

Subject:	Managing Conflicts of Interest
Presented By:	Nikki Cocks, Director of Operations and Delivery
Submitted To:	Governing Body Tuesday 24 March 2015
Purpose of Paper:	Agreement
<p>Summary: The Managing Conflicts of Interest Policy has been reviewed as part of an annual review process and to reflect best practice. Recent guidance was issued in by NHS England which included specific provision in relation to co-commissioning of primary care services. While NHS Norwich CCG is not currently considering taking on co-commissioning responsibilities and this part of the guidance is not relevant, the guidance superseded all previous guidance on managing conflicts of interest. The policy review was undertaken to ensure that the CCG complies with the most up to date guidance, and was a joint piece of work with the other Norfolk CCGs to ensure consistency across Norfolk.</p> <p>The policy applies to all,</p> <ul style="list-style-type: none"> • the members of the CCG; • the members of its Governing Body; • the members of the CCG's or Governing Body's committees or sub-committees; and • its employees. <p>The particular changes to note are,</p> <ol style="list-style-type: none"> 1. Declaration of Members' Interest (section 3.1 page 8): a requirement for members of the CCG to declare their interests. This will primarily apply to those who are engaged in CCG decision making, including Council of Members' representatives 2. Additional provisions where GPs practices are potential providers (section 9, page 14); recognising and managing any conflicts or potential conflicts that may arise in relation to procurement. 3. Designing service requirements (section 10, page 16): it is good practice to engage relevant providers, especially clinicians in confirming that a design of service specifications will meet patient need. 4. Transparency of GP earnings (section 11, page17) – to improve transparency of GP earnings there will be a new contractual requirement for GP practices to publish on their practice website by 31st March 2016, the mean net earnings of GPs in their practice (to include contractor and salaried GPs) relating to 2014/15 financial year <p>Members are asked to note the requirement for them to declare any change of circumstance that affects the individual's interest as soon as possible after that change occurs.</p> <p>The Governing Body will also want to be assured that an annual review of the Conflicts of Interest Register is currently underway, due for completion by 31 March 2015.</p>	
<p>Recommendation: The Governing Body is asked to agree the revised policy, and ensure that they are familiar with the requirements.</p>	