

Managing Conflicts of Interest – Guidance

The following fact sheet is intended to provide an overview of the key points from the CCG Standards of Business Conduct policy in relation to managing conflicts of interests. It is not exhaustive, further information should be sought from the policy and relevant page numbers are detailed below.

Useful Links

- CCG Standards of Business Conduct Policy [here](#).
- [NHS England Guidelines](#)
- [Case Studies](#)

Background Bits: Pages 6 & 7

A conflict of interest is a set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of delivering, commissioning, or assuring taxpayer funded health and care services is, or could be impaired or influenced by another interest they hold.

A conflict of interest can be actual or potential

Actual

There is a material conflict between one or more interest

Potential

There is a possibility of a material conflict between one or more interests in the future

Types of interest P12 and Appendix 1

Type	Description	Example
Financial interest	This is where an individual may get direct financial benefits.	Being a partner of a private or not-for-profit company which is doing or is likely to do business with health organisations
Non-financial professional interest	This is where an individual may obtain a non-financial professional benefit, such as increasing their professional reputation or status or promoting their professional career. GPs and practice managers, who are members of the governing body or committees of the CCG, should declare details of their roles and responsibilities held within their GP practices.	Being an advisor for the CQC or NICE; Being a medical researcher; Being a GP with a special interest e.g. dermatology, acupuncture
Non-financial personal interest	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.	Voluntary roles; Suffering from a condition requiring individually funded treatment.

Indirect interest	This is where an individual has a close association with an individual who has an interest as described above. A declaration of interest for a 'business partner' in a GP partnership should include all relevant collective interest 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).	A spouse or partner; Close relative; Close friend; Business partner.
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Who should declare interests? Page 11

- All CCG employees including:
 - Any full and part time staff
 - Any staff on sessional or short term contracts
 - Any students and trainees
 - Agency staff
 - Seconded staff
 - Voluntary staff
 - Apprentices
- Members of the Governing Body
- All members of the CCG (i.e. each GP Practice)
This includes each provider of primary medical services which is a member of the CCG under Section 140 (1) of the 2006 Act. Declarations should be made by:
 - GP Partners
 - Any individual directly involved with the business or decision-making of the CCG.

When do interests need to be declared? Page 13

Declarations must be made within 28 days of the individual becoming aware of it and completed forms and registers need to be forwarded to the Corporate Governance Team via email - glccg.conflictsofinterestglos@nhs.net, for compiling onto a central register. This register will then be published on the CCG website at least annually.

Interests should be declared by individuals:

- **On appointment**
- **At meetings**
- **When prompted to by the CCG**
- **When there has been a change in role or circumstance**

Gifts, Hospitality and other areas of business conduct Page 16

Staff in GP Practices offer support during significant events in people's lives, and we should be proud that services are valued, but situations where the acceptance of gifts could rise to conflicts of interest should be avoided. See below for further information on what can and cannot be accepted from external parties, and what to do when you receive a gift.



What is a gift?

A gift can be defined as any item of cash or goods, or any service, which is provided for personal benefit, free of charge or at less than its commercial value.

What is meant by hospitality?

Hospitality means offers of meals, refreshments, travel, accommodation and other expenses in relation to attendance at meetings, conferences, education and training events.

Acceptable	Declare?	Not acceptable / treat with caution	Declare?
Gifts			
Low cost branded promotional aids (under £6) from suppliers or contractors	✓	Gifts from suppliers or contractors linked (currently or prospectively) to the CCG's business over the estimated £6 value	✓
Gifts from patients, families and service users under the value of £50	X	Gifts over the value of £50 should be treated with caution and only accepted on behalf of the organisation, not in a personal capacity	✓
		Multiple gifts from the same source over a twelve month period, where this exceeds a cumulative £50	✓
		Requesting gifts	N/A
		Personal gifts of cash or cash equivalents (vouchers)	✓
Hospitality			
Hospitality from contractors or suppliers is modest and reasonable, but obtain senior approval	✓	Hospitality which may compromise or be reasonably seen to compromise ability to exercise judgement	✓
Meals and refreshments under the value of £25	X	Offers including holiday accommodation, sporting fixtures, theatre or other events	✓
Meals and refreshments between £25 and £75	✓	Meals and refreshments over the value of £75 unless (in exceptional circumstances) prior approval given	✓

Modest offers to pay some or all of the travel and accommodation costs related to the attendance at events		Offers which go beyond modest	
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A common sense approach should be applied to the estimation of gifts and hospitality, but if in doubt, declare.

Declaring Interests at Meetings

Declarations of Interest should be a standing item on all agendas for Committees, sub-committees, or working groups.

When in a position of influence, or involved in decision-making, all attendees at meetings are required to declare interest in relation to items on the agenda, before it is discussed.

These interests should then be recorded within the minutes, including details of why it’s an actual or potential interest, and how it was managed.

The admin bits

The CCG is required to maintain a number of registers of declarations, including one for members of the CCG (i.e. each Practice) including GP Partners.

These registers will be published at least annually, but may also be updated on an adhoc basis when required.

The Process – what happens?

(see overleaf)

The Process – what happens?



Further information and help

The CCG Corporate Governance team is on hand to assist with any queries you have on the guidance and what is expected from you as an individual or within your practice.
glccg.conflictsofinterestglos@nhs.net **0300 421 1732**