

This paper is being submitted to the Governing Body for amendment and/or approval as appropriate. It should not be regarded, or published, as CCG Policy until formally agreed at the Governing Body meeting, which the press and public are entitled to attend.

Public Governing Body Meeting – 16 June 2015

Title:	Conflict of Interest Policy	Author:	Helen Potton, Interim Chief Operating Officer
Number:	PGB-15-66	Executive Director:	Helen Potton, Interim Chief Operating Officer
Which of the risks on the Risk Register or Board Assurance Framework does this paper address?		Awareness of conflicts of interests is an essential part of commissioning and has the potential to affect all risks.	
Which Committee has this paper been presented to previously?		Audit & Risk Committee, June 2015 (AC-15-28)	
Governing Body Action Required			
<input checked="" type="checkbox"/>	For Approval / Decision	<input type="checkbox"/>	For Review
<input type="checkbox"/>	For Assurance	<input type="checkbox"/>	To Receive Update

Executive Summary

The potential for conflicts of interest arising within the CCG is high particularly in light of the Co-Commissioning Agenda. As a result it is essential that the CCG has a robust and appropriate Conflict of Interest Policy in place to deal with conflicts, including perceived conflicts.

The attached Policy has been written having due regard to best practice, NHS England’s Guidance issued in December 2014 and the current procedures used within the CCG. It has been subject to an engagement process to develop it which has included colleagues within the CCG, Internal Audit, the Audit & Risk Committee Chair, Board of Directors and approval at the Audit & Risk Committee with no suggested amendments.

The Policy will need to be supported by a robust Procurement Policy which will be reviewed together with the development of a Gifts and Hospitality Policy. These policies will be produced and presented to the Board of Directors to enable new policies to be presented to the Audit & Risk Committee at their meeting on 9 July 2015.

In addition the current Policy and Process for Managing Conflicts of Interest deals with secondary employment. This has also been removed from the new Conflict of Interest Policy and it has been

agreed that this will be reviewed by the Workforce Committee with a view to developing a standalone policy regarding secondary employment within the HR framework.

Recommendations

The Governing Body is asked to ratify the new Conflict of Interest Policy.

Conflicts of Interest Policy

Date: May 2015

Document Management

Title of Document:	Conflicts of Interest Policy
Superseded documents	Policy and Process for Managing Conflicts of Interest
Type of Document:	Policy
Description:	To detail the policy of the organisation in terms of the declaration of conflicts of interest
Target Audience:	All staff, including the members of Nene CCG, the Governing Body members and the members of its committees or sub-committees and the committees and the committees (including joint committees) or sub-committees of its Governing Body and members of its advisory groups and panels and any contractors working on behalf of the CCG.
Author:	Helen Potton, Interim Chief Operating Officer
Sponsoring Director	Helen Potton, Interim Chief Operating Officer
Department:	Corporate Services
Organisation:	NHS Nene Clinical Commissioning Group
Approved by:	Audit & Risk Committee
Date of Approval:	27 May 2015
Ratified by Governing Body:	
Version No:	
Next Review date:	May 2016
Internal Distribution:	All staff, including the members of the CCG, the Governing Body members and the members of its committees or sub-committees and the committees and the committees (including joint committees) or sub-committees of its Governing Body and members of its advisory groups and panels and any other individuals working on behalf of the CCG.
Availability:	Nene Shared Drive, Nene CCG Website
Associated Documents	Managing Conflicts of Interest: Statutory Guidance for CCGs published (NHS England December 2014) NHS Clinical Commissioners, Royal College of General Practitioners and British Medical Association – Shared principles on conflicts when CCGs are commissioning from member practices (December 2014) (Annex 1 to the above) Next steps towards primary co-commissioning (NHS England November 2014) Standards for members of NHS Boards and Clinical Commissioning Groups (Professional Standards Authority, November 2012) Towards Establishment: Creating responsive and accountable CCGs Technical appendix 1 (NHS Commissioning Board, October 2012)

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1 Introduction

This policy has been produced in light of statutory guidance issued by NHS England: *Managing Conflicts of Interest: Statutory Guidance for CCGs* – under section 14Z8 of the NHS Act 2006 (as amended by the Health and Social Care Act 2012).

2 Background

NHS Nene Clinical Commissioning Group (Nene CCG) is responsible for the stewardship of significant public resources when making decisions about the commissioning of health and social care services. In order to ensure, and be able to evidence that these decisions secure the best possible services for the population it serves, it must demonstrate accountability to relevant stakeholders (particularly the public), probity and transparency in the decision-making process. This will become even more important as Nene CCG becomes involved in delegated or joint primary care commissioning and co-commissioning.

A key element of this assurance involves management of conflicts of interest with respect to any decisions made. Although such conflicts of interest are inevitable, having processes to appropriately identify and manage them is essential to maintain the integrity of the NHS commissioning system and to protect Nene CCG, its Governing Body, its employees and associated GP practices from allegations and perceptions of wrong-doing.

This policy reflects the seven principles of public life promulgated by the Nolan Committee. These include:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

3 Scope

This policy will apply to:

- the members of Nene CCG;
- the members of its Governing Body;
- the members of its committees or sub-committees and the committees (including joint committees) or sub-committees of its Governing Body;
- the members of its advisory panels or groups;
- its employees; and
- any other individual working on behalf of Nene CCG.

Nene CCG will ensure that all employees and decision-makers are aware of the existence of this policy by:

- an introduction to the policy being given during local induction for new starters to Nene CCG;
- a quarterly reminder of the existence and importance of the policy delivered via internal communication methods; and
- a quarterly reminder to update declaration forms sent to all members of the Governing Body and any other committee, sub-committee, or decision-making or advisory group.

Individuals to whom this policy applies will be personally responsible for ensuring that they:

- are familiar with its provisions;
- do not knowingly place themselves in a position which creates a potential conflict between their individual and personal interests and their CCG duties;
- comply with the procedures set out in the policy including making declarations of potential or actual conflicts of interest where necessary; and
- attend any conflict of interest training made available to them including training offered by NHS England.

If applicable, individuals should also refer to their respective professional codes of conduct relating to conflicts of interest.

References in this policy to “committee” shall include reference to “joint committees” where relevant.

Alongside this policy, individuals should familiarise themselves with the policy on gifts and hospitality.

Nene CCG will view instances where this policy is not followed as serious and may take disciplinary action against individuals, which may result in removal from office in accordance with the provisions of the constitution and/or dismissal. The following policies (as amended) will apply to breaches of this policy where appropriate:

- Raising Concerns at work (Whistleblowing) Policy
- Disciplinary Policy

Nene CCG will support its lay members, where appropriate, in participating in any governance training programmes offered by NHS England.

4 Policy Statement

Conflicts of interest may arise where an individual's personal interests or loyalties or those of a connected person (a relative, close friend or business associate or business partner) conflict with those of the CCG. Such conflicts may create problems such as inhibiting free discussion which could result in decisions or actions being taken which are not in the interests of Nene CCG and/or NHS England.

A conflict of interest may also create the appearance, impression or perception that Nene CCG and/or NHS England has acted improperly and needs to be declared and managed appropriately.

A conflict of interest is not specifically defined in any relevant guidance or legislation but may include:

- **a direct pecuniary interest:** where an individual may financially benefit from the consequences of a commissioning decision (for example, as a provider of services);
- **an indirect pecuniary interest:** for example, where an individual is a partner, member or shareholder in an organisation that will benefit financially from the consequences of a commissioning decision;
- **a non-pecuniary interest:** where an individual holds a non-remunerative or not-for profit interest in an organisation, that will benefit from the consequences of a commissioning decision (for example, where an individual is a trustee of a voluntary provider that is bidding for a contract);
- **a non-pecuniary personal benefit:** where an individual may enjoy a qualitative benefit from the consequence of a commissioning decision which cannot be given a monetary value (for example, a reconfiguration of hospital services which might result in the closure of a busy clinic next door to an individual's house); and

- **where an individual is closely related to**, or in a relationship, including a business relationship or friendship, with an individual who fits into one of the above categories.

Further, it should be noted that:

- **the possibility of the perception of wrongdoing**, impaired judgement or undue influence shall also be considered a conflict of interest for the purposes of this policy and should be declared and managed accordingly; and
- **where there is doubt as to whether a conflict of interest exists**, it should be assumed that there is a conflict of interest and declared and managed accordingly.

Where an individual has any queries with respect to conflicts of interest they should seek advice from Corporate Services.

5 Register of Interests and Register of Procurement Decisions

Nene CCG shall keep and maintain a Register of Interests (the "Register") of all those interests declared and shall keep and maintain a register of procurement decisions (the "Procurement Register").

Conflicts of interests shall be reported to Corporate Services who will update the Register whenever a new or revised interest is declared. Corporate Services will ensure that the Register includes sufficient information about the nature of the interest and the details of those holding the interest.

Corporate Services will review the Register regularly. The Register shall be formally checked every three months to ensure that the Register is accurate and up to date.

The Procurement Register must record details of any procurement decisions made, details of who was involved in the decision-making and a summary of how any conflicts that arose in the context of the decision have been managed. Information regarding procurement decisions shall be provided to Corporate Services.

Both the Register and the Procurement Register shall be available:

- on the CCG's website <http://www.neneccg.nhs.uk/>; and
- upon request, addressed to Corporate Services at Nene CCG's headquarters.

Where members declare interests, this shall include the interests of all relevant individuals within their organisation (e.g. partners or practice managers in a GP practice) who have a relationship with Nene CCG and/or NHS England and who would potentially be in a position to benefit from Nene CCG's decisions.

The Register template is attached at Appendix 1. The Procurement Register template is attached at Appendix 2.

Both Registers will form part of the CCG's annual accounts.

6 Declaration of Interests

Declarations of Interest shall be made and their existence regularly confirmed or updated including in, but not limited to, the following situations:

- on appointment of an individual to Nene CCG, its Governing Body or any committee or sub-committee or other advisory or decision-making group or panel;
- quarterly;

- at meetings - all attendees shall be asked to declare any interest they have in any agenda item before it is discussed or as soon as it becomes apparent, even if the same interest has previously been declared in the Register or at another meeting;
- on an individual changing role or responsibility within a CCG or its Governing Body; and
- on any other change of circumstances that affects the individual's interests (e.g. where the individual takes on a new role outside Nene CCG or sets up a new business or relationship).

In addition to the provisions above, individuals who have a conflict of interest have an obligation to declare this in writing to Corporate Services as soon as they become aware of it and in any event not later than 28 days after becoming aware.

Where an individual is unable to provide a declaration in writing, for example, if a conflict becomes apparent during the course of a meeting, they must make an oral declaration before witnesses, and provide a written declaration as soon as possible thereafter.

The declaration of interests' template is attached at Appendix 3.

7 Managing Conflicts of Interest

7.1 Principles

Nene CCG will manage conflicts of interest by applying a number of principles, processes and safeguards including:

- Statutory requirements.
- Doing business appropriately – ensuring commissioning decisions are in line with our constitution, standards of business and commissioning strategy.
- Being proactive not reactive – considering potential conflicts of interests (e.g. when appointing individuals to decision-making roles); ensuring all members and employees of Nene CCG and any other persons (including GPs and employees of member GP practices) that sit on a decision-making forum of Nene CCG, such as the Governing Body or any committee or sub-committee, are aware of their obligations to declare conflicts of interests; maintaining a register of interests; and agreeing in advance how to deal with scenarios where a conflict of interest occurs.
- Governing Body and committee front sheet templates to include consideration of whether a Conflict of Interest arises and if so the proposal for its management.
- Each Committee chair will receive a list of declarations previously made of all committee members.
- Assuming individuals will act ethically and professionally, but may not always appreciate the potential for conflicts of interest or relevant rules and procedures.
- Being balanced and proportionate – ensuring rules are clear and robust but not overly prescriptive or restrictive so as to hinder the decision-making process.
- Being open and ensuring early engagement with patients, the public, clinicians and other stakeholders, including local Healthwatch and Health and Wellbeing Boards in relation to proposed commissioning plans.
- Responsiveness and best practice – ensuring that commissioning intentions are based on local health needs and reflect evidence of best practice.
- Transparency – ensuring that the approach taken is clearly evidenced by an audit trail.
- Securing expert advice – ensuring that commissioning plans take into account advice from appropriate health and social care professionals and experts.
- Engaging with providers – ensuring early engagement with both incumbent and potential new providers over potential changes to commissioned services for the local population.
- Creating clear and transparent commissioning specifications.
- Following proper procurement processes and legal arrangements.
- Ensuring sound record-keeping.

- Having in place a clear, recognised and easily enacted system for dispute resolution.

7.2 General Provisions

In accordance with Nene CCG's constitution, it shall manage conflicts of interest that are declared or arise as stated in the following provisions.

The Accountable Officer will ensure that for every interest declared, either in writing or by oral declaration, arrangements are in place to manage the conflict of interests or potential conflict of interests, to ensure the integrity of the CCG's decision making processes.

Arrangements for the management of conflicts of interest are to be determined by the Accountable Officer, their nominated person or the chair of any relevant meeting and will include the requirement to put in writing to the relevant individual arrangements for managing the conflict of interests or potential conflicts of interests, where possible within a week of the declaration. Where it has not been possible to advise in writing the process to be adopted it will be sufficient for the Accountable Officer, their nominated person or the chair of any relevant meeting to advise the individual verbally of the process to be adopted which will then be notified to the Chair of the Audit & Risk Committee as soon as practicable thereafter.

The arrangements will confirm the following:

- a) When an individual should withdraw from a specified activity, on a temporary or permanent basis (this may include asking an individual to be excluded from meetings, or relevant parts of meetings, during which relevant issues are discussed or to attend such discussions but not participate in any related vote); and
- b) Monitoring of the specified activity undertaken by the individual, either by a line manager, colleague or other designated individual.

Where an interest has been declared, either in writing or by oral declaration, the declarer will ensure that before participating in any activity connected with Nene CCG's exercise of its commissioning functions, they have received confirmation of the arrangements to manage the conflict of interest or potential conflict of interest from the Accountable Officer, their nominated person or the chair of any relevant meeting.

Where an individual member, employee or person providing services to Nene CCG is aware of an interest which:

- has not been declared, either in the Register or orally, they will declare this at the start of the meeting;
- has previously been declared, in relation to the scheduled or likely business of the meeting, the individual concerned will bring this to the attention of the chair of the meeting (the "Chair"), together with details of arrangements which have been confirmed for the management of the conflict of interests or potential conflict of interests.

The Chair, consulting with Corporate Services if necessary, will then determine how this should be managed and inform the member of their decision. Where no arrangements have been confirmed, the Chair of the meeting may require the individual to withdraw from the meeting or part of it. The individual will then comply with these arrangements, which must be recorded in the minutes of the meeting.

Where the Chair of any meeting of Nene CCG, including committees, sub-committees, or the Governing Body and the Governing Body's committees and sub-committees, has a personal interest, previously declared or otherwise, in relation to the scheduled or likely business of the meeting, they must make a declaration and the deputy Chair will act as Chair for the relevant part of the meeting. Where arrangements have been confirmed for the management of the conflict of

interests or potential conflicts of interests in relation to the Chair, the meeting must ensure these are followed. Where no arrangements have been confirmed, the deputy Chair may require the Chair to withdraw from the meeting or part of it. Where there is no deputy Chair, the members of the meeting will select one in accordance with their Terms of Reference.

Any declarations of interests, and arrangements agreed in any meeting of Nene CCG, committees or sub-committees, or the Governing Body, the Governing Body's committees or sub-committees, will be recorded in the minutes.

Where more than 50% of the members of a meeting are required to withdraw from a meeting or part of it, owing to the arrangements agreed for the management of conflicts of interests or potential conflicts of interests, the Chair (or deputy) will determine whether or not the discussion can proceed.

In making this decision the Chair will consider whether the meeting is quorate, in accordance with the number and balance of membership set out in Nene CCG's Constitution. Where the meeting is not quorate, owing to the absence of certain members, the discussion will be deferred until such time as a quorum can be convened. Where a quorum cannot be convened from the membership of the meeting, owing to the arrangements for managing conflicts of interest or potential conflicts of interests, the Chair of the meeting shall consult with the Accountable Officer on the action to be taken.

This may include:

- a) Requiring another of Nene CCG's committees or sub-committees, the Governing Body or the Governing Body's committees or sub-committees (as appropriate) which can be quorate to progress the item of business, or if this is not possible,
- b) Inviting on a temporary basis one or more of the following to make up the quorum (where these are permitted members of the Governing Body or committee / subcommittee in question) so that Nene CCG can progress the item of business:
 - i) a member of the CCG who is an individual;
 - ii) an individual appointed by a member to act on its behalf in the dealings between it and the CCG;
 - iii) a member of a relevant Health and Wellbeing Board;
 - iv) a member of a Governing Body of another Clinical Commissioning Group.

Any such arrangements shall be recorded in the minutes.

In any transaction undertaken in support of Nene CCG's exercise of its commissioning functions (including conversations between two or more individuals, e-mails, correspondence and other communications), individuals must ensure, where they are aware of an interest, that they conform to the arrangements confirmed for the management of that interest. Where an individual has not had confirmation of arrangements for managing the interest, they must declare their interest at the earliest possible opportunity in the course of that transaction and declare that interest as soon as possible thereafter. The individual must also inform either their line manager (in the case of employees), or the Corporate Service's team of the transaction.

The Corporate Service's Team will take such steps as deemed appropriate, and request information deemed appropriate from individuals, to ensure that all conflicts of interest and potential conflicts of interest are declared.

7.3 Provisions relating to primary care commissioning

Procurement decisions relating to the commissioning of primary medical services shall be made by a committee of Nene CCG's Governing Body. This will take the form of a joint committee

established between Nene and Corby CCGs and NHS England for joint commissioning and for delegated commissioning will be a committee established by Nene and Corby CCGs. The membership of any such committee shall be as set out below.

Conflict of interest issues shall be considered on a case by case basis. Where a committee would not be quorate because of conflicts of interest, the committee may invite, on a temporary basis additional lay members, CCG members, GP representatives from other CCG areas and non-GP clinical representatives to make up the quorum so that the committee can progress the item of business. The committee shall adhere to any additional guidance issued by NHS England in relation to management of conflicts of interest in the context of joint or delegated primary medical care commissioning.

GPs shall not be precluded from strategic discussions on primary care issues whether at meetings of the committee or on any joint and/or advisory group or panel subject to those GPs complying with this conflict of interest policy.

7.4 Appointing Governing Body or committee members

Nene CCG shall consider whether conflicts of interest should exclude individuals from being appointed to the Governing Body or to a committee or sub-committee of the CCG.

Such consideration shall be made on a case by case basis depending on the nature and extent of the interest, in particular whether the individual (or a family member) could benefit from any decision made and whether the interest relates to such a significant area of business such that the individual would be unable to make a full and proper contribution.

Any individual who has a material interest in an organisation which provides or is likely to provide substantial business to a CCG (either as a provider of healthcare or commissioning support services) shall not be a member of the Governing Body.

Nene CCG shall ensure that the membership of the committee which has been established to make commissioning decisions regarding primary medical services shall be constituted so as to ensure that the majority is held by lay and executive members. The Chair and Vice Chair of these committees must always be lay members.

7.5 Contractors and people who provide services to Nene CCG

Anyone seeking information in relation to procurement, or participating in procurement, or otherwise engaging with the CCG in relation to the potential provision of services or facilities to the CCG, will be required to make a declaration of any relevant conflict / potential conflict of interest.

Anyone contracted to provide services or facilities directly to Nene CCG will be required to make a declaration of any relevant conflict / potential conflict of interest and this requirement will be set out in the contract for their services.

7.6 Additional provisions where GPs practices are potential providers

Where member GP practices are potential providers of services to be commissioned, whether in the context of co-commissioning or under any joint or delegated commissioning arrangements or otherwise, the CCG shall use the "Procurement" template as set out in the Procurement Policy.

The templates may be inspected upon request (addressed to Corporate Services) at Nene CCG's headquarters.

7.7 Providing reassurance

Nene CCG shall address the issues raised in the Procurement template when drawing up its plans to commission a service for which member GP practices may be potential providers and set these out when complying with their duty in relation to public involvement.

This will provide appropriate assurance:

- that Nene CCG is seeking and encouraging scrutiny of its decision-making process; and
- that the proposed service meets local needs and priorities; and
- that a robust process has been followed in deciding to commission the service, in selecting the appropriate procurement route, and in addressing potential conflicts; and
- for NHS England in their role as assurers of any co-commissioning arrangements.

In designing service requirements Nene CCG shall engage relevant providers in confirming that the design of service specifications will meet patient need and shall ensure that any undertaken engagement is done transparently and fairly.

7.8 Preserving integrity of decision-making process when all or most GPs have an interest in a decision

In accordance with the general provisions above, where certain members have a material interest, they shall be excluded from relevant parts of meetings, or join in the discussion but not participate in the decision-making itself (i.e. not have a vote).

If all of the GPs or other practice representatives on a decision-making body could have a material interest in a decision, particularly where Nene CCG is proposing to commission services on a single tender basis from all GP practices in the area, or where it is likely that all or most practices would wish to be qualified providers for a service under Any Qualified Provider (AQP). Nene CCG shall:

- refer the decision to the Governing Body and exclude all GPs or other practice representatives with an interest from the decision-making process; and
- consider co-opting individuals from a Health and Wellbeing Board or one or more members of the Governing Body of another CCG onto the Governing Body, or inviting the Health and Wellbeing Board or another CCG to review the proposal, to provide additional scrutiny (though the voting rights of any invitees shall be in accordance with the provisions of the CCG's constitution); and
- ensure that rules on being quorate at meetings (set out in Nene CCG's constitution) enable decisions to be made; and
- plan ahead to recognise when items on meeting agendas that require decisions to be made are coming up that the agreed processes for ensuring they remain quorate are implemented.

The Chair (or their deputy where relevant) may, depending on the nature of the conflict, allow GPs or other practice representatives to join in the Governing Body's discussion (but not vote) about the proposed decision.

GPs shall comply with the latest guidance published by the General Medical Council (GMC) from time to time including Good Medical Practice (2013) and any supplementary guidance.

7.9 Transparency – publication of contracts and GP Earnings

All contracts, including the value of the contracts, shall be published on Nene CCG's website as required by legislation.

In addition, where we decide to commission services through AQP, we will publish on our website the type of services that we are commissioning and the agreed price for each service. Further, information as to the providers who qualify to provide the service shall be publicly available.

The information referred to shall be set out in the CCG's annual report.

In line with commitments on transparency of GP earnings, the CCG will be required to follow any requirements for the provision of details of GPs' contractual earnings from the CCG for publication on GP practice websites.

7.10 Role of commissioning support

Nene CCG cannot sub-delegate commissioning decisions to an external provider of commissioning support. However, the CCG shall ensure that it seeks and receives appropriate technical support to decide the most appropriate procurement route, undertake procurements and manage contracts in ways that manage conflicts of interest and preserve integrity of decision-making. Nene CCG shall ensure that it:

- determines and signs off the specification and evaluation criteria; and
- makes the decision and/or signs off on the decision on which providers to invite to tender; and
- makes the final decision on the selection of the provider.

Where another CCG or a commissioning support service undertakes procurement activity on behalf of Nene CCG, we shall ensure that they are compliant with requirements of the regulations in the same way that Nene CCG must be itself.

7.11 Lessons Learned

Nene CCG is committed to learning where non-compliance with policies and procedures relating to conflicts of interest will be managed, including how this will be addressed when it relates to contracts already entered into. As well as actions to address non-compliance, lessons learned will be reviewed by way of an incident review presented to the Audit & Risk Committee.

8 Equality and Diversity Statement

Nene CCG is committed to ensuring that it treats its employees fairly, equitably and reasonably and that it does not discriminate against individuals or groups on the basis of their ethnic origin, physical or mental abilities, gender, age, religious beliefs, sexual orientation, gender reassignment, marriage or civil partnership, pregnancy or maternity or race.

If you have any concerns or issues with the contents of this policy or have difficulty understanding how this policy relates to you or your role, please contact Corporate Services.

9 Monitoring Compliance and Effectiveness of the Policy

The policy will be reviewed annually by the Audit and Risk Committee. All groups and individuals to whom this policy applies (as set out above) will be reminded of the policy and Register at least quarterly. Corporate Services shall take any action necessary as highlighted by the review.

Where Nene CCG takes on delegated or joint commissioning responsibilities, the Audit and Risk Committee Chair and Accountable Officer must provide formal direct attestation to NHS England that Nene CCG has complied with the Statutory Guidance as part of an annual certification. To enable the attestation to be made the Audit and Risk Committee Chair and Accountable Officer may seek appropriate evidence as required to support this.

Register of Procurement Decisions

Description of health service to be provided	Details of the procurement decision	Summary of any conflicts of interest in relation to the decision and how this was managed	Who was involved in the decision making process

Declaration of Interests

Please read before completing the attached form

- Nene CCG must make arrangements to ensure that:
 - all members of Nene CCG;
 - all members of its Governing Body;
 - all members of its committees or sub-committees and the committees (including joint committees) or sub-committees of its Governing Body;
 - all members of its advisory panels or groups;
 - all its employees; and
 - any other individual working on behalf of Nene CCGdeclare any interest which may lead to a conflict with the interests of the CCG and/or NHS England and the public for whom they commission services in relation to a decision to be made by the CCG and/or NHS England or which may affect or appear to affect the integrity of the award of any contract by the CCG and/or NHS England.
- A declaration must be made of any interest likely to lead to a conflict or potential conflict as soon as the individual becomes aware of it, and within 28 days.
- If any assistance is required in order to complete this form, then the individual should contact Corporate Services.
- The completed form should be sent by both email and signed hard copy to the Corporate Services at the CCG's headquarters.
- Any changes to interests declared must also be registered within 28 days by completing and submitting a new declaration form.
- The register will be published:
 - On the CCG's website; and
 - Upon request addressed to Corporate Services at the CCG's Headquarters.
- Any individual must provide sufficient detail of the interest, and the potential for conflict with the interests of the CCG and/or NHS England and the public for whom they commission services, to enable a lay person to understand the implications and why the interest needs to be registered.
- If there is any doubt as to whether or not a conflict of interests could arise, a declaration of the interest must be made.

Interests that must be declared (whether such interests are those of the individual themselves or of a family member, business associate, close friend or other acquaintance of the individual) include:

- roles and responsibilities held within member practices;
- directorships, including non-executive directorships, held in private companies or PLCs;
- ownership or part-ownership of private companies, businesses or consultancies likely or possibly seeking to do business with the CCG and/or NHS England;
- shareholdings of companies in the field of health and social care;
- a position of authority in an organisation (e.g. charity or voluntary organisation) in the field of health and social care;
- any connection with a voluntary or other organisation contracting for NHS services;
- research funding/grants that may be received by the individual or any organisation in which they have an interest or role;
- any other role or relationship which the public could perceive would impair or otherwise influence the individual's judgment or actions in their role within the CCG.
- If there is any doubt as to whether or not an interest is relevant, a declaration of the interest must be made.

Declaration of Interest Form

Name:		
Position within or relationship with, the CCG or NHS England:		
Interests		
Type of Interest	Details	Personal interest or that of a family member, close friend or other acquaintance?
Roles and responsibilities held within member practices		
Directorships, including non-executive directorships, held in private companies or PLCs		
Ownership or part ownership of private companies, businesses or consultancies likely or possibly seeking to do business with the CCG and/or with NHS England		
Shareholdings (more than 5%) or companies in the field of health and social care		
Positions of authority in an organisation (e.g. charity or voluntary organisation) in the field of health and social care		
Any connection with a voluntary or other organisation contracting for NHS Services		

Research funding/grants that may be received by the individual or any organisation they have an interest or role in		
Other specific interests?		
Any other role or relationship which the public could perceive would impair or otherwise influence the individual's judgement or actions in their role within the CCG and/or with NHS England		

To the best of my knowledge and belief, the above information is complete and correct. I undertake to update as necessary the information provided and to review the accuracy of the information provided regularly and no longer than annually. I give my consent for the information to be used for the purposes described in the CCG's Constitution and published accordingly.

Signed:

Date: