of the shares do not exceed £5,000, or one hundredth of the total nominal value of the issued share capital of the company, whichever is less; and,

if the share capital is of more than one class, the nominal value of shares of any one class, in which the beneficial interest does not exceed one hundredth of the total issued share capital of that class.

3 RELEVANT MEMBERSHIP OF VOLUNTARY AND CHARITABLE ORGANISATIONS

Please list any memberships held by yourself and your immediate family, (as defined in Section 4) of charitable or voluntary bodies in the field of health and supported living, indicating any positions of responsibility.

4 OTHER

Please detail any other matter relevant to yourself and your immediate family (as defined in Section 4), which could possibly lead to any conflict of interest.

NOTES

- Completion of this declaration does not diminish the responsibility of all Directors and senior staff to **always** ensure that they do not participate in any activities within the Trust, which may lead to a conflict of interest.
- Although completion of the declaration will be required annually, Directors and senior staff should immediately advise the Director of Finance of any material changes which occur during the year.