

MANAGING CONFLICTS OF INTEREST POLICY

Trust Board	Item: 18
Date: 18 March 2022	Enclosure: N
<p>Executive Summary: After a review by LCFS, recommendations were made to improve the policy and further conform to the NHSE model policy.</p> <p>These are as follows and have been implemented in this version:</p> <p>Section 7 – Decision Making Staff</p> <ul style="list-style-type: none"> • Added Council of Governors. • Add ‘Staff considered by Finance, IT, Estates and Procurement as having the power to enter into contracts on behalf of the Trust’. <p>Section 8.1 – Identification & Declaration of Interests (including gifts and hospitality)</p> <p>Add ‘It is the responsibility of staff members to identify where an actual conflict, or potential conflict, arises and take appropriate action, including discussing with their line manager if they are unsure whether an actual conflict is arising.’</p> <p>Section 8.2 Proactive Review of Interests</p> <p>Add ‘We will prompt decision-making staff annually to review declarations they have made and, as appropriate, update them or make a nil return.’</p> <p>11.4 – Shareholdings and Other Ownership Issues</p> <p>Clarified that all directorships should be declared to avoid ambiguity.</p> <p>11.7 – Donations</p> <p>Add ‘Staff should not actively solicit charitable donations unless this is a prescribed or expected part of their duties for the organisation, or is being pursued on behalf of the organisation’s own registered charity or other charitable body and is not for their own personal gain.’</p> <p>13.1 – Identifying and Reporting Breaches</p> <p>Add reference to also reporting breaches of policy to the Trust LCFS.</p> <p>13.2 – Taking Action in Response to Breaches</p> <ul style="list-style-type: none"> - Reference NHS Counter Fraud Authority (NHS CFA) to replace to NHS Protect - Reference Bribery Act 2010 	

For: Information <input type="checkbox"/> Assurance <input type="checkbox"/> Discussion and input <input type="checkbox"/> Decision/approval <input checked="" type="checkbox"/>	
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Risk Implications – Link to Assurance Framework or Corporate Risk Register:	-
Legal / Regulatory / Reputation Implications:	Bribery Act 2010
Link to Relevant CQC Domain: Safe <input type="checkbox"/> Effective <input type="checkbox"/> Caring <input type="checkbox"/> Responsive <input type="checkbox"/> Well Led <input checked="" type="checkbox"/>	
Link to Relevant Strategic Theme:	
Document Previously Considered By:	LCFS
Recommendations: To approve the updates.	