



CODE OF CONDUCT

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CODE OF CONDUCT

SECTION 1: INTRODUCTION AND PRINCIPLES

Introduction

1. The role of NHS Quality Improvement Scotland in promoting improvement in the quality of healthcare makes it especially important that high standards of conduct are demonstrated both within the organisation, amongst our colleagues, and externally, with health care professionals and the general public. Everyone who works for NHS QIS contributes to its good reputation and is trusted to maintain its standards.
2. This Code of Conduct reflects the values and culture of NHS QIS whilst also incorporating the 'seven principles of public life' established by the Nolan Committee and Scottish Executive guidance for NHS staff. Staff who are registered with, or members of, professional bodies will also have separate codes of conduct which they follow in the course of their work.
3. This document applies to all staff and to everyone who does work on behalf of the organisation, including agency staff, contractors and consultants, secondees, reviewers, members of the public etc. In this document, all these categories will be referred to as 'staff' unless identified separately. It applies wherever work is undertaken and applies to all activities associated with NHS QIS including courses, conferences, review visits and work-related social events.
4. If staff feel that they are being asked to act in a way which is in conflict with the principles of this Code of Conduct, they should report the matter to their line manager, Head of Unit or Director. In the case of lay reviewers, this should be reported to the Director of Performance Assessment and Development or the Public Partnership Coordinator.

Principles of Public Life

5. The Committee on Standards in Public Life was set up in 1994 and established the 'seven principles of public life' which it believed should apply to all in the public service. These are adopted by all public sector bodies and must be followed by everyone who works for NHS QIS. They are as follows:
 - **Selflessness**
Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.
 - **Integrity**
Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.
 - **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.

- **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.

- **Openness**

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

- **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.

- **Leadership**

Holders of public office should promote and support these principles by leadership and example.

SECTION 2: CONDUCT IN NHS QUALITY IMPROVEMENT SCOTLAND

Corporate values in delivering NHS QIS work

6. At an early stage in the development of NHS QIS, a set of corporate values was developed for delivering the work of the organisation¹. All staff must comply with these values when delivering NHS QIS work, even though a number of them will be more relevant to some staff than others:

We deliver our commitments to the public and to NHSScotland by following an approach that is:

- independent - we reach our own conclusions and report on what we find
- open and transparent - we explain what we do, how and why we do it, and what we find, using language and formats that are easy to understand and to access
- sensitive and professional - we recognise needs, beliefs and opinions and respect and encourage diversity.

Our work is:

- partnership focused - we work with patients and the public, NHSScotland and many other organisations to improve the quality of care and avoid duplication
- evidence-based - we base our conclusions and recommendations on the best evidence available
- quality-driven - we make sure our own work is monitored and evaluated, internally and externally.

General staff conduct

7. NHS QIS is committed to ensuring that all staff have a positive working environment, based on constructive working relationships. Bullying, harassment and victimisation will not be tolerated by the organisation.
8. NHS QIS is committed to reflecting the diverse population of Scotland and to the integration of equal opportunities into all aspects of employment. Everyone who works for the organisation has a responsibility for giving respect and the right to receive respect at all times. Everyone is responsible for their own actions and behaviours and must take steps to ensure they conduct themselves appropriately at all times.
9. Staff should read and understand all organisational policies, procedures, and documentation concerning their employment and their authority at work. They should act in good faith at all times and ensure that their actions will not bring the organisation into disrepute. Staff who do not comply with the Code of Conduct or organisational policies, may be subject to disciplinary action.

¹ See the NHS QIS document: 'Improving Patient Care: A Strategic Framework'

10. All staff who undertake work for the organisation act on behalf of NHS QIS and are responsible for demonstrating the values of the organisation through positive behaviours. These behaviours include the following:

- treating one another with respect
- giving each other their dignity
- respecting each other's right to privacy and confidentiality
- accepting and being sensitive to each other's differences
- being professional in relations with each other
- building constructive working relationships
- working with and supporting each other.

11. Staff are expected to promote a positive and professional image of the organisation. This is reflected in appearance and behaviour. It is important therefore that staff dress appropriately, do not drink alcohol during the working day and do not attend work smelling of alcohol or being under the influence of alcohol or illegal drugs.

12. Alcohol must not be consumed during the working day. Alcohol can be taken in moderation at events organised by NHS QIS outwith working hours but staff are still representing the organisation while at such events. They are expected to behave professionally and are accountable for their behaviour. Inappropriate behaviour may be regarded as misconduct and handled under the disciplinary policy and procedures.

External relationships

13. By the nature of NHS QIS work, staff come into contact with many people and organisations from outwith the organisation. It is important that, at all times, staff treat all people with courtesy and respect, and without bias or prejudice.

Contractors and suppliers

14. When entering into contracts with contractors or suppliers (for example employment agencies, reviewers, office suppliers, or contracting out work to individuals or companies), the Standing Financial Instructions must be followed. If in any doubt about the process of purchasing and/or authorising expenditure, advice should be sought from line managers or the Finance Unit.

15. Contractors and suppliers are selected on the basis of quality, suitability and value for money, and impartiality must be shown in all purchasing decisions.

Use of resources

16. NHS QIS is publicly funded and staff are required to ensure that efficiency, effectiveness and economy is achieved when using the organisation's resources. All resources must be used for the legitimate benefit of the organisation and not for personal gain.

17. Staff have access to personal computers and to the internet for their work and these can also be for personal use, as long it is in line with IT policies, in particular those concerning e-mail and the internet. Such use is dependent on the following:
- that it takes place in staff's own time
 - that staff are not receiving a fee for the purpose.
18. If in any doubt about the use of IT resources, advice should be sought from line managers or the IT Unit.

Gifts and hospitality

19. From time to time, staff may be offered gifts (eg diaries, bottles of wine, tickets) or hospitality (eg lunch, drinks) from external sources. Great care should be taken in accepting gifts or offers of hospitality as they may be considered as a means of encouraging favouritism towards the donor. Therefore it would not be advisable to accept any gifts or hospitality without first considering the donor's relationship with NHS QIS. For example, accepting gifts or hospitality from a commercial organisation during a tendering process could be seen to be compromising to NHS QIS.
20. The approval of a Director must be obtained in all cases before accepting a gift or hospitality. All acceptances should be reported to the Head of Corporate Secretariat without delay, who will record it in a register. If in any doubt about what may constitute gifts or hospitality, or how to deal with sometimes sensitive situations where they need to be refused, advice should be sought from line managers or the Head of Corporate Secretariat.
21. Tokens of appreciation such as book tokens which are received as a result of external engagements on behalf of NHS QIS may be retained (see 'Undertaking external work') but should be notified to the Head of Corporate Secretariat to be recorded.
22. Under the Prevention of Corruption Acts, staff can be asked to prove that receipt of any gifts, hospitality, financial benefit or any other consideration from someone seeking to gain a contract, is not corrupt. Staff could be subject to disciplinary action up to and including dismissal, if they breach the provisions of the Act during the course of their employment with NHS QIS.

Conflicts of interest

23. The work of NHS QIS is dependent on impartiality, independence and objectivity. It is important, therefore, that staff ensure that they are not put in a position which appears to create a conflict between personal interests (eg beliefs, political affiliations, friendships) and the work they do on behalf of NHS QIS. NHS QIS is a politically neutral body, so it is important that staff are not influenced by their own political affiliations when carrying out their responsibilities.
24. Similarly, staff must ensure that they do not use, or give the impression of using, their position at NHS QIS for personal gain or to benefit friends or family.
25. If staff feel that there is, or may be, a perceived conflict of interest, even though they intend to put NHS QIS before their personal interest, they should notify their

line manager or the Head of Corporate Secretariat immediately. In some circumstances, it may be preferable for responsibility for a particular action or decision to be passed to another member of staff in that instance.

26. If managers are involved in or about to be involved in any organisational process such as discipline or grievance where their relationship with a member of staff may affect their ability to be impartial or objective, they should advise their line manager or the Human Resources Unit at the earliest possible opportunity. A decision will then be taken on whether their involvement is appropriate.

Openness and confidentiality

27. As a public body, NHS QIS is committed to being open and transparent in how it conducts its business. To this end, Board meetings are open to the public and a range of minutes and reports are publicly available on the website. The Freedom of Information Act gives the public the right to access information from public bodies. and NHS QIS has put in place a publications strategy to meet the requirements of the Act
28. It is equally important to ensure the confidentiality of certain information is maintained, as appropriate. This particularly relates to staff information (covered by the Data Protection Act), patient information (covered by the Caldicott Principles) and other official information which is held in confidence. This does not apply where there is a legal duty to provide information. If staff have any queries about confidentiality, they should speak to their line manager, the Human Resources Unit (on staff information) or the Director of Performance Assessment and Practice Development (on patient information).
29. The responsibility to maintain confidentiality continues after staff have left the employment of NHS QIS.
30. In order to achieve consistency and appropriateness of sometimes sensitive public messages, only authorised staff may speak to the media.

Recruitment and selection

31. Managers who are responsible for making appointments to NHS QIS must ensure that they are made on merit only. Recruitment and selection policies and procedures must be followed to ensure a fair process, in line with employment legislation such as equal opportunities and data protection. The advice of the Human Resources Unit must be followed with regard to due process.
32. If any member of staff who is involved in influencing decisions in the recruitment and selection process has any kind of relationship which might affect his/her ability to be impartial and objective, s/he should advise the manager responsible for the appointment or the Human Resources Unit at the earliest possible opportunity. A decision will then be taken on whether the involvement is appropriate.
33. Staff must not lobby those involved in the recruitment and selection process if they are applying for posts and must not lobby on behalf of someone else. Anyone who has been lobbied needs to advise the manager responsible for making the appointment before decisions are taken.

34. Referees for current or ex-members of staff, who are acting on behalf of NHS QIS, should ensure that their reference represents the views of the organisation and it needs to be approved by the Head of Unit or Director. By law, references must be fair and objective, and advice should be sought from the Human Resources Unit in all sensitive cases. Referees acting in a personal capacity should not use the NHS QIS logo.

Undertaking external work

35. In principle, staff can accept additional employment outwith NHS QIS in their own time, subject to the approval of their Head of Unit or Director. To be approved, the employment needs to be free of conflict of interest and have no adverse effect on the work of NHS QIS or on their own performance. The resources of NHS QIS cannot be used in external employment.
36. Where staff undertake work using NHS QIS information or experience (such as publications, speeches or lectures) any payment should be remitted to NHS QIS. Such payment will be placed in an endowment fund to be used, with the approval of the Chief Executive, for the benefit of NHS QIS staff. Tokens of appreciation such as book tokens may be retained but should be notified to the Head of Corporate Secretariat to be recorded.

Public interest disclosure ('whistle blowing')

37. If anyone believes in good faith that NHS QIS is involved in misconduct, malpractice, unsafe or dishonest behaviour, they should refer to the Public Interest Disclosure Policy and raise the issue with their line manager or Head of Unit at the earliest opportunity. In the case of lay reviewers, this should be reported to the Director of Performance Assessment and Development or the Public Partnership Coordinator.