

Annex A: Conflict of Interest Policy – Schedule of changes to be made following Audit Committees' meeting 01 October 2015

Reference	Issue	Proposed Action
Para 7 and Appendix 2	Some of the interests of our GPs in GP provided services are not due to directorship, employment or shareholdership, but because they are part of a provider network which sometimes is not yet a legal entity or, in our case, the a CIC for our GP network. So I think we need to be more explicit on this. (DV)	Para 7 and Appendix 2 should be amended to cover any organisational entities (legally constituted or not)
Paras 25 & 28	How can there be quorum if say the issue is a contract with a GP federation? (PY)	<ol style="list-style-type: none"> 1) Review if/what changes may need to be proposed to CCG Constitutions to allow for changes to GB decision making quorum 2) Revise policy wording, if necessary, in light of 1) above. Also, review wording to clarify that potential/actual conflicts of interest must be identified as early in the process as possible with mitigating adjustments made to the decision making process mapped early on.
Para 27	This declaration will be substantial- what processes are in place to pull this together- should we have done this for 14/15? (PY)	Delete paragraph
Para 33	Need to define, more clearly, policy around 'offer of a gift'.	Introduce a threshold (£100?) at which offers of gifts must be declared. Also, specify more clearly the circumstances where an offer, whatever the amount, must be declared e.g. where the offer has been made by a party involved in a CCG procurement.
Para 35	The careless reader could interpret it as meaning that invitations to sporting/cultural events etc. are acceptable provided that their value is less than £100. I do not believe that that is - and in my view it should not be - the intention. Accordingly, I suggest para 35 is amended. (TW)	<p>Amend wording to read:</p> <p>Any personal gift of cash or cash equivalent (e.g. tokens) must be declared whatever its value. Modest hospitality, for example, a drink and sandwich during a</p>

		<p>working lunch is normal and reasonable and does not require approval of a manager. However, offers of</p> <p>a) hospitality relating to theatre evenings, sporting fixtures, or holiday accommodation (regardless of value), or</p> <p>b) other hospitality which exceeds, or is perceived to exceed, £100</p> <p>can only be accepted in exceptional circumstances with the prior authorisation of the Accountable Officer. In the case of the Accountable Officer or CCG Chairs being offered such hospitality, the Chair of the Audit Committee's authorisation is also required.</p>
General comment	Develop SOP & detailed guidance to support good Col governance, for example, managing perceptions of conflicts, etc.	Should be developed
General comment	Typo in footer "CWHH" instead of "CWHHE"	amend