

NHS City and Hackney Clinical Commissioning Group

Conflicts of Interest Policy

(Including Gifts, Hospitality and Sponsorship)

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| Owner: | Matthew Knell |
| Date of production: | 12/09/2017 |
| Current version number: | 1.1 |
| Agreed by Audit Committee: | 13/07/2017 |
| Agreed by Governing Body: | 25/11/2016 |
| Due for revision or renewal: | November 2018 |

| Version Number | Date produced | Author | Changes made |
|----------------|---------------|------------------|--|
| 0.1 | 29/07/2016 | Matthew Knell | First draft of document through to how to declare an interest (minus secondary employment and commercial sponsors sections). |
| 0.2 | 16/09/2016 | Jennifer Nabwogi | Second draft of document from 'How do I declare an interest?' onwards. |
| 0.3 | 11/11/2016 | Matthew Knell | Final edits before sent to RSM for comment |
| 0.9 | 16/11/2016 | Matthew Knell | Updated to take account of RSM feedback |
| 0.95 | 18/11/2016 | Matthew Knell | Updated to address Paul Haighs feedback |
| 0.99 | 21/11/2016 | Matthew Knell | Updated to accept track changes for GB approval |
| 1.0 | 25/11/2016 | Matthew Knell | Governing Body discussed and agreed policy |
| 1.1 | 12/09/2017 | Olivia Katis | Updated policy to reflect latest NHSE guidance and submitted for GB approval |

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Introduction and Background

1. All of us at NHS City and Hackney Clinical Commissioning Group (CCG) are committed to making our decisions and conducting our business in an open and transparent fashion, as detailed in our Constitution (see section 4.1.9 of that document). A clear and straight forward Conflicts of Interest Policy is vital to ensuring that everyone who works with us, whether members of staff, GP colleagues or members of the public, are aware of our approach to, and how we work with conflicts of interest in a consistent manner across our meetings and in our shared work.
2. Broadly speaking, a conflict of interest occurs where someone's ability to exercise judgement, act in a role or reach a decision is, or could be, impaired or influenced by their involvement in another role or relationship. It's important to note that we need to take anything that may possibly constitute a conflict of interest into account, no matter how insignificant it may seem. We want to be able to document and demonstrate that we are conducting ourselves to the high standards set out in our Constitution and what our local patients expect from their NHS.
3. Conflicts of interest are inevitable in commissioning, in the majority of our work and in the nature of who we work with. We want to work closely with local clinicians and the public to ensure that local services are designed specifically for patients, their friends and family and see this as a real strength of how we work. Many of these colleagues will naturally need to make a declaration of interest regarding their day job, their membership of a local organisation or that they are a patient with a local GP practice. It is how we manage these conflicts of interest that really matters and that is what this document concentrates on.
4. This document provides information on how the CCG defines and manages conflicts of interest, and the expectations and responsibilities of those who work with us to declare those interests. Actions that need to be undertaken are clearly marked in boxes.

Purpose of the conflicts of interest policy

5. This policy aims to:
 - Safeguard clinically led commissioning, whilst ensuring objective decisions;
 - Enable us to demonstrate that we are acting fairly and transparently, and in the best interests of our patients and all those involved in the delivery of healthcare services in City and Hackney;
 - Uphold confidence and trust in the NHS;
 - Support all those who work with us to understand conflicts of interest, when they may arise and how to manage them;
 - Ensure that we operate within the legal frame work;
 - Be a practical resource and toolkit for those who work with us in identifying conflicts of interest and managing them effectively.

Principles of how we work

6. We are committed to the vision, values and aims that we set out in our Constitution (see section 4 of that document) in order to establish an inclusive and representative stakeholder community. Our Governing Body (GB) sets regular leadership objectives that the CCG, and those who work with us, are expected to work towards (see section 7.7 of our Constitution). In addition to these measures, we are subject to and adhere to a range of statutory requirements and recognised frameworks which include:
 - Section 14O of the National Health Service Act 2006 (as amended by the Health and Social Care Act 2012) (“the Act”), which sets out the minimum requirements of what both NHS England (NHSE) and CCGs must do in terms of managing conflicts of interest;
 - The latest version of NHSE national guidance on Managing Conflicts of Interest, published in June 2016 (<https://www.england.nhs.uk/commissioning/wp-content/uploads/sites/12/2016/06/revsd-coi-guidance-june16.pdf>);
7. Details of further statutory and regulatory frameworks we work within may be found in Annex A at the end of this policy.
8. In addition to these frameworks, in order to support the management of conflicts of interest, we:
 - **Do business appropriately:** Conflicts of interest become much easier to identify, avoid and manage when the processes for needs assessments, consultation mechanisms, commissioning strategies and procurement procedures are right from the outset, because the rationale for all decision-making will be clear and transparent and will withstand scrutiny;
 - **Are proactive, not reactive:** We seek to identify and minimise the risk of conflicts of interest at the earliest possible opportunity;
 - **Are balanced and proportionate:** Our rules are clear and robust but not overly prescriptive or restrictive. They ensure that decision-making is transparent and fair whilst not being overly constraining, complex or cumbersome;
 - **Are transparent:** We clearly document the approach and decisions taken at every stage in the commissioning cycle so that a clear audit trail is evident;
 - **Create an environment and culture** where individuals feel supported and confident in declaring relevant information and raising any concerns.

What is a Conflict of Interest?

9. A conflict of interest is a set of circumstances that creates a risk that professional judgement or actions regarding a primary interest will be unduly influenced by a secondary interest. In our case, the primary interest is the CCG’s interests and those of local patients whom we work on behalf of.

10. Secondary interests include not only financial gain but also such motives as the desire for professional advancement and the wish to do favours for family and friends. Some secondary interests are not wrong in of themselves, but can become an issue when they are believed to have greater weight than the primary interests of the CCG.
11. The majority of conflicts of interests can be grouped into the areas below. These are not exhaustive and when declaring potential conflicts of interest, an individual should always err on the side of caution and declare anything that may fall under the definition of a possible conflict.

Financial interests

12. This is where an individual may get direct financial benefit from the consequences of a commissioning decision. This could, for example, include being:
 - A director, including a non-executive director, or senior employee in a private company or public limited company or other organisation which is doing, or which is likely, or possibly seeking to do, business with health or social care organisations;
 - A shareholder (or similar ownership interests), a partner or owner of a private or not-for-profit organisation, business, partnership or consultancy which is doing, or which is likely, or possibly seeking to do, business with health or social care organisations;
 - A management consultant for a provider.
13. This could also include an individual being:
 - In secondary employment (see section 17 of this document);
 - In receipt of secondary income from a provider;
 - In receipt of a grant from a provider;
 - In receipt of any payments (for example honoraria, one-off payments, day allowances or travel or subsistence) from a provider;
 - In receipt of research funding, including grants, that may be received by the individual or any organisation in which they have an interest or role; and
 - Having a pension that is funded by a provider (where the value of this might be affected by the success or failure of the provider).

Non-financial professional interests

14. This is where an individual may obtain a non-financial professional benefit from the consequences of a commissioning decision, such as increasing their professional reputation or status or promoting their professional career. This may, for example, include situations where the individual is:
 - An advocate for a particular group of patients;
 - A GP with special interests e.g., in dermatology, acupuncture etc;
 - A member of a particular specialist professional body;

- An advisor for the Care Quality Commission (CQC) or the National Institute for Health and Care Excellence (NICE);
- A medical researcher.

Non-financial personal interests

15. This is where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit. This could include, for example, where the individual is:

- A voluntary sector champion for a provider;
- A volunteer for a provider;
- A member of a voluntary sector board or has any other position of authority in or connection with a voluntary sector organisation;
- Suffering from a particular condition requiring individually funded treatment;
- A member of a lobby or pressure group with an interest in health.

Indirect interests

16. This is where an individual has a close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest in a commissioning decision (as those categories are described above) for example, a:

- Spouse / partner who volunteers for a provider;
- Close relative e.g., parent, grandparent, child, grandchild or sibling who works as a local GP;
- Close friend who is in receipt of a grant from a provider to the CCG;
- Business partner who holds shares in a health service provider.

Secondary employment

17. We take all reasonable steps to ensure that work colleagues, committee members, office holders, contractors and others engaged in work with us are aware of the requirement to inform us if they are employed or engaged in, or wish to be employed or engage in, any employment or consultancy work in addition to their work with us. The purpose of this is to ensure that the CCG is aware of any potential conflicts of interest and to support the health and wellbeing of our colleagues. Examples of work which might conflict with the business of the CCG, including part time, temporary and fixed term contract work, include:

- Employment with another NHS body;
- Employment with another organisation which might be in a position to supply goods/services to the CCG;
- Directorship of a GP Federation; and
- Self-employment, including private practice, in a capacity which might conflict with our work or which might be in a position to supply goods / services to us.

18. We have in place clear and robust policies to manage issues arising from secondary employment for colleagues directly employed by the CCG on permanent contracts. The CCGs employment contract with its permanent employees states:

Before undertaking any work outside the CCG, you must first obtain the written consent of your manager to do so. It is also the CCG's duty generally to monitor your working hours including hours that you work for a person, firm or employer other than the CCG. It is your responsibility to tell your manager about any work you are planning to undertake outside the CCG.

You will also need to discuss with your manager any voluntary work you are planning to undertake which might involve an actual or perceived conflict of interest.

If you hold an executive or non-executive office, public appointment or have any other personal, financial or business relationship that may impact on your role in the CCG or may affect the decisions and policies of the CCG this must also be declared in writing to your manager. Your manager will advise you as to whether such interests should be included in the CCG's Declaration of Interests Register.

Wherever possible, we will do our best to accommodate what you want to do and we will never withhold agreement without good reason.

19. In particular, it is not acceptable for pharmacy advisers or other advisers, work colleagues or consultants working with us on matters of procurement to themselves be in receipt of payments from the pharmaceutical or devices sector.
20. The CCG operates a 'Working with the Pharmaceutical Industry' policy that also provides more guidance on this area that should be referred to when appropriate.

Commercial sponsors

21. Those who work with us may, from time to time, be offered various types of commercial sponsorship including courses, conferences, meetings and publications in connection with the activities they carry out for or on our behalf or for the GP practices in City and Hackney. Any such offers (whether accepted or declined) must be declared so that they can be included on the CCG's register of interests and/or register of gifts.
22. The CCG's Corporate Services team is in position to provide colleagues with guidance on whether or not it would be appropriate to accept any such offers. Where such offers are reasonably justifiable and in accordance with this policy then they may be accepted.

How do I identify a Conflict of Interest?

23. Many Conflicts of Interest are obvious, easy to identify and describe, while others are less obvious (and potentially less impactful).
24. We ask everyone who works with us to err on the side of caution and declare any involvement, circumstance or relationship they hold that may potentially impact on the work and decisions of the CCG. We have developed a guide to the potential types of conflicts (see Annexe B) to help guide those who work with us through any potential conflicts they may have. There is also set of case studies provided by NHSE that might be helpful in providing further examples available at <https://www.england.nhs.uk/commissioning/wp-content/uploads/sites/12/2016/06/coi-case-studies-jun16.pdf>.
25. There is no harm in declaring too many interests - while the impact of a conflict not being declared can be significant and harmful for the CCG. A perception of wrongdoing, impaired judgement or undue influence can be as detrimental as any of them actually occurring. If in doubt, it is better to assume the existence of a conflict of interest and manage it appropriately rather than ignore it. For a conflict of interest to exist, financial gain is not necessary.
26. If, after reading this policy, you still need further assistance on how to identify a conflict of interest, please contact the CCG's Corporate Services team (contact details are at the end of this policy).

Who needs to make a declaration of interest?

27. We ask that declarations of interest are made by all CCG employees and colleagues, including:
- All full and part time staff of the CCG;
 - Any staff member, GP, other clinician or individual on sessional or term limited contracts with the CCG;
 - Office holders;
 - Any students and trainees (including apprentices);
 - Agency staff;
 - Seconded staff, including GPs working as Clinical Leads with the CCG.
28. In addition, we require any self-employed consultants or other individuals working for us under a contract for services to make a declaration of interest. We also ask for declarations of interest from all members and attendees of our Governing Body and all members and attendees of our Committees, sub-committees, sub-groups and Programme Boards, including:
- Co-opted members;
 - Appointed deputies;
 - Any members of Committees or Groups from other organisations.

29. GPs, practice managers or nurses, who are members of the CCG Governing Body or Committees of the CCG, should declare details of their roles and responsibilities held within their GP practices, any GP run provider organisations and other organisations that may involve a conflict of interest.
30. Where the CCG is participating in a joint committee alongside other CCGs, any interests which are declared by the committee members are recorded on the register(s) of interest of each participating CCG.
31. All members of the CCG (i.e., each GP Practice) need to ensure that key members of staff make a declaration of interests. Declarations should be made by the following groups:
 - GP partners (or where the practice is a company, each director);
 - Any individual directly involved with the business or decision-making of the CCG.
32. A declaration of interest for a “business partner” in a GP partnership should include all relevant collective interests of the partnership, and all interests of their fellow GP partners (which could be done by cross referring to the separate declarations made by those GP partners, rather than by repeating the same information verbatim).
33. Whether an interest held by another person gives rise to a conflict of interests will depend upon the nature of the relationship between that person and the individual, and the role of the individual within the CCG.

How do I declare a Conflict of Interest?

34. We aim to create an environment in which members of staff, Governing Body, Committee members, and our member practices feel able, encouraged and obliged to be open, honest and upfront about actual or potential conflicts. We would like everyone who works with us to be aware of what to do if they suspect a conflict of interest in order to ensure efficient decision making, transparency and fairness.
35. We need declarations of interest from all those individuals described in sections 27 – 33 above to be made as soon as reasonably practicable and by law, the CCG must be informed of any new interest **within 28 days** of it arising.
36. We have a declaration of interest template that is available to all colleagues (see Annex C). Once this template has been completed and submitted to the CCG’s Corporate Services team either in hard copy or electronically via email, the information from the template will be entered into the CCGs Register of Interests (see Annex D).
37. Those who work with us have the following further opportunities to make declarations of interest:

- **On appointment** – All individuals appointed to any role with the CCG, it's Governing Body or any Committees are asked to complete a declaration of interest on their first day;
- **On a six-monthly basis** – We ask that a declaration of interest be made by all individuals working with the CCG every six months and where there are no interests or changes to a previous declaration, that a “no conflicts to declare” or “no change” statement be recorded;
- **At meetings** - All attendees at our meetings are required to declare their interests, as a standing agenda item, for all relevant items at every Governing Body, Committee, sub-committee or working group meeting. This is required even if an interest has been recorded in the register of interests - it should still be explicitly declared in meetings where matters relating to that interest are discussed;
- **On changing role, responsibility or circumstances** - Whenever an individual's role, responsibility or circumstances change in a way that affects the individual's interests (e.g., where an individual takes on a new role outside the CCG or enters into a new business or relationship), a declaration should be made to reflect the change in circumstances as soon as possible, and in any event within 28 days. This could involve a conflict of interest ceasing to exist or a new one materialising.

38. All individuals who work with us should take personal responsibility to record all conflicts as soon as they become aware of them. Whilst individuals have a responsibility to register their own conflicts, we also expect individuals to recognise their personal duty of candour in raising any perceived conflicts of other individuals, in order to ensure that transparency and openness is maintained. The Conflicts of Interest Guardian is a safe point of contact for members of staff and everyone who works with us to raise any concerns. See sections 49 to 53 and 96 to 97 for further details.
39. We are keen to maintain a culture of openness and support to all colleagues and those who work with us and as such, want to uphold a culture where individuals can raise concerns and believe this supports the overarching requirement that where there is any doubt about the existence of a conflict, it is better to raise it so a declaration can be recorded. This supports our Whistleblowing Policy and Constitutional statements about our ethos of encouraging our staff and members to feel confident in speaking out over any concerns they may have.
40. We aim to provide clear guidance to members of staff, Governing Body and Committee members and everyone we work with as to what might constitute a conflict of interest, providing examples that may arise. A range of conflicts of interest case studies can be found at <https://www.england.nhs.uk/commissioning/wp-content/uploads/sites/12/2016/06/coi-case-studies-jun16.pdf>

The CCG Corporate Services team provide every new starter or newly appointed individual who will be working with the CCG with a declaration of interest form (See Annex C) as part of their contract and induction pack. This form needs to be completed and returned, preferably via email back to the Corporate Services team (See contact details at end of this policy) within 28 days of issue.

The CCG Corporate Services team require all staff and colleagues who work with the CCG to keep the team up to date and informed of any changes in role, circumstance or responsibilities that arise and might constitute a conflict of interest. The CCG's standard employment contract and contract for service contain clauses requiring this information to be disclosed. By law, the CCG must be informed of any new interest within 28 days of it arising.

The CCG Corporate Services team work with colleagues across the organisation and with partners to maintain an up to date contact list for all CCG bodies and Committees on a three monthly basis. It is useful to inform the team of any changes as soon as possible in order that the Register of Interests and contact lists are as up to date as possible at all times.

A Corporate Calendar of all regular CCG meetings is available from the Corporate Services team, which details memberships and contact details for all attendees, these details are used by the team in the six monthly reviews and are important to be kept up to date.

The CCG Corporate Services team conduct a review exercise every six months (in April and October) of the Register of Interests and circulate each individuals declared interests to those working with the CCG, or covered by the Register. We ask those individuals to check their interests and respond to the Corporate Services team confirming that they are still correct, or that they complete a new declaration of interest's template to detail any new interests that may have arisen. We require these responses within 28 days of issue.

How does the CCG keep its Register of Interests?

41. The CCG maintains a Register of Interests available from the Corporate Services team and also available on its public website at <http://www.cityandhackneyccg.nhs.uk/about-us/register-of-interests.htm>. The Register is populated by the Corporate Services team with the information from each

declaration of interest form within five working days of that declaration being received.

42. The Register of Interests contains the following information:

- Name of the person declaring the interest;
- Date that the declaration is being made;
- Position within, or relationship with, the CCG;
- Job title(s);
- Type of interest - financial interest, non-financial professional interest, non-financial personal interests, indirect interest or other;
- Description of interest, including for indirect interests details of the relationship with the person who has the interest;
- The dates from which the interest relates;
- The agreed actions to be taken to mitigate any risk for the CCG with the individual's line manager or a senior manager within the CCG;
- Memberships of CCG regular meetings, bodies and Committees.

43. The Register of Interests is updated on the CCGs public website on a monthly basis on, or as close to the first of the month as possible, with the date of publication clearly indicated.

44. All declared interests remain on the Register of Interests for a minimum of six months after the interest has expired. Monthly iterations of the Register of Interests are archived and saved for a minimum of six years after the date on which it expired. These archived Registers of Interest are available via the CCGs public website in addition to the current version.

45. The Register of Interests is designed to cover the entire CCG, with columns covering the information detailed above and additional columns to allow for filtering to indicate memberships of CCG meetings, bodies and Committees. This allows a single declaration of interest to be applied to multiple meetings, with the Register then being filterable by meeting membership.

The CCG Corporate Services team transfer Declarations of Interest into the Register of Interest within five days of receipt.

The CCG Corporate Services team arrange for the publication of the Register of Interests on a monthly basis on the 1st of the month on the CCGs website. Older versions of the Register are archived and also available on the website.

How does the CCG manage Conflicts of Interest?

46. Everyone in the CCG has responsibility to appropriately manage conflicts of interest. Certain individuals, within the CCG, have specific responsibilities in relation to Conflicts of Interest.

Appointment of Governing Body members, Committee members and senior members of staff

47. On appointing Governing Body members, Committee members and senior staff, we consider, on a case by case basis, whether conflicts of interest could exclude individuals from being appointed to the relevant role.

Lay Members

48. Lay members play a critical role in our work, providing scrutiny, challenge and an independent voice in support of robust decision-making and the effective management of conflicts of interest. They chair a number of our Committees. We currently have three Lay Members and two Associate Lay Members, with one of the Lay Members taking on the role of Conflicts of Interest Guardian.

Conflicts of Interest Guardian

49. Our CCG Audit Chair is also the CCG's Conflicts of Interest Guardian in order to further strengthen scrutiny and transparency of our decision making. This role is supported by the CCG's Head of Corporate Services.

50. The Conflicts of Interest Guardian, supported by the Head of Corporate Services:

- Acts as conduit for GP practice staff, members of the public and healthcare professionals who have any concerns with regard to conflicts of interest;
- Is a safe point of contact for members of staff and everyone who works with us to raise any concerns in relation to this policy;
- Supports the rigorous application of conflict of interest principles and policies;
- Provides independent advice and judgement where there is any doubt about how to apply conflicts of interest policies and principles in an individual situation;
- Provides advice on minimising the risks of conflicts of interest.

51. The Conflicts of Interest Guardian will not serve as either the Chair or Vice Chair of the Local GP Provider Contracts Committee or Primary Care Commissioning Committee, but may hold a membership on that Committee of the CCG, as long as that role does not compromise their duties as Conflicts of Interest Guardian.

52. The Conflicts of Interest Guardian will be asked to assure NHS England, on an annual basis that the CCG has had due regard to statutory guidance on managing conflicts of interest and that the CCG has implemented and maintained sufficient safeguards for the commissioning of primary care.

53. Executive members of our Governing Body have an ongoing responsibility to ensure the robust management of conflicts of interest, and everyone who works with us has an ongoing individual responsibility to help us to manage conflicts of interest effectively.

Mitigating and working with Conflicts of Interest

54. The CCG takes a variety of steps to either address or mitigate all conflicts of interest that colleagues hold. The steps taken depend on the conflict in question and the nature of the work or decision that it applies to. We support and enable Chairs of meetings and colleagues to best decide how to handle conflicts of interest and encourage open discussion and challenge both of conflicts themselves and how they should be addressed in our business.
55. The CCG Corporate Services team do make general recommendations on how to handle each conflict recorded in the Register of Interest, drawn from the following selection of 'default' actions that can be taken. These are recommendations only, and it is up to the Chair of each CCG meeting, Board or Committee to either accept this recommendation, or to make their own judgement.
56. Possible 'default actions' taken to address or mitigate conflicts of interest include:
- a. Requiring the individual who has a conflict of interest (including the Chair or Vice Chair if necessary) not to attend the meeting in totality;
 - b. Asking the individual to leave the room when the relevant matter is being discussed and when any decisions are being taken in relation to that matter. In private meetings, this could include requiring the individual to leave the room and in public meetings to either leave the room or join the audience in the public gallery;
 - c. Allowing the individual to participate in some or all of the discussion when the relevant matter is being discussed but asking them to leave the meeting when the decisions are being taken in relation to that matter. In private meetings, this could include requiring the individual to leave the room and in public meetings to either leave the room or join the audience in the public gallery. This course of action may be appropriate where, for example, the conflicted member has relevant knowledge and experience on the matter under discussion which would benefit the meeting;
 - d. Noting the interest and ensuring that all attendees are aware of the nature and extent of the interest, but allowing the individual to remain and participate in both the discussion and any decisions taken. This course of action will be appropriate where it has been decided that the interest declared is either immaterial or not relevant to the matters under discussion;
 - e. In relation to private meetings (ie where meeting papers are not available publically), ensuring that the individual concerned does not receive the supporting papers or minutes of the meeting which relate to the matter(s) which give rise to the conflict.

How do I manage Conflicts of Interest in CCG meetings?

57. Every CCG meeting that meets to make a recommendation on, or decision on the CCG services is required to hold a Register of Interest. This includes:

- a. The CCG Governing Body;
- b. Clinical Executive Committee;
- c. Finance and Performance Committee;
- d. Audit Committee;
- e. Local GP Provider Contracts Committee;
- f. Primary Care Commissioning Committee;
- g. Prioritisation and Investment Committee;
- h. Safeguarding Group;
- i. GP Confederation Oversight Group;
- j. All CCG Clinical Programme Boards;
- k. All CCG Service and Performance Review Meetings;
- l. All CCG Clinical Quality Review Meetings;
- m. Other meetings as required.

58. Other CCG meetings can take a cut of the Register of Interests as required for their meetings and Terms of Reference for each regular meeting will outline their approach to Conflicts of Interest.

59. The CCGs standard Terms of Reference includes the following statement:

A declaration of interest will be completed by all members and attendees of this meeting and will be kept up to date in line with the CCG policy on Managing Conflicts of Interest. A register of interests will be brought to every meeting and included on the agenda as a matter of business.

Additionally all attendees should be reminded to look over the agenda and consider whether any topics being discussed might present an area of interest. This means an item where a decision or recommendation made may advantage that person, their family and/or their workplace. These advantages might be financial or in another form, perhaps the ability to exert unseen influence.

Where anything on the agenda or raised in the meeting has the potential to create such a conflict, it should be raised with the Chair and the Corporate Services team. This means we can ensure that our decision, recommendations or actions can be guarded from the impact of any possible conflict attendees could have and be seen to be so. Attendees should, where possible, raise such issues before the meeting, or as soon as a potential conflict becomes apparent. This openness is important so that all can discuss how to manage decision making in a complex environment and learn together how to manage these issues well.

The CCG has agreed a principle that we will all challenge each other on areas of interest or possible conflict, recognizing that these issues can sometimes be overlooked.

The specific procedure for managing declarations and conflicts of interest in CCG meetings is set out in detail in the Conflicts of Interest Policy (sections 57 to 70). The Corporate Services team will provide support and advice on all matters relating to the identification and management of conflicts of interest.

60. Every CCG meeting should include the following statement at the top of the agenda for the meeting, which provides some helpful advice and points to consider ahead of and at the start of each meeting:

Please look over the agenda and think about which of these topics might present an area of interest for you. This means an item where a decision or recommendation made may advantage you, your family and/or your workplace. These advantages might be financial or in another form, perhaps the ability to exert unseen influence.

Where anything on the agenda has the potential to put you in such a position, or raised in the meeting along the way, you should tell us all about it. This means we can ensure that our decision, recommendations or actions can be guarded from the impact of any possible conflict you or others could have and be seen to be so. If you are unsure it is always best to raise the possibility with the chair before the meeting, or at any point during the meeting if a possible interest strikes you. This openness is important as we can all discuss how to manage decision making in a complex environment and learn together how to manage these issues well.

We are agreed that we will all challenge each other on areas of interest or possible conflict as we recognise that sometimes these issues can be overlooked.

61. The first place to check for potential conflicts of interest in a meeting is the conflicts of interest register which is included as part of the meeting papers. This register should form part of the standing items or meeting business at the opening of each meeting and is required to be acknowledged by the Chair of the meeting. This acknowledgement is also required to be minuted, along with any comments or declarations made in the meeting.
62. At the beginning of a meeting, the Chair should ask if anyone has any conflicts of interest to declare in relation to the business to be transacted at the meeting. Any interests relevant to the business of the meeting should then be declared whether or not those interests have been previously declared and indicated on the circulated Register of Interests.
63. Similarly, any new offers of gifts or hospitality (whether accepted or not) should be declared at the meeting and then entered on the CCG's register of gifts and hospitality thereafter.

64. While it's the responsibility of each individual member of the meeting to declare any relevant interests, should the Chair or any other member of the meeting be aware of any facts or circumstances which may give rise to a conflict of interests but which have not been declared then they should bring this to the attention of the Chair who will decide whether or not a conflict of interest exists and how to manage it.
65. Where the Chair has a conflict of interest in relation to one or more items of the business to be transacted at the meeting, the Vice Chair for matters involving a conflict of interest must decide how to manage the conflict. The most preferable solution is for this Vice Chair to chair all or part of the meeting, but another non-conflicted member of the meeting can fulfil this role if the Vice Chair is also conflicted.

The CCG Corporate Services team maintain a standard agenda template for CCG meetings that includes a statement on how to manage conflicts of interest within meetings and a Register of Interests standing item. This template is available as Annex E at the end of this policy

Every set of CCG meeting papers is expected to be circulated with a cut of the centrally maintained Register of Interests, filtered to cover those individuals attending the relevant meeting. This Register of Interests is a standing item at the start of each CCG meeting and requires the Chair to acknowledge the circulated Register, ask attendees for any undocumented interests and to assess and confirm whether any of the interests will impact on the business of the meeting.

Chairing arrangements and decision-making processes

66. The Chair of a meeting of the Governing Body or any of its sub committees has ultimate responsibility for deciding whether a conflict of interest exists and for taking appropriate action. In the event that the Chair of a meeting has a conflict of interest, the Vice Chair for matters involving a conflict of interest is responsible for deciding the appropriate course of action in order to manage the conflict of interest. In making such decisions, the non-conflicted members may wish to consult with the Conflicts of Interest Guardian or another member of the Governing Body.
67. It is good practice to proactively consider, with support from the CCG's Head of Corporate Services, potential conflicts of interest ahead of any CCG meeting and determining how they should be managed.
68. In order to support Chairs in their role, a register of interests is distributed in advance of every CCG meeting.

69. Two key tools are available to support CCG meeting Chairs in ensuring Conflicts of Interest are addressed – a template agenda is available for use in all meetings, with a header included setting out the attendee’s requirements to declare interests. The CCGs Register of Interests also includes default actions for the Chair to consider with regards to each possible conflict of interest. These actions are provided as guidance and it is for each meeting Chair to consider whether they should be acted on in each meeting.

Minute-taking

70. We maintain robust minutes of each meeting in order to ensure complete transparency in our decision-making processes. Minutes of our public meetings are available on our website at www.cityandhackneyccg.nhs.uk. If any conflicts of interest are declared or otherwise arise in the meeting, we record them in the minutes.

How we manage conflicts of interest throughout the Commissioning cycle

Designing service requirements

71. The way in which we design our services can either increase or decrease the extent of perceived or actual conflicts of interest. To this extent, we meet our legal duty to involve the public and patients at every stage of the commissioning cycle through our Public and Patient Involvement (service). This enables us to make transparent and credible commissioning decisions.

72. We also engage, in a fair, non-discriminatory and transparent manner, all relevant providers, especially clinicians, in confirming that the design of the service specifications will meet patient needs.

Procurement and awarding grants

73. We recognise that conflicts of interest will arise in relation to the procurement of healthcare services. We take appropriate measures to effectively prevent, identify and remedy conflicts of interest arising in the conduct of procurement procedures in order to avoid any distortion of competition and to ensure equal treatment of everyone involved in our procurement process.

74. We also comply with two procurement regimes:

- The NHS procurement regime – the NHS (Procurement, Patient Choice and Competition (No.2)) Regulations 2013: made under S75 of the 2015 Act,
- The European procurement regime – Public Contracts Regulations 2015 (PCR 2015).

75. In practice:

- The CCG does not award a contract for the provision of NHS healthcare services where conflicts, or potential conflicts, between the interests involved in commissioning such services and the interests involved in providing them affect, or appear to affect, the integrity of the award of that contract;
- We keep a record of how we manage conflicts in relation to NHS commissioning contracts we award or enter into;
- We address a range of factors when drawing up plans to commission general practice services;
- Where we engage a commissioning service unit or any third party to undertake some of the procurement activities or to manage contracts, we ensure that the commissioning service unit or the third party has robust systems to enable us to meet our duties in relation to procurement. In such instances we still make the commissioning decisions;
- We retain records of contract award decisions and other key decisions made during the procurement process for at least three years from the date of award of the contract;
- We maintain and publish, on our website, a register of procurement decisions we make.

Declarations of interests for bidders / contractors

76. As part of our procurement process, we ask bidders to declare any conflicts of interest on the standard CCG Declaration of Interests form to enable us to comply with the principles of equal treatment and transparency. If a conflict exists or it is perceived, we maintain an internal audit trail on how the conflict has been dealt with.

How does the CCG keep its Register of Procurement Decisions?

77. We maintain a register of procurement decisions taken, either for the procurement of a new service or any extension or material variation of a current contracts. The register is publicly accessible by patients and the public at our website at www.cityandhackneyccg.nhs.uk. We capture the following information on the register:

- Details of the decision;
- Who was involved in making the decision (including the name of the CCG clinical Lead, the CCG contract manager, the name of the decision making committee and the name of any other individuals with decision making responsibility);
- A summary of any conflicts of interest in relation to the decision and how we managed those conflicts while ensuring the anonymity of bidders where necessary;
- The award decision taken.

78. The Register of procurement decisions taken is updated on the CCGs public website on a monthly basis on, or as close to the first of the month as possible, with the date of publication clearly indicated.

79. Monthly iterations of the Register of procurement decisions taken are archived and saved for a minimum of three years after the date on which it expired. These archived Registers of procurement decisions taken are available via the CCGs public website in addition to the current version.

80. A template register of procurement decisions is at Annex H at the end of this policy.

How does the CCG publish its Registers?

81. All those who make a declaration of conflicts of interest or a declaration of gifts or hospitality are made aware that the registers are published and are accessible by members of the public from our website.

82. We publish the following registers on the CCG's website:

- Register of interests;
- Register of gifts and hospitality;
- Register of procurement decisions.

83. In exceptional circumstances, where the public disclosure of information could give a real risk of harm or is prohibited by law, an individual's name and/or other information may be redacted from the publicly available register. In addition, where an individual believes that substantial damage or distress may be caused by the publication of information, they are entitled to request that we don't publish that information. Such a request must be made in writing to the CCG's Conflicts of Interest Guardian who will make a decision to publish or not to publish. In all circumstances, the CCG retains a confidential unredacted register.

Register of Gifts and Hospitality

84. We maintain a register of gifts and hospitality for all those who work for or on behalf of the CCG.

85. We define a 'gift' as any offer of cash, goods, any service or similar comparable offer, which is intended for personal benefit, free of charge or at less than its commercial value.

86. All gifts of any nature should be declined, whatever their value and whether they are offered to staff, Governing Body and Committee members or to those working with the CCG, for instance as Clinical Lead GPs or Consortia Lead GPs in respect to their role with the CCG. This could include, for instance, an offer of a gift for attendance at a conference from the organiser, free travel from a pharmaceutical company or discount vouchers for attending a meeting.

87. The only exceptions to this policy to decline gifts relates to items of little financial value (less than £10) such as diaries, calendars, stationery and other gifts acquired from meetings, events or conferences, and items such as flowers and small tokens of appreciation from members of the public to staff for work well done. Gifts of this nature do not need to be declared, nor recorded on the register.
88. Gifts from non-suppliers under the value of £50 can be accepted and do not need to be declared; gifts with a value of £50 can be accepted on behalf of the organisation, but not in a personal capacity.
89. Only modest offers of hospitality [under the value of £25] provided in normal and reasonable circumstances and in line with the individuals CCG working role are acceptable, and should be on a similar scale to that which the CCG might offer in similar circumstances (e.g., tea, coffee, light refreshments at meetings). Hospitality of this nature does not need to be declared to the Corporate Services team, nor recorded on the register, unless it is offered by suppliers or contractors linked (currently or prospectively) to the CCG's commissioning business, in which case all such offers (whether or not accepted) should be declared and recorded. Hospitality between £25-£75 can be accepted but must be declared, hospitality over £75 should be refused unless senior approval is given.
90. The person to whom these offers are made should declare this to the CCG's Corporate Services team, who maintain the register of gifts and hospitality so that the offer which has been declined can be recorded on the register.

How do I declare a gift or offer of hospitality?

91. The Declaration of Gifts or Hospitality form is available as Annex F at the end of this policy. Declarations should be made using this form within 28 days of them being encountered.
92. This form should be completed and set to the Corporate Services team for inclusion on the public Register of Gifts and Hospitality.
93. The Corporate Services team can offer help and support on declaring offers of Gifts and Hospitality.

The CCG Corporate Services team conduct a review exercise every six months (in April and October) of the Register of Gifts and Hospitality, alongside the review of the Register of Interests. We ask all individuals working with the CCG to check and respond to the Corporate Services team confirming that they are still correct, or that they complete a new declaration of interest's template to detail any new interests that may have arisen. We require these responses within 28 days of issue.

The CCG requires all staff and colleagues who work with it to keep the Corporate Services team up to date and informed of any offer of a gift or hospitality. The CCGs standard employment contract and contract for service contain clauses requiring this information to be disclosed. By law, the CCG must be informed of any new offer within 28 days of it arising.

How does the CCG keep its Register of Gifts and Hospitality?

94. All hospitality or gifts declared are transferred to our register of gifts and hospitality that we maintain. The template for the register is included in Annex G. The document includes any gifts and hospitality declared in meetings. The declaration contains the following information:

- Recipient's name;
- Current position(s) held by the individual (within the CCG);
- Date of offer and/or receipt;
- Details of the gifts or hospitality;
- The estimated value of the gifts or hospitality;
- Details of the supplier/offeror (e.g. their name and the nature of their business);
- Details of previous gifts and hospitality offered or accepted by this offeror/supplier;
- Details of the officer reviewing/approving the declaration made and date;
- Whether the offer was accepted or not;
- Reasons for accepting or declining the offer.

95. The Register of Gifts and Hospitality is updated on the CCGs public website on a monthly basis on, or as close to the first of the month as possible.

96. All declared interests remain on the Register through the financial year, with monthly iterations of the Register of Interests archived and saved for a minimum of six years after the date on which it expired. These archived Registers are available via the CCGs public website in addition to the current version.

How do I raise a concern or breach of this policy?

97. It is a duty of everyone who works with us to speak up about genuine concerns in relation to this policy and to report those concerns. We ask that colleagues don't ignore suspicions or try to carry out an investigation themselves but rather speak to our Conflicts of interest Guardian or the Head of Corporate Services. Contact details are provided at the end of this policy.

98. A report may also be made by an employee of the CCG in accordance with our whistleblowing policy or by an employee of another organisation through the whistleblowing policy of their employer.

Impact of non-compliance of the conflicts of interest policy

99. We ask that everyone who works with us helps us to manage conflicts of interests effectively. Failure to comply with this policy can have serious implications for the CCG, linked organisations and any individuals concerned.

Civil implications

100. If we fail to manage conflicts of interests effectively, we could face civil challenges to decisions we make leading to potential delays in service commissioning, waste public money and damage our reputation.

Disciplinary implications

101. Individuals who should, but fail to disclose any relevant interests or who breach this policy will be subject to investigation by a three-member panel consisting of the CCG Head of Corporate Services and two Governing Body Members including the Conflicts of Interest Guardian. Where it is not appropriate for the Conflicts of Interest Guardian to serve on the investigating panel, another Lay Member of the Governing Body should serve. Where it is not appropriate for the Head of Corporate Services to serve on the investigating panel, the CCG Chief Officer should nominate a suitable alternative.

102. The panel should complete its investigation and make its recommendations to the CCG Chief Officer within four working weeks.

103. The investigatory panel may recommend:

- a. For members of staff, application of the CCG Disciplinary Procedure including, if appropriate, the process for gross misconduct;
- b. For Office Holders, termination of office following the procedures set out in the contract for service appointment letter and, where appropriate, the CCG Constitution;
- c. For secondees, termination of the secondment and notification to the seconding organisation;
- d. For interims or contractors, termination of the contract under the terms set out in the contract and notification to the relevant agency or employer.

104. While the investigation is taking place, the individual under investigation may continue to work but should not be involved in decisions regarding the use of NHS funds.

Criminal implications

105. Failure to manage conflicts of interest could also lead to criminal proceedings for such offences as fraud, bribery and corruption with adverse implications for the CCG, linked organisations and any other individuals we engage.
106. The Fraud Act 2006 created a criminal offence of fraud and defines three ways of committing it:
- Fraud by false representation;
 - Fraud by failing to disclose information; and,
 - Fraud by abuse of position.
107. Bribery is generally defined as giving or offering someone a financial or other advantage to encourage that person to perform their functions or activities. The Bribery Act 2010 introduced a corporate offence which means commercial organisations, like the CCG, will be exposed to criminal liability, punishable by an unlimited fine, for failing to prevent bribery.
108. Any suspicions or concerns of acts of fraud or bribery can be reported online via <https://www.reportnhsfraud.nhs.uk/> or via the NHS Fraud and Corruption Reporting Line on 0800 0284060. All calls are dealt with by experienced trained staff and any caller who wishes to remain anonymous may do so.

Professional regulatory implications

109. Statutorily regulated healthcare professionals who work with us are under professional duty imposed by their relevant regulator to act appropriately with regard to conflicts of interest. Where we believe that any such regulated healthcare professional has acted improperly, we shall report the individual to their regulator so that our concerns can be investigated.

Conflicts of interest training

110. The CCG's Corporate Services team offers training to all our members of staff, Governing Body and Committee members on the management of conflicts of interest.
111. The CCGs training offer will be based on the material produced by NHS England and will consist of, at a minimum, online training and guidance issued by email. In person training sessions and individual support will be offered as required or requested.

112. The CCG will require this training to be conducted every financial year and within six weeks of an individual starting with the organisation. Training will be monitored and recorded in line with other mandatory CCG training.

How to contact us in relation to this policy

113. If you need further assistance in relation to this policy, please contact the Corporate Services team at:

NHS City and Hackney Clinical Commissioning Group
3rd floor, A Block
St Leonard's
Nuttall Street
London N1 5LZ

Tel: 020 3816 3222

Email: CAHCCG.cityandhackneyccg@nhs.net

The Head of Corporate Services for the CCG (Matthew Knell) can be contacted at:

Tel: 0203 816 3230

Email: matthew.knell@nhs.net

Annexes

Annex A: Conflicts of interest policy – Statutory and regulatory frameworks we adhere to:

- The Public Contract Regulations 2015 (<http://www.legislation.gov.uk/ukxi/2015/102/regulation/57/made>);
- The National Health Service (procurement, patient choice and competition) (no.2) regulations 2013 (<http://www.legislation.gov.uk/ukxi/2013/500/contents/made>);
- The Bribery Act 2010 (<http://www.legislation.gov.uk/ukpga/2010/23/contents>);
- The Equality Act 2010 (<http://www.legislation.gov.uk/ukpga/2010/15/contents>);
- Guidance from the British Medical Association (BMA) on conflicts of interest for GPs in their role as commissioners and providers (<http://www.bma.org.uk/support-at-work/commissioning/ensuring-transparency-and-probity>);
- Guidance from the Royal College of General Practitioners (RCGP) on Managing conflicts of interest in clinical commissioning groups (http://www.rcgp.org.uk/~media/Files/CIRC/Managing_conflicts_of_interest.ashx);
- Guidance from the General Medical Council (GMC) on Good Medical Practice (http://www.gmc-uk.org/guidance/good_medical_practice/contents.asp);
- The Good Governance Standard for Public Services (http://www.cipfa.org/~media/files/publications/reports/governance_standard.pdf);
- The standards of behaviour published by the Committee on Standards in Public Life (1995) known as the 'Nolan Principles' (<https://www.gov.uk/government/publications/the-7-principles-of-public-life>);
- The seven key principles of the NHS Constitution (<http://www.nhs.uk/NHSEngland/thenhs/about/Pages/nhscoreprinciples.aspx>);
- Standards for members of NHS boards and CCG governing bodies in England (<http://www.professionalstandards.org.uk/publications/detail/standards-for-members-of-nhs-boards-and-clinical-commissioning-group-governing-bodies-in-england>);
- The UK Corporate Governance Code (<https://www.frc.org.uk/Our-Work/Codes-Standards/Corporate-governance/UK-Corporate-Governance-Code.aspx>);

Annex B: Declaration of Interest Template guidance and potential types of conflicts

Please complete the Declaration of Interest template as follows:

| Information requested | Guidance |
|--|--|
| Name | Your full name, including any titles as appropriate |
| Position within or relationship with CCG or other NHS organisation: | <p>Please detail any and all roles you fill with the CCG – this may be:</p> <ul style="list-style-type: none"> • Employed by the CCG in a specific role, in which case this title should be supplied (EG, CCG Head of Corporate Services); • Working with the CCG as a Clinical Lead for a specific area of work, in which case that area of work should be provided (EG Clinical Lead for Maternity); • Member or attendee of a CCG run meeting, body or committee, in which case your status and the name of the meeting should be indicated (EG Attendee of the Prioritisation and Investment Committee). <p>You may need to enter multiple positions into this section of the template.</p> |
| Date of declaration: | The date that this form was completed. |
| Type of Interest | Explanation / examples |

| | |
|--|---|
| <p>Financial interest</p> | <p>This is where an individual may get direct financial benefit from the consequences of a commissioning decision. This could, for example, include being:</p> <ul style="list-style-type: none"> • A director, including a non-executive director, or senior employee in a private company or public limited company or other organisation which is doing, or which is likely, or possibly seeking to do, business with health or social care organisations; • A shareholder (or similar ownership interests), a partner or owner of a private or not-for-profit organisation, business, partnership or consultancy which is doing, or which is likely, or possibly seeking to do, business with health or social care organisations; • A management consultant for a provider. <p>This could also include an individual being:</p> <ul style="list-style-type: none"> • In secondary employment (see section 19 of this document); • In receipt of secondary income from a provider; • In receipt of a grant from a provider; • In receipt of any payments (for example honoraria, one-off payments, day allowances or travel or subsistence) from a provider; • In receipt of research funding, including grants, that may be received by the individual or any organisation in which they have an interest or role; and • Having a pension that is funded by a provider (where the value of this might be affected by the success or failure of the provider). |
| <p>Non-financial professional interest</p> | <p>This is where an individual may obtain a non-financial professional benefit from the consequences of a commissioning decision, such as increasing their professional reputation or status or promoting their professional career. This may, for example, include situations where the individual is:</p> <ul style="list-style-type: none"> • An advocate for a particular group of patients; • A GP with special interests e.g., in dermatology, acupuncture etc; • A member of a particular specialist professional body; • An advisor for the Care Quality Commission (CQC) or the National Institute for Health and Care Excellence (NICE); • A medical researcher. |

| | |
|--|--|
| <p>Non-financial personal interest</p> | <p>This is where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit. This could include, for example, where the individual is:</p> <ul style="list-style-type: none"> • A voluntary sector champion for a provider; • A volunteer for a provider; • A member of a voluntary sector board or has any other position of authority in or connection with a voluntary sector organisation; • Suffering from a particular condition requiring individually funded treatment; • A member of a lobby or pressure group with an interest in health. |
| <p>Indirect interest</p> | <p>This is where an individual has a close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest in a commissioning decision (as those categories are described above) for example, a:</p> <ul style="list-style-type: none"> • Spouse / partner who volunteers for a provider; • Close relative e.g., parent, grandparent, child, grandchild or sibling who works as a local GP; • Close friend who is in receipt of a grant from a provider to the CCG; • Business partner who holds shares in a health service provider. |

Annex C: Declaration of interest template

NHS City and Hackney CCG Declaration of Conflicts of Interest form

| | |
|---|--|
| Name: | |
| Position within or relationship with CCG or other NHS organisation(s): | |
| Date of this declaration: | |

| Details of interests | | |
|---|---|--------------------------------------|
| Type of Interest | Name and nature of Business / Organisation | Nature of interest / Comments |
| <i>Financial interest / Non-financial professional interest / Non-financial personal interest / Indirect interest / Other (please describe)</i> | | |
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The information submitted will be held by City and Hackney CCG for personnel or other reasons specified on this form and to comply with the CCG's policies. This information may be held in both manual and electronic form in accordance with the Data Protection Act 1998. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and published in registers that the CCG holds.

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to the CCG as soon as possible and no later than 28 days after the interest arises. I am aware that if I do not make full, accurate and timely declarations then civil, or internal disciplinary action may result.

| | | | |
|----------------------------------|--|-------|--|
| Signed (physical or electronic): | | Date: | |
|----------------------------------|--|-------|--|

Please return this form to the Corporate Services Team, NHS City and Hackney CCG (as indicated in any covering email)

Annex D: Register of interest template

NHS CITY AND HACKNEY CLINICAL COMMISSIONING GROUP REGISTER OF INTERESTS TEMPLATE

| Forename | Surname | Date of declaration | CCG position / role | Nature of Business / organisation | Nature of interest / Comments | Potential or actual area where interest could occur | Default actions taken to mitigate risk |
|----------|---------|---------------------|---------------------|-----------------------------------|-------------------------------|---|--|
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Annex E: Agenda template for CCG meetings

Name of committee - Date, Time

Location of meeting

AGENDA

Chair:

Please look over the agenda and think about which of these topics might present an area of interest for you. This means an item where a decision or recommendation made may advantage you, your family and/or your workplace. These advantages might be financial or in another form, perhaps the ability to exert unseen influence.

Where anything on the agenda has the potential to put you in such a position, or raised in the meeting along the way, you should tell us all about it. This means we can ensure that our decision, recommendations or actions can be guarded from the impact of any possible conflict you or others could have and be seen to be so. If you are unsure it is always best to raise the possibility with the chair before the meeting, or at any point during the meeting if a possible interest strikes you. This openness is important as we can all discuss how to manage decision making in a complex environment and learn together how to manage these issues well.

We are agreed that we will all challenge each other on areas of interest or possible conflict as we recognise that sometimes these issues can be overlooked.

| | Agenda Items | Led by & Appendix number | Timing |
|--------------------|---|--|--------|
| Committee Business | | | |
| 1. | a) Minutes of the last meeting; b) Action tracker; c) Matters arising; d) Register of Interests and declarations of interests. | Speaker Name <i>Paper reference</i> <i>Paper pages</i> | |
| For Decision | | | |
| 2. | TBC | Speaker Name <i>Paper reference</i> <i>Paper pages</i> | |
| For Information | | | |

| | Agenda Items | Led by & Appendix number | Timing |
|----|--------------------|--|--------|
| 3. | TBC | Speaker Name <i>Paper reference</i> <i>Paper pages</i> | |
| 4. | Any other business | Speaker Name <i>Paper reference</i> <i>Paper pages</i> | |

Annex F: Declaration of Gifts or Hospitality template

NHS City and Hackney CCG Declaration of Gifts or Hospitality form

| | | |
|---|-----------|-------|
| Recipient Name | | |
| Position | | |
| Date of Offer | | |
| Date of Receipt (if applicable) | | |
| Details of Gift / Hospitality | | |
| Estimated Value | | |
| Supplier / Offeror Name and Nature of Business | | |
| Details of Previous Offers or Acceptance by this Offeror/ Supplier | | |
| Details of the officer reviewing and approving the declaration made and date | | |
| Declined or Accepted? | | |
| Reason for Accepting or Declining | | |
| Other Comments | | |
| <p>The information submitted will be held by the CCG for personnel or other reasons specified on this form and to comply with the organisation's policies. This information may be held in both manual and electronic form in accordance with the Data Protection Act 1998. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and published in registers that the CCG holds.</p> <p><i>I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to the CCG as soon as practicable and no later than 28 days after the interest arises. I am aware that if I do not make full, accurate and timely declarations then civil, criminal, professional regulatory or internal disciplinary action may result.</i></p> | | |
| <p>I do / do not (delete as applicable) give my consent for this information to published on registers that the CCG holds. If consent is NOT given please give reasons:</p> | | |
| Signed: | Date: | |
| Signed: | Position: | Date: |
| (Counter signed by Line Manager or a Senior CCG Manager) | | |
| Please return to the Corporate Services team at the CCG for processing and publication. | | |

Annex G: Declaration of Gifts or Hospitality template

**NHS CITY AND HACKNEY CLINICAL COMMISSIONING GROUP
DECLARATION OF GIFTS AND HOSPITALITY
REGISTER**

| Recipient Name | Position | Date of offer | Date of receipt (if applicable) | Details of Gift/Hospitality | Estimated Value | Supplier / Offeror name and nature of Business | Details of previous Offers by this supplier / offeror | Accepted or Declined? | Other comments |
|----------------|----------|---------------|---------------------------------|-----------------------------|-----------------|--|---|-----------------------|----------------|
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Annex H: Register of procurement decisions and contracts awarded

| Contract / Service title | Procurement description | Renewal or new procurement (if renewal, include details) | Procurement type – CCG procurement, collaborative procurement with partners | CCG clinical lead | CCG contract manager | Decision making process and name of decision making committee | Summary of conflicts of interest declared and how these were managed | Contract Award (supplier name & registered address) | Contract value (£) (Total) | Contract value to CCG |
|--------------------------|-------------------------|--|---|-------------------|----------------------|---|--|---|----------------------------|-----------------------|
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