

<b>POLICIES AND PROCEDURES MANUAL</b>	NUMBER: B-505
POLICY OWNER: Chief Financial Officer	EFFECTIVE: January 2017
APPROVED BY: Administrative Committee	REVISED:
	REVIEWED: September 2018

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## GIFT POLICY

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### A. PURPOSE

To provide overall guidance to all staff, physicians, board members and volunteers concerning the receipt of gifts, gratuities and/or honorariums from vendors. QCH is committed to ensuring that contracting and purchasing activities are fair, accountable, transparent, and conducted to obtain the best value for money.

### B. POLICY STATEMENT

Gifts that in any way influence or appear to influence business decisions are not acceptable. Giving or receiving occasional gifts of nominal value is a common practice in building and maintaining business relationships. However, if any gift of more than nominal value is offered, or nominal gifts are received on an ongoing basis, then the procedures outlined in this policy must be adhered to.

### C. SCOPE

Applies to all programs and services of the Queensway Carleton Hospital ("QCH", or "the Hospital").

Any contributions received by staff, physicians, board members and volunteers that are intended for priority needs of the hospital, shall be directed to QCH Foundation in accordance with C-010 *Fundraising at Queensway Carleton Hospital*.

*Gifts received from patients and families are also guided by the professional standards established for Physicians, Nursing and other Health Care professionals and should be adhered to in conjunction with this policy.*

### D. DEFINITIONS

**Gift:** Something acquired without charge or consideration, such as a meal, a ticket to a cultural, musical, sporting or special event, cash, honoraria, a gift certificate, a piece of jewelry, a bottle of alcohol, etc.

**Nominal Value:** less than one hundred and fifty (\$150) dollars

### E. PROCEDURE

During an RFP process, employees, physicians, Board members and/or volunteers involved in a product or equipment evaluation **cannot accept any gifts** including nominal value gifts whatsoever from a vendor who is responding to the RFP. Prior to accepting a gift, employees, physicians, Board members and/or volunteers should confirm with purchasing that the organization providing the gift is not participant in an ongoing RFP process at the Hospital.

For all other circumstances, gifts of more than a nominal value must be reported to the Chief Financial Officer (CFO) **and** approved by either the CFO or the Chief Executive Officer (CEO). Approval for gifts to the CEO will be approved by the CFO and monitored by the Board Chair.

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If the gift is deemed to be in conflict, and therefore not approved, the employee who is offered or receives such payment or gift of more than a nominal value shall refuse it or return it to the giver in a tactful manner, advising the giver of the hospital policy prohibiting its acceptance.

For gifts of entertainment, the person offering and accepting the invitation must attend and the purpose must be for business discussion or the enhancement of a business relationship. Accepting entertainment that may appear inappropriate should be discussed with the CEO or CFO in advance. If an invitation seems inappropriate, the offer should be rejected.

Employees who receive an honorarium from a Board or professional organization for services separate and apart from their employment responsibilities at the Queensway Carleton Hospital are entitled to keep this honorarium on the condition that:

- they report it to the CEO or CFO,
- No conflict of interest exists, and
- Business hours used to provide these services are coded as vacation or leave without pay.

No employee shall permit influence that could conflict with the best interest of the Queensway Carleton Hospital, or jeopardize the reputation of the hospital.

The responsibility for adherence to this policy is a joint one. Individuals who represent the hospitals must not allow themselves to be put into a position where their judgments can be influenced.

Employees approaching vendors for donation to hospital or staff events should ensure the vendor understands that a donation does not obligate the hospital in any way. These donations must also be reported to the CFO.

Hospital dollars intended for hospital use cannot be used as a donation to fundraising events.

Any employee not complying with this policy shall be subjected to appropriate disciplinary action up to and including termination

## **RELATED POLICIES**

- C-001 Signing & Approval Authority
- C-010 Fundraising at Queensway Carleton Hospital
- B-105 Conflict of Interest
- G-100 Corporate Purchasing Policy
- E-106 Employee Code of conduct
- E-107 Physician Code of conduct