



**Dorset  
Clinical Commissioning Group**

NHS Dorset Clinical Commissioning Group:

# Standards of Business Conduct

Incorporating Conflicts of interest Policy



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## 1. Introduction

- 1.1 This policy describes the public service values, which underpin the work of the NHS and to reflect current guidance and best practice to which all individuals within NHS Dorset Clinical Commissioning Group (CCG) must have regard in their work for the CCG.
- 1.2 The CCG aspires to the highest standards of corporate behaviour and responsibility. All CCG staff are required to comply with this policy.
- 1.3 The Code of Conduct and Code of Accountability in the NHS (second revision July 2004) sets out the following three public service values which are central to the work of the CCG:
  - Accountability - everything done by those who work in the NHS must be able to stand the test of parliamentary scrutiny, public judgements on propriety and professional codes of conduct.
  - Probity - there should be an absolute standard of honesty in dealing with the assets of the NHS: integrity should be the hallmark of all personal conduct in decisions affecting patients, officers and members and suppliers, and in the use of information acquired in the course of NHS duties.
  - Openness - there should be sufficient transparency about NHS activities to promote confidence between the CCG and its staff, patients and the public.
- 1.4 In addition, all individuals within the CCG must abide by the Seven Principles of Public Life as set out by the Committee on Standards in Public Life and set out at Appendix A of this policy [and the NHS Clinical Commissioners, Royal College of General Practitioners and British Medical Association – Shared Principles on Conflicts of Interest when CCGs are commissioning from member practices.](#)

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## 2. Scope of policy

- 2.1 This policy applies to:
  - CCG Governing Body Members;
  - CCG Non Governing Body Lay Members;
  - CCG GPs;
  - CCG employees (whether their remit is clinical or corporate);
  - Committee Members;
  - Third parties acting on behalf of the CCG under a contract;
  - Agency staff engaged by the CCG; and secondees  
(All referred to collectively in this policy as “CCG Staff” or “staff”) and
  - CCG Member Practices.

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### **3. Prevention of corruption**

3.1 The CCG has a responsibility to ensure that all CCG staff are made aware of their duties and responsibilities arising from the Bribery Act 2010. Under this Act there are four offences:

- Offering, promising or giving a bribe to another person (section 1);
- Requesting, agreeing to receive, or accepting a bribe (section 2);
- Bribing, or offering to bribe, a foreign public official (section 6);
- Failing to prevent bribery (section 7).

3.2 All CCG staff must be aware of the Bribery Act 2010 and should also refer below for further guidance in relation to this.

### **4. Raising concerns**

4.1. It is the duty of every member of staff to speak up about genuine concerns in relation to criminal activity, breach of a legal obligation (including negligence, breach of contract or breach of administrative law), miscarriage of justice, danger to health and safety or the environment, and the cover up of any of these in the workplace. The CCG has developed a whistle-blowing policy setting out the arrangements for raising and handling staff concerns. The procedure for reporting specific concerns relating to fraud bribery or corruption are described in paragraph five.

### **5. Counter fraud measures**

5.1 All CCG staff must not to use their position to gain financial advantage.

5.2 The CCG encourages staff with concerns or reasonably held suspicions about potentially fraudulent activity or practice, bribery and corruption to report these. CCG staff should immediately inform the Local Counter Fraud Specialist who will inform the Chief Financial Officer, unless the Chief Finance Officer is implicated. If that is the case, he will report it to the Chair or Chief Officer, who will decide on the action to be taken.

5.3 CCG staff can also call the NHS Fraud and Corruption Reporting Line on free phone 0800 028 40 60. This provides an easily accessible and confidential route for the reporting of genuine suspicions of fraud within or affecting the NHS. All calls are dealt with by experienced trained staff and any caller who wishes to remain anonymous may do so.

5.4 Anonymous letters, telephone calls, etc are occasionally received from individuals who wish to raise matters of concern, but not through official channels. While the suspicions may be erroneous or unsubstantiated, they may also reflect a genuine cause for concern and should always be taken seriously. The Local Counter Fraud Specialist or Chief Financial Officer will make appropriate enquiries to establish any foundation to the suspicion that has been raised.

5.5 CCG staff should not ignore their suspicions, nor investigate themselves.

## 6. Standing orders (SOs), standing financial instructions (SFIs) and scheme of delegation (SD)

6.1 All CCG staff must carry out their duties in accordance with the CCG's Constitution, SOs, SFIs and SD (collectively referred to as the Governance Documents). The Governance Documents set out the statutory and governance framework in which the CCG operates and there is considerable overlap between the contents of this policy and the provisions of the Governance Documents. CCG staff must at all times refer to and act in accordance with the Governance Documents to ensure current CCG process is followed. In the event of doubt, CCG staff should seek advice from their line manager. In the event of any conflict arising between the details of this policy and the Governance Documents, the provisions of the Governance Documents shall prevail.

## 7. Declaration of interests

7.1 The CCG has in place principles and procedures for managing potential conflicts of interests which could be deemed or assumed to affect the decisions made by those involved in the CCG. These decisions could include awarding contracts, procurement, policy, employment and other decisions.

7.2 CCG staff should not allow their judgement or integrity to be compromised. They should be, and be seen to be, honest and objective in the exercise of their duties and should understand fully their terms of appointment, duties and responsibilities.

7.3 This section describes the CCG policy in relation to the identification and management of conflicts of interest for staff. Adherence to these provisions is mandatory in order to identify and manage current, [perceived](#) or potential conflicts which may arise between the interests of the CCG and the personal interests, associations and relationships of its staff or representative family members.

7.4 Failure to adhere to these provisions relating to the declaration of interests may constitute the criminal offence, as an individual could gain an unfair advantage or financial reward for themselves or a family member/friend or associate. Any suspicion [or knowledge](#) that a relevant personal interest may not have been declared should be reported to the CCG Governing Body Secretary, who may refer the matter to the Local Counter Fraud Office.

- [The Local Counter Fraud Officer shall ~~make a report~~ \(through the Chief Finance Officer where the matter may constitute a criminal offence and through the Director of Engagement and Development where the matter relates to a disciplinary issue\) to the Audit and Quality Committee of his findings together with a recommendation regarding any further action.](#)
- [Without prejudging the issue, the staff member concerned will not be able to participate in any decision-making meeting pending consideration of the Local](#)

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Counter Fraud Officer's report and recommendation by the Audit and Quality Committee.

- Where a contract has been entered into following one or more episodes of non-compliance with policy and procedure relating to conflicts of interest, the CCG will, where appropriate, seek independent legal counsel upon the proper course to redress any unfairness that may have occurred.
- For the avoidance of doubt, every instance relating to a breach of policy or procedure relating to conflicts of interest shall be considered by the Audit and Quality Committee who will make a determination regarding any action to address or redress the situation.

7.5 All CCG staff must declare any interest, ~~either~~ on appointment, ~~or~~ when the interest is acquired, or on a change of role or responsibility and at any meeting if that interest ~~which~~ may directly or indirectly give rise to an actual or potential conflict of interest or duty. Such interests, and potential conflicts of interest, include personal and indirect interests, and may arise through:

- financial interests (for example, where someone involved has significant shareholdings or voting rights in a company or partnership);
- decisions affecting individuals who share the interests of organisation staff – for example, family members or members of societies, clubs or other organisations;
- acceptance of hospitality from current or prospective business contacts; and acceptance of gifts.

7.6 A family member may include:

- a partner (someone who is married to, a civil partner or someone with whom the CCG staff member lives in a similar capacity);
- a parent or parent in law;
- a son or daughter or stepson or step daughter;
- the child of a partner;
- a brother or sister;
- a brother or sister of the staff member's partner;
- a grandparent and/ or a grandchild;
- an uncle or aunt;
- a nephew or niece;
- and the partners of the above.

7.7 Further examples of relevant interests for non-Governing Body member CCG staff are set out in Appendix B. If in doubt CCG staff should take advice from the Governing Body Secretary/Secretariat.

- 7.8 The CCG is required to maintain a register of interests to record formally declarations of interest of CCG Governing Body members. The declaration form set out at Appendix C should be completed by Governing Body members and sent to the Governing Body Secretary. Further guidance on the declaration of interests by CCG Governing Body members is set out in the declaration of interest policy for Governing Body members, available from the Governing Body Secretary.
- 7.9 The CCG will also maintain a register of interests declared by all other CCG staff. CCG staff (excluding Governing Body members) should complete the form set out at Appendix D to declare any relevant interests and send it to the Governing Body Secretary.
- 7.10 The CCG will also maintain a register of interests declared by all CCG Member Practices. CCG Member Practices should complete the form set out at Appendix I to declare any relevant interests and send it to the Governing Body Secretary. Relevant interests will include those of all individuals within the Member Practice who have a relationship with the CCG and who would potentially be in a position to benefit from the CCG's decisions.
- 7.11 The CCG will maintain a record of how conflicts, actual, perceived or potential have been managed, particularly in the context of specific procurement decisions.
- 7.12 In the event of any dispute relating to Conflicts of Interests and/or Declarations thereof, the matter may be referred by the CCG Chair to the Audit and Quality Committee. The Audit and Quality Committee shall hear representations from all concerned parties and make a determination which shall be binding upon all parties.
- 7.13 All Declarations of Interest made by CCG staff and Member Practices will be reviewed by the Governing Body Secretary annually and reported to the Audit and Quality Committee quarterly and annually to the Governing Body.
- 7.14 Prior to any final offer of employment or engagement being made by the CCG, the CCG will assess the materiality of any interests declared as part of the appointment process for prospective Governing Body and Committee members and required by this policy where the individual (or a family member or business partner) could benefit from any decision of the Governing Body.
- The CCG shall determine the extent of any declared interest and determine whether it is significant enough that the individual concerned would not be able to make a full and proper contribution to the Governing Body or Committee and whether that individual should therefore not become a member of the Governing Body or Committee.
  - Any individual who has a material interest in an organisation that provides or is likely to provide substantial services to the CCG (either as a provider of healthcare or commissioning support services) should not be a member of the Governing Body or Committee. ~~If~~ if the nature of their interest is such that they

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are likely to need to exclude themselves from decision making on so regular a basis that it significantly limits their ability to effectively operate as a Governing Body or Committee member.

7.15 Where all of the GPs or other Practice Representatives on a decision making body could have a material interest in a decision relating to primary medical services (or any other matter where GP Members are conflicted) the matter in question shall be referred to the Governing Body but excluding all GPs or other Practice Representatives with an interest, from the decision making process.

- Where a matter has been referred to the Governing Body as in 7.15 above, or where the decision has through other governance means been sent to the Governing Body for determination, the Governing Body shall follow the requirements of paragraph 8.4.8 to 8.4.12 of the CCG's Constitution to ensure that a valid decision can be made.

7.164 Further guidance on the management of conflicts of interest is provided in the Constitution.

7.17 A copy of all registers of Interests declared by CCG Member Practices and CCG staff together with a register of Procurement Decisions will be publically available in a prominent place on the CCG's website and may be inspected upon request at the CCG's Headquarters.

## **8. Personal conduct**

### **8.1 Lending or borrowing**

The lending or borrowing of money between staff should be avoided, whether informally or as a business, particularly where the amounts are significant.

It is a serious breach of discipline for any member of staff to use their position to place pressure on someone in a lower payband, a business contact, or a member of the public to loan them money.

### **8.2 Gambling**

No member of staff may bet or gamble when on duty or on CCG premises, with the exception of small lottery syndicates or sweepstakes related to national events such as the World Cup or Grand National among immediate colleagues.

### **8.3 Trading on official premises**

Trading on official premises is prohibited, whether for personal gain or on behalf of others. Canvassing within the office by, or on behalf of, outside bodies or firms (including non-CCG interests of staff or their relatives) is also prohibited. Trading does not include small tea or refreshment arrangements solely for staff.

#### **8.4 Collection of money**

Charitable collections must be authorised by Corporate Services. Other flag day appeals are not permitted, and collection tins or boxes must not be placed in offices. With line management agreement, collections may be made among immediate colleagues and friends to support small fundraising initiatives, such as raffle tickets and sponsored events. Permission is not required for informal collections amongst immediate colleagues on an occasion like retirement, marriage or a new job.

#### **8.5 Bankrupt or insolvent staff**

Any member of staff who becomes bankrupt or insolvent must inform their line management and Human Resources as soon as possible. Staff who are bankrupt or insolvent cannot be employed in posts that involve duties which might permit the misappropriation of public funds or involve the handling of money.

## **8.6 Arrest or conviction**

A member of staff who is arrested and refused bail or convicted of any criminal offence must inform their line management and Human Resources.

## **9. Gifts and hospitality**

- 9.1 With the exception of items of little value (less than £25) such as diaries, calendars, flowers and small tokens of appreciation (including seasonal gifts), which may be accepted, all offers of gifts should be declined. In cases of doubt, advice should be sought from your line manager. A 'gift' is defined as any item of cash or goods, or any service, which is provided for personal benefit at less than its commercial value.
- 9.2 Any personal gift of cash or cash equivalents (e.g. tokens) must be declined whatever its value.
- 9.3 CCG staff should:
- report immediately all offers of gifts of a value in excess of £25 to the Governing Body Secretary; and
  - return promptly any such gifts, with a letter politely explaining the terms of this policy and stating that you are not allowed to accept them.
- 9.4 CCG staff should exercise discretion in accepting offers of hospitality from contractors, other organisations or individuals concerned with the supply of goods or services. Modest hospitality provided in normal and reasonable circumstances during the course of working visits may be acceptable, although it should be on a similar scale to that which the CCG might offer in similar circumstances, e.g. hospitality provided at meetings, events, seminars. In cases of doubt, advice should be sought from your line manager.
- 9.5 All hospitality or gifts accepted regardless of value should be recorded in the Hospitality Register held by the Governing Body Secretary (example attached at Appendix E) as soon as is reasonably practicable. It is not necessary to record refreshments such as tea, coffee etc, or for course participants to record meals provided during a training event or seminar.
- 9.6 CCG staff should be cautious of accepting small items of value, or hospitality over that afforded in a normal meeting environment (i.e. beverages) during a procurement process or from bidders/potential bidders. This avoids any potential claim of unfair influence, collusion or canvassing.
- 9.7 Care should be taken when providing hospitality. Avoid providing hospitality at non- business locations unless there is a clear need to do so – this should be agreed in advance by a director. Any hospitality provided should be modest.

## **10. Outside employment and private practice**

- 10.1 Employees of the CCG (depending on the details of their contract as regards outside employment and private practice) are required to inform the CCG if they are engaged in or wish to engage in outside employment in addition to their work with the CCG (using the form at Appendix D). The purpose of this is to ensure that the CCG is aware of any potential conflict of interest with their CCG employment. Examples of work which might conflict with the business of the CCG include:
- employment with another NHS body;
  - employment with another organisation which might be in a position to supply goods/services to the CCG; and
  - self-employment, including private practice, in a capacity which might conflict with the work of the CCG or which might be in a position to supply goods/services to the CCG.
- 10.2 The HR team of the CCG will send an annual reminder to all CCG staff about this requirement.
- 10.3 Permission to engage in outside employment/private practice will be required and the CCG reserves the right to refuse permission where it believes a conflict will arise.

## **11. Political activities**

- 11.1 Any political activity should not identify an individual as an employee of CCG. Conferences or functions run by a party political organisation should not be attended in an official capacity, except with prior written permission from a National director.

## **12. Commercial sponsorship**

- 12.1 CCG staff may accept commercial sponsorship for courses, conferences, post/project funding, meetings and publications if they are reasonably justifiable and in accordance with the principles set out in this policy. In cases of doubt advice should be sought from your line manager. Permission (with details of the proposed sponsorship) must be obtained from the relevant director in writing in advance and a copy of this permission must be sent to the Governing Body Secretary. (See Appendix G "Application to seek permission to accept commercial sponsorship").
- 12.2 Acceptance of commercial sponsorship should not in any way compromise commissioning decisions of the CCG or be dependent on the purchase or supply of goods or services.
- 12.3 Sponsors should not have any influence over the content of an event, meeting, seminar, publication or training event.

- 12.4 The CCG should not endorse individual companies or their products. It should be made clear that the fact of sponsorship does not mean that the CCG endorses a company's products or services.
- 12.5 During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection legislation.
- 12.6 No information should be supplied to a company for their commercial gain unless there is a clear benefit to the NHS. As a general rule, information which is not in the public domain should not normally be supplied.

### **13. Suppliers and contractors**

- 13.1 All CCG staff who are in contact with suppliers and contractors (including external consultants), and in particular those who are authorised to sign purchase orders or enter into contracts for goods and services are expected to adhere to professional standards in line with those set out in the Code of Ethics of the Chartered Institute of Purchasing and Supply (Appendix F).
- 13.2 All CCG staff must treat prospective contractors or suppliers of services to the CCG equally and in a non-discriminatory way and act in a transparent manner.
- 13.3 CCG staff involved in the awarding of contracts and tender processes must take no part in a selection process if a personal interest or conflict of interest is known. Such an interest must be declared to the Governing Body Secretary using the form at Appendix C or D as soon as it becomes apparent. CCG staff should not at any time seek to give unfair advantage to any private business or other interests in the course of their duties.
- 13.4 The CCG has duties under European and UK procurement law and CCG staff must comply with Standing Financial Instructions (SFIs) in relation to all contract opportunities with the CCG.
- 13.5 CCG staff must not seek, or accept, preferential rates or benefits in kind for private transactions carried out with companies with which they have had, or may have, official dealings on behalf of the CCG. This does not apply to officers' and members' benefit schemes offered by the NHS or trade unions.
- 13.6 CCG staff invited to visit organisations to inspect equipment (e.g. software or training aids) for the purpose of advising on its purchase will be reimbursed for their travelling expenses in accordance with the travel expenses policy laid down by the CCG. Such expenses should not be claimed from other organisations to avoid compromising the purchasing decisions of the CCG.
- 13.7 Every invitation to tender to a prospective bidder for CCG business must require each bidder to give a written undertaking, not to engage in collusive tendering or other restrictive practice and not to engage in canvassing the CCG, its employees or officers concerning the contract opportunity tendered.

13.8 Offers of pro bono work from prospective bidders for CCG business should be politely refused.

## **14. Initiatives**

14.1 As a general principle any financial gain resulting from external work where use of CCG time or title is involved (eg, speaking at training events/conferences, writing articles etc) and/or which is connected with CCG business must be forwarded to the Governing Body Secretary.

14.2 Any patents, designs, trademarks or copyright resulting from the work (eg, research) of an employee of the CCG carried out as part of their employment by the CCG shall be the Intellectual Property of the CCG.

14.3 Approval from the appropriate line manager should be sought prior to entering into an obligation to undertake external work connected with the business of the CCG, eg writing articles for publication, speaking at conferences.

14.4 Where the undertaking of external work, gaining patent or copyright or the involvement in innovative work, benefits or enhances the CCG's reputation or results in financial gain for the CCG, consideration will be given to rewarding employees subject to any relevant guidance for the management of Intellectual Property in the NHS issued by the Department of Health.

## **15. Confidentiality**

15.1 Information concerning the CCG which is not in the public domain must not at any time be divulged to any unauthorised person. Similarly, patient data or personal data concerning staff must not be divulged. This duty of confidence remains after termination of employment and applies to all individuals working within CCG.

15.2 Care should be taken that neither the duty of confidentiality nor the Data Protection Act is breached inadvertently by, for instance discussing confidential matters in public places, such as whilst travelling by train, or by leaving portable IT equipment containing confidential information where it might easily be stolen, such as on full view in a parked car. Data should only be distributed using mechanisms with an appropriate level of security.

15.3 CCG staff must maintain confidentiality of information at all times, both commercial data and personal data, as defined by the Data Protection Act.

15.4 CCG staff should guard against providing information on the operations of the CCG which might provide a commercial advantage to any organisation (private or NHS) in a position to supply goods or services to the CCG. For particularly sensitive procurements/contracts CCG staff may be asked to sign a non-disclosure agreement, a copy of which can be found at Appendix H.

## 16. Management arrangements

- 16.1 CCG staff should be aware that a breach of this policy could render them liable to prosecution as well as leading to the termination of their employment or position with the CCG.
- 16.2 CCG staff who fail to disclose any relevant interests, outside employment or receipt of gifts or hospitality as required by this policy or the CCG's Governance Documents may be subject to disciplinary action which could, ultimately, result in the termination of their employment or position with the CCG.
- 16.3 The Governing Body Secretary will be responsible for maintaining the register of interests, holding the Hospitality Register and reviewing the implementation of this policy.

## 17. Complaints

- 17.1 CCG staff who wish to report suspected or known breaches of this policy should inform the Governing Body Secretary. All such notifications will be held in the strictest confidence and the person notifying the Governing Body Secretary can expect a full explanation of any decisions taken as a result of any investigation.

## 18. Further information

This policy is an interpretation of guidance and is based on examples of good practice. In addition to referring to the CCG's Governance Documents standing orders, matters reserved to the Governing Body, standing financial instructions and financial scheme of delegation. CCG staff should refer to:

- the National Health Service Act 2006 & the Health and Social Care Act 2008;
- the Code of Conduct for NHS Managers;
- the Nolan Principles on Conduct in Public Life;
- [the NHS Codes of Conduct and Accountability; \(NHS Appointments Commission & Department of Health – amended July 2004\)](#)
- [The NHS Clinical Commissioners, Roayl College of General Practitioners and British Medical Association – shared Principles on Conflicts of Interest when CCGs are commissioning from member practices.](#)
- the Code of Practice on Openness in the NHS; and
- any additional or successor guidance published by the Department of Health.

Copies of these documents will be available from the Governing Body Secretary.

This policy will be reviewed regularly, and in accordance with the following on an as and when required basis:

- legislative changes; good practice guidance; case law;
- significant incidents reported; new vulnerabilities; and
- changes to organisational infrastructure.

## Appendix A

### **The seven principles of public life set out by the Committee on Standards in Public Life (the Nolan Principles)**

#### **Selflessness**

Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

#### **Integrity**

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

#### **Objectivity**

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for awards or benefits, holders of public office should make choices on merit.

#### **Accountability**

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

#### **Openness**

Holders of public office 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 when the wider public interest clearly demands.

#### **Honesty**

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

#### **Leadership**

Holders of public office should promote and support these principles by leadership and example.

## Appendix B

### Examples of conflicts of interest for CCG staff (excluding Governing Body members)<sup>1</sup>

Scenario	Declaration of Interest Required (Y/N)	Disqualification from involvement in matter of interest appropriate?
CCG staff member (or a family member) is a director, shareholder, employee or partner of an entity which has an interest in bidding for a contract for services which is being put out to tender by the CCG.	Yes.	Yes, depending on circumstances this should be considered.
CCG staff member (or a family member) is an existing director or partner in one or more potential providers of services to the CCG	Yes - on appointment.	Yes.
CCG staff member (or a family member) holds a contract with or is a director/ shareholder/ employee of a company or party to a partnership which holds a contract with the CCG.	Yes – on appointment.	Yes

<sup>1</sup> Governing Body members should refer to the Constitution for further guidance.

## Appendix C

### CCG declaration of interests by CCG Governing Body members

Note: A Declaration of Interest must be submitted by a CCG Governing Body Member to the Governing Body Secretary on appointment as a CCG Governing Body Member, reviewed annually and also in the event that any Personal Interest or potential Personal Interest arises during the course of their involvement with the CCG.

NAME:	DESIGNATION:
NATURE OF INTEREST: (Please write none if applicable)	
Signature _____ Date: _____	

Please identify any actual or potential Personal Interest that may arise as a consequence of your role as a Governing Body member of the CCG and how you propose that these will be dealt with.

A conflict of interest shall not arise solely by virtue of a person's employment or engagement by an NHS Trust, or other NHS body (although representatives with these interests are required to disclose such relationships for information purposes only).

## Appendix D

### Specimen declaration of interest by CCG staff – for the period xx-xx

**Full name:**

**Position:**

(Nil entries are required for each item if applicable)

**Nature of interest**

**Details**

**A. Consultancies and/or direct employment:**

**B. Fee paid work**

**C. Shareholdings**

**D. Fellowships / trusteeships & membership of voluntary bodies:**

**E. Any other personal interests not covered above**

**F. Non-personal interests:**

I confirm that the information provided is a full, accurate and complete list of all my interests that require declaration to the CCG. I acknowledge that any changes in these declarations must be notified to the Governing Body Secretary as soon as they occur. I will provide the CCG with further details of any interest declared if required.

I am also aware that any hospitality received or offered must be notified to the Governing Body Secretary on the appropriate declaration form as soon as possible.

**Signed & Dated**

## Notes

**Declaring interests helps to avoid public concern that external links and relationships might unduly influence the work of the CCG. It ensures that such interests are openly and publicly declared.**

**Declaring an interest would not necessarily preclude an individual from undertaking an external activity, whether Personal or Non-Personal, but it might mean that they would not be able to take part in certain parts of a process where there could be a conflict of interest. As a result, for example, an individual may be asked to leave the room during certain parts of a meeting.**

**Examples of particular interests that should be regarded as relevant are:**

- Directorships, including Non-Executive Directorships held (by you or a family member) in private companies or PLCs;
- Ownership or part-ownership (by you or a family member) of private companies, businesses or consultancies likely or possibly seeking to do business with the CCG;
- Majority or controlling share holdings (by you or a family member) in organisations likely or possibly seeking to do business with the CCG;
- A position of authority in a charity or voluntary organization (by you or a family member) in the field of health and social care or contracting for CCG services; and
- Research funding/grants (by you or a family member) that may be received by an individual or his/her department.

**CCG Hospitality Register**

NAME	POSITION	DATE & DETAILS OF GIFT OR HOSPITALITY RECEIVED	VALUE WHERE KNOWN (OR ESTIMATED VALUE) £	SUPPLIER	REASON FOR THE GIFT/HOSPITALITY

## Appendix F

### The Chartered Institute of Purchasing and Supply (CIPS) Code of Ethics

#### Use of the code

Members of CIPS are required to uphold this code and to seek commitment to it by all those with whom they engage in their professional practice. Members are expected to encourage their organisation to adopt an ethical purchasing policy based on the principles of this code and to raise any matter of concern relating to business ethics at an appropriate level. The Institute's Royal Charter sets out a disciplinary procedure which enables the CIPS Council to investigate complaints against any of our members and, if it is found that they have breached the code, to take appropriate action. Advice on any aspect of the code is available from the CIPS.

This code was approved by the CIPS Council on 11 March 2009.

#### As a member of The Chartered Institute of Purchasing & Supply, I will:

- maintain the highest standard of integrity in all my business relationships;
- reject any business practice which might reasonably be deemed improper; never use my authority or position for my own personal gain;
- enhance the proficiency and stature of the profession by acquiring and applying knowledge in the most appropriate way;
- foster the highest standards of professional competence amongst those for whom I am responsible;
- optimise the use of resources which I have influence over for the benefit of my organisation; and
- comply with both the letter and the intent of:
  - the law of countries in which I practice;
  - agreed contractual obligations; and
  - CIPS guidance on professional practice.

## Appendix G

### Application to Seek Permission to Accept Commercial Sponsorship

Please complete the form below and then pass to the relevant Director for approval. If approval is given, send a copy of the form, once signed by the Director, to the Governing Body Secretary.

1 Detail of staff

Name

Title

E-mail

Tel-No

2 Details of proposed sponsorship, including details of proposed sponsor

Approval by relevant Director

Name

Title

Signature

Date

Any comments

Please return this form to:

Governing Body

Secretary

CCG

## Appendix H

### Non-disclosure agreement

*NHS Dorset Clinical Commissioning Group(CCG) - express requirement for confidentiality*

You have been requested to be involved in [INSERT DETAILS] (the "Project").

The CCG or other parties participating in the Project may provide you with, as part of your role in respect of the Project, access to certain confidential information relating the Project (whether before or after the date of this letter), in writing, by email, orally or by other means (including from or pursuant to discussions with any other party or which is obtained through attendance at meetings related to the Project) and trade secrets including, without limitation, technical data and know-how relating to the Project, including in particular (by way of illustration only and without limitation) [EXAMPLES] and including (but not limited to) information that you may create, develop, receive or obtain in connection with your engagement on the Project, whether or not such information (if in anything other than oral form) is marked confidential (the "Confidential Information").

Accordingly we draw to your attention that as part of your role for the CCG you are required to:

maintain the Confidential Information in the strictest confidence and not divulge any of the Confidential Information to any third party without the prior written permission of the CCG; and

not make use of, reproduce, copy, discuss, disclose or distribute the Confidential Information other than for use as part of your role in the Project.

The above obligations in respect of this Confidential Information are supplemental to any prior representation, understanding and commitment (whether oral or written) between us. The terms of this Letter can only be changed by a written document, agreed upon by both of us and signed by duly authorised persons. These provisions shall be governed and construed by English law.

Yours faithfully

For and on behalf of the  
**NHS Dorset Clinical  
Commissioning Group**

By signing this letter you agree to comply with these terms.

<b>Signed:</b>	
<b>Date:</b>	
<b>Print Name:</b>	

