

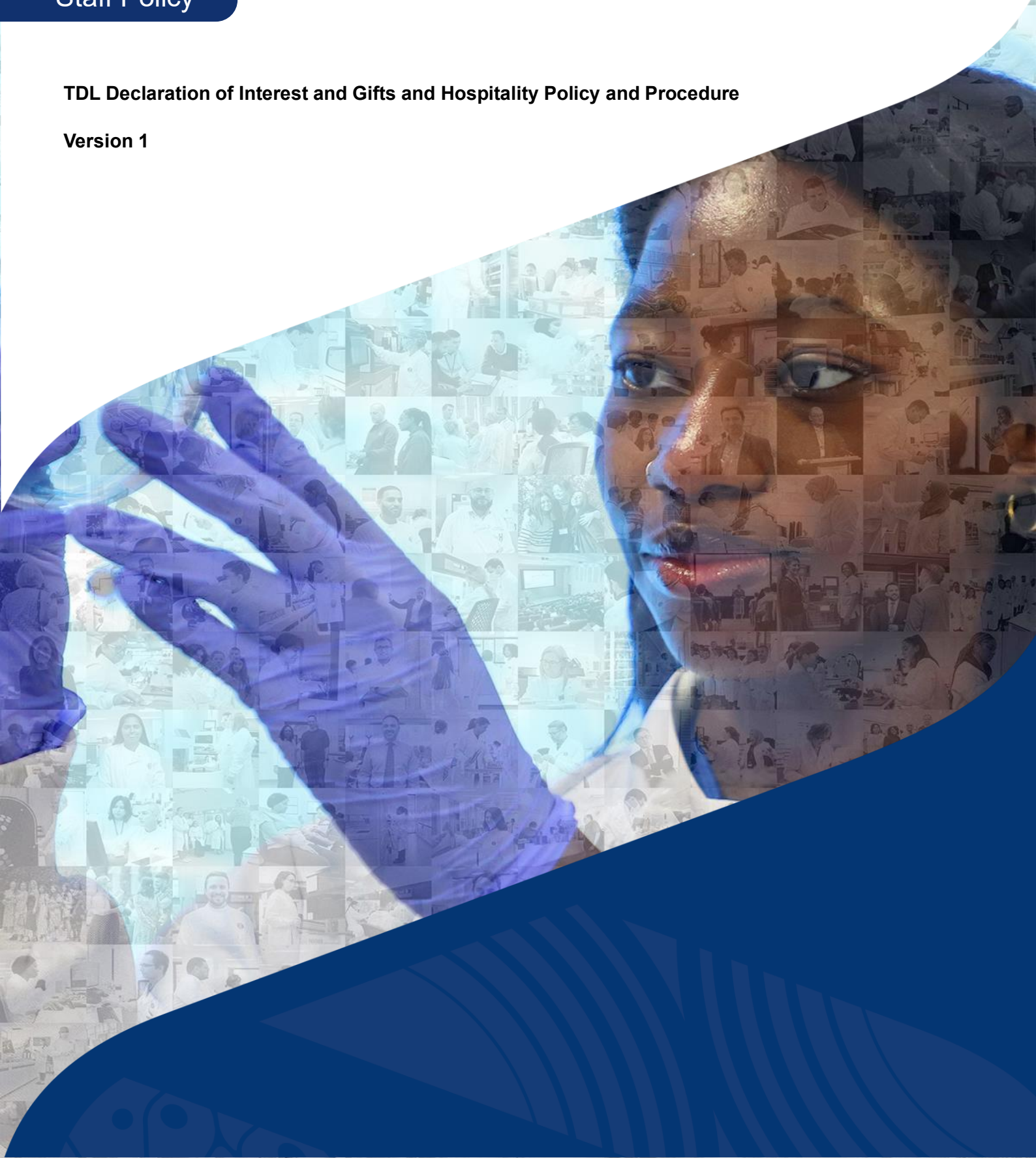


**THE DOCTORS
LABORATORY**

Staff Policy

TDL Declaration of Interest and Gifts and Hospitality Policy and Procedure

Version 1



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1 Introduction and Applicability

- 1.1.1 TDL is the managing partner for the HSL Partnerships. TDL staff, when acting on behalf of the HSL Group, are doing so under the managing partner arrangement with HSL. The HSL Group is subject to the NHS Counter Fraud Authority (“NHS CFA”) compliance framework.
- 1.1.2 In fulfilling this role as managing partner, only certain TDL employees are authorised to contract with external parties, and such purchases are authorised via the TDL Group’s purchase management system by the responsible Executive team member.
- 1.1.3 Many of HSL’s costs are arranged as part of a UK group deal led by TDL, or as part of the Sonic Group global procurement network. Costs incurred this way are subject to TDL’s internal governance (aligned with Sonic Group) and are outside the scope of the NHS CFA measures dealing with Conflicts of Interest.
- 1.1.4 The NHS CFA-aligned policy on Conflicts of Interest will apply to TDL staff when a member of the TDL Executive team (acting as a Managing Partner representative) engages with a third party exclusively on behalf of HSL.

2 Examples

- 2.1.1 Consider a TDL Executive procuring the supply of warehouse racking.
 - If the racking is only going to be used by HSL Facilities, then this policy applies. The engagement with the supplier must be under the terms of the NHS CFA compliance framework.
 - If the racking is procured under an existing contractual arrangement or supplier agreement with TDL, for example the supplier already supplies warehouse racking to the TDL laboratory in Manchester, then this policy does not apply.

In both cases, however, the TDL Executive is still subject to TDL and Sonic Group governance.

3 Enforcement

- 3.1.1 All potential Conflicts of Interest must be logged with the COI Administrator, by following the registration process, as soon as they arise. The TDL Board will review the register monthly, along with authorisation activity from each TDL Executive, and if the Board considers the matter to be relevant to the HSL register, it will instruct the COI Administrator to log it accordingly.
- 3.1.2 If any registered Conflict of Interest changes, then the COI Administrator must be informed so that the register can be updated.

4 Document approval.

Document Approvals are recorded within the document record card within Sonic Healthcare UKs electronic quality management system (e-QMS). This policy was agreed by the Audit & Risk Committee.

Approved documents will be marked as active in the footer of the document. Documents that are not marked approved are not considered controlled. Printed copies are not permitted. Records of approval and reference copies of procedures are available from qmg@tdlpathology.com.

5 Change Details

Change Request number	Change Detail	Implemented in Version Number
N/A	N/A	N/A