

## Statement of compliance for safeguarding our patients

MultiHealth Specialists Ltd is committed to safeguarding all patients who access our services. The term safeguarding covers everything that assists a child, young person or adult at risk to live a life that is free from harm, abuse and neglect and which enables them to retain independence, well-being, dignity and choice.

We are committed to ensuring that safeguarding is firmly embedded within the wider duties of the organisation.

We confirm that we comply with the statutory requirement to undertake Disclosure and Barring Service (DBS) checks on all staff (including volunteers) prior to employment where they are required. Dependent on role, staff will have a standard or enhanced level of assessment.

All of our safeguarding policies and systems are robust and are reviewed every two years or more frequently, if required, to comply with any new national guidance or legislation. We have a robust training strategy in place with regard to delivering safeguarding training.

The Clinical Director is the executive director lead for safeguarding.

## Statement of compliance for CHC Training

MultiHealth is committed to improving the standard of knowledge and application of the NHS Continuing Healthcare and Funded Nursing care framework to all practitioners involved in the breadth of the process and to provide a uniform approach.

MultiHealth understands our client and citizens rights to have their CHC assessment or review delivered by a well trained workforce, and as such we undertake regular reviews to maintain all our internal policies, procedures and working practices in order to maintain a high performing service. All personnel who undertake any aspect of the CHC process have to undertake the following modules delivered by eLearning for Health.

- Introduction to NHS Continuing Healthcare
- Core Values and Principles of NHS Continuing Healthcare
- Referral for NHS Continuing Healthcare: Fast Track Pathway Tool
- Referral for NHS Continuing Healthcare: Checklist
- Multidisciplinary Assessment and Completing the Decision Support Tool
- Referral for NHS-funded Nursing Care and Assessment
- Co-ordination of a CHC Multidisciplinary Team
- NHS Continuing Healthcare Reviews
- Care and Support Planning and Case Management
- Brokerage for NHS Continuing Healthcare
- Commissioning for NHS Continuing Healthcare
- Dispute Resolution in NHS Continuing Healthcare
- Transition from Childhood to Adulthood

- Data and Finance Reporting
- Decision-Making in NHS Continuing Healthcare
- Independent Review Panel and Parliamentary and Health Service Ombudsman

### **Statement of compliance for GDPR**

The EU General Data Protection Regulation (GDPR) is a privacy and data protection regulation in the European Union effective from May 25 2018 and retained in domestic law as the UK GDPR following the UK's departure from the European Union.

The UK GDPR imposes new obligations on organisations that control or process personal data and introduces new rights and protections for citizens.

We are committed to ensuring that your privacy is protected and we strictly adhere to the provisions of all relevant Data Protection Legislation, including UK GDPR, ensuring all personal data is handled in line with the principles outlined in the regulation that state:

Personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and, where necessary, kept up to date
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

MultiHealth respects our client and citizens rights to data privacy and protection, and as such we undertake regular reviews to maintain all our internal policies, procedures and working practices in order to meet the requirements of the UK GDPR. All personnel are trained annually to ensure high levels of UK GDPR in the organisation and we maintain our DPS Toolkit submission to the NHS.

We place a high priority on protecting and managing data in accordance with accepted standards and helping our clients utilise our products and services.

MultiHealth are committed to compliance with the UK GDPR as both a processor and controller of personal data

Further information is available within our Privacy Policy.

## Statement of compliance anti bribery and corruption

The Bribery Act 2010 came into force on 1 July 2011 with the aim of tackling bribery and corruption in both the private and public sectors. Bribery is defined as the giving or receiving of a financial or other advantage in exchange for improperly performing a relevant function or activity.

MultiHealth is committed to applying the highest standards of ethical conduct, following good NHS business practice, and having robust controls in place to prevent bribery. However, as an organisation we cannot afford to be complacent and under no circumstances is the giving, offering, receiving, or soliciting of a bribe acceptable and the organisation will not tolerate this in any form.

MultiHealth's zero tolerance approach to bribery and corruption is set out in further detail within our Anti Bribery and Fraud Policy, and across a range of other policies and procedural documentation. This applies to all staff and executives, together with contractors and associates working or acting on behalf of MultiHealth.

Any act of bribery undertaken by a member or an employee of MultiHealth will result in disciplinary action and will be treated with a similar level of importance by the Board.

### **Bribery**

Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is improper conduct.

Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is improper conduct, or where that party acts improperly in anticipation of such advantage.

Bribery of an official is defined as the giving or promising of a financial or other advantage, which is intended to influence the official to obtain business or an advantage in the conduct of business, unless the official is required or permitted by law to be influenced by such advantage.

No party may:

- Give or promise any financial or other advantage to another party (or use a third party to do the same), on the Company's behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will constitute improper conduct.
- Request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will constitute improper

conduct, or where the recipient intends to act improperly in anticipation of such an advantage.

All parties must:

- Be aware and alert at all times of all bribery risks.
- Exercise due diligence always when dealing with third parties on behalf of the Company; and report all concerns relating to bribery to a Company Director, or in the case of non-employees, their normal point of contact within the Company.

### **Facilitation Payments**

A facilitation payment is defined as a small payment made to officials to ensure or speed up the performance of routine or necessary functions.

Facilitation payments constitute bribes and may not be made at any time irrespective of prevailing business customs in certain territories.

Facilitation or similar payments may be made in limited circumstances where a parties' life is in danger but under no other circumstances. Any payment so made must be reported to a Company Director as soon as is reasonably possible and practicable.

### **Gifts and Hospitality**

Gifts and hospitality remain a legitimate part of conducting business and should be provided only in compliance with the Company's Gifts and Hospitality Policy.

Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be always exercised when giving or receiving any form of gift or hospitality on behalf of the Company.

The following general principles apply:

- Gifts and hospitality may neither be given nor received as rewards, inducements, or encouragement for preferential treatment or inappropriate or dishonest conduct.
- Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.
- Cash should be neither given nor received as a gift under any circumstances.
- Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.
- The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.
- Certain gifts which would otherwise be in breach of this Policy and/or the Hospitality and Gifts Policy may be accepted if refusal would cause significant and/or cultural offence, however the Company will donate any gifts accepted for such reasons to a charity of the directors choosing.

- All gifts and hospitality, whether given or received, must be recorded in the Hospitality & Gifts Register.

### **Charitable Donations**

Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity.

- All charitable donations must be fully recorded.
- Proof of receipt of all charitable donations must be obtained from the recipient organisation.
- Under no circumstances may charitable donations be made in cash.
- No charitable donation may be made at the request of any party where that donation may result in improper conduct.

MultiHealth currently makes donations to Liverpool Community Advice

### **Political Donations**

The Company does not make political donations and the Company is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.

Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the Company and are not made to obtain any form of advantage in any business transaction.

### **Consequences of Bribery and Corruption**

Failure to comply may result in penalties for MultiHealth, including fines, legal action, reputational damage, and loss of business.

For employees and associates of the company, failure to comply with this Policy and/or with the Act will result in discipline, up to and including summary dismissal. Individuals who violate the UK Bribery Act, or other anti-bribery laws may be personally liable and subject to fines and/or imprisonment.



Joyce Bowler Clinical Director



Clare Boyd Business Director