

## NHS DORSET CLINICAL COMMISSIONING GROUP

## GOVERNING BODY

## ANNUAL REVIEW OF DECLARATIONS OF INTEREST

<b>Date of the meeting</b>	17/03/2021
<b>Author</b>	S Lower, Corporate Office Manager
<b>Lead Director</b>	Nikki Rowland, Chief Finance Officer
<b>Purpose of Report</b>	To provide an update to the Governing Body regarding the Conflicts of Interest regime.
<b>Recommendation</b>	The Governing Body is asked to <b>note</b> the Annual Review of Declarations of Interest.

## Monitoring and Assurance Summary

<b>Conflicts of Interest</b>	<p>Managing conflicts of interest, including gifts, hospitality and sponsorship is crucial to give confidence that CCG commissioning decisions are robust, fair and transparent and in order to protect healthcare professionals and maintain public trust.</p> <p>A 'conflict of interest' is defined as 'A set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of delivering, commissioning or assuring taxpayer funded health and care services is, or could be, impaired or influenced by another interest they hold'. A conflict of interest may be actual or potential.</p> <p>The CCG's Standards of Business Conduct which incorporates the Conflicts of Interest Policy is set out under Section 7 of the <a href="#">Dorset CCG's Governance Handbook</a>.</p>
<b>Involvement and Consultation</b>	N/A
<b>Equality, Diversity and Inclusion</b>	N/A
<b>Financial and Resource Implications</b>	N/A
<b>Legal/governance</b>	Declarations of interest are required to be made by all CCG employees, Governing Body and Committee members, GPs remunerated by the CCG and CCG member practices. The CCG is required to have a system in place to satisfy itself on an annual basis that the Registers of Interest are accurate and up to date.

	Conflicts of Interest mandatory on-line training is also required to be undertaken annually by relevant CCG employees, Governing Body and Committee members, GPs remunerated by the CCG and any clinicians/individuals involved or likely to be involved in taking commissioning or procurement decisions.
<b>Risk description/rating</b>	Failure to manage the conflicts of interest regime could lead to legal challenge including the potential for criminal action in the event of fraud, bribery or corruption.

## 1. Introduction

- 1.1 The CCG's Constitution and/or Statute requires that one or more registers of the interests of members of the CCG, members of its Governing Body, members of its committees, GPs remunerated by the Governing Body and CCG employees are maintained and published on the Group's website and reviewed by the Governing Body.
- 1.2 This requirement is supplemented by the CCG's values, particularly to work honestly and openly and to be transparent.
- 1.3 I am pleased to be able to advise that following the Conflicts of Interest regime internal audit undertaken by BDO in November/December 2020, a 'substantial assurance' was provided for both the design and operational effectiveness and 'full compliance' under each of the NHSE headings.
- 1.4 The CCG will be required to report its position at the year-end in its Annual Governance Statement.

## 2. Report

- 2.1 All members of the Governing Body, its Committees, GPs remunerated by the Governing Body, staff, Member Practices, GP Principals/Directors and those individuals outside the CCG who perform a function for it are asked to declare interests that they have which do or may conflict with the interests of the CCG.
- 2.2 Compliance regarding Declarations of Interest is good; at the time of writing there are two outstanding responses due to maternity leave. All Member Practices have responded to the annual check for 2020-21.
- 2.3 Regarding the NHS England Conflicts of Interest mandatory training, all Governing Body, Committee members, paid GPs and key procurement personnel are required to complete the training on an annual basis. The completion requirement remains met for 2020-21 and is actively monitored to ensure continued compliance. Communications regarding the annual training requirement for the year 2021-22 will commence during April/May 2021.

- 2.4 Please open the attached link to review the declarations of interest made by your colleagues on the Governing Body, Committees, GPs remunerated by the Governing Body, Staff and member Practices.

<http://www.dorsetccg.nhs.uk/aboutus/declarations-of-interest.htm>.

### 3. Conclusion

- 3.1 The Governing Body is asked to **note** this report and the interests declared.

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**Date: 05/03/21**