

Gifts, Hospitality and Sponsorship Policy (District)

Introduction Southern District Health Board ('Southern DHB') is committed to ensuring that the receipt of gifts, donations, sponsorship or hospitality by any member of staff or individual associated with the operation or governance of Southern DHB does not create a real or perceived conflict of interest or an actual or perceived obligation to another party.

Policy Scope This policy applies to all Southern DHB employees including temporary employees and contractors, any person who is involved in the operation or governance of Southern DHB including joint appointees, volunteers, those with honorary or unpaid staff status and Board members (collectively referred to as 'staff members').

Definitions

Board members 'Board members' includes the commissioner and deputy commissioners.

Conflict of Interest 'Conflict of interest' is any situation in which private interest or personal considerations may affect the judgement of the staff member and/or the staff member's ability to act in the best interest of the Southern DHB.

Donation A 'donation' may take the form of money, product or service provided to Southern DHB whereby the donor has an expectation that such donations are put directly to enhance the provision of the DHB's services without any expectations (in terms of either services or personnel) to the donor.

Gift A 'gift' is any tangible benefit provided as a product or a service that is received by a staff member in association with their work at Southern DHB from any person or organisation outside the DHB.

Gifts include but are not limited to:

- Presents, including gift vouchers & tickets to events
- Flowers
- Wine/Alcohol
- Money
- Free or discounted conference attendance

Hospitality

'Hospitality' is a type of gift that may involve food, alcohol, entertainment or a meal and being hosted by a Southern DHB related person or organisation, including supplier companies or professional bodies and associations, at an occasion or function. Hospitality includes but is not limited to:

- Meals
- Corporate hospitality at events, including sporting events
- Catered corporate functions

Sponsorship

- 'Sponsorship received' is a gift of money, products or services provided by a range of corporates or individuals including a potential or current supplier:
 - to assist or support a Southern DHB activity and the sponsor has an expectation of public acknowledgment or endorsement by the DHB for their products or services
 - to assist or support an individual to attend a conference, for example payment of conference registration fees, air fares, accommodation.
- 'Sponsorship given' is the assistance or support of a project or staff endeavour by way of money, products or services whereby Southern DHB expects either:
 - to enhance staff wellbeing; or
 - public acknowledgement or endorsement of the DHB.

Principles

- All procurement of goods and services by Southern DHB shall be free of real or perceived conflicts of interest.
- Individual staff members should politely decline gifts and hospitality wherever possible.
- Gifts of money should not be accepted by individuals under any circumstances.
- All acceptances of gifts, donations, sponsorship and hospitality shall subject to the provisions detailed below, be recorded in an electronic register.

- Southern DHB reserves the right to accept donations in circumstances where adverse obligations may result.

Register

- Gifts, hospitality, and sponsorship accepted by individuals of a value more than \$50 must be recorded in the register and approved in accordance with this policy.
- Failure to disclose and record gifts, hospitality, and sponsorship with a value of more than \$50 may be considered misconduct for the purposes of Southern DHB's disciplinary procedures.

Gifts

- Gifts offered to individuals should be politely declined other than in circumstances in which :
 - to decline will cause significant offense, or
 - it is culturally appropriate, or
 - the value of the gift does not exceed \$25 , and
 - the gift does not comprise cash.
- Where a gift has been accepted the receipt is also governed by the [Sensitive Expenditure Policy \(District\)](#) (48567) and requires both disclosure; and approval as set out in the [Sensitive Expenditure Policy \(District\)](#) (48567):
 - Gifts valued under \$200 require Level 3 approval.
 - Gifts valued over \$500 require Level 2 approval.
 - Gifts valued over \$1,000 require Level 1 approval.

Sponsorship

- Individuals should politely decline sponsorship, including subsidised conference attendance, except where careful consideration has been given to the following:
 - accepting the sponsorship provides clear and tangible benefits to Southern DHB, and
 - the benefits clearly outweigh the costs and restrictions this will place on the individual's ability to be involved in any subsequent procurement processes; andprior approval has been given in writing as detailed in the [Sensitive Expenditure Policy \(District\)](#) (48567).

- Southern DHB will not approve the receipt of sponsorship to either the organisation or any individual or department in circumstances in which a sponsor (or any individual employed by or associated with a sponsor) benefits directly, or is perceived to benefit directly or gain advantage over others in respect of services provided by Southern DHB.

Hospitality

- Hospitality offered to individuals should generally be politely declined other than in circumstances in which:
 - to decline will cause significant offense; or
 - it is culturally appropriate; or
 - the value of the hospitality does not exceed \$50.
- Where hospitality is accepted the receipt is also governed by the [Sensitive Expenditure Policy \(District\)](#) (48567) and requires both disclosure and approval.

Procurement

- Any individual involved in any procurement decision shall be required to declare:
 - they have no conflicts of interest.
 - they have received no gift, sponsorship or hospitality from any of the proposed suppliers in the last eighteen months.
- The gifts, sponsorship and hospitality register will be independently scrutinised by the procurement lead to ensure there is no risk of real or perceived conflicts of interest.

Donations to SDHB

Southern DHB will not accept donations:

- For the purchase of equipment or the provision of services where in the opinion of Southern DHB there are unreasonable restrictions placed on the use of the donation; or
- In circumstances in which in the opinion of Southern DHB, utilisation of the donation in the manner proposed by the donor will have a significantly adverse financial outcome; or
- In circumstances in which a donor (or any individual employed by or associated with a donor) benefits, or is perceived to benefit, directly or gains advantage over others in respect of services provided by Southern DHB.

Donation of Artworks to Southern DHB

All potential donations of artworks are determined by the appropriate Arts Committee. Refer to:

- [Art in Our Hospitals \(Otago\)](#) (42899); or the
- [Artworks Policy \(Southland\)](#) (80257)

Donations from Southern DHB

Donations will not generally be made by Southern DHB other than:

- In exceptional circumstances; and approved by the chief executive or in accordance with the [Delegation of Authority Policy \(District\)](#) (21584); and
- The proposed donation is consistent with Southern DHB's strategic priorities.

Compliance

Members of staff who do not comply with this policy may be subject to Southern DHB's disciplinary procedures.

Associated Documents:

- Our shared values and behaviours (Pulse –Southern Future)
- [Art in Our Hospitals \(Otago\)](#) (42899)
- [Artworks Policy \(Southland\)](#) (80257)
- [Code of Conduct and Integrity \(District\)](#) (18679)
- [Code of Ethics Policy](#) (21192)
- [Disclosure of Interests Policy \(District\)](#) (27894)
- [Delegation of Authority Policy \(District\)](#) (21584)
- [Disciplinary Policy \(District\)](#) (55569)
- [Fraud Policy \(District\)](#) (25546)
- [Koha Policy \(District\)](#) (24622)
- [Managing Gifts and Sponsorship Guidelines \(District\)](#) (81063)
- [Protected Disclosures / Whistle-blowing Policy \(District\)](#) (19708)
- [Sensitive Expenditure Policy \(District\)](#) (48567)

References:

- Ministry of Health. 2010. [Conflict of Interest Guidelines for District Health Boards](http://www.health.govt.nz/system/files/documents/publications/conflict-of-interest-guidelines-dhb_0.pdf). Wellington; Author http://www.health.govt.nz/system/files/documents/publications/conflict-of-interest-guidelines-dhb_0.pdf
- Controller and Auditor-General. [Managing Conflicts of Interest: Guidance for Public Entities](#).

General Notes

Scope of Practice: Ensure you are fully qualified to perform the role specified in any document.

Deviations: If you need to deviate from any procedure, policy, or guideline, make notes and follow up.

Caution - Printed Copies: Printed copies of this document cannot be relied on after the date at the bottom of the page. Check release date and version number against the electronic version on MIDAS to ensure that they are current.

Disclaimer: This document meets the Southern District Health Board's specific requirements. The Southern DHB makes no representations as to its suitability for use by others, and accepts no responsibility for the consequences of such use.