

Conflicts of Interest Guardian Log

Date Raised	Summary of Case	Summary of Concerns	Actions Taken
5 th August 2020	Authorisation of secondary employment required whereby CCG Urgent Care Lead holds a bank contract with South West Ambulance Foundation Trust (SWFT)	<ul style="list-style-type: none"> Ensuring separation of roles and that this does not adversely impact upon substantive appointment with the CCG 	<p>Communication issued outlining that:</p> <ul style="list-style-type: none"> Ensure online Conflicts of Interest training is completed as a priority, if not done so already Keep declaration up to date and if any circumstances or the nature of the role changes, to notify the CCG immediately. Nonetheless, if nothing changes, requested that declaration is reviewed on a six-monthly basis Proactively declare connection to SWFT in any meetings or circumstances where SWFT contract or performance are discussed To not participate in any discussions about funding or contract matters related to SWFT
10 th August 2020	Authorisation of secondary employment required whereby CCG CHC Nurse Coordinator periodically pursues care home agency work	<ul style="list-style-type: none"> Ensuring separation of roles and that this does not adversely impact upon substantive appointment with the CCG 	<p>Communication issued outlining that:</p> <ul style="list-style-type: none"> Ensure online Conflicts of Interest training is completed as a priority, if not done so already Keep declaration up to date and if any circumstances or the nature of the agency work changes, to notify the CCG immediately. Nonetheless, if nothing changes, requested that declaration is reviewed on a six-monthly basis

<p>2nd December 2020</p>	<p>Consideration of whether Elected GB GP Lead could continue as regular attendee of Primary Care Commissioning Committee (PCCC), in light of declared interest pertaining to spouse’s directorship at SW Healthcare</p>	<ul style="list-style-type: none"> • Consideration of whether individual could reasonably continue in this role with the PCCC, in light of materiality of newly declared interest 	<p>Following review and dialogue with the Col Guardian, it was decided that:</p> <ul style="list-style-type: none"> • Individual to be stood down from the PCCC due to the materiality of the declared conflict and challenges in adequately mitigating this • Identification and appointment of another non conflicted clinician to this role as regular attendee of the committee
<p>5th February 2021</p>	<p>Authorisation of secondary employment required whereby CCG Business Support Assistant is undertaking a fixed term, weekend role with Vaccination UK</p>	<ul style="list-style-type: none"> • Ensuring separation of roles and that this does not adversely impact upon substantive appointment with the CCG 	<p>Communication issued outlining that:</p> <ul style="list-style-type: none"> • Approval obtained to proceed, but to maintain ongoing dialogue with manager to ensure this arrangement does not adversely impact upon role with the CCG and individual wellbeing
<p>17th February 2021</p>	<p>Authorisation of secondary employment required whereby CCG Designated Clinical Officer for SEND is undertaking residual work for Worcestershire Health and Care Trust, as well as being an advisor for Midlands Occupational Therapy</p>	<ul style="list-style-type: none"> • Ensuring separation of roles and that this does not adversely impact upon substantive appointment with the CCG 	<p>Communication issued outlining that:</p> <ul style="list-style-type: none"> • The individual must undertake this work on their non-working day, this work must not interfere with their CCG role and to consult their manager if anything changes • Keep declaration up to date and if any circumstances or the nature of the role changes, to notify the CCG immediately.

<p>8th March 2021</p>	<p>Authorisation of secondary employment required whereby CCG Infection Prevention & Control Nurse is undertaking employment with Worcestershire Acute Hospitals Trust (WAHT)</p>	<ul style="list-style-type: none"> • Ensuring separation of roles and that this does not adversely impact upon substantive appointment with the CCG 	<p>Following review and dialogue with the Col Guardian, it was decided that no further action was needed beyond recording.</p>
<p>14th April 2021</p>	<p>Authorisation of bank work for a CHC Nurse Assessor who previously held substantive employment at a care organisation for 17 years.</p>	<ul style="list-style-type: none"> • Questioned whether it is appropriate for her to undertake CHC Needs Assessments 	<p>Following review, determined that:</p> <ul style="list-style-type: none"> • Organisation for which CHC Nurse Assessor undertakes bank work is a NHS provider and not a private agency, therefore would be no potential for financial benefit • A CHC Needs Assessment is a structured, objective process which requires levels of senior sign-off • The bank work will support the maintenance of the individual's clinical certification and experience <p>Actions agreed are:</p> <ul style="list-style-type: none"> • Ensure CHC Nurse Assessor adds this bank work to their conflicts of interest declaration • CHC team to raise secondary employment at team meetings to ensure that colleagues are clear regarding the requirements to declare and ensure it is managed appropriately
<p>6th May 2021</p>	<p>Authorisation of appointment of interim CHC Consultant on a fixed term basis via an agency</p>	<ul style="list-style-type: none"> • Ensuring that the individual's declared conflicts of interest in respect of own 	<p>Following review, determined that conflicts can be adequately managed through inclusion of relevant mitigations, therefore appointment could proceed</p>

		consultancy and work with other CCGs would not present an unmanageable conflict	
14 th May 2021	Authorisation of appointment of Business Support Assistant for End of Life Care and ReSPECT Project in view of declared interest pre-appointment that father is Director of ICS	<ul style="list-style-type: none"> Ensuring that proposed appointment did not pose any material conflicts in practice 	Following review and dialogue with the Col Guardian, it was decided that no further action was needed beyond recording, as there was no identified way in which the roles could conflict
21 st May 2021	Review of appropriateness of ReSPECT Programme Manager to continue undertaking role as Trustee at Kemp Hospice	<ul style="list-style-type: none"> Questioned whether Trustee role could now represent a fundamental, incompatible conflict with the individual's day to day role 	<p>Following review, determined that:</p> <ul style="list-style-type: none"> As day to day role would involve liaison with partner organisations such as Kemp Hospice, it was decided that this would be a conflict that could not be adequately mitigated <p>Action agreed that:</p> <ul style="list-style-type: none"> Individual to step down from role as Trustee, which they also decided of their own volition
14 th June 2021	Authorisation of secondary employment whereby Digital Projects and Analytics Manager has assumed role of Associate Director at Leadership Development International	<ul style="list-style-type: none"> Ensuring separation of roles and that this does not adversely impact upon substantive appointment with the CCG 	<p>Following review it was determined that the individual would participate in trade fairs, webinars and workshops, as well as obtain their own clients for coaching and professional development initiatives.</p> <p>Action agreed that:</p> <ul style="list-style-type: none"> Individual should not take part in any decisions where Leadership Development International could benefit from

[Title]

			<ul style="list-style-type: none">• Individual should ensure that they do not engage or undertake any business relating to this role during CCG time
16 th July 2021	Independent Chair for CHC Appeals declared that they are undertaking work for Coventry and Warwickshire CCG as Transformation Project Lead	<ul style="list-style-type: none">• Ensuring separation of roles and that the role with Coventry and Warwickshire does not interfere with or impair the individual's ability to fulfil the requirements of their role for HWCCG	Following review, determined that this would not pose any material conflict and fine to proceed with the proposed appointment