

**Health Professions Council  
Finance and Resources Committee Meeting 18<sup>th</sup> September 2006**

**Introduction of an Employee Gifts and Inducements Policy**

**Executive Summary and Recommendations**

**Introduction**

The HPC Employee Handbook does not currently contain a Gifts and Inducements Policy. Whilst no significant issues have arisen in this area in the past, it is felt that it would be good practice to include such a policy as part of an employee's terms and conditions.

A proposed policy has been drafted in consultation with advice from HPC's employment advisors (the Work Foundation). As this constitutes a change to employees' terms and conditions of employment, they have been consulted about the policy and their suggestions and feedback incorporated into the document.

As this is a relatively significant change to the Employee Handbook, it has been brought to the attention of the Finance and Resources Committee.

It is further suggested that, once a policy has been agreed for HPC employees, a policy for Council members will be put to Council for consideration.

**Decision**

The Committee is asked to:

- discuss the proposed policy, and suggest any appropriate amendments which will then be taken back to employees as part of the overall consultation; and
- agree whether or not the policy is approved and can therefore be implemented (with an appropriate period of notice to employees which is generally one month).

**Background information**

None.

**Resource implications**

None.

**Financial implications**

None.

**Appendices**

None.

**Date of paper**

23<sup>rd</sup> August 2006.

## Section 8I – Gifts and Inducements

This policy must be followed with regard to gifts or benefits received in connection with your employment.

- 1.0 You must not directly or indirectly seek, receive or obtain, in respect of any services provided by or on behalf of the HPC, any gift, hospitality, discount, rebate, commission or other inducement or corrupt payment (whether in cash or in kind) which is not authorised by the HPC's policy.
- 2.0 Excessive amounts of entertainment accepted by you, or given by you to others, is forbidden.
- 3.0 Other than by way of a token nature, you are not permitted to receive, without the prior permission of your Manager and the Human Resources department, any gifts, hospitality, discounts, rebates, commission or favours in relation to the HPC's business from any person or business with whom you are involved on the HPC's business.
- 4.0 Gifts of a token nature should not be declared using the Gifts and Inducements Register, however, all others must be declared.

Excessive amount of entertainment may include (but are not limited to) offers of days out at events, offers of gifts such as a basket of goods, attending functions which involve non-work related events. This may also include gifts such as offering employees private discounts if they buy products for their personal use from a supplier.

Gifts of a token nature may include items such as flowers, pens, tee-shirts, diaries, calendars, bottles of wine, or functions that are work related (such a dinner following a day of working with consultants).

At Christmas time it is recognised that Departments receive a larger than normal amount of gifts and in this case, it is advisable that gifts should be shared within the Departments receiving them or the company generally. For very significant gifts such as large food hampers, the supplier should be contacted and advised that such gifts cannot be accepted in future.

No gifts should be accepted under any circumstances at the time of business transactions or contract awards.

A Gifts and Inducements Register is kept within the Human Resources Department and gifts should be registered with Human Resources within seven days of your receipt of the same by using the attached Gifts and Inducements Form.

Date	Ver.	Dept/Cmte	Doc Type	Title	Status	Int. Aud.
2006-06-12	a	HRD	POL	Section_8I_Gifts and Inducements	Final DD: None	Internal RD: None

Failure to comply with the above notification and/or recording requirements is likely to result in disciplinary action.

### **Non-Compliance**

If you (or any person on your behalf) accept any gift, hospitality, discount, rebate, commission, or other inducement or corrupt payment of a value in excess of something which is of a token nature and do so without the prior permission of your Manager and the Human Resources department, you must immediately account to the HPC for the amount so received. Such accounting shall not preclude disciplinary action.

Should you not voluntarily account to the HPC, the HPC reserves the right to deduct from your next salary payment a sum the HPC deems to be equivalent to the gift, hospitality, discount, rebate, commission or inducement or corrupt payment accepted by you or on your behalf.

<b>Date</b>	<b>Ver.</b>	<b>Dept/Cmte</b>	<b>Doc Type</b>	<b>Title</b>	<b>Status</b>	<b>Int. Aud.</b>
2006-06-12	a	HRD	POL	Section_8 _Gifts and Inducements	Final DD: None	Internal RD: None

## GIFTS AND INDUCEMENTS FORM



**Employee Name and Position:** \_\_\_\_\_

**Department:** \_\_\_\_\_

**Company who supplied gift and HPC relationship with them:** \_\_\_\_\_

**Reason for Gift or Inducement:** \_\_\_\_\_

**Approximate Value of Gift or Inducement (if known):** \_\_\_\_\_

\_\_\_\_\_  
**Employee Signature**

**Date:** \_\_\_\_\_

\_\_\_\_\_  
**Manager/Director Signature:**

**Date:** \_\_\_\_\_

\_\_\_\_\_  
**Director of Human Resources:**

**Date:** \_\_\_\_\_

*Please Note: This form must be forwarded to Human Resources; it will be retained on your Employee Personnel File and details of the gift received by you will be recorded in the Gifts and Inducements Register.*

Date	Ver.	Dept/Cmte	Doc Type	Title	Status	Int. Aud.
2006-06-12	a	HRD	POL	Section_8 _Gifts and Inducements	Final DD: None	Internal RD: None