

**Board of Directors**

<b>Subject:</b>	Conflicts of Interest – Compliance progress report		<b>Date:</b> 1 <sup>st</sup> April 2021	
<b>Prepared By:</b>	Laura Webster – Corporate PA			
<b>Approved By:</b>	Shirley Higginbotham – Director of Corporate Affairs			
<b>Presented By:</b>	Shirley Higginbotham – Director of Corporate Affairs			
<b>Purpose</b>				
To provide the annual update of the status of the Trust's Conflicts of Interest register.			<b>Approval</b>	
			<b>Assurance</b>	<b>X</b>
			<b>Update</b>	
			<b>Consider</b>	
<b>Strategic Objectives</b>				
<b>To provide outstanding care</b>	<b>To promote and support health and wellbeing</b>	<b>To maximise the potential of our workforce</b>	<b>To continuously learn and improve</b>	<b>To achieve better value</b>
				<b>X</b>
<b>Overall Level of Assurance</b>				
	<b>Significant</b>	<b>Sufficient</b>	<b>Limited</b>	<b>None</b>
			<b>X</b>	
<b>Risks/Issues</b>				
<b>Financial</b>	Breaches of the policy could result in financial loss for the Trust.			
<b>Patient Impact</b>				
<b>Staff Impact</b>	Individual breaches by members of staff could incur fines.			
<b>Services</b>				
<b>Reputational</b>	Potential negative reputational impact to trust.			
<b>Committees/groups where this item has been presented before</b>				
N/A				
<b>Executive Summary</b>				
<p>All staff are required to submit a declaration of interest if they have a conflict, in line with the Trusts Conflict of Interests Policy. This must be made upon appointment with the Trust or when a conflict arises during their employment.</p> <p>All staff band 7 and above are required to complete an annual declaration. A nil declaration must be submitted if there is no conflict to declare.</p> <p>From April 2020 to date, various methods of employee communication have been used including:-</p> <ul style="list-style-type: none"> <li>• Weekly Bulletin x15.</li> <li>• Screen Splash – Intermittent appearance since April 2020.</li> <li>• Targeted emails – Monthly from May 2020.</li> <li>• Payslip message – Appeared in April and May.</li> <li>• Divisional Triumvirates have been emailed with all staff from the division who are non-compliant.</li> <li>• Line Managers have been notified of relevant staff declarations for review.</li> <li>• The Declaration of Interests system has been made available to staff working from home, who do not have VPN access, via the internet.</li> <li>• Individuals who have an undeclared interest (identified via Companies House by 360 Assurance) have been contacted to ensure these are recorded on the Trusts Register of Interests.</li> </ul>				

### Overview (Band 7+ Staff)

958

Staff on ESR



Declared

130



Nil Return

740



Non-compliant

88

As of 8<sup>th</sup> March 2021, 88 employees within the Trust who are band 7+ remain non-compliant; this is an increase from 61 employees who were non-compliant in January 2021. The increase is due to 40 Band 7+ roles being recruited to giving an overall total of 958 in comparison to the 918 recorded in January 2021. New-starters have been contacted to ask that they complete their declaration of interests.

In comparison to March 2020 36 were reported as being non-compliant with an overall total of 876 Band 7+ staff being identified via ESR. The documents associated with this report details the associated individuals.

Arrangements have been made to communicate to all staff with regards to reviewing their Conflict of Interests declaration in April 2021, this will include a daily screen splash upon login, weekly messages within the Staff Bulletin and a monthly message within colleague's payslips.

The ESR integration of the Declaration of Interests system was established 18<sup>th</sup> March 2019. This has ensured data is updated on a real-time basis and allows new staff members to declare an interest / submit their nil return as soon as they commence work with the Trust. Staff leaving the Trust are automatically be removed from the Trust's register after the mandatory six month period, archive arrangements are in place.