

### **Management of Conflicts of Interest Breach – September 2017**

In September 2017 a breach was reported which related to the sending of restricted Minutes of a meeting to potentially conflicted Members in error. The email was deleted from one Member's email before they were able to read it; this Member subsequently confirmed they had not had sight, nor printed the papers. The other two Members were notified that they had been sent the Minutes in error and were requested to delete the emails with immediate effect.

The Minutes related to a procurement for which the leads were informed of the breach in order that this was taken into consideration going forward.

The responsible Director confirmed that the breach had been a theoretical rather than an actual breach, since a risk averse approach had been adopted by excluding the named persons from the meeting and from receiving the Minutes. No procurement had started; the persons involved were only potential providers; and there was no content in the Minutes which would put them at a material advantage.

The breach was reviewed by the Deputy Director of Governance and the breach was deemed as being a 'Level 1' breach, having 'no material effect'. The Conflicts of Interest Guardian approved this conclusion.