

Minor revisions to the NHS Sheffield CCG Standards of Business Conduct and Conflicts of Interest Policy and Procedure

Governing Body meeting

H

7 September 2017

Author(s)	Sue Laing, Corporate Services Risk and Governance Manager
Sponsor	Julia Newton, Director of Finance
Is your report for Approval / Consideration / Noting	
<p>APPROVAL:</p> <p>The Standards of Business Conduct and Conflicts of Interest Policy and Procedure was approved by Governing Body at its meeting in February 2017. NHS England have since made further small amendments to the CCG statutory guidance to ensure it is fully aligned with the recently published NHS-wide conflicts of interest guidance <i>Managing conflicts of interest in the NHS: Guidance for staff and organisations</i>. This requires minor changes to the CCG's policy.</p> <p>The revised policy (with tracked changes) can be found in the noting pack at item 20c.</p>	
Are there any Resource Implications (including Financial, Staffing etc)?	
No	
Audit Requirement	
<p><u>CCG Objectives</u></p> <p><i>Which of the CCG's objectives does this paper support?</i></p> <p>This paper supports delivery of the CCG's Strategic Objective 5 - Organisational development to ensure the CCG can achieve its aims and objectives and meet national requirements.</p> <p>It also gives assurances against Risk 5.4 - Inadequate adherence to principles of good governance and legal framework leading to breach of regulations and consequent reputational or financial damage.</p>	
<p><u>Equality impact assessment</u></p> <p><i>Have you carried out an Equality Impact Assessment and is it attached?</i> Yes</p> <p>There are no specific issues associated with this policy.</p>	

PPE Activity

How does your paper support involving patients, carers and the public?

The Standards of Business Conduct and Conflicts of Interest Policy and Procedure (the Standards) sets out the Clinical Commissioning Group's (CCG) process for managing its business in an open and transparent way.

Recommendations

The Governing Body is asked to approve the proposed changes to the Standards of Business Conduct and Conflicts of Interest Policy and Procedure to ensure compliance with the revised statutory guidance on managing conflicts of interest for CCGs.

Governing Body is asked to note that if the changes outlined in this paper are approved, an updated document will be uploaded to the CCG's web site with immediate effect.

Minor revisions to the NHS Sheffield CCG Standards of Business Conduct and Conflicts of Interest Policy and Procedure

Governing Body meeting

7 September 2017

1. Introduction

The Standards of Business Conduct and Conflicts of Interest Policy and Procedure (the Standards) was approved by the Governing Body at its meeting on 2 February 2017 [Standards of Business Conduct and Conflicts of Interest Policy and Procedures](#). NHS England has since made some small amendments to the CCG statutory guidance to ensure it is fully aligned with the recently published NHS-wide conflicts of interest guidance *Managing conflicts of interest in the NHS: Guidance for staff and organisations*.

Members are asked to note that due to the timing of meetings the proposed changes have not previously been presented to Audit and Integrated Governance Committee for its discussion as would be our normal process, but given the minor nature of the changes required we have brought directly to Governing Body.

2. Proposed Changes to The Standards of Business Conduct and Conflicts of Interest Policy and Procedure

CCGs are required to review their conflicts of interest policy to ensure it continues to meet the requirements of the revised statutory guidance and to make any required updates by 16 September 2017. The key changes are set out below:

- **Registers of interest:** requires that CCGs have systems in place to satisfy themselves as a minimum on an annual basis that their registers of interest are accurate and up-to-date, and as a minimum have to ensure that decision-making staff are included on the published register.

This action is already in place – the Audit and Integrated Governance Committee Terms of Reference and Annual Audit Plan have been updated to review Declarations of Interest at least twice a year. The proposal is that the CCG will continue to publish **all** declarations of interest on the published register to provide full transparency. The rationale is also to avoid any confusion and continual monitoring as to who are decision making staff given that for example under the scheme of delegation we have quite a large number of budget managers and a wide range of staff attending meetings where commissioning and other decisions are taken.

- **Gifts from suppliers or contractors:** gifts of low value (up to £6), such as promotional items, can now be accepted.
- **Gifts from other sources:** gifts of under £50 (rather than £10) can be accepted from non-suppliers and non-contractors, and do not need to be declared; gifts with

a value of over £50 can now be accepted on behalf of the organisation, but not in a personal capacity.

- **Hospitality – meals and refreshments:** thresholds have been amended to advise that hospitality under £25 does not need to be declared. Hospitality between £25 and £75 can be accepted, but must be declared, and hospitality over £75 should be refused unless senior approval is given.
- **Declarations of Interest template:** no longer requirement to give consent for information to be published on CCG conflicts of interest registers.

3. Recommendation

The Governing Body is asked to approve the proposed changes to the Standards of Business Conduct and Conflicts of Interest Policy and Procedure to ensure compliance with the revised statutory guidance on managing conflicts of interest for CCGs.

Governing Body is asked to note that if the changes outlined in this paper are approved, an updated document will be uploaded to the CCG's web site with immediate effect.

Paper prepared by Sue Laing, Corporate Services Risk and Governance Manager

On behalf of Julia Newton, Director of Finance

August 2017