


Item Number: 14									
Name of Presenter: Rachel Potts									
Meeting of the Governing Body 1 September 2016	 Vale of York Clinical Commissioning Group								
Conflicts of Interest Policy – Review and Update									
Purpose of Report For Approval									
<p>Rationale In June 2016 NHS England, (NHSE) issued revised Conflicts of Interest Statutory Guidance.¹ The CCG's Conflicts of Interest Policy has been reviewed against this guidance and the accompanying policy checklist and amended accordingly.</p> <p>The Conflicts of Interest Policy was also reviewed against both the Procurement Policy and the Business Conduct Policy. The section in the Business Conduct Policy regarding management of Gifts and Hospitality has been moved to the Conflicts of Interest Policy to maintain conformity with the NHSE policy checklist.</p>									
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¹ <https://www.england.nhs.uk/commissioning/wp-content/uploads/sites/12/2016/06/revsd-coi-guidance-june16.pdf>

Recommendations

The Governing Body are requested to:

- approve the amendments to the Conflicts of Interest Policy;
- note and fully endorse the process for managing and recording declarations of interest in meetings; and
- note the new mandatory Conflicts of Interest training requirements.

Responsible Chief Officer and Title	Report Author and Title
Rachel Potts Chief Operating Officer	Pennie Furneaux Policy and Assurance Manager

Annexes

- Annex 1 Summary of Changes to the Conflicts of Interest Policy
- Annex 2 Conflicts of Interest Policy version 3.2
- Annex 3 Conflicts of Interest Form for Members/Employees

Annexes 2 and 3 are attached for Governing Body members and available at <http://www.valeofyorkccg.nhs.uk/about-us/governing-body-meetings/>

**Governing Body
Summary of Changes to Conflicts of Interest Policy**

1 September 2016

Additions:

Section 7.3-7.5	The Conflicts of Interest Guardian
Section 8	Managing conflicts of interest at meetings
Section 9	Minute taking
Section 15	Gifts and Hospitality (checked against CCG's Business Conduct Policy and section from CCG Business Conduct Policy incorporated.)
Section 16	Raising concerns and breaches
Appendix 4	Revised declarations of interest form for members / employees
Appendix 9	Recording declarations of interest in minutes

Notes re: Amendments/Clarifications:

- Declarations of Interest to be made twice per annum rather than quarterly.
- Declarations of Interest only required from those staff at member GP practices with involvement in CCG decision-making processes.
- Registers recording Declarations of Interest for Governing Body, Council of Representatives and Staff (grade 8a and above) will be reviewed annually by the Audit Committee with an assurance report provided to the Governing Body, to include explanations of any concerns and how these were managed.
- The Registers for Governing Body, Council of Representatives and staff (grade 8a and above) will be reviewed and republished at least every six months.
- NHS England will be providing mandatory online conflicts of interest training for all staff which will have to be completed annually.
- The policy has been reviewed against both the Procurement Policy and the Business Conduct Policy to ensure consistency.
- Appendix 3 - clarification that gifts of a value of less than £10 do not need to be declared.
- Section 9 - value of casual gifts that can be accepted has been amended from less than £25 to less than £10.
- References to the Commissioning Support Unit have either been amended or removed.
- Clarification Accountable Officer, Chief Operating Officer responsibilities and remove Chief Finance Officer responsibility for maintenance of registers.
- Clarification of Deputy Chair and Vice Chair terminology.
- Revised template register for gifts and hospitality.