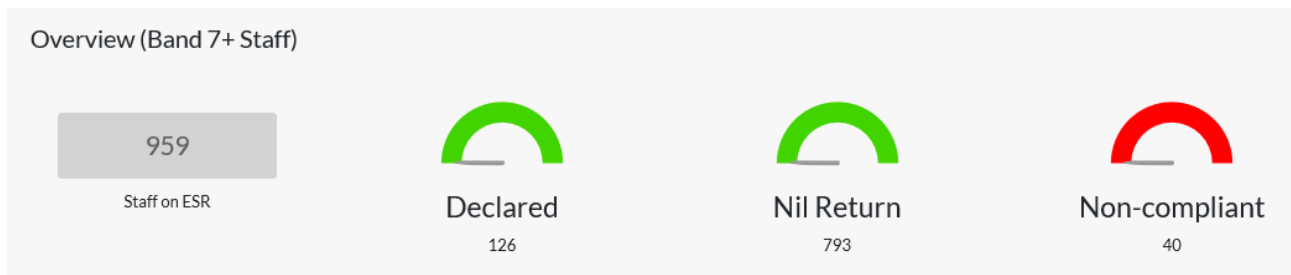


Board of Directors meeting - coversheet

Subject:	Register of Interests	Date: 7 th April 2022		
Prepared By:	Laura Webster – Corporate PA			
Approved By:	Shirley Higginbotham – Director of Corporate Affairs			
Presented By:	Shirley Higginbotham – Director of Corporate Affairs			
Purpose				
To provide the annual update of the status of the Trust's Conflicts of Interest register.			Approval	X
			Assurance	
			Update	
			Consider	
Strategic Objectives				
To provide outstanding care	To promote and support health and wellbeing	To maximise the potential of our workforce	To continuously learn and improve	To achieve better value
				X
Overall Level of Assurance				
	Significant	Sufficient	Limited	None
			X	
Risks/Issues				
Financial	Breaches of the policy could result in financial loss for the Trust.			
Patient Impact				
Staff Impact	Individual breaches by members of staff could incur fines.			
Services				
Reputational	Potential negative reputational impact to trust.			
Committees/groups where this item has been presented before				
Audit & Assurance Committee 15/03/22 (minor amendment to compliance figures since last reporting)				
Executive Summary				
<p>All staff are required to submit a declaration of interest if they have a conflict, in line with the Trusts Conflict of Interests Policy. This must be made upon appointment with the Trust or when a conflict arises during their employment. The ESR integration of the Declaration of Interests system was established 18th March 2019. This has ensured data is updated on a real-time basis and allows new staff members to declare an interest / submit their nil return as soon as they commence work with the Trust. Staff leaving the Trust are automatically be removed from the Trust's register after the mandatory six-month period, archive arrangements are in place.</p> <p>All staff band 7 and above are required to complete an annual declaration. A nil declaration must be submitted if there is no conflict to declare.</p> <p>From April 2021 to date, various methods of employee communication have been used including:-</p> <ul style="list-style-type: none"> • Weekly Bulletin x5. • Screen Splash – Intermittent appearance since April 2021. • Targeted emails – Monthly from April 2021. • Divisional Triumvirates have been emailed with all staff from the division who are non-compliant. • Line Managers have been notified of relevant staff declarations for review. • The Declaration of Interests system has been made available to staff working from home, who do not have VPN access, via the internet. • Individuals who have an undeclared interest (identified via Companies House by 360 Assurance) have been contacted to ensure these are recorded on the Trusts Register of Interests. 				

- Comparison report carried out to identify colleagues who have been non-compliant for 1+ years. These individuals have been contacted with a letter from the AAC Chair. Those who remain non-compliant have been invited to attend the AAC taking place 21st September to explain why they remain non-compliant.
- Inclusion of Medical & Dental compliance figures in the Medical Workforce article.
- Updates made to all appraisal documents to include a 'tick box' to confirm the individual is compliant.

Dashboard as of 28th March 2022



As of 28th March 2022, **40** employees within the Trust who are band 7+ remain non-compliant; this is a reduction from **62** employees who were non-compliant in January 2022. In comparison to March 2021 **88** individuals were reported as being non-compliant which further evidences compliance across the Trust is improving. New-starters have been contacted to ask that they complete their declaration of interests.

The documents associated with this report details the associated individuals.

Arrangements have been made to communicate to all staff with regards to reviewing their Conflict of Interests declaration in April 2022, this will include a daily screen splash upon login, weekly messages within the Staff Bulletin and a monthly message within colleague's payslips.

In line with the NHS Standard Contract, the following documents are required to be published to the Trust's website:-

- Register of Interests for the prior financial year (2021/22).
- List of submitted nil-returns (2021/22).
- List of decision-making staff (Band 7+) who are currently non-compliant (2021/22).

The Register of Interests will be published to the Trust's website once **APPROVED** by members of the Board.