

NHS Dorset Clinical Commissioning Group
Governing Body Meeting
Standards of Business Conduct

Date of the meeting	18/09/2013
Author	C Lakeman, Governing Body Secretary and General Counsel
Sponsoring GB member	T Goodson, Chief Officer
Purpose of report	To inform Members of a proposed extension to the current Standards of Business Conduct policy.
Recommendation	The Governing Body is asked to Approve: a) the revised Standards of Business Conduct document – link to document
Resource implications	Budgeted
Link to strategic principles	<ul style="list-style-type: none"> • Services designed around patients • Preventing ill health and inequalities • Sustainable healthcare services • Care closer to home
Risk assurance Impact on high level risks	The policy will reduce the risks associated with fraud and misappropriation.
Privacy impact assessment	PIA stage 1 completed. No further PIA needed.
Outcome of equality impact assessment process	None required. Policy applies to all staff regardless of protected characteristics.
Actions to address impact	N/A.
Legal implications	None.
Freedom of information	Unrestricted.
Public and patient engagement	N/A
Reason for inclusion in Part 2	N/A
Previous Committees/Governing Body	This is the first occasion the revised Policy has been seen by the Governing Body and follows a recommendation made by Internal Audit.

1. Introduction

- 1.1 Good Governance dictates that all those associated with the CCG, and in particular those employed or engaged by the CCG, should be aware of the Standards of Business Conduct expected of them in their role.
- 1.2 The CCG currently has a document entitled 'Standards of Business Conduct' which primarily focuses on Conflicts of Interest.
- 1.3 Following a recent audit report recommending a widening of the policy to incorporate gifts and hospitality and other matters related to business conduct, including Conflicts of Interest, the attached document has been drafted.

2. Report

- 2.1 The proposed Standards of Business Conduct will apply to all Governing Body staff and contractors and, additionally, will require CCG Member Practices to declare interests.
- 2.2 The policy encompasses; the requirements of the Bribery Act 2010, a duty on every member of staff to speak up about genuine concerns, addresses counter fraud measures, repeats the obligation to follow standing orders and the scheme of delegation, consolidates items relating to declarations of interest, sets out aspects of personal conduct that are unacceptable and clarifies the position regarding gifts and hospitality.
- 2.3 In addition it details the process to be followed when dealing with employment outside the CCG and employment in private practice, conduct expected of suppliers and contractors, clarifies the position on intellectual property, reinforces the duty of confidentiality and sets out the consequences for failure to comply.
- 2.4 It is written in straight forward terms that will be easily understood and is based upon a similar document produced by NHS England.

3. Conclusion

- 3.1 The Governing Body is asked to approve the policy so that staff and all those associated with the CCG are aware of their responsibilities, have a documented resource to which to refer when in doubt and enable a comprehensive record of interests to be created.

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