

# POLICY DOCUMENT

## Gifts, Hospitality & Sponsorship Policy

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## 1. Introduction

- 1.1. West Leicestershire Clinical Commissioning Group (WLCCG) has a responsibility to ensure integrity and probity in its relationships with suppliers, contractors and service users; and ensure that robust systems of control are in place within the CCG to prevent fraud, bribery and corruption.
- 1.2. During the course of their work, staff will sometimes receive offers of gifts (which includes goods or payment) and hospitality. Openness in declaring and recording these matters is a safeguard for staff who might otherwise be perceived to be receiving a personal and direct benefit in contravention of the CCG Constitution (i.e. Standing Orders and Prime Financial Policies) and Fraud, Corruption and Bribery Policy.

## 2. Purpose

- 2.1. This policy document is intended to inform all CCG employees and members of the Governing Body of their responsibilities when accepting gifts, hospitality and forms of sponsorship and to advise them to consider fully the implications of their actions in respect of the various probity issues contained in this policy.
- 2.2. This policy helps to establish a culture of openness and transparency in the CCG's business transactions. To maintain public confidence WLCCG must be able to demonstrate that its decision-making processes are not influenced by inappropriate inducements.
- 2.3. The CCG will view instances where this policy is not followed as serious and may take disciplinary action against individuals as a result. The CCG will refer cases of potential fraud, bribery and corruption to their Counter Fraud Specialist for investigation. Where appropriate, NHS Counter Fraud Authority and/or the Police will also be involved.
- 2.4. This policy has been written in line with both the Bribery Act 2010, which revised the legal framework for combating bribery in the public and private sectors, and NHS England guidance: *Managing Conflicts of Interest in the NHS, Guidance for staff and organisations (2017)*.

## 3. Scope

- 3.1. This policy applies to all members of staff directly employed by the CCG, members of the Governing Body and committees, individuals for whom the CCG has legal responsibility and individuals who act in an official capacity on its behalf. This includes:
  - a) persons serving on committees and other decision-making groups (including representatives and members of third-party organisations) established by WLCCG;

- b) individuals who sit on WLCCG committees or act in an advisory capacity to the CCG;
  - c) staff covered by a letter of authority/honorary contract or work experience. This includes non-Board GPs working for the CCG
  - d) Any staff who are seconded to the CCG;
  - e) Contract and agency staff.
- 3.2. It is the responsibility of all those listed above to familiarise themselves with this policy and comply with its provisions.
- 3.3. This policy excludes GPs' own internal register for gifts, hospitality and sponsorship offered by patients or suppliers in their capacity as a provider of healthcare services. Each practice should have its own internal procedure for the management of such gifts and hospitality (such as chocolates, flowers, wine etc.). Any gifts, hospitality or sponsorship offered to GPs and Practices in their capacity as a commissioner of healthcare are covered by this policy.

#### **4. Definitions and Examples of Hospitality, Sponsorship and Gifts**

- 4.1. **Hospitality** - Delivery of services across the NHS relies on working with a wide range of partners (including industry and academia) in different places and, sometimes, outside of 'traditional' working hours. As a result, staff will sometimes appropriately receive hospitality. Hospitality covers a wide spectrum and can include: free meals, drinks, hotel accommodation, receptions, education and training events, exhibitions or conferences, music and cultural events, sport and leisure events, particularly golf competitions, and use of company facilities. Staff receiving hospitality should always be prepared to justify why it has been accepted, and be mindful that even hospitality of a small value may give rise to perceptions of impropriety and might influence behaviour.
- 4.2. **Sponsorship** - Sponsorship of NHS events by external parties is valued. Examples include meetings sponsored by pharmaceutical companies and payment for a venue or provision of a lunch or drinks at a meeting where CCG business is conducted. Offers to meet some or part of the costs of running an event secures their ability to take place, benefiting NHS staff and patients. Without this funding there may be fewer opportunities for learning, development and partnership working. However, there is potential for conflicts of interest between the organiser and the sponsor, particularly regarding the ability to market commercial products or services. As a result there should be proper safeguards in place to prevent conflicts occurring.

- 4.3. **Gifts** - Staff in the NHS offer support during significant events in people's lives. For this work they may sometimes receive gifts as a legitimate expression of gratitude. A gift is defined as any item of cash or goods, or any service, which is provided for personal benefit at less than its commercial value. Examples of the kind of gifts which might be offered include: Stationery items such as pens, notepads, calculators, food or confectionery, particularly chocolates and biscuits, flowers or plants, ornaments, mugs, wines and spirits, articles of clothing, jewellery or watches, tickets for cultural or sporting events, discounted rates for hire or purchase, free publications and cash. We should be proud that our services are so valued. But situations where the acceptance of gifts could give rise to conflicts of interest should be avoided. Staff and organisations should be mindful that even gifts of a small value may give rise to perceptions of impropriety and might influence behaviour if not handled in an appropriate way.

## 5. Legal Framework

- 5.1. It is vital that staff and Governing Body members comply with all aspects of this policy as not to do so could lay them open to allegations of fraud, bribery or corruption. If in any doubt as to whether a particular interest should be declared, or a gift, form of hospitality or sponsorship registered, individuals should take a cautious approach and do so.

- 5.2. The Bribery Act 2010 created a number of bribery offences:

- Offering, promising, or giving a bribe to another person to perform a relevant 'function or activity' improperly, or to reward a person for the improper performance of such a function or activity;
- Requesting, agreeing to receive, or accepting a bribe to perform a function or activity improperly irrespective of whether the recipient of the bribe requests or receives it directly or through a third party, and irrespective of whether it is for the recipient's benefit.

A new corporate offence has also been introduced:

- Failure of a commercial organisation to prevent bribery. This means that the CCG can be held responsible if it fails to enact adequate procedures to prevent bribery.

- 5.3. All allegations of suspected fraud, bribery and/or corruption must be reported to the CCG's Counter Fraud Specialist in accordance with the CCG's Fraud, Corruption and Bribery Policy.

## 6. Roles & Responsibilities

- 6.1. The **Governing Body** is responsible for ensuring that:

- the CCG's policies and procedures reflect statutory requirements and best practice

particularly in relation to the procurement of services;

- members have regard to the Professional Standards Authority document [Standards for Members of NHS Boards and Clinical Commissioning Group Governing Bodies in England](#), and the NHS Business Services Authority guidance [Standards of Business Conduct Procedure](#), (HSG (93)5), as well as [the Nolan principles](#).

**6.2. All members of CCG staff including Governing Body members and all those listed in section 3.1 must:**

- ensure that he/she reads and understands the CCG's Gifts, Hospitality & Sponsorship Policy and Conflicts of Interest Policy;
- ensure that he/she is familiar with, and adhere at all times to, the principles set out in the NHS Business Services Authority guidance [Standards of Business Conduct Procedure](#), (HSG (93)5), as well as [the Nolan principles](#) (Appendix 1);
- report any indication of non-compliance with this policy to either the Director of Performance and Corporate Affairs or the CCG's Counter Fraud Specialist for further investigation (contact details can be found in section 12 of this policy). Any identified fraud, bribery and/or corruption will be pursued as a criminal offence;
- maintain appropriate confidentiality at all times in respect of information to which he/she has access in the course of his/her duties. In particular, he/she will observe the strict rules relating to patient confidentiality, and will not misuse commercial information, nor will he/she make it available to other people without consulting the line manager;
- ensure that he/she always conducts him/herself and provides services in such a way as to up-hold the good name of the NHS and the CCG;
- adhere to the CCGs disciplinary rules as set out in its disciplinary policy;
- be aware and comply with the provisions of the Bribery Act 2010 as amended from time to time;
- understand that failure to follow this policy may damage the CCG and its work and so may be viewed as a disciplinary matter, to be dealt with under normal disciplinary procedures, and the penalty could include dismissal.

**6.3. GPs - General Medical Council (GMC) advice recommends that any GP with a responsibility for or involved in, commissioning services must:**

- satisfy themselves that all decisions made are fair, transparent and comply with the law;

- keep up to date with and follow the guidance and codes of practice that govern the commissioning of services where they work.
- 6.4. The NMC Code of Conduct for **Nurses and Midwives** Professional standards of practice and behaviour for nurses and midwives states that:
- “Clause 21: Uphold your position as a registered nurse or midwife. To achieve this, you must:*
- *refuse all but the most trivial gifts, favours or hospitality as accepting them could be interpreted as an attempt to gain preferential treatment”*
- 6.5. The **Director of Performance and Corporate Affairs** will:
- Ensure that this Policy is reviewed annually by the Corporate Management Team;
  - Ensure that the Gifts, Hospitality and Sponsorship Register is maintained and that the Audit Committee receives the Register on an annual basis.
- 6.6. The **Counter Fraud Specialist** - any indication of non-compliance with this policy, or with SFIs, particularly where there is a suspicion of financial irregularity, will be referred to the CCG’s Counter Fraud Specialist for further investigation. Where fraud, bribery and/or corruption is proven, the CCG will pursue disciplinary and/or criminal sanctions against identified perpetrators, as well as seek redress, where applicable.
- 6.7. **NHS Counter Fraud Authority** - leads on work to identify and tackle crime across the health service. The aim is to protect NHS staff and resources from activities that would otherwise undermine their effectiveness and their ability to meet the needs of patients and professionals. Ultimately, this helps to ensure the proper use of valuable NHS resources and a safer, more secure environment in which to deliver and receive care. The NHS Counter Fraud Authority may jointly investigate any financial irregularity within the CCG with the Counter Fraud Specialist.

## **7. Principles and Guidelines for Hospitality, Sponsorship and Gifts**

- 7.1. In the environment in which the NHS operates, it is potentially possible for staff to gain personal benefits from their position within the CCG. Examples of these might be:
- offers of gifts from patients or suppliers;
  - offers of hospitality from potential suppliers to the CCG (suppliers covers services as well as goods);
  - offers from suppliers to an individual member of staff to purchase goods at discount or special prices.

- 7.2. The intention of this policy is to outline the behaviours required to maintain the highest standards of probity and provide assurance that any relationships entered into lead to a clear benefit for the NHS, and represent value for money.
- 7.3. The guiding principle is that you must not accept gifts, hospitality or other benefits of any kind from a third party, which might be seen to compromise your personal and professional integrity.
- 7.4. In order to maintain the highest standards of business conduct and to ensure compliance with the 7 Nolan principles (Appendix 1), all employees and others acting on behalf of WLCCG must apply the following principles:
- Not accepting gifts, hospitality or benefits of any kind from a third party which might be perceived as compromising their personal judgement or integrity;
  - Not using their official position to further their private interests or those of others;
  - Declaring all relevant private interests in accordance with the CCG's Conflicts of Interest Policy;
  - Declaring the offer and/or acceptance of gifts, hospitality or sponsorship which goes beyond simple low cost or conventional type refreshments, as described further below, within 28 days so that the details can be recorded on the central register (see Appendix 2 for declaration form);
  - Base all procurement decisions and negotiations of contracts on achieving best value for money for the tax payer;
  - If in any doubt, seek advice from the Director of Performance & Corporate Affairs.
- 7.5. There is a need however, to distinguish between simple, low cost gifts and hospitality of a conventional type, for example, stationery items, a working lunch, or an evening meal at a networking forum, compared with more expensive and elaborate hospitality. There is clearly a need for a sense of balance and judgement. Modest hospitality is an accepted courtesy of a business relationship. Examples of this could be hospitality for speaking at ceremonial events or attending networking forums. Further guidance on this is contained below.

## **8. Accepting/Declining and Recording Hospitality, Sponsorship and Gifts**

### **Hospitality**

- 8.1. A blanket ban on accepting or providing hospitality is neither practical nor desirable from a business point of view. However, individuals should be able to demonstrate that the acceptance or provision of hospitality would benefit the CCG.
- 8.2. The main point is that in accepting hospitality, staff need to be aware of and guard against the dangers of misrepresentation or perception of favouritism. It is easier to justify meetings which relate directly to work, but where these happen outside

working hours and on purely social occasions then they need to be justified as not being a personal gift or benefit.

- 8.3. There is a need to distinguish between simple, low cost hospitality of a conventional type, for example, a working lunch or evening meal compared with more expensive and elaborate hospitality. There is clearly a need for a sense of balance.
- 8.4. In line with NHS England guidance, the overarching principles applying in all circumstances are:
- Staff should not ask for or accept hospitality that may affect, or be seen to affect, their professional judgement;
  - Hospitality must only be accepted when there is a legitimate business reason and it is proportionate to the nature and purpose of the event;
  - Particular caution should be exercised when hospitality is offered by actual or potential suppliers or contractors – these can be accepted if modest and reasonable but individuals should always obtain senior approval and declare these;
- 8.5. In line with NHS England guidance, the following principles apply to meals and refreshments:
- Under a value of £25 - may be accepted and need not be declared;
  - Of a value between £25 and £75\* - may be accepted and must be declared;
  - Over a value of £75\* - should be refused unless (in exceptional circumstances) senior approval is given. A clear reason should be recorded on an organisation's register(s) of interest as to why it was permissible to accept;
  - A common sense approach should be applied to the valuing of meals and refreshments (using an actual amount, if known, or an estimate that a reasonable person would make as to its value). \*The £75 value has been selected with reference to existing industry guidance issued by the ABPI <http://www.pmcpa.org.uk/thecode/Pages/default.aspx>
- 8.6. In line with NHS England guidance, the following principles apply to travel and accommodation:
- Modest offers to pay some or all of the travel and accommodation costs related to attendance at events may be accepted and must be declared;
  - Offers which go beyond modest, or are of a type that the organisation itself might not usually offer, need approval by senior staff, and should only be accepted in exceptional circumstances, and must be declared. A clear reason should be recorded on an organisation's Gifts & Hospitality Register as to why it was permissible to accept travel and accommodation of this type. A non-exhaustive list of examples includes:
    - offers of business class or first class travel and accommodation (including domestic travel);
    - offers of foreign travel and accommodation.

Acceptance of frequent or regular invitations to events or functions, particularly from the same source and where a considerable degree of hospitality is involved, may severely test the principles referenced earlier (section 7) and should be considered carefully. However, there may be instances where staff receive invitations to events run by organisations where attendance is considered an integral element in building and maintaining relationships. In these circumstances it is important that the guidelines and procedures in this policy are followed.

- 8.7. Where a contract is being negotiated, hospitality of any kind, including attendance of staff at seasonal events hosted by suppliers or contractors, should not be accepted. The principle of integrity requires that staff should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality must be subject to clear controls, and that any that is accepted must be declared and recorded (see below).
- 8.8. Where there is any doubt, advice should be sought from the relevant line manager or Director of Performance & Corporate Affairs. The offer and/or acceptance of hospitality which goes above the value of £25 must be recorded in the Gifts, Hospitality and Sponsorship Register using the pro-forma at Appendix 2, which must be completed and returned to the Corporate Affairs Team within 28 days so that the details can be recorded on the central register.

## **Gifts**

- 8.9. In line with NHS England guidance, the overarching principle applying in all circumstances is that staff should not accept gifts that may affect, or be seen to affect, their professional judgement. Therefore, any acceptance of a gift needs to be justified. CCG members and employees are asked to think about the context in which the offer has been made, and the effect on their position. For example, could the gift be likely, or be seen as likely to influence you? The onus is on the CCG member or employee to make sure that the acceptance of a gift will not be misconstrued.
- 8.10. Any personal gift of cash or cash equivalents (e.g. vouchers, tokens, offers of remuneration to attend meetings whilst in a capacity working for or representing the CCG) must always be declined, whatever their value and whatever their source, and the offer which has been declined must be declared to the team or individual who has designated responsibility for maintaining the register of gifts and hospitality and recorded on the register.
- 8.11. NHS England guidance also provides the following principles and rules:

### **Gifts from suppliers or contractors:**

- Gifts from suppliers or contractors doing business (or likely to do business) with an organisation should be declined, whatever their value;
- Subject to this, low cost branded promotional aids may be accepted where they are under the value of a common industry standard of £6\* in total, and need not be declared. The £6 value has been selected with reference to

existing industry guidance issued by the ABPI:  
<http://www.pmcpa.org.uk/thecode/Pages/default.aspx>

**Gifts from others sources (e.g. patients, families, service users):**

- Gifts of cash and vouchers to individuals should always be declined;
- Staff should not ask for any gifts;
- Gifts valued at over £50 should be treated with caution and only be accepted on behalf of an organisation (i.e. to an organisation's charitable funds), not in a personal capacity. These should be declared by staff;
- Modest gifts accepted under a value of £50 do not need to be declared;
- A common sense approach should be applied to the valuing of gifts (using an actual amount, if known, or an estimate that a reasonable person would make as to its value);
- Multiple gifts from the same source over a 12 month period should be treated in the same way as single gifts over £50 where the cumulative value exceeds £50.

8.12. As described above, gifts should, in general, be refused to avoid the appearance of improper acceptance. However, gifts and benefits of a trivial or inexpensive nature (under £50) may be accepted, as outlined above. This could include items such as:

- conventional personal gifts, such as flowers, fruit or confectionery of reasonable value – for someone who has been off work for a long time (for example through sickness or the birth of a child);
- team gifts of low value, such as confectionery, intended to be shared by the team.

8.13. It is recognised that there are exceptional cases where refusal of a gift will clearly offend a donor, cause embarrassment or appear discourteous. In these cases the donor should be advised that the permission of management will have to be sought as to whether or not the gift can be accepted. The relevant line manager should be asked to decide whether to:

- Allow the recipient to accept the gift; or
- Return the gift to the donor with a suitably worded letter (from the Corporate Affairs Team) explaining why the gift cannot be accepted; or
- Use or dispose of it, if possible, in or by WLCCG
- If in any doubt, the line manager should seek advice from the Assistant Director of Corporate Affairs.

8.14. WLCCG has established a Register of Gifts and Hospitality, which is held by the Corporate Affairs Team. Regardless of whether it was accepted or declined, any gift which exceeds or is considered to exceed £50 must be declared for inclusion in the Gifts and Hospitality Register by the individual who received the offer. Multiple gifts from the same source over a 12 month period should be treated in the same way as single gifts over £50 where the cumulative value exceeds £50. The individual must

complete the pro-forma at Appendix 2 and then return it to the Corporate Affairs Team within 28 days so that the details can be recorded on the central register.

## **Sponsorship**

- 8.15. In line with NHS England guidance, the following principles apply to sponsorship:
- Sponsorship of events by appropriate external bodies should only be approved if a reasonable person would conclude that the event will result in clear benefit for the organisation and the NHS;
  - During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection rules and legislation;
  - No information should be supplied to the sponsor from which they could gain a commercial advantage, and information which is not in the public domain should not normally be supplied;
  - At the CCG's discretion, sponsors or their representatives may attend or take part in the event but they should not have a dominant influence over the content or the main purpose of the event;
  - The involvement of a sponsor in an event should always be clearly identified in the interest of transparency;
  - Organisations should make it clear that sponsorship does not equate to endorsement of a company or its products and this should be made visibly clear on any promotional or other materials relating.
- 8.16. Specifically in the case of Pharmaceutical Companies, CCG Members and independent contractors should be aware of the Association of British Pharmaceutical Industry (ABPI) code of practice which clearly sets out the industry standard. For more information regarding pharmaceutical sponsorship, please refer to the CCG's Pharmaceutical Sponsorship and Joint Working with the Pharmaceutical Industry Policy.
- 8.17. WLCCG has established a Register of Gifts and Hospitality, which is held by the Corporate Affairs Team. Any sponsorship offered or accepted must be recorded in the central register. The individual must complete the pro-forma at Appendix 2 and then return it to the Corporate Affairs Team within 28 days so that the details can be recorded on the central register.

## **9. Policy Review**

- 9.1. This Policy will be reviewed annually by the Corporate Management Team.
- 9.2. The Audit Committee will review the Gifts & Hospitality Register on an annual basis and will make any necessary recommendations arising from its review.

## **10. Policy Dissemination**

- 10.1. The CCG will ensure that all employees and decision-makers are aware of the existence of this policy by:
- An introduction to the policy being given during local induction for new starters to the CCG;
  - The Policy will be available to all members of staff; the Governing Body; members of committees and sub-groups; and to GP member practices via the shared drive and via the WLCCG intranet;
  - An annual reminder of the existence and importance of the policy delivered via internal communication methods.

## **11. Monitoring and audit arrangements**

- 11.1. Adherence to this Policy will be reviewed regularly by the Director of Corporate.
- 11.2. The Audit Committee will be responsible for undertaking reviews of decision- making processes to ensure that the Policy is applied effectively and where further controls are required will advise accordingly. The Audit Committee will also carry out audit reviews where the Policy has not been adhered to to identify any lessons learnt and advise on changes to systems and processes as appropriate.

## **12. Counter Fraud Specialist Contact Details**

- 12.1. All concerns or suspicions relating to fraud, corruption or bribery must be reported to the CCG's Counter Fraud Team, by telephoning 0116 225 6121, by emailing: [counterfraud.360@nhs.net](mailto:counterfraud.360@nhs.net) or writing to: Riverside House, Bridge Park Road, Thurmaston, Leicester, LE4 8BL.

## Appendix 1 – Nolan Principles

### Nolan Principles

1. The 'Nolan Principles'69 set out the ways in which holders of public office should behave in discharging their duties. The seven principles are:

1.1 **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

1.2 **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

1.3 **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

1.4 **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

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

1.6 **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

1.7 **Leadership** – Holders of public office should promote and support these principles by leadership and example

Source: *The First Report of the Committee on Standards in Public Life* (1995)

## Appendix 2

### Declarations of Gifts and Hospitality

Recipient Name	Position	Date of Offer	Date of Receipt (if applicable)	Details of Gift / Hospitality	Estimated Value	Supplier / Offeror Name and Nature of Business	Details of Previous Offers or Acceptance by this Offeror/ Supplier	Details of the officer reviewing and approving the declaration made and date	Declined or Accepted?	Reason for Accepting or Declining	Other Comments

*The information submitted will be held by the CCG for personnel or other reasons specified on this form and to comply with the organisation's policies. This information may be held in both manual and electronic form in accordance with the Data Protection Act 1998. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and published in registers that the CCG holds.*

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to the CCG as soon as practicable and no later than 28 days after the interest arises. I am aware that if I do not make full, accurate and timely declarations then civil, criminal, professional regulatory or internal disciplinary action may result.

I **do / do not (delete as applicable)** give my consent for this information to published on registers that the CCG holds. If consent is NOT given please give reasons:

Signed:

Date:

Signed:

Position:

Date:

(Line Manager or a Senior CCG Manager)

Please return to Amy Stevens, Corporate Affairs Officer: [amy.stevens@westleicestershireccg.nhs.uk](mailto:amy.stevens@westleicestershireccg.nhs.uk)