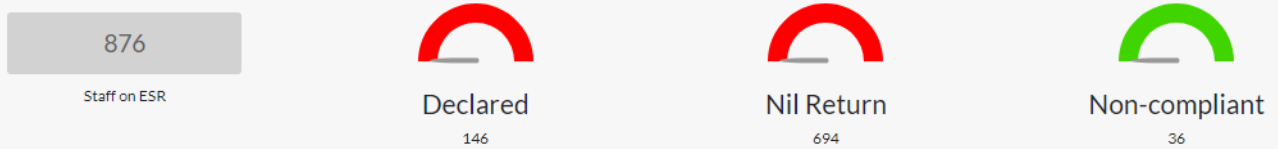


Board of Directors

Subject:	Conflicts of Interest – Compliance progress report	Date: 2 nd April 2020		
Prepared By:	Laura Webster – Corporate PA			
Approved By:	Shirley Higginbotham – Director of Corporate Affairs			
Presented By:	Shirley Higginbotham – Director of Corporate Affairs			
Purpose				
To consider the Conflict of Interests Register, regarding the recording of declarations in line with the Conflicts of Interest Policy for the year 2019/20			Approval	
			Assurance	
			Update	
			Consider	X
Strategic Objectives				
To provide outstanding care	To promote and support health and wellbeing	To maximise the potential of our workforce	To continuously learn and improve	To achieve better value
				X
Overall Level of Assurance				
	Significant	Sufficient	Limited	None
			X	
Risks/Issues				
Financial	Breaches of the policy could result in financial loss for the Trust.			
Patient Impact				
Staff Impact	Individual breaches by members of staff could incur fines.			
Services				
Reputational	Potential negative reputational impact to trust.			
Committees/groups where this item has been presented before				
N/A				
Executive Summary				
<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 2019 to date, various methods of employee communication have been used including:-</p> <ul style="list-style-type: none"> • Weekly Bulletin X 4 • Screen Splash – Intermittent appearance since April 2019 • Targeted emails – Monthly • Payslip message – Appeared in April and August • Divisional Triumvirates have been emailed with all staff from the division who are non-compliant. • Divisional General Managers have been emailed to confirm declaration of gifts and hospitality exceeding £50.00. • Line Managers have been notified of relevant staff declarations for review. • Band 7+ Staff who have been non-compliant for the past two years have been identified and reported to the Divisional Triumvirates. The identified staff have also been contacted by the Corporate Secretariat team requesting they submit a declaration / nil return for 2019/20. The Deputy Medical Director has emailed all clinicians who were identified on the list from Counter Fraud as having interests in private companies. 				

- The Deputy Medical Director is also reviewing the doctor’s appraisal process to ensure compliance with the Conflicts of Interests Policy.
- The Deputy Medical Director has emailed all Consultants who remain non-compliant on the Trust’s Conflicts of Interests system.
- Clinical Chairs have been invited to the Audit & Assurance Committee to provide an assurance update on ways the Division are ensuring that staff band 7 or above are compliant with the Trust’s Conflicts of Interest Policy.
- Divisional Triumvirates have been made aware of the new draft NHS Standard Contract changes regarding conflicts of interest declarations. From April 2020 the Trust must disclose, in a prominent position on its website, any Decision-Making Staff, by name and position who have neither completed a declaration of interest nor submitted a nil return in respect of that Contract Year, as required under Managing Conflicts of Interests in the NHS.

Overview (Band 7+ Staff)



As of 12th March 2020, 36 employees within the Trust who are band 7+ remain non-compliant and have been for the past 11 months; this is a reduction from 138 employees who were non-compliant in March 2019.

The ESR integration of the Declaration of Interests system was established 18th March 2019. This ensures 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 removed from the Trust’s register after the mandatory six month period, archive arrangements are in place.

Arrangements have been made to communicate to all staff with regards to reviewing their Conflict of Interests declaration in April 2020.