

## Public Board Meeting Report

<b>Subject:</b>	Conflicts of Interest	<b>Date: 28<sup>th</sup> March 2019</b>		
<b>Prepared By:</b>	Shirley Higginbotham – Director of Corporate Affairs			
<b>Approved By:</b>	Shirley Higginbotham – Director of Corporate Affairs			
<b>Presented By:</b>	Shirley Higginbotham – Director of Corporate Affairs			
<b>Purpose</b>				
To consider the Conflict of Interests Register, regarding the recording of declarations in line with the Conflicts of Interest Policy for the year 2018-9		<b>Approval</b>		
		<b>Assurance</b>		<b>X</b>
		<b>Update</b>		
		<b>Consider</b>		
<b>Strategic Objectives</b>				
<b>To provide outstanding care to our patients</b>	<b>To support each other to do a great job</b>	<b>To inspire excellence</b>	<b>To get the most from our resources</b>	<b>To play a leading role in transforming health and care services</b>
	<b>X</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 impact to trust of breaches with regard to procurement of services or equipment.			
<b>Committees/groups where this item has been presented before</b>				
Audit and Assurance Committee 21 <sup>st</sup> March 2019				
<b>Executive Summary</b>				
<p>A new online Conflicts of Interest register was developed and launched on 30th June 2017. This enables all staff to complete their declarations on-line, the register is supported by a detailed 'how to' guide and FAQ's.</p> <p>All staff band 7 and above are required to complete an annual declaration including a nil declaration.</p> <p>From April 2018 to date, various methods of employee communication has been used including:-</p> <ul style="list-style-type: none"> <li>• Weekly Bulletin X 12</li> <li>• Screen Splash – Intermittent appearance since April 2018</li> <li>• Targeted Emails – Monthly</li> <li>• Payslip message – Appearing in April 2018</li> <li>• Divisional triumvirates have been emailed with all staff from the division who are non-compliant.</li> <li>• Divisional General Managers have been emailed to confirm declaration of gifts and hospitality exceeding £50.00</li> </ul> <p>We will continue with the above actions from April 2019 and work with 360 Assurance and Counter Fraud to implement any other initiatives which may increase compliance.</p> <p>The deputy medical director has emailed all clinicians who were identified on the list from Counter Fraud as having interests in private companies.</p>				

The deputy medical director is also reviewing the doctor's appraisal process to ensure a declaration of conflicts of interest is requested.

#### Overview (Band 7+ Staff)



As of 7<sup>th</sup> March 2019, 138 employees within the Trust that are band 7+ are non-compliant, this is a reduction from 152 employees who were non-compliant in January 2019 and the 291 staff who were non-compliant in March 2018. The documents associated with this report details the associated individuals and staff groups.

The ESR (Electronic Staff Records) integration plan has been approved. The ESR integration with the Declaration of Interests system will ensure data is updated on a real-time basis and allow new staff members to declare an interest/ submit their nil return as soon as they commence work with the Trust.

It is anticipated the ESR integration will go live in April 2019.