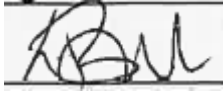



# SOP 33: Due Diligence

<b>SOP reference:</b>	SOP 33	
<b>Version:</b>	2.0	
<b>Authors:</b>	Lauren Bull	
<b>Approved by Trust Senior Responsible Officer for R&amp;I:</b>	Noel Peters	
	30/06/2026	
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IT IS THE RESPONSIBILITY OF ALL USERS OF THIS SOP TO ENSURE THAT THE CORRECT VERSION IS BEING USED

All staff should regularly check the Research & Innovation Webpage for information relating to the implementation of new or revised versions. Staff must ensure that they are adequately trained in the new procedure and must make sure that all copies of superseded version are promptly withdrawn from use unless notified otherwise by the SOP Controller.

The definitive version of all Gloucestershire Hospitals NHS Foundation Trust SOPs appear online. If you are reading this in printed form, check that the version number and date below is the most recent one as shown on the R&D website:

<https://www.gloshospitals.nhs.uk/about-us/research-our-hospitals>

The Gloucestershire Hospitals NHS Foundation Trust wishes to acknowledge York Hospitals NHS Foundation Trust and University Hospitals Bristol NHS Foundation Trust who gave permission to use their templates in the development of these SOPs.

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## Version History Log

This area will be updated with details of all changes made to the SOP whether due for full review or not.

Version	Details of Change	Date Implemented
1.0	Original SOP	01/10/2024
2.0	Updating process due to change in innovation and to link with new Innovation SOP 39	04/08/2026

This SOP will be reviewed every three years unless changes to any relevant legislation require otherwise

### Related Documents:

#### SOPs

SOP 39: Identifying and Approving Innovation Projects

#### Guidelines

## Glossary

<b>DD</b>	Due Diligence
<b>GHNHSFT</b>	Gloucestershire Hospitals NHS Foundation Trust
<b>GARII</b>	Gloucester Advanced Research Innovation Institute
<b>RIG</b>	Research and Innovation
<b>GIG</b>	GARII Innovation Group
<b>MHRA</b>	Medicines and Healthcare products Regulatory Agency
<b>GOG</b>	Governance and Oversight Group
<b>HOS</b>	Heads of Service

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## **1. Introduction, Background and Purpose**

This SOP describes the process to be followed within the Research, Innovation and Genomics (RIG) Department to complete the Due Diligence (DD) process for Innovation projects. Due diligence must be conducted for any new external company or organisation RIG plan to engage with, or for any existing partners or vendors, if there are significant changes in their operations, ownership, or financial status.

Due diligence is a comprehensive and structured investigation, undertaken to evaluate and verify the accuracy of information regarding a company or organisation, before making a decision, or entering into an agreement. It involves a thorough assessment of the relevant aspects of a subject, including financial, legal, operational, and strategic factors, to identify any potential risks or opportunities.

Adherence to this SOP ensures that all necessary checks are performed to mitigate risks and make informed decisions, thereby safeguarding the interests of the RIG department and Trust.

## **2. Who should use this SOP?**

Staff members within Gloucestershire Hospitals NHS Foundation Trust (GHNHSFT) RIG Department working on Innovation projects will follow this SOP. The team should liaise with the Trust patent lawyer, or legal experts as required.

## **3. When should this SOP be used?**

This SOP is applicable, in the following circumstances:

- New partnerships – as soon as discussions with a new company or organisation as a potential partner, collaborator or vendor begin and prior to entering any form of strategic alliance.

- Contracting – when contracting with vendors, suppliers or service providers, ensuring all due diligence activities are completed and approved before any binding commitments are made or any contracts/agreements are finalised.
- Investment and funding – evaluation of potential funding recipients or projects requiring GHNHSFT support with identifying funding streams.
- Mergers and Acquisitions - assessing viability and risks of acquiring, merging with, or making significant investments with, another entity. Including merger or acquisition that has, or may occur to an existing partner.

The due diligence process should be initially completed by members of the Research Project Support team and documented at the timepoint as detailed in SOP 39

## **4. Due Diligence Process**

### **4.1 Key considerations**

The due diligence review should cover the following key aspects, as per the Checklist (Appendix 2). It is important to note that this list is not exhaustive and the reviewer can add any other relevant information during the process:

1. Management/Company structure: Detail the company structure for coherence and logic from details held at UK Companies House, or equivalent body if an international organisation. Review management qualifications and strategic direction, noting any discrepancies.
2. Financial Transparency: Check the availability and detail of financial records, found at Companies House, or equivalent. Detail any revenue streams, asset holdings, and investment profiles.
3. Company Directors: Ensure all directors within the company/entity are listed on Companies House (or equivalent) to enable checks and verification of their history.

4. Intellectual Property: Confirm if patents are public and pending, or if the technology has been featured in publications. Absence can indicate reluctance for public scrutiny. Liaise with patent lawyer as required.
5. Values: Do the ethical standards and values of the potential partner align with those of GHNHSFT?
6. Reputation: Investigate the operational status of previous companies they have been involved with. Assess the company's standing as an employer, consider employer awards (e.g. 'Best place to work') and review sites (e.g. Glassdoor). Treat awards with scepticism and verify their authenticity – have they been awarded by formal bodies with long term history?
7. Public Perception: Check for any directors who have been struck off or have outstanding objections, which could indicate financial liabilities. Review and detail press coverage, social media presence, and professional profiles on platforms such as LinkedIn and X (formally known as Twitter.)
8. Legal: Note directors holding multiple concurrent company registrations and assess for legitimacy. Detail any outstanding legal disputes, HR issues, or patent infringements found. Review on Companies House, or equivalent for international organisations, and request a confirmation from the partners on any outstanding matters.
9. Approvals: For all healthcare IT, check DTAC. For Medical devices -Verify CE Mark certification, Class and intended use for electronic and electrical safety standards. For software, verify that DCB0129 safety documentation is available. For software as a medical device (including AI), verify CE mark certification. Class and intended use. For Medications -Check for MHRA (Medical Approvals). For and understand the implications if not acquired.

Once the DD information has been collected by the project support team it will be sent to the members of GIG to review and raise any concerns in the next meeting. Approval will then be needed from GOG and HOS before proceeding with the planned partnership.

## Appendix 1: Useful Links/sites

DTAC:

[Digital Technology Assessment Criteria \(DTAC\): guidance for buyers and suppliers - Key tools and information - NHS Transformation Directorate](#)

DCB 0129:

[Step by step guidance - NHS England Digital](#)

Companies House:

<https://www.gov.uk/government/organisations/companies-house>

Glassdoor:

<https://www.glassdoor.co.uk/index.htm>


LinkedIn:

[www.linkedin.com](http://www.linkedin.com)

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## Appendix 2: Due Diligence template

Document template can be found here: [Due Diligence template](#)  
 or contact RIG ([ghn-tr.commercialadmin@nhs.net](mailto:ghn-tr.commercialadmin@nhs.net)) for a copy.

		
<b>COMMERCIAL AND IN CONFIDENCE</b>		
<h3>Due Diligence – Risk Assessment</h3>		
<b>Company Name:</b>		
<b>Date Due Diligence Checklist completed</b>	<b>By:</b>	
	<b>Date:</b>	
Criteria	RAG Rating	Comments
Management /company structure		
Financial		
Company Directors		
Intellectual Property		
Values		
Reputation – as employer / awards		
Public perception		
Legal		
Approvals		
1		



COMMERCIAL AND IN CONFIDENCE

CONCLUSION		
	RAG Rating	Comments
OVERALL RATING		

Sign off by Trust Senior Responsible Officer for R&I:	Name:
	Signed:
	Date