



## NHS 24 – Code of Conduct

DOCUMENT CONTROL	
<b>Owner:</b>	Head of Human Resources Business Services
<b>Document Control:</b>	HR Business Support
<b>Date Live From:</b>	April 2015
<b>Review/Approval Group:</b>	PPRG and Executive Team
<b>Last Reviewed:</b>	February 2015
<b>Review Due/Cycle:</b>	Every 3 years

# **CODE OF CONDUCT FOR STAFF**

## **Contents**

### **1. Introduction – NHS 24 Values**

### **2. Scope**

### **3. Application of the Code of Conduct**

### **4. Standards of Behaviour**

#### 4.1 Staff Rights

#### 4.2 Staff Responsibilities

#### 4.3 Use of Alcohol and Illegal Drugs

### **5. Accountability**

#### 5.1 Public Accountability

#### 5.2 Use of Resources

#### 5.3 Bribery

### **6. Equality, Diversity and Human Rights**

### **7. Conflicts of Interests**

#### 7.1 Staff Responsibilities

#### 7.2 Registration of Interests

#### 7.3 Declaration of Interests

#### 7.4 Additional Conflict of Interests

#### 7.5 Acceptance of Gifts and Hospitality

#### 7.6 Other Employment

#### 7.7 Conduct Outside of Work

#### 7.8 Contact with the Police

#### 7.9 Political Activities

#### 7.10 Politically Restricted Posts

### **8. Access to Information**

#### 8.1 Dealing with the Media

### **9. Concerns about Improper Conduct & Whistleblowing**

#### 9.1 "Whistleblowing"

**APPENDIX A – REGISTRATION OF INTERESTS (EXECUTIVE DIRECTORS AND SENIOR MANAGERS REPORTING DIRECTLY TO EXECUTIVE DIRECTORS)**

**APPENDIX B – REGISTRATION OF INTERESTS (STAFF WITH DELEGATED FINANCIAL AUTHORITY AND/OR DIRECT INFLUENCE OVER NHS 24'S DECISIONS (BUT WHO ARE NOT EXECUTIVE DIRECTORS AND DO NOT REPORT DIRECTLY TO EXECUTIVE DIRECTORS))**

**APPENDIX C – STAFF GIFTS AND HOSPITALITY REGISTRATION FORM**

**APPENDIX D – DECLARATION OF ACCEPTANCE OF NHS 24 CODE OF CONDUCT**

## 1. INTRODUCTION – NHS 24 VALUES

NHS 24 aims to create a positive environment in which each individual is valued by promoting and encouraging NHSScotland's 2020 Workforce Vision values. The values set out by NHSScotland are:

- care and compassion
- dignity and respect
- openness, honesty and responsibility
- quality and teamwork

These values are applied in day to day work, reinforced through induction and training and articulated in actions and words by those who lead and work in the organisation. NHS 24 apply these values in conducting its business and in its relationships with staff, service users and others. It is important that all staff live out these values in their working life to ensure a supportive and professional environment for all.

This Code of Conduct provides guidance to staff on how to ensure that actions and behaviour are consistent with both NHS 24's values and the high standards of conduct required to maintain public confidence in the work of NHS 24. This code of conduct should be read in conjunction with other professional codes of conduct, where applicable.

This Code is compliant with and subject to the provisions of the European Convention on Human Rights (ECHR) as applied by the Human Rights Act 1998.

The main ECHR provisions which are relevant in relation to the interpretation and application of the Code include:

- Article 8 – right to respect for private and family life
- Article 9 – freedom of thought, conscience and religion
- Article 10 – freedom of expression

## 2. SCOPE

This Code applies to all staff of NHS 24, regardless of length of service or nature of contract. Contractors, consultants or agency staff working with NHS 24 will be expected to abide by the standards and principles set out in the Code and to seek advice from the Human Resources Directorate when in doubt. Members of the Board of NHS 24 are subject to the Code of Conduct set out in the NHS 24 Corporate Governance Manual.

### **3. APPLICATION OF THE CODE**

All staff must at all times observe the highest standards of impartiality, integrity, objectivity, confidentiality and honesty in relation to all work undertaken.

- Staff should familiarise themselves with the contents of this Code and act in accordance with the principles and the guidance set out in it.
- Staff must ensure that they understand their duties, rights and responsibilities, and are familiar with the functions and role of NHS 24 and NHS 24's policies and procedures as they affect their job. New staff will be required to attend relevant training or induction courses to assist them in this.
- Staff should ensure that they understand this Code and how it relates to their work. Staff are encouraged seek further advice from their line manager, Human Resources, or staff side representative, if they are unclear on any aspect of this code. Staff should be aware that failure to comply with the Code of Conduct is a disciplinary matter.
- For Healthcare Support Workers their performance must comply with the "Mandatory Induction Standards for Healthcare Support Workers in Scotland" 2009; and with the Code of Conduct for Healthcare Support Workers, both as amended from time to time (copies can be obtained on-line at [www.workinginhealth.com/standards/healthcaresupportworkers](http://www.workinginhealth.com/standards/healthcaresupportworkers) or from the Human Resources Department).

### **4. STANDARDS OF BEHAVIOUR**

NHS 24 is a publicly funded service and as such is subject to public scrutiny to ensure the highest standards of service are achieved at all times. NHS 24 therefore has a responsibility to ensure that all staff are aware of their rights and the standards of behaviour required. These standards are in line with PIN Policies and NHS 24's Dignity at Work Policy. The following sections outline the responsibilities of staff both in work and outside of work.

#### **4.1 All Staff have a right to:**

- Work free from harassment or intimidation regardless of disability , sexual orientation, sex, race, religion or belief, pregnancy and maternity or gender reassignment, age
- Be spoken to politely and be treated with respect

- Be treated fairly and courteously by colleagues and those outside the organisation
- Be treated fairly in recruitment, training and promotion
- Be listened to and have their point of view considered
- A private life and commitments outside of work respected
- Speak out if felt to be a victim of bullying, harassment or intimidation and have this complaint taken seriously and properly investigated

#### **4.2 All Staff have a responsibility to:**

- Ensure behaviour (at work or outside of work) and appearance at work or whilst representing NHS 24, does not reflect negatively on NHS 24 in a way that would bring its reputation into disrepute or cause a loss of public confidence in its work
- Challenge attitudes which demean or denigrate other people (individuals or groups) and develop awareness of the impact of individual behaviour
- Act professionally in dealings with colleagues - treat colleagues as individuals and show sensitivity to their needs
- Treat complainants, those investigated, and other stakeholders, with fairness, courtesy and sensitivity to their needs and situation
- Consider others in carrying out work responsibilities
- Keep in mind the limitations of individual experience and value others' perspectives and experience
- Express points of view without being aggressive or overbearing
- Listen to what others say and respect their point of view
- Learn from any mistakes
- Try to find solutions and work through disagreements
- Take responsibility for personal learning and development and support the learning and development of colleagues
- Take action if made aware of or are witness to any improper conduct, including any act of harassment or discrimination (please see Section 9 for further details)
- Not discriminate unlawfully, for example, in making decisions
- Not put pressure on others to discriminate unlawfully

#### **4.3 Use of Alcohol or Illegal Drugs**

Staff must not drink alcohol during working hours (including during meal breaks) under any circumstances. This is also applicable whilst 'on-call'.

Social events at which alcohol may be consumed should be arranged after work. If attending a function during the working day at which alcohol is served, staff must not participate.

Should staff members arrive at work under the influence of alcohol or drugs, this will be regarded by NHS 24 as a serious matter and may lead to disciplinary action. Where drugs have been prescribed which may affect a staff member's ability to do their job, advice should be sought from their GP or line manager at the earliest opportunity to identify the health and safety implications.

## **5. ACCOUNTABILITY**

All NHS 24 staff should conduct themselves with impartiality, integrity, objectivity and honesty. Staff should not deceive or knowingly mislead others, including the public, other staff members, the Executive Team, the Board, Ministers, or the Scottish Parliament.

### **5.1 Public Accountability**

Staff of public bodies (including NHS 24) who deal with the health of the public should do so sensitively, objectively, confidentially and with consideration, consent, integrity, and vigilance. Staff of public bodies should offer the public the highest standards of conduct and health service.

### **5.2 Use of Resources**

All staff have a duty to ensure that NHS 24's resources are used in the most appropriate manner as befits public money. Staff should consider this when using NHS 24's resources to ensure maximum efficiency.

### **5.3 Bribery**

The Bribery Act 2010 sets out the responsibilities of individuals and organisations in relation to preventing acts of bribery. In particular, the Act creates two general offences relating to:

- the offering, promising or giving of a bribe; and
- the requesting, agreeing to receive or accepting of a bribe.

The Act also sets out two further offences which relate specifically to commercial bribery. These include the specific offence of bribing a foreign official in addition to the corporate liability for failing to prevent bribery on behalf of a commercial organisation.

A bribe is a financial or other advantage in connection with a person performing a function improperly (where a person fails to meet the expectation that they will act in good faith, impartially or in accordance with a position of trust). Any individual found guilty of bribery could face a maximum 10 years prison sentence and/or an unlimited fine.

NHS 24 is committed to preventing any acts of bribery involving or affecting the organisation and its staff, and will co-operate fully with any legal investigation into alleged activity. NHS 24 will deem any such activity as Gross Misconduct which will be managed in line with the Management of Staff Conduct: Disciplinary Policy and Procedure.

Staff are encouraged to report any suspicions in this regard to their line manager in the first instance, in line with section 9.1 below and the NHS 24 Whistleblowing Policy.

Staff are also reminded of their obligations regarding the acceptance of gifts and hospitality as set out in section 7.5 below.

## 6. EQUALITY, DIVERSITY AND HUMAN RIGHTS

NHS 24 aim to be exemplar employer and ensure its workforce has the cultural awareness and capacity to meet the different needs of Scotland's diverse population. NHS 24 are committed to:

- Adopting an equality, diversity and a human rights based approach in all work
- The elimination of discrimination; and
- Delivering equality of opportunity.

As a health board and as a body of NHS Scotland staff, NHS 24 are committed to contributing to the delivery of a health service where equality, diversity and human rights is adopted by all and finds expression in the everyday work of members of staff.

**Equality** refers to creating a fairer society where everyone can participate and have the opportunity to fulfill their potential.

**Diversity** refers to recognising and valuing difference for the benefit of the patient, carers, members of staff and the public.

**Human Rights** refers to ensuring patients and members of staff are safe in healthcare settings; have their privacy and confidentiality safeguarded; and are treated with fairness, dignity and respect.



NHS 24 aims to ensure that the opportunity to embed equality, diversity and human rights in all actions is fully exploited during the design, development, delivery and review of all our functions, policies, services and practices.

As part of this NHS 24 will recognise the particular needs of the six strands of Fair for All. These are; ethnicity, disability, gender, sexual orientation, religion or belief or age and the various legal duties and obligations associated with delivering measurable equality of access to and experience in our services. These principles apply equally to all staff and service users of NHS 24. NHS 24 aim to ensure that no hierarchy of inequality emerges in its approach by ensuring that it frames the delivery of all equalities work across all the major equality communities in specific Equality Schemes and Action Plans. In each of these NHS 24 will set out its objectives, in partnership working with organisations representing the views and experiences of the six major equality communities, to deliver evidenced equality of opportunity for all people who:

- Use NHS 24 services.
- Apply for a job with NHS 24.
- Work for NHS 24, or
- Are involved as NHS 24's partners.

NHS 24 will endeavor to safeguard staff from abuse which is motivated by hatred or prejudice towards a member of staff's ethnicity, disability, gender, sexual orientation, religion or belief or age.

Any form of abuse which contains racist, homophobic or religious prejudice is an aggravation of a criminal offence, which will be reported to the police.

All staff have a personal and professional responsibility to ensure that, through their actions, they meet the legal duties on equality. To ensure that staff understand this responsibility, NHS 24 requires all staff to complete a mandatory eLearning course on Equality and Diversity Awareness. Further information can be obtained from the Equality and Diversity Team who are located within the Human Resources department at Cardonald.

## **7.0 CONFLICT OF INTEREST**

It is important that the public can have confidence that decisions made by NHS 24 and its staff are not influenced by personal interests. All staff are required to **declare** interests which could be in conflict, or be perceived by the public to be in conflict, with their duties as an NHS 24 member of staff. In addition, some staff are required to **register** their interests either publicly, or internally, dependant upon their position within NHS 24 and the nature of their work (see section 7.1 below).

## 7.1 Staff Responsibilities

Staff members are split into 3 distinct groups with regard to conflicts of interest and the associated requirements. These groups are:

### **Executive Directors and Senior Managers who report directly to Executive Directors:**

The above group are required to publicly register all interests as outlined in section 7.2 below, using Appendix A. Staff within this group are required to register their interests at the time of appointment, and as and when their circumstances change throughout their employment. In addition, there is also a requirement on this group to update registered interests on an annual basis. This process is managed by the Board Secretary who has responsibility to maintain and publish the public register of interests through NHS 24's website.

### **Staff who have delegated financial authority and/or direct influence over NHS 24's decisions but who are not included in the above category:**

This group are required to register all interests as outlined in section 7.2 below, using Appendix B. Details of registration for this group will be held within NHS 24 but will not be made available publicly. Staff within this group are required to register their interests at the time of appointment, and as and when their circumstances change throughout their employment.

### **All remaining staff:**

This group have no requirement to register interests.

## 7.2 Registration of Interests

Staff who are required to register their interests should register them in line with the 6 categories below. Full details relating to these categories are available within Annex B of the NHS 24 Corporate Governance

Manual and staff are advised to consult this manual prior to registering an interest.

### **Category One: Remuneration**

Staff have a registerable interest where they receive remuneration from any employment (other than with NHS 24), self-employment, office, directorship, partnership or other work.

### **Category Two: Related Undertakings**

Staff have a registerable interest where they hold a directorship which is not remunerated but where the company concerned is a subsidiary or parent of another company in which the staff member does hold a remunerated directorship.

### **Category Three: Contracts**

Staff have a registerable interest where they (or a firm in which they are partner, or a company in which they hold a directorship or significant shareholding) have a current contract with NHS 24 under which goods or services are to be provided, or works are to be undertaken.

### **Category Four: Houses, Land and Buildings**

Staff have a registerable interest where they own or have any other right or interest in houses, land and buildings, which may be significant and relevant to the work and operation of NHS 24.

### **Category Five: Shares and Securities**

Staff have a registerable interest where they have an interest in shares in a company which may be significant and relevant to the work and operation of NHS 24.

### **Category Six: Non-Financial Interests**

Staff may also have a registerable interest if they have non-financial interests which are significant and relevant to the work and operation of NHS 24. For example, membership or holding office in other public bodies, clubs, societies and organisations such as voluntary organisations.

## **7.3 Declaration of Interests**

In addition to any required **registration** of interests, all staff are required to **declare** interests should they find themselves in a situation where there is a potential conflict of interest.

For example, if during the course of a meeting, the subject turns to a particular organisation, and a member of staff at that meeting has an interest in that organisation, the member of staff should declare this interest and agreement should be reached as to whether the potential conflict prohibits the staff member from participating in the meeting. In general, if the interest is of a financial nature, the member of staff should not participate any further in the meeting; if the interest is non-financial further participation may be appropriate.

In addition, when making a declaration of interests all staff should consider the relevance of interests of relatives, friends or other persons living at the same address. The key test is whether a member of the public could reasonably regard the interests of another as being influential over a member of staff's work within NHS 24.

It is the responsibility of individual staff members to judge whether an interest is sufficiently relevant to require declaration and staff are advised to err on the side of caution; however, should there be any doubt as to whether an interest should be declared, staff should liaise with their line manager in the first instance. If further advice is required, line managers should contact the Board Secretary.

#### **7.4 Additional Conflicts of Interests**

In addition to the above potential conflicts of interest, staff are required to advise their line manager when:

- Complaints have been received from any individual known personally by the member of staff
- Any personal relationship with another member of staff, or potential member of staff, where either party are asked to participate in a decision making process (e.g. recruitment, appraisal, discipline, control of resources etc) which affects the other person.

#### **7.5 Acceptance of Gifts and Hospitality**

Staff should not use their official position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour, to any person. Staff should not receive benefits of any kind from a third party, which might

reasonably be seen to compromise personal judgement and integrity or amount to any real or substantive personal gain.

### **Gifts**

Staff must not personally accept gifts in any circumstances, which are judged to have a value of £20 or more.

Staff may receive gifts to a value of more than £20 on behalf of NHS 24 but their receipt must, in all circumstances, be advised to the Board Secretary together with information in respect of where the gifts are to be kept/displayed. It is not necessary to record any gifts which are isolated gifts of a trivial character, inexpensive (under £20), seasonal gifts such as a calendar or diary, or simple items of office equipment of modest value.

### **Hospitality**

Staff may accept conventional hospitality provided it is normal and reasonable in the circumstances, for example:

- Tea, coffee, biscuits and sandwiches at meetings
- An invitation to an annual dinner of an organisation with which NHS 24 has regular contact
- A working lunch in the course of normal business provided this is not recurrent or lavish.

Any hospitality over £20 that is received by NHS 24 staff in connection with their official duties must be registered on the attached form (Appendix C) and submitted to the Board Secretary.

Offers to attend purely social, artistic or sporting functions should be declined.

Under the Prevention of Corruption Act 1916, staff of a public body may be required to prove that the receipt of payment or other consideration from someone seeming to obtain a contract is not corrupt.

## **7.6 Other Employment**

In order to ensure the health and safety of staff, and protect the work and service delivery of NHS 24, staff are required to declare all other employment to their line manager. Line managers should notify HR Shared Services of any additional employment and confirm that permission has been granted (where applicable). HR Shared Services will retain this information within staff member's personal file.

- 7.6.1** All staff are expected to be fully committed to the work of NHS. Staff must seek permission from their line manager to undertake additional employment. A request to undertake additional employment will not be unreasonably refused, however line managers should consider any potential conflict of interest and the total number of hours worked by the staff member in determining whether additional employment is appropriate.

You must seek express agreement if you are off sick with NHS 24 and wish to continue to work in your secondary employment.

Line managers should also consider the European Working Time Directive which limits working hours to an average of 48 hours per week over a 17 week period. To ensure the continuing health and safety of staff, the option to opt out of the European Working Time Directive will not normally be granted to NHS staff.

Line managers will also bear in mind staff's right to respect for private and family life, in line with Article 8 of the European Convention of Human Rights.

## **7.7 Conduct Outside Work**

In line with Article 8 of the European Convention on Human Rights, NHS 24 respect staff's right to respect for private and family life. NHS 24 requires staff to exercise this right with responsibility to ensure their private activities do not bring the work of NHS 24 into disrepute.

Where staff have concerns regarding their work or colleagues, these issues should be raised in the first instance with their line manager, or if required, using the provisions set out in section 9. Staff should refrain from discussing or making negative statements publicly, including via the internet, social networking sites, by email, or with non-NHS members of staff.

In addition, staff should be aware that membership or involvement with organisations or activities whose values are inconsistent with those of NHS 24 will create reasonable doubt of the staff member's ability to comply with this code.

Any activity or communication, including forms of social media, outside of work which is considered to be in conflict with the principles of this Code may result in a disciplinary investigation in accordance with NHS 24's Disciplinary Procedures. Staff should seek advice from line managers or Human Resources in advance of taking part in any event or activity which may fall into this category. Staff must also advise their line manager as

soon as practicable if inadvertently found in a situation which could reflect negatively on NHS 24.

Staff must not knowingly put themselves in a position where private interests conflict with those of NHS 24. Any conflict of interest must be resolved in NHS 24's favour.

## **7.8 Contact with the Police**

Staff must advise line managers as soon as practicable, should they be:

- arrested
- charged with a criminal offence, or
- are subject to a police investigation

Staff must immediately advise their Director of any criminal convictions, including driving offences (excluding parking offences) which lead to loss of driving licence and where this is a requirement for the role or where the staff member has an NHS 24 leased car.

## **7.9 Political Activities**

NHS 24 is required to act impartially and public confidence might be affected if it is believed that personal political views compromise the impartiality of staff. This section is concerned with party political activity liable to give public expression to political views rather than with privately held beliefs and opinions. It is not intended that these restrictions affect trade union membership or activities.

Staff may be members of a political party (which need not be declared) and may participate in political activities such as helping with administration at the time of a general election or delivering leaflets provided they are conscious of the standards of behaviour expected, as set out in this Code, and exercise proper discretion particularly in regard to the work of NHS 24. On matters directly affecting NHS 24, staff should not make political speeches or engage in other political activities.

Should a staff member wish to run for Government Office, advice must be sought at an early stage from the relevant Director and it is likely that the staff member will be required to take a leave of absence to do so.

## **7.10 Politically Restricted Posts**

To ensure the impartiality of NHS 24, certain posts are politically restricted. This means that postholders:

- must not be politically active
- must not campaign for a political party,
- must not hold political office
- must not occupy party political posts or
- must not hold particularly sensitive or high profile unpaid roles in a political party

The Chief Executive and all Board Directors are politically restricted posts.  
Other posts which are affected are:

Posts which act as spokesperson for the organisation

**OR**

Posts which require a significant degree of face-to-face contact with stakeholders, pressure groups, or other bodies or individuals who are seeking to influence NHS 24

**AND**

Where it would appear to the public that the postholder had some influence over the outcome of the Cabinet Secretary's decisions.

## **8. ACCESS TO INFORMATION**

NHS 24 believes in openness and aims to provide regular and full information to the public and any individual involved in a complaint at all stages of work, subject to necessary confidentiality constraints.

NHS 24 will define those occasions in which confidentiality is required for operational reasons, to maintain the confidence of other agencies and to protect individuals. It is imperative that patients and the public have complete faith in NHS 24's ability to maintain confidentiality when required. To achieve this, all staff must:

- Follow NHS 24 policies in respect of complaint handling and security (including maintaining appropriate confidentiality)
- Comply with the Data Protection Act and not use information gained in the course of employment for unauthorised purposes
- Keep confidential any personal data on individuals (including patients and staff members) and continue to keep this information confidential after employment with NHS 24 has ended. Staff may



only divulge this information if ordered to do so by a statutory body, Court of Law or as part of an official enquiry. In this context information may also be divulged to any person acting as the staff member's legal representative.

## **8.1 Writing/Speaking in Public and Responding to the Media**

When writing or speaking publicly (either via the internet, in a formal speech, or informally at a meeting) staff should be aware that they are representing NHS 24 or its position on a particular issue. Even where there is an understanding that only personal opinions are being expressed, staff should err on the side of caution and refrain from passing comment on any aspect of NHS 24's work, which could bring NHS 24's reputation into disrepute. Speeches or articles, which relate to NHS 24 work, should be cleared with the Head of External Communications before entering the public domain.

Staff should not make direct contact with the media or respond to media enquiries unless it has been agreed in advance that they should do so. All media enquiries should be directed to the Head of External Communications, in the first instance.

## **9. CONCERNS ABOUT IMPROPER CONDUCT**

It is the responsibility of all staff to ensure that NHS 24 processes and procedures are applied properly, and in line with this Code. Should staff feel they are being asked to do something which they believe to be:

- Illegal, improper or unethical
- In breach of a professional code
- Maladministration, fraud or misuse of public funds
- Inconsistent with the Code

they should raise the matter, in writing, with their line manager in the first instance, or if this is not possible or there is reluctance to do so, report the matter to an HR advisor or senior member of the HR team.

Where the concern involves a Director or the Executive Team, the staff member could consider raising the concern with the Chief Executive or the Chair of the Staff Governance Committee. In exceptional circumstances, where the staff member does not feel they are able to raise the concern internally, provisions are set out within the Whistleblowing Policy, for external reporting.

The same procedure should be applied where staff believe colleagues are involved in improper conduct. Staff should not investigate these matters themselves as this will give rise to an irresolvable conflict of interest.

## **9.1 “Whistleblowing” – Public Interest Disclosure Act 1998**

NHS 24 aims to support any member of staff who raises concerns regarding the conduct of others, where these concerns are raised in good faith. The Public Interest Disclosure Act (1998) allows staff to complain to an Employment Tribunal if they are dismissed or suffer detriment or victimisation for reporting the wrongdoing.

The legislation does not protect whistleblowers in all circumstances. A disclosure will be protected if the staff member has good grounds for believing that one or more of the following has occurred or is likely to occur:

- A criminal offence
- A failure to comply with a legal obligation
- A miscarriage of justice
- The endangering of an individual’s health and safety
- Damage to the environment
- Deliberate concealment of information relating to any of the above

Disclosures will be protected if the staff member who makes the disclosure does so:

- In good faith to the employer,
- In accordance with the agreed procedure set out below,
- Reasonably believes the information and any allegation contained in it is substantially true and
- Does not act for personal gain or malice

### **9.1.1 NHS 24’s Whistle blowing Procedure**

Where a member of staff believes that improper conduct, in line with section 9.1 above, has been committed, they should raise this with their line manager in the first instance. If this is not possible, it should be raised with their local HR Advisor or a senior member of the HR Team. Please refer to NHS 24’s Whistleblowing Policy for further information.

The Public Interest Disclosure Act also allows for matters to be raised externally. For staff of public bodies “protected disclosures” (which meet the conditions set out in section 9.1) may be made to a Scottish Minister

and in the case of NHS 24 this would be the Cabinet Secretary for Health and Wellbeing.

The disclosure can be made directly or through departmental officials. Staff may seek their own legal advice or contact Public Concern at Work ([www.pcaw.co.uk](http://www.pcaw.co.uk)) which is a designated legal advice centre.

**APPENDIX A****CONFIDENTIAL WHEN COMPLETED****NHS 24 STAFF REGISTER OF INTERESTS FORM****REGISTRATION OF INTERESTS**

This form is for Executive Directors and Senior Managers who report directly to Executive Directors who have interests to register, in line with section 6.2 of the Code of Conduct for Staff.

A copy of the completed form should be given to Human Resources to be retained on file and to the Board Secretary for inclusion in the published NHS 24 Register of Interests where it will be available for public inspection alongside similar declarations from the Commissioners.

Staff are advised to consult Annex B of the NHS 24 Corporate Governance Manual, prior to completing this form.

I....(Name)..... register the following interests, in line with section 6.2 of NHS 24's Code of Conduct for Staff. I understand that due to the nature of my role, these interests will be held on the NHS 24 Register which will be available for public inspection.

I confirm the following interests (please provide full details, or write N/A if applicable, and continue on a separate sheet if required):

Category One: Remuneration .....

.....

.....

.....

Category Two: Related Undertakings .....

.....

.....

.....

Category Three: Contracts .....

.....

.....

.....

Category Four: Houses, Land and Buildings.....

.....

.....

.....

Category Five: Shares and Securities .....

.....

.....

.....

Category Six: Non-Financial Interests.....

.....

.....

.....

Name:.....

Job Title.....

Signature.....Date.....

**APPENDIX B****CONFIDENTIAL WHEN COMPLETED****NHS 24 STAFF REGISTER OF INTERESTS FORM****REGISTRATION OF INTERESTS**

This form is for staff who have delegated financial authority and/or direct influence over NHS 24's decisions (but who are not Executive Directors and do not report directly to Executive Directors) who have interests to register, in line with section 6.2 of the Code of Conduct for Staff.

A copy of the completed form should be given to Human Resources to be retained on file. These interests will be retained on an NHS 24 register but will **not** be made available publicly.

Staff are advised to consult Annex B of the NHS 24 Corporate Governance Manual, prior to completing this form.

I....(Name)..... register the following interests, in line with section 6.2 of NHS 24's Code of Conduct for Staff. I understand that due to the nature of my role, these interests will be held internally on an NHS 24 Register but will **not** be made available publicly.

I confirm the following interests (please provide full details, or write N/A if applicable, and continue on a separate sheet if required):

Category One: Remuneration .....

.....

.....

.....

Category Two: Related Undertakings .....

.....

.....

.....

Category Three: Contracts .....

.....

.....

.....

Category Four: Houses, Land and Buildings.....

.....

.....

.....

Category Five: Shares and Securities .....

.....

.....

.....

Category Six: Non-Financial Interests.....

.....

.....

.....

Name:.....

Job Title.....

Signature.....Date.....

**APPENDIX C****NHS 24****STAFF GIFTS AND HOSPITALITY REGISTRATION FORM**

<b>NAME</b>
<b>NAME OF ORGANISATION OR INDIVIDUAL PROVIDING GIFT OR HOSPITALITY<sup>1</sup></b>
<b>DETAILS, INCLUDING VALUE, OF GIFT OR HOSPITALITY</b>
<b>DATE RECEIVED</b>
<b>NOTE ON WHAT HAS BEEN DONE WITH GIFT (where appropriate)<sup>2</sup></b>
<b>STAFF SIGNATURE</b>
<b>DATE FORM COMPLETED</b>
<b>DATE RECORDED IN REGISTER BY BOARD SECRETARY</b>

**Please return completed forms to the Board Secretary, Caledonia House, Cardonald Park, Fifty Pitches Road, Glasgow G51 4ED.**

<sup>1</sup> All hospitality judged to be over £20 must be registered

<sup>2</sup> Accepted gifts must either be handed to the Board Secretary or if to be kept, a cheque for the judged value of the gift made payable to the designated charity given to the Board Secretary



**APPENDIX D – DECLARATION OF ACCEPTANCE OF NHS 24 CODE OF CONDUCT**

I acknowledge that I have received and read the NHS 24 Code of Conduct and understand the responsibilities it puts on me as an employee.

Name.....Date.....

Signature.....