



**Anti-corruption
guideline for the
University Hospital of
Würzburg**



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I. Preliminary remarks

1. Introduction

Collaboration with hospitals and practitioners on the one hand and with (pharmaceutical and medical technology) industry on the other hand are repeatedly the subject of criminal investigations and media reports.

Close collaboration with these two branches is desired and promoted but at the same time the fight against corruption and public service law and labour law demand a strict line of demarcation to ensure compliance particularly with criminal provisions.

Due to its responsibility for compliance with legal requirements, the management board of the University Hospital of Würzburg decided in 2015 to establish a compliance management system. This anti-corruption guideline builds on the code of conduct that was issued at that time and makes its provisions concrete, particularly with regard to No. 9 (Avoidance of conflicts between private and business interests), No. 11 (Non-cash benefits / gifts and entertainment / invitations) and No. 12 (Donations / sponsoring).

2. Scope

This guideline applies to all employees¹ of the UHW as well as to employees of the Free State of Bavaria who work at the UHW.

Specific provisions in statutes, regulations and other sources that apply to the UHW remain unaffected.

3. Purpose

The purpose of this guideline is to prevent corruption as well as the suspicion of corruption, and to preserve the public's trust in the lawful behaviour of the UHW. At the same time, forms of influence are to be prevented that are not criminally relevant, but could lead to a conflict between professional and personal interests.

In addition, it protects every employee from possible criminal consequences by demonstrating concrete room to manoeuvre.

Insofar as points 7 and 8 describe acceptance of benefits as acceptable, this represents general approval in terms of § 331 par. 3 of the German criminal code. It is assumed that the benefit was not demanded and that the acceptance was voluntary and without any expectation of quid pro quo. Demanding is present, for example, when pressure was exerted on the one giving the benefit.

¹ In this guideline, for better readability, solely the masculine form is used. This form is explicitly to be understood as gender-neutral. It refers to all people, regardless of gender.

4. Terms

Corruption: The goal of criminal law regarding corruption is to protect the objectivity of the service being provided. Decisions regarding prescribing a medication or the procurement of medical devices should be made without being influenced by extraneous considerations.

Consequently, for employees of the UHW it is strictly forbidden under § 331 par. 1 of the German criminal code (StGB) to demand, promise or accept a benefit for themselves or a third party in exchange for performance of their duties.

A benefit is any provision or a material or immaterial nature that objectively improves the employee or a third party's economic, legal or personal situation.

The amounts listed in No. 7 - 10 are regular market prices including sales tax, not the purchase prices for those providing the benefit. They refer to the calendar year.

5. Fundamental principles for corruption prevention

Compliance with the following basic principles helps to safeguard one's own actions and to protect against corruption:

Separation principle

The separation principle requires strict separation of benefits to the UHW or individual employees from procurement decisions and sales transactions.

It also requires the separation of private and business interests, insofar as not separating them could lead to conflicts of interest. When conflicts of interest arise, the employee must notify his supervisor about the possibility of bias.

Documentation principle

The documentation principle demands written documentation of all benefits provided to the UHW or individual employees as well as possible quid pro quo. The documentation must be done such that a third party could at any time trace the work processes and reasons e.g., for a procurement decision.

The documents must be retained for the legally defined time periods.

Transparency / approval principle

Each (even offered and not yet received) benefit to employees must be documented and disclosed. All benefits to the UHW must be documented in writing by the responsible person/department.

Four eyes principle

The four eyes principle is to be applied.

Appropriateness / equivalency principle

The relationship between benefits and services in return must be appropriate in all cases. Otherwise the impression of granting or accepting the benefit could arise.

The evaluation of appropriateness depends on many factors (e.g., difficulty of the service, exceptional competence of the one providing the service, time expenditure, market compensation, etc.).

Cost-effectiveness and frugality

It must be kept in mind that all funds received by the UHW are subject to the principles of cost-effectiveness and frugality. If the UHW accepts (third-party) funds, even from private donors, the received funds become public funds and must be managed as such.

Cashless benefits

A benefit provided by a company to the UHW or individual employees must not be accepted in cash.

6. Organisational measures

To sustainably prevent corruption at the UHW and to increase sound legal protection for all employees, the following points must be complied with.

a) Support from the Hospital in the prevention of corruption

The cooperation of all employees at the UHW is necessary to avoid, discover and clear up corruption.

By their actions, managers are examples for their employees.

Because it is a matter of legally punishable behaviour resulting in harm to finances and reputation, there cannot be any solidarity with colleagues.

- In the course of time, routine work processes can lead to organisational niches in which corruption can more easily go unnoticed. Such defects must be reported to the relevant manager.
- All managers must take care that their employees are familiar with the contents of this guideline and observe the applicable rules. All employees are obligated to inform themselves adequately about corruption, and in cases of uncertainty to notify the people in the responsible positions.

b) Behaviour in suspected or actual cases of corruption

Each employee must act when there is the suspicion of corruption. The following options are available:

- The legal department or the central compliance officer can be contacted in person, in writing, or by e-mail.
- A report can be submitted to the compliance reporting system via the intranet. For details, see point 22 of the UHW's code of compliance.

II. Benefits to employees

Refusing a gift is not easy, because it implies that the giver has dishonest intentions. The giver who wants to corrupt an employee wants above all to become a special business partner / patient / colleague and possibly “get them hooked” and at some point to no longer be treated like any other.

Consequently, monetary gifts and gifts in kind, entertainment and other benefits (e.g., price discounts that are not available to every other UHW employee) cannot be accepted without special approval by the UHW unless they are of low value and the grant and acceptance is voluntary and without any expectation of quid pro quo.

Givers of benefits can be companies, their employees, colleagues, patients and their relatives.

Companies, their employees and closely associated companies must be regarded as a single unit.

Likewise, gifts from patients and their relatives must be summed.

7. Monetary gifts and gifts in kind

7.1 From patients

Monetary gifts and gifts in kind from patients can be accepted under the following conditions:

- A gift from a patient to an employee can be worth up to 25 Euro per inpatient stay.
- The value of the benefits given by a patient to an employee must not exceed 100 Euro per calendar year.
- Gifts from relatives of the patient must be included in the comparison to the maximum limits.
- The benefit must not be accepted until the date the patient is discharged at the soonest.
- Accepting gifts for distribution to other employees or “for the ward” is possible.

7.2 Among colleagues

For gifts between hospital employees, caution is required if the giver can benefit from decisions made by the recipient. One example is that a manager (the recipient) recommends an employee (the giver) for a more highly paid position.

Gifts, for example on birthdays, on the occasion of a birth or of leaving the Hospital, are permissible provided they are of normal value.

When in doubt, an application for approval can be helpful in protecting oneself against suspicion of corruption.

7.3 From industry

Gifts in kind from companies can be accepted under the following conditions:

- Gifts in kind from companies may be worth up to 25 Euro.
- The value of the gifts in kind from a company to an employee must not exceed 100 Euro per calendar year.
- Gifts from various representatives of a company or from closely associated companies must be summed.
- The gift must not have to do with tickets for cultural, recreational or sports events or other leisure activities.

8. Entertainment

Acceptance of entertainment (food and drink) is permissible under the following conditions:

- The total cost for entertainment on a single occasion must not exceed 60 Euro.
- The value of entertainment provided by a company, in which an employee participates, must not exceed the sum of 240 Euro per calendar year. Entertainment provided by various representatives of a company or by closely associated companies is to be summed; gifts in kind (see 7.3) are included in the 240 Euro.
- Each entertainment occasion must have a business purpose, e.g., discussion of technical or collaboration issues between the UHW and the company.
- Costs for companions must not be assumed.

9. Participation in conventions, continuing education, etc.

The rapid pace of medical and technical progress makes lifelong learning necessary. This is demonstrated for example by physicians' obligation for continuing education in § 4 par. 1 of the Rules of Professional Practice for Physicians (BO) in Bavaria. In return § 32 par. 2 BO allows the acceptance of benefits having monetary value in an appropriate amount, exclusively for professional development.

Assumption of costs by companies for participation in scientific conferences, continuing education events and informational events, etc. is possible in principle, but requires advance approval by the UHW. For instructional events, e.g., product trainings, see No. 17.

For active participation (e.g., a lecture, poster presentation, moderation, etc.) for which additional compensation is paid, the rules for ancillary activities apply (No. 10).

The conditions for approval are:

- The purpose of participating is to impart or acquire knowledge and experience that are in the interests of the UHW.
- The only costs that may be assumed are for travel to and from the event, conference fees and hotel fees (including hotel breakfast).
- The costs must not exceed an appropriate amount. The basis for this is the Bavarian Travel Costs Act (BayRKG).
- The scientific and/or official aspect must always be clearly in the foreground; therefore there is the obligation to attend. Related stays for private purposes are possible, but must only be chronologically subordinate (in principle not more than 30% of the total absence) insofar as the costs of travel there and back are paid by a company.
- Assumption of costs for companions such as a spouse is excluded.
- The application must precisely quantify all of the costs to be assumed. Lump sums cannot be approved.
- Participation in more than two events per year with financial support from the same company is not allowed.
- Ancillary activities that are chronologically associated with sponsored conventions, continuing education, etc., cannot be approved. Interruption of business trips to perform ancillary activities is not allowed.

10. Ancillary activities

Ancillary activities require approval in advance by the employer on the basis of transparency and documentation of all relevant details. Approval can only be granted if official interests are not impacted, e.g., due to the chronological scope of the ancillary activity.

The service and consideration must always be in an appropriate proportion to each other and must be trackable. For lump sum remuneration, for example, the number of hours worked must be provided.

The following maximum compensation per hour is permissible:

- 120 Euro per hour; for proven experts, the appropriate compensation may be up to 300 Euro per hour.

- The compensation is calculated based on the time for preparation, wrap-up, and the activity itself. Travel time can be compensated in an appropriate proportion to the compensation for the contractual service.
- Actual costs for hotel stays, travel and participation in the convention can be reimbursed in addition to the honorarium.

Ancillary activities are completely incompatible with tasks as an employee. A contract cannot separately compensate an employee for ancillary activity that is already a task as an employee. This applies in particular to all activities within a study / research at the UHW, e.g., as a consultant, advisor, director of a clinical study, study director, clinical investigator (CI), member of the steering committee, etc. until final conclusion of the study / research. Application observations also cannot be accepted as ancillary activity. The same applies to presentations at continuing education events of the UHW, even if a company pays the compensation.

Ancillary activities cannot be performed during working hours. Based on the principle of separation – even if the costs for this are assumed by a third party – travel as an employee cannot be interrupted or extended to perform ancillary activities.

Per calendar year, compensation for ancillary activities on behalf of companies that are in a business relationship with the UHW should generally not exceed 30% of the employee's annual compensation as a full-time employee.

III. Benefits to the UHW

11. Donations

Donations means one-sided benefits to the UHW, not to employees as individuals (in this case see II, "Benefits to employees") or funding associations. They require approval in advance, which can be granted under the following conditions:

- The monetary benefit or benefit in kind is given willingly and disinterestedly without quid pro quo by the UHW or individual employees. No harm is done if the UHW points out the donor's support or expresses thanks.
- Earmarking of donations is possible, but not in favour of individual employees.
- The donation must be made and used for charitable purposes, i.e., for research and teaching, training and continuing education, or to improve healthcare and patient care; this excludes the financing of social events such as Christmas parties, company outings, entertainment, etc.

- Donations must not be related to sales transactions such as decisions regarding procurement, treatment or prescriptions.
- Non-paid allocation of a device is an in kind donation, which likewise must be approved. This applies both to gifts and loans.

If all requirements are met, upon request the UHW will provide a donation receipt.

12. Sponsoring

Companies can participate financially in the organisation of UHW trainings. Such support is possible to an appropriate degree, but must meet the following requirements:

- The professional or scientific aspect of the event must be clearly in the foreground.
- Sponsors must not have any influence on the contents of the event.
- The sponsor must not bear the cost for leisure activities or pay costs for companions.
- The sponsor must have an objective relationship to the event.
- The financial support of the sponsor must be adequately indicated (e.g., in program books, posters, websites, etc.).
- Under criminal law, the benefit must not be demanded. The potential sponsoring partner can however be made aware by way of an invitation regarding the event and the possibility of setting up an information stand.
- Selection from among multiple sponsors must be done according to objective criteria.
- The service and consideration must be in an appropriate proportion to each other (equivalency principle). The price per square meter for information stands must be the same for all exhibitors and may only differ in this regard for objective reasons (e.g., a better location).
- The sponsor and the UHW must be contractual partners.

13. Industry-funded research

Financial support of research projects by companies is explicitly desired by the Free State of Bavaria.

Nevertheless there are requirements, which when complied with exclude the suspicion of corruption to the greatest extent possible:

- The hospital administration must be consulted early regarding negotiations with companies. The contractual partner of the company is the UHW, represented by the legal department.
- The legal department and the researching department provide the greatest possible transparency through written documentation of all relevant details.
- The service and consideration must be in an appropriate proportion to each other.

- Conclusion of the contracts must not be a reward for prior procurement decisions; likewise, it must not occur with the expectation of future procurements unrelated to the project.
- For reasons of criminal law, the financial support of the research project must not be demanded.

Note also the Free State of Bavaria's third-party guidelines dated 21/10/2002 as well as the handout "Management of third-party funding at the University Hospital of Würzburg" (<http://www.verwaltung-3.intranet.uk-wuerzburg.de/abt-34-internes-und-externes-forschungsfoerdermittelmanagement/referat-341-drittmit-telangelegenheiten/bewirtschaftung-von-a-z.html>).

14. Collaboration with hospitals and practitioners

Collaborations with external hospitals and practitioners to promote optimised patient care are reasonable and appropriate. In all types of collaboration, the principle of appropriateness must be taken into account, according to which the service and the compensation must be proportionate. Based on legal requirements, promising or granting fees or other benefits for the assignment of patients is explicitly forbidden. It must be ensured for the patients that irrelevant incentives do not lead to the UHW's recommendation; this would be an impermissible interference with the patient's right to freedom of choice of a physician.

IV. Other

15. Awarding orders, procurement

Decisions regarding awarding orders or procurement of goods and services must not be influenced by irrelevant considerations. For this reason, the UHW observes the principle of central procurement. According to this principle, only explicitly authorised departments may assign orders or purchase goods and services. If an unauthorised person places an order, they must bear the costs for the procured good or service, possibly even personally.

The corresponding statutory provisions regarding procurement law and the procurement rules of the University Hospital of Würzburg must be strictly observed.

16. Mediation of third-party services to patients

Hospital treatment is also often coupled to external services. This includes for example physicians providing follow-up care, physical therapists, nursing services, pharmacies, medical supply stores, home care providers, etc.

Patients frequently ask for a recommendation. There are the following options:

- There are providers of the service, centrally selected by the UHW.
- The patient receives a pre-prepared, alphabetically sorted list of relevant providers in the local area for their own selection.

Recommendations beyond this could raise suspicion of corruption and are therefore to be avoided.

17. Companies' cost-free instructional events

The use of current medical devices frequently assumes specific knowledge. The manufacturers therefore frequently offer trainings, instructional events or continuing education events regarding their products. The following should be noted:

- It is unproblematic if these services were already arranged during procurement. For new medical devices, insofar as possible, the UHW therefore arranges with the manufacturers for such trainings to be cost-free.
- In individual cases, insofar as medical devices were procured without such an agreement, user trainings must be paid for.

Providers of such trainings, instructional events or continuing education events must be referred to the relevant procurement department (see point 2.2 of the procurement rules).

18. Advertising

The UHW generally does not advertise for external partners. Likewise, external partners are generally not allowed to use the UHW as a reference hospital for their own advertising purposes or to use the logo. Exceptions to these rules are approved by the hospital management board or a delegated person/department.

19. Job shadowing

Job shadowing by pharmaceutical representatives or other representatives from the pharmaceutical or medical technology industries in clinics, e.g., in order to gain insight into everyday clinical life, should be reluctantly approved in view of possible compliance concerns. Interns may only accompany and observe daily clinical life, but must not take an active part themselves, because this would nullify their status as an intern.

Remuneration for the internship must correspond to the equivalence principle based on the Medical Fee Schedule for Physicians (GOÄ).

V. Coming into effect

This guideline comes into effect upon being signed.

Würzburg, 13 December 2018

[SIGNATURE]

Prof. Dr. Georg Ertl
Medical Director

[SIGNATURE]

Anja Simon
Commercial Director

Appendix

Monetary gifts and gifts in kind from patients

Under the following conditions, monetary gifts and gifts in kind from patients can be accepted without separate approval:

- A gift from a patient to an employee can be worth up to 25 Euro per inpatient stay.
- The value of the benefits given by a patient to an employee must not exceed 100 Euro per calendar year.
- Gifts from relatives of the patient must be included in the comparison to the maximum limits.
- The benefit must not be accepted until the date the patient is discharged at the soonest.
- Accepting gifts for distribution to other employees or “for the station” is possible.

Even if no reporting or subsequent approval is required within the above limits, for which one would have to provide documentation, it is nevertheless recommended in one’s own interest to note the benefits in writing, e.g.,

Patient Edward Example

20.01.17: Bottle of wine	19 Euro
03.04.17: Own portion of monetary gift	11 Euro
13.06.17: Gift basket from his wife	25 Euro
	= 55 Euro (and thus less than 100 Euro)

Permissible

On his date of discharge, a patient gives a nursing staff member a 20 Euro tip, and another 20 Euro in the context of another inpatient stay.

One patient gives 60 Euro for the entire station. This is permissible, because the sum is distributed to all employees from the station - assuming the recipient only retains his own portion.

Impermissible

The patient gives the treating physician a bottle of wine worth 19 Euro. On the same day, the patient’s spouse gives the same physician a gift basket worth 23 Euro.

Over the course of one year, the patient already gave a nursing staff member gifts worth a total of 120 Euro. Because the nursing staff member tells the patient the next time that she cannot accept anything more, the patient nevertheless hands her a gift, saying, “Then just give it to your spouse”.

Contact person:

In the event of questions regarding monetary gifts and gifts in kind from patients as well as for approvals for benefits that exceed the given limits, please contact business area 2 - Human Resources.

Gifts in kind and hospitality from industry

Under the following conditions, **gifts in kind** from companies can be accepted without separate approval:

- Gifts in kind from companies may be worth up to 25 Euro.
- The value of the gifts in kind from a company to an employee must not exceed 100 Euro per calendar year.
- Gifts from various representatives of a company or from closely associated companies must be summed.
- The gift must not have to do with tickets for cultural, recreational or sports events or other leisure activities.

The following rules apply to **entertainment**:

- The total cost for entertainment on a single occasion must not exceed 60 Euro.
- The total value of entertainment for which a company pays on multiple occasions may be up to 240 Euro. Entertainment provided by various representatives of a company or by closely associated companies is to be summed; gifts in kind (see above) are included in the 240 Euro.
- Each entertainment occasion must have a business purpose, e.g., discussion of technical or collaboration issues between the UHW and the company, a joint research project, etc.
- Costs for companions must not be assumed.

Even if no reporting or subsequent approval is required within the above limits, for which one would have to provide documentation, it is nevertheless recommended in one's own interest to note the benefits in writing, e.g.,

"Pharma" company

16.02.17: Ballpoint pen from representative X	8 Euro
13.03.17: Dining out with representative X	32 Euro
09.05.17: USB stick from representative Y	5 Euro
30.06.17: Buffet at pharmaceutical satellite symposium at convention	up to 60 Euro
21.09.17: Bar with representative Y	14 Euro
05.12.17: Entertainment at steering committee session	52 Euro
	= 171 Euro

Permissible

In March, employee E receives a promotional gift worth 20 Euro from representative A of pharmaceutical firm X. Four months later, representative B, who also works for X, gives him a USB stick worth 8 Euro.

Employee S accepts a promotional gift worth 18 Euro from representative 1 of medical device manufacturer G; two months later, she is invited to dinner worth 57 Euro by representative 2, who also works for G; in the same year she receives a special issue of a specialist journal worth 21 Euro from pharmaceutical company Z.

In September, a representative of pharmaceutical company P invites employee F to dinner worth 39 Euro, then they go to a bar and the representative pays for F's drinks in the amount of 18 Euro; the reason for the meeting is a joint research project.

One week later, F drives to a convention. In the evening he visits company P's satellite symposium regarding a new medication; a component of the symposium is a buffet worth 29 Euro per participant.

Employee E drives to a scientific conference. She participates in an expert forum regarding her speciality, which is hosted by a medical device manufacturer and includes entertainment.

She need not inquire about the exact value of the entertainment, because, due to their own guidelines, nearly all companies in the medical field may only give invitations to entertainment that does not exceed 60 Euro in value.

Impermissible

Employee N is invited by representative A for dinner worth 84 Euro. (At most, an invitation worth 60 Euro would be permissible; i.e., N would need to pay 24 Euro herself.)

Representative C invites employee R to go golfing and pays the fees (45 Euro).

Medical device manufacturer Y invites employee M and her husband, who doesn't work for the UHW, for dinner worth 57 Euro apiece. (It would have been permissible if her husband had paid for his own dinner. Whether a public prosecutor could be convinced that the entertainment was business-related despite the husband's participation is questionable.)

Contact person:

In the event of questions regarding gifts in kind and entertainment paid for by companies as well as for approvals for benefits that exceed the given limits, please contact business area 2 - Human Resources.

Participation in conventions, continuing education, etc.

Assumption of costs by companies for participation in scientific conferences, continuing education events and informational events, etc. is possible in principle, but requires advance approval by the UHW.

For instructional events, e.g., product trainings, see No. 17 of the guideline.

For active participation (e.g., a lecture, poster presentation, moderation, etc.) for which additional compensation is paid, the rules for ancillary activities apply (see No. 10 of the guideline).

The conditions for approval are:

- The purpose of participating is to impart or acquire knowledge and experience that are in the interests of the UHW.
- The only costs that may be assumed are for travel to and from the event, conference fees and hotel fees (including hotel breakfast).
- The costs must not exceed an appropriate amount. The basis for this is the Bavarian Travel Costs Act (BayRKG).
- The scientific and/or official aspect must always be clearly in the foreground; therefore there is the obligation to attend. Related stays for private purposes are possible, but must only be chronologically subordinate (in principle not more than 30% of the total absence) insofar as the costs of travel there and back are paid by a company.
- Assumption of costs for companions such as a spouse is excluded.
- The application must precisely quantify all of the costs to be assumed. Lump sums cannot be approved.
- Participation in more than two events per year with financial support from the same company is not allowed.
- Ancillary activities that are chronologically associated with sponsored conventions, continuing education, etc., cannot be approved. Interruption of business trips to perform ancillary activities is not allowed.

Permissible

With financial support from medical device manufacturer S, radiologist R drives to the Deutscher Röntgenkongress (German X-Ray Convention) in Leipzig, which lasts from Wednesday through Saturday, and gains knowledge there which is helpful for her work at the UHW. S pays for the trip there and back, the convention fees and the hotel stay in accordance with the Bavarian Travel Costs Act (BayRKG).

R prolongs her stay in Leipzig at her own cost and does not drive back until Sunday evening.

Employee C spends two weeks on holiday in Spain at his own cost. Immediately thereafter, he drives to a three-day convention in Barcelona; his participation is in the UHW's interests. Pharmaceutical company P pays for the convention fees and the hotel stay. (It would not be permissible if P additionally paid for the travel costs.)

Employee V participates in a scientific conference. Pharmaceutical company P pays for the travel costs and conference fees.

At the periphery of the conference, company F hosts a company workshop at the end of which the participants can partake from a buffet (value per participant approx. 40 Euro). V can attend the workshop, provided the annual upper limit for entertainment paid for by F does not exceed a value of 240 Euro (see No. 8 of the Anticorruption Guideline).

Every year, a surgeon drives to the convention of the Deutsche Gesellschaft for Chirurgie (the German Surgical Society) and also to the annual conference of the Vereinigung Mittelrheinischer Chirurgen (Middle Rhein Surgeons' Association). At all events, he is financially supported by the same medical device manufacturer. Due to variations in scheduling, sometimes three events take place within twelve months. Approval is nevertheless possible provided the other requirements are met, because the Anticorruption Guideline targets the calendar year.

Pharmaceutical company P provides 500 Euro to the UHW as financial support so that an employee can participate in a continuing education event. The remaining costs, according to P's thinking, are to be borne by the UHW.

Impermissible

Employee E attends a scientific conference in Berlin with financial support from company C. Her participation is in the interests of the UHW. C pays appropriate travel costs as well as the hotel stay in accordance with the Bavarian Travel Costs Act (BayRKG).

As an ancillary activity, C asks E to give a scientific presentation at an expert forum at the periphery of the conference. (As a work task, the presentation would have been permissible. The honorarium would have been collected by the UHW and paid into a third-party account or budget account of the clinic in which E works.)

Employee E is invited to participate in a training, instructional event or continuing education event regarding a medical device at the manufacturer's expense. The cost-free nature of this training for the UHW is not part of the procurement agreement.

In this case, the training is to be paid for by the UHW (see No. 17 of the Anticorruption Guideline).

Order forms

Please apply for approval of companies assuming costs of participation in scientific conferences, continuing education events and informational events, etc. using the form, "Request for approval of benefits from third parties in accordance with § 331 StGB", which must be submitted in addition to the work travel request and/or continuing education travel request (<http://www.verwaltung-2.intranet.uk-wuerzburg.de/formulare-gb-2.html>, No. 2. Work trips and continuing education trips, business trips).

Contact person:

In the event of questions regarding participation in conventions, continuing education, etc. as well as for approval, please contact the following employees from Unit 2.2.1, Working Time Management / Travel Costs:

Elke Dümmig	201-55276	Duemmig_E@ukw.de
Maria Göpfrich	201-55176	Goepfrich_M@ukw.de
Delia Kleinmann	201-55475	Kleinmann_D@ukw.de
Hilde Krug	201-55076	Krug_H@ukw.de

Ancillary activities

Ancillary activities require approval in advance by the employer on the basis of transparency and documentation of all relevant details. Approval can only be granted if official interests are not impacted, e.g., due to the chronological scope of the ancillary activity.

The service and consideration must always be in an appropriate proportion to each other and must be trackable. For lump sum remuneration, for example, the number of hours worked must be provided.

The following maximum compensation per hour is permissible:

- 120 Euro per hour; for proven experts, the appropriate compensation may be up to 300 Euro per hour.
- The compensation is calculated based on the time for preparation, wrap-up, and the activity itself. Travel time can be compensated in an appropriate proportion to the compensation for the contractual service.
- Actual costs for accommodation, trips and participation in conventions can be reimbursed to an appropriate extent (see No. 9 of the anticorruption guideline) in addition to the honorarium.

Ancillary activities are completely incompatible with tasks as an employee. A contract cannot separately compensate an employee for ancillary activity that is already a task as an employee. This applies in particular to all activities within a study / research at the UHW, e.g., as a consultant, advisor, director of a clinical study, study director, clinical investigator (CI), member of the steering committee, etc. until final conclusion of the study / research. Application observations also cannot be accepted as ancillary activity. The same applies to presentations at continuing education events of the UHW, even if a company pays the compensation.

Ancillary activities cannot be performed during working hours. Based on the principle of separation – even if the costs for this are assumed by a third party – travel as an employee cannot be interrupted or extended to perform ancillary activities.

Per calendar year, compensation for ancillary activities on behalf of companies that are in a business relationship with the UHW should generally not exceed 30% of the employee's annual compensation as a full-time employee.

Forms

The forms for reporting and the request for approval of an ancillary activity can be found on the intranet at <http://www.verwaltung-2.intranet.uk-wuerzburg.de/formulare-gb-2.html>, No. 6, Ancillary Activities. There you will also find an information sheet regarding the other requirements for approval of ancillary activities.

Contact person:

In the event of questions regarding ancillary activities as well as for approvals, please consult the employees from department 2.1, Human Resources.