

# Community Pharmacy Derbyshire Governance Framework

## Code of Conduct

Community Pharmacy Derbyshire (CPD) is the organisation that represents the general body of NHS pharmacy contractors in Derby and Derbyshire, and the conduct of all members acting in their capacity as such must be directed solely to the furtherance of the interests of the organisation and the contractors it serves.

- i. No person shall be eligible to be a member of Community Pharmacy Derbyshire unless they agree to be bound by the Code of Conduct adopted from time to time by Community Pharmacy Derbyshire.
- ii. A member of Community Pharmacy Derbyshire who, other than by reason of qualification for appointment to Community Pharmacy Derbyshire has a personal interest, pecuniary or otherwise, in a subject under discussion by COMMUNITY PHARMACY DERBYSHIRE or any of its subcommittees should ensure that interest is made known to COMMUNITY PHARMACY DERBYSHIRE. If the member wishes to participate in the discussion or vote on the subject, the Chair of COMMUNITY PHARMACY DERBYSHIRE, or of the relevant subcommittee, will decide whether the member should be permitted to take part in the discussion or, if there is one, the vote.
- iii. Members of COMMUNITY PHARMACY DERBYSHIRE must respect the confidentiality of all papers issued to them as members of COMMUNITY PHARMACY DERBYSHIRE and other information identified as confidential and acquired by them solely by virtue of their position as a member of the Committee. Should any Committee member wish to disclose items within the COMMUNITY PHARMACY DERBYSHIRE agenda which are not in the public domain, permission should be sought of COMMUNITY PHARMACY DERBYSHIRE through the Chief Executive.
- iv. Members of COMMUNITY PHARMACY DERBYSHIRE must ensure that the finances of the Committee are properly applied to the furtherance of the objectives of the Committee.
- v. If a member of COMMUNITY PHARMACY DERBYSHIRE knowingly breaches any provision of this Code of Conduct, COMMUNITY PHARMACY DERBYSHIRE may pass a motion of censure naming the member of COMMUNITY PHARMACY DERBYSHIRE accordingly.

## Corporate Governance and COMMUNITY PHARMACY DERBYSHIRE

COMMUNITY PHARMACY DERBYSHIRE accepted in April 2003 the following guiding principles for members of the Committee:

**Accountability** - Members of COMMUNITY PHARMACY DERBYSHIRE are accountable for their decisions and actions to contractors and the public and therefore submit to scrutiny.

**Openness** - Members 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 for short term tactical reasons, or when the wider public interest clearly demands.

**Honesty** - Members have a clear duty to declare any private interest relating to their COMMUNITY PHARMACY DERBYSHIRE duties and take steps to resolve any conflicts arising.

**Leadership** - Members should promote and support the above principles by leadership and by example.

**Representativeness** (Selflessness) - members must reflect the interests of the contractors who elected or appointed them to COMMUNITY PHARMACY DERBYSHIRE and must make decisions in the interests of the general body of contractors; they must not make decisions in order to gain financial or other material benefits for themselves, family or friends.

**Integrity** - members must not put themselves under any obligation that might influence their performance on COMMUNITY PHARMACY DERBYSHIRE or their ability to reflect the interests of the contractors who elected or appointed them or to make decisions in the interests of the general body of contractors.

**Objectivity** - in making decisions and in carrying out the business of COMMUNITY PHARMACY DERBYSHIRE, members should act within the constitution and make decisions only on merit.

**Note** - the effect of the principles of Representativeness and Integrity is that the nominating bodies can mandate the member to express a view but cannot bind them in how they vote or decide on a particular issue. This means the member can hear and participate in debate and is free to amend their view in the light of the debate. They will no doubt then reflect back to the relevant body why they made the decision they did, recognising their accountability.

## Code of Conduct – Declaration of Interests

### Code of Conduct – Declaration of Interests

Name: David Evans

1	Remunerated Directorship of companies (public or private) and businesses owned personally or in partnership	Daleacre Healthcare Ltd t/a Evans Pharmacy Daleacre Holdings Ltd Blackwell Medical Services Ltd
2	Remunerated employment or offices	see above
3	Remunerated Consultancies (list all consultancies in the preceding 12 months)	None
4	Remunerated work performed under contract	None
5	Names of companies or other bodies in which I have an interest, either on my own account, my spouse or infant children, for a beneficial interest in shareholdings greater than the 10% of the share capital	see above
6	Remunerated contributions to professional and scientific publications	None
7	Names of charities, not for profit and/or voluntary sector organisations in the field of health and social care or that contract for NHS services that I or my spouse have involvement with.	None
8	Other sources of income or pecuniary support relevant to my membership of COMMUNITY PHARMACY DERBYSHIRE	None
9	Membership of other pharmaceutical bodies	RPS Director of AIMp Ltd GPhC Registration (2033668)

In addition, please notify COMMUNITY PHARMACY DERBYSHIRE of any gifts and hospitality over £100 received for non-COMMUNITY PHARMACY DERBYSHIRE activities, which could have a perceived association with COMMUNITY PHARMACY DERBYSHIRE activities.

I confirm my agreement to be bound by the Code of Conduct adopted from time to time by the COMMUNITY PHARMACY DERBYSHIRE

Signed:  Date: 9/8/2023

## COMMUNITY PHARMACY DERBYSHIRE Committee members' Code of Conduct Declaration

I David Evans..... (Name of COMMUNITY PHARMACY DERBYSHIRE Committee member) declare that:

1. I have received, or have access to (for example, on the COMMUNITY PHARMACY DERBYSHIRE website [www.derbyshireipc.org](http://www.derbyshireipc.org)), of a copy of each of the following COMMUNITY PHARMACY DERBYSHIRE Governance documents. The COMMUNITY PHARMACY DERBYSHIRE:

- a) Constitution
- b) Rules
- c) Code of Conduct
- d) Code of Conduct – Declaration of Interests
- e) Procedure for dealing with unauthorised disclosures
- f) Guidance on the Bribery Act
- g) Guidance on Competition Law Compliance

**2. I have read the Code of Conduct and the Procedure for dealing with unauthorised disclosures and agree:**

- a) to abide by the Code; and,
- b) to maintain the confidentiality of COMMUNITY PHARMACY DERBYSHIRE information identified as confidential or that might reasonably be expected to be confidential.

**3. Confidential COMMUNITY PHARMACY DERBYSHIRE information** includes:

- a) confidential personal information (which may be special category or sensitive personal information), confidential financial or pharmacy market sensitive information, and information provided in confidence to COMMUNITY PHARMACY DERBYSHIRE from third parties including, in particular, information from the Department of Health and Social Care, NHS England and NHS improvement and NHS Business Services Authority, and pharmacy contractors, as well as,
- b) confidential discussions and decisions associated with negotiations and future changes to the Community Pharmacy Contractual Framework and/or associated community pharmacy services.

**4. Unauthorised disclosure** of confidential COMMUNITY PHARMACY DERBYSHIRE information includes such disclosure to:

- a) the body or company that has appointed me to COMMUNITY PHARMACY DERBYSHIRE (including, for example, senior staff members and colleagues in the organisation), and
- b) contractors who have elected me to COMMUNITY PHARMACY DERBYSHIRE (including, for example, senior staff members and colleagues in the organisation)

- c) any organisation associated with my appointment or election, for example a pharmacy organisation
- d) my employer, or any pharmacy contractor, or other organisation with which I may be engaged or associated (including, for example, senior staff members and colleagues in the organisation).

5. I agree to be bound by the COMMUNITY PHARMACY DERBYSHIRE Code of Conduct and in the event that I disclose or facilitate the disclosure of confidential COMMUNITY PHARMACY DERBYSHIRE information when NOT authorised to do so, or fail to maintain its security such that there is an unauthorised disclosure, I agree to cooperate with any COMMUNITY PHARMACY DERBYSHIRE investigation (into the facts and my conduct) and, following investigation, abide by any determination of the COMMUNITY PHARMACY DERBYSHIRE Governance and Audit Committee or any successor body, subject to any internal appeal in accordance with COMMUNITY PHARMACY DERBYSHIRE procedures.

6. I've received a copy of the CPD expense policy and agree to follow the policy in relation to any claims for expenses made

Signed  ..... (Name of COMMUNITY PHARMACY DERBYSHIRE Committee member)

Date 9/8/2023 .....

## Procedure for dealing with unauthorised disclosure of confidential material

### General Principles

These should be read in conjunction with the Code of Conduct.

1. All confidential material will be identified in agendas and papers as such. Where an agenda item is marked as confidential all papers and discussions related to the item must be treated as being confidential, even if not specifically marked as such.
2. In case of doubt the CEO or Chair should be consulted before any disclosure is made.
3. Disclosure includes disclosure to the body nominating or electing a member to COMMUNITY PHARMACY DERBYSHIRE. Unless otherwise agreed, material identified as confidential must be restricted to COMMUNITY PHARMACY DERBYSHIRE members and staff.
4. Once material identified as confidential is in the public domain, it ceases to be confidential.
5. Details of opinions expressed by individual members and how members voted on specific issues should not be disclosed by anyone other than the individual member. Members are expected to adopt corporate responsibility for the Committee's decisions.

### Procedure in the event of a disclosure of confidential material

1. A member who becomes aware that confidential material has been disclosed, by him/herself or someone else, should provide information to the Chair or the CO.
2. The Chair will decide whether the disclosure is sufficiently serious to merit reference for inquiry by the Review and Audit Panel, or whether he/she can deal with the matter informally.
3. In cases referred to the Governance Committee the Panel will conduct such investigation and inquiries as it considers are warranted. If the Panel concludes that an identified member of the Committee has been responsible for the unauthorised disclosure it may determine:
  - a) That no action should be taken in respect of the matter
  - b) To give informal advice to the member
  - c) To give a formal rebuke, reported in confidence to the Committee
  - d) To give a formal, public rebuke
  - e) To exclude the member from attendance at meetings of COMMUNITY PHARMACY DERBYSHIRE or its subcommittees for a specified period
  - f) To exclude the member from the Committee.
4. A member excluded by a determination under f) above will be ineligible for membership of COMMUNITY PHARMACY DERBYSHIRE for a period of three years from the date of the determination. When considering whether a determination under e) should be made, the Governance Committee will have regard to the need to avoid prejudicing the interests of contractors represented by the individual.
5. Determinations made by the Governance Committee will be communicated in writing together with the reasons for the determination.
6. A member of the Committee may appeal to the Vice Chair of COMMUNITY PHARMACY DERBYSHIRE against a determination or, in the event that the member is the Vice Chair, to the Chair of the LPC.

## Guidance on the Bribery Act

The Bribery Act 2010 came into force on 1 July 2011 and is supported by guidance published by the Ministry of Justice. See <https://www.gov.uk/government/publications/bribery-act-2010-guidance>.

The Bribery Act 2010 modernises the Law on bribery. It is concerned with bribery which very generally is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. This could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker.

COMMUNITY PHARMACY DERBYSHIRE could be liable if a member of the Committee commits a bribery offence. We could also be liable if an employee or agent, pays a bribe specifically to get business, keep business, or gain a business advantage for COMMUNITY PHARMACY DERBYSHIRE.

Prosecutions are possible only with the consent of the Director of Public Prosecutions or the Director of the Serious Fraud Office. There is a defence if an organisation can show it has adequate procedures in place to prevent bribery. The procedures depend on the bribery risks and include:

**1 Proportionality:** The action should be proportionate to the risks faced and the size of the business. Although we are a small organisation we negotiate a significant contract.

**2 Top Level commitment:** It is for all members of COMMUNITY PHARMACY DERBYSHIRE but particularly the Chair, Chief Executive and Review and Audit Panel to commit to an anti-bribery culture. We need to show through that top level commitment that all members, and senior staff as well as people who we do business with understand that COMMUNITY PHARMACY DERBYSHIRE does not tolerate bribery.

**3 Risk Assessment:** There is additional guidance on risk assessment, and this involves considering the risks in the different markets that COMMUNITY PHARMACY DERBYSHIRE operates. The risks of bribery in are very small.

**4 Due Diligence:** This involves checking that the members of COMMUNITY PHARMACY DERBYSHIRE, members of staff and agents acting on behalf of COMMUNITY PHARMACY DERBYSHIRE are trustworthy, especially if they are going to represent COMMUNITY PHARMACY DERBYSHIRE during discussions in any areas where there is a risk of bribery.

**5 Communication:** Communicating policies and procedures to staff and to others who perform services for COMMUNITY PHARMACY DERBYSHIRE enhances awareness and helps to deter bribery by making clear the basis on which we do business. Awareness raising (for example through briefings such as this) is a way of setting out the COMMUNITY PHARMACY DERBYSHIRE position.

**6 Monitoring and Review:** The effectiveness of procedures may change over time.

### Risk assessment

The Government assesses that organisations will face little or no risk of bribery, especially if their business is undertaken primarily in the UK. The procedures to prevent bribery should be proportionate to the relative risks – for COMMUNITY PHARMACY DERBYSHIRE, existing controls such as over COMMUNITY PHARMACY DERBYSHIRE expenditure, accounting and commercial or agent contracts for example reflect an anti-bribery culture.

It is important to ensure that ‘management’ is fully aware and committed to the objective of preventing bribery.

We need to consider doing due diligence checks on persons who will actually perform services for COMMUNITY PHARMACY DERBYSHIRE, or on its behalf. In low risk areas, all that may be required is to satisfy ourselves that people performing services for COMMUNITY PHARMACY DERBYSHIRE (for example, an agent) are genuine and someone we can trust to do COMMUNITY PHARMACY DERBYSHIRE’s business.

The Review and Audit Panel will keep this guidance under review and to confirm whether there are any particular risks, using the Appendix as the starting point – and if so, how to minimise these.

This briefing will also be provided to members of staff who negotiate contracts, and agents or consultants who negotiate on behalf of COMMUNITY PHARMACY DERBYSHIRE. Copies will also be provided to directors of COMMUNITY PHARMACY DERBYSHIRE Data Systems Ltd so that they can satisfy themselves about the risks they face.

## **Appendix - COMMUNITY PHARMACY DERBYSHIRE Bribery Act Risk Assessment**

The following are areas where it is suggested that there are potential risks. The Review and Audit Panel will keep these under review and amend as required.

### **Identified areas of risk**

The principle areas where a question of bribery might arise include:

- Hospitality, promotional or other business expenditure, such as dinners and agreements with any professional partners.

It is not intended that genuine hospitality or similar business expenditure that is reasonable and proportionate be caught by the Act, so COMMUNITY PHARMACY DERBYSHIRE can continue to provide bona fide hospitality, promotional or other business expenditure. Although key decision makers are invited to working dinners etc. and the intention is to build relationships, the cost of dinners, must be modest and proportionate. Invitations to attend must not be dependent on the invitee agreeing to act improperly in relation to contracts with COMMUNITY PHARMACY DERBYSHIRE.

- COMMUNITY PHARMACY DERBYSHIRE negotiates with bodies such as NHS England and the Department of Health and Social Care. It is suggested that the risk of bribery is negligible.
- COMMUNITY PHARMACY DERBYSHIRE maintains close links with the Pharmacy All-Party Parliamentary Group. This group of parliamentarians is clearly very influential in matters relating to pharmacy.

This link is unlikely to involve bribery – but – because communications consultants are paid by COMMUNITY PHARMACY DERBYSHIRE to advise us and the other pharmacy bodies who provide financial support for the APPG, we should ensure that they understand that COMMUNITY PHARMACY DERBYSHIRE has a strong anti-bribery policy. We should also request from any communications consultants' details of their anti-bribery policies.



## Guidance on Competition Law Compliance

### Guidelines for Meetings

The COMMUNITY PHARMACY DERBYSHIRE, being a representative body for pharmacists in the UK, brings together a number of parties, many of whom are competitors. This can give rise to competition law concerns should any commercially sensitive information be disclosed or discussed at any meeting. A short guide to Competition Law Risk is at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/587464/cma-risk-guide-2016-revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/587464/cma-risk-guide-2016-revised.pdf)

To avoid any competition law concerns, all participants at any COMMUNITY PHARMACY DERBYSHIRE meeting (whether it be a formal committee or subcommittee meeting or more informal occasion) should take care in any discussions with other participants who are or who may become competitors. The guidelines below provide a framework for such discussions and, where appropriate (for instance the use of an agenda or minutes would not be appropriate during an informal social gathering), should be adhered to at all times.

#### 1. Objectives of the meeting

- 1.1 A clearly listed agenda should be prepared before the meeting identifying the topics for discussion - the agenda should be used to provide the framework for the discussion and the meeting should not stray beyond those items listed to be discussed.
- 1.2 Topics for discussion should be limited to the activities and responsibilities of the COMMUNITY PHARMACY DERBYSHIRE, as well as general industry matters. Examples of COMMUNITY PHARMACY DERBYSHIRE activities and responsibilities and general industry matters would include:
  - 1.2.1 The detailed functions and roles of the COMMUNITY PHARMACY DERBYSHIRE including (but not limited to):
    - (a) liaising with the Department of Health and Social Care and National Health Service bodies on behalf of chemists;
    - (b) the negotiation, as representative of the general body of chemists, with the Department of Health and Social Care and NHS bodies on the conditions of service and remuneration for the dispensing of prescriptions and provision of other services;
    - (c) agreeing with the Department of Health and Social Care the prices to be used in the prescription processing division for NHS prescriptions or other pharmaceutical services;
    - (d) the provision of administration, audit and advisory services relating to chemists on NHS matters.
  - 1.2.2 Current or proposed legislation or regulation - for example:
    - (a) defects in existing legislation/regulation and difficulties faced by the sector in complying with such legislation/regulation;
    - (b) status of legislative/regulatory proposals;
    - (c) industry-wide responses to consultations;
    - (d) impact of current or proposed legislation/regulation (without disclosing any commercial information relevant to a member);
    - (e) Industry-wide initiatives to comply with legislation/regulation;
  - 1.2.3 General developments or trends in the sector;
  - 1.2.4 Collection or review of industry data (but any data that contains commercially sensitive information should be historic, generalised and made anonymous prior to being disclosed to other members);

- 1.2.5 Educational or training events for members;
- 1.2.6 Current or proposed guidelines/rules/codes prepared by the COMMUNITY PHARMACY DERBYSHIRE:
  - (a) scope of guidelines/rules/codes;
  - (b) amendments to current guidelines/rules/codes
  - (c) Compliance with such guidelines/rules/codes.

## **2. Conducting the meeting**

- 2.1 Generally, minutes should be made recording all discussions during the meeting;
- 2.2 If a member wishes to clarify (for competition law compliance purposes) whether he/she can or cannot discuss a particular topic, or if any member has any doubts about an issue it would like to raise for discussion, this should be raised with the Chair of the meeting outside of the meeting prior to the issued being raised.
- 2.3 If any of the issues listed in 3.1 below are raised, the discussion should be terminated immediately.

## **3. Discussions during the meeting**

- 3.1 Where members (at the meeting) include actual or potential competitors, they should not discuss their own or their competitors' commercial strategy or any matter which would be considered commercially sensitive. Subjects to avoid are:
  - 3.1.1 Individual commercial policies of those companies present - this includes historical, current or future policy where it is not in the public domain and participants should not question other participants about such policy;
  - 3.1.2 Any commercial difficulties faced by the participants other than in very general terms - for example, members may express their general concern at rising costs or overheads but should not disclose the impact of those costs on their profit margins or other financial figures;
  - 3.1.3 Any proposal discussing any coordinated commercial conduct between participants (for instance relating to pricing, distribution or arrangements with customers);
  - 3.1.4 Any request made by one participant (or discussion) asking other members to stop any particular commercial conduct or relationships;
  - 3.1.5 The sharing of commercially sensitive information (verbally and in writing) – including (but is not limited to);
    - (a) Pricing terms;
    - (b) Current terms and conditions of supply trade;
    - (c) Details of the commercial arrangements with customers or suppliers;
    - (d) Sales information;
  - 3.1.6 Making any allegation as to the commercial conduct of others.
- 3.2 To the extent that any information is shared between participants, such information should be general, non-specific and where appropriate, should be historical and made anonymous to ensure that the information is not commercially sensitive and cannot be attributed to any participants.

## **4. Outcomes of the meeting**

- 4.1 Minutes of the meeting should be prepared and circulated to attendees. Note that any decision or recommendation made at a COMMUNITY PHARMACY DERBYSHIRE meeting, however informal, can be subject to competition law and could constitute a potentially anti-competitive agreement.

## Governance - COMMUNITY PHARMACY DERBYSHIRE and COMMUNITY PHARMACY DERBYSHIRE Committees, Panels and Groups

### COMMUNITY PHARMACY DERBYSHIRE

COMMUNITY PHARMACY DERBYSHIRE, which is representative of NHS community pharmacies in England, has a membership of:

- Four Independent Members
- Four AIMp Members
- Four CCA Members

All elected as representatives in accordance with the Rules.

### Subcommittees

COMMUNITY PHARMACY DERBYSHIRE has a number of subcommittees.

- Audit Committee
- Communication Sub Group
- Governance Committee.

Membership to each group agreed by the full committee. TOR to be completed by the new committee members.

## Community Pharmacy Derbyshire (CPD) Expense Policy July 2023

### 1. Introduction

- 1.1 This policy is designed to ensure that Community Pharmacy Derbyshire (CPD) Members and designated persons appointed to represent CPD are not penalised financially and do not lose employment income, when undertaking CPD activities.
- 1.2 CPD and CPD members are subject to tax legislation and HMRC guidance, in particular, the Income Tax (Earnings and Pensions) Act 2003. CPD members' daily allowance claims must be paid by PAYE, unless paid direct to the CPD member's employer, or the contractor that the CPD member represents, **in accordance with HMRC rules for those in professional practice** <https://www.gov.uk/hmrc-internal-manuals/employment-income-manual/eim01125> .
- 1.3 Any breach of this policy will be referred to the Governance Sub Committee of CPD for consideration.

### 2. Chargeable occasions.

- 2.1 Chargeable occasions covered are:
  - a) The underlying principle is that expenses are payable for occasions where CPD Members are working on behalf of CPD and this has been approved by the Chair, Chief Officer or Treasurer.
  - b) Claims are payable for the following events (face-to-face or virtual):
    - i. CPD and CPD subcommittee meetings
    - ii. CPE Conference
    - iii. Regional CPD meetings, whether organised by CPE or established regional groups
  - c) Claims for other meetings must be authorised in advance by the Chair, Chief Officer and the Treasurer.
- 2.2 Members' requests to attend training/conferences on behalf of the CPD, or the need for accommodation while on CPD business, or authorisation for single items of expenditure above £100, must be approved in advance by a full meeting of the committee. If the schedule of meetings does not allow for this, applications must be approved by a panel comprising the Chair, Treasurer and Chief Officer. That approval must be reported back to the next meeting to be included in the minutes of the meeting.

### 3. Submission of claims

- 3.1 Members are expected to:
  - a) Prior to submitting any claims, CPD members and designated persons appointed to represent the CPD must provide the necessary details of their employer or contractor, or relevant details, as appropriate, for claims to be paid, or assist the CPD to set up PAYE arrangements for claims to be paid. **Written assurances that daily allowance payments will be declared to HMRC as professional income may be required.**
  - b) Submit claims as soon as possible, within three months of the expenditure (unless otherwise agreed with the Committee or subcommittee comprising the Chair, Treasurer and Chief Officer) and within one month of the end of the financial year.
  - c) Provide original invoices, receipts or itemised bills, to support all expense claims or if scanned and submitted electronically, **original receipts should be retained** and the CPD reserves the right to inspect them.
  - d) If the expenses are paid by another person, for example, the employee's company, they may not be claimed by the individual.

- e) Submit claims on the attached form in a manner that is clear, understandable and auditable and in a format that is acceptable to the Treasurer. A sample form is available in appendix 1.
- f) The CPD reserves the right not to pay claims submitted outside these submission guidelines, or outside the terms of the policy.

### 3.2 Authorisation/ limits:

- a) Once the expense claim form is complete, the claimant must sign the declaration. Single items of expenditure or activity exceeding £100 must be approved in advance.

### 3.3 Payment process:

- a) Claims will be paid by BACS.
- b) Claims will normally be processed for payment within 30 days.
- c) Expense claims (genuine expenses incurred by the individual) may be paid direct to the individual CPD member and not through PAYE.
- d) For CPD members who are:
  - i. **Employees of a contractor member** - daily allowance claims **MUST** be paid by PAYE unless paid direct to the CPD member's employer or the contractor the CPD member represents.
  - ii. **Contractors (in professional practice – companies; partnerships and sole traders)** - daily allowance claims **MUST** be paid by PAYE unless paid direct to the contractor's retail pharmacy business.
  - iii. **Representatives of a contractor member and designated persons appointed to represent the CPD** - daily allowance claims **MUST** be paid by PAYE unless paid direct to the contractor's retail pharmacy business. An exception is a locum in professional practice if the daily allowance is part of the professional income.
  - iv. **Retired or non-working representatives of a contractor member** - must be paid by PAYE (because the payment is not for lost professional/employment income).

## 4. Rates

### 4.1 Current rates for face to face meetings set at:

- a) £30 per hour unless exceptional circumstances
- b) This rate is reviewed annually by CPD in light of prevailing locum rates.

### 4.2 Virtual meetings will be set at

- a) £30 per hour unless exceptional circumstances
- b) This rate is reviewed annually by CPD in light of prevailing locum rates

### 4.3 Travel/ Transport:

- a) As of April 2023, the rate is £0.45/mile for the first 10,000 miles and £0.25 per mile thereafter irrespective of engine size. The mileage rate is determined by HMRC.
- b) Only reasonable mileage claims are paid, for example, within the CPD area or within the immediate area around the CPD area; subject to the discretion of the Audit Committee.
- c) Any other travel should be by the most cost-efficient means, for example, second-class advance rail fares; only in exceptional cases will open fares be considered reasonable expenses. The need to travel should always be carefully considered alongside the option of a virtual meeting. Only where there is considered advantage in terms of networking or importance should the travel option be taken. The Audit Committee will

regularly review travel costs vs activity and may challenge any unnecessary or inappropriate travel.

#### 4.4 **Parking and Tolls**

- a) The CPD will reimburse parking and toll costs for business travel away from home and Committee members' normal place of work when supported by a receipt/ticket. The CPD will not pay any type of parking penalty notice or similar penalty.

#### 4.5 **Accommodation:**

- a) Accommodation may be claimed if members are required to attend a location on CPD business and this location is sufficiently far away from home or normal place of work (and the CPD area) to make a return journey unreasonable.
- b) Accommodation must be approved in advance.
- c) If commitments require evening travel and/or accommodation, then a meal/breakfast/soft drinks up to a maximum value of £40 may be claimed if required. Alcohol expenses will not be reimbursed.
- d) All relevant receipts must be submitted with the expenses claim

#### 4.6 **Business Calls:**

- a) The cost of calls you make on CPD business can be reclaimed. You must provide details of the calls you have made by attaching an itemised bill with the business calls highlighted.

#### 4.7 **Miscellaneous:**

- a) Other legitimate claims will be considered by the Committee.
- b) This policy does **not** apply to CPD staff (including Chief Officers). Refer to the CPD staff handbook for employees.
- c) This policy does not apply to CPD members where their time spent on CPD activities is more than 'insubstantial' compared to carrying on their professional practice.

#### 5. **Disclosure:**

- a) Members expenses may be made available to contractors or disclosed in accordance with legal requirements, for example, in the CPD Annual Report.

#### 6. **Contact details of:**

- a) Claims should be sent to CPD Support Officer [katherinewman@derbyshirelpc.co.uk](mailto:katherinewman@derbyshirelpc.co.uk)

- b) Treasurer Details  
Darryl Dethick  
Peak Pharmacy  
Buttermilk Lane  
Bolsover  
Chesterfield  
S44 6AE

07880 955917

[darryl.dethick@peakpharmacy.co.uk](mailto:darryl.dethick@peakpharmacy.co.uk)