

Title:	Register of Interests
Report to the:	Trust Board
Meeting date:	24 <sup>th</sup> January 2024
Agenda item:	2
Report author:	Sarah Feal, Trust Secretary and Freedom to Speak-up Guardian
Executive sponsor:	Rachel Hawkins, Director of Corporate Affairs

Assurance level:	Substantial <input checked="" type="checkbox"/> Reasonable <input type="checkbox"/> Partial <input type="checkbox"/> Minimal <input type="checkbox"/>
Rationale:	The organisation has achieved the rating of 'substantial' assurance from internal audit for governance and decision-making [20 October 2023].
Assurance action:	Not applicable.

## 1.0 Executive Summary

- 1.1 A conflict of interest is defined as a set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of delivering, commissioning, or assuring taxpayer funded health and care services is, or could be, impaired or influenced by another interest they hold.
- 1.2 A conflict of interest may be '**actual**': there is a material conflict between one or more interests or '**potential**': there is the possibility of a material conflict between one or more interests in the future.
- 1.3 Staff may hold interests for which they cannot see potential conflict. However, caution is always advisable because others may see it differently. It will be important to exercise judgement and to declare such interests where there is otherwise a risk of imputation of improper conduct.

1.4 Interests fall into the following categories:

Financial interests	Non-financial professional interests	Non-financial personal interests	Indirect interests
Where an individual may get direct financial benefit from the consequences of a decision, they are involved in making	Where an individual may obtain a non-financial professional benefit from the consequences of a decision, they are involved in making, such as increasing their professional reputation or promoting their professional career	Where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit, because of decisions they are involved in making in their professional career	Where an individual has a close association with another individual who has a financial interest, a non-financial professional interest or a non-financial personal interest who would stand to benefit from a decision they are involved in making

## 2.0 Recommendation

### 2.1 The members are asked to:

- **Receive** any new declarations of interest or declarations relating to matters on the agenda.
- **Reconfirm** current declarations on the Register of Interests [Appendix A] are accurate and up to date.
- **Confirm** that all offers of Gifts and Hospitality received in the last 28 days have been registered with the Trust Secretary.
- **Note** that Gurjote Sehmbi will remain on the public register for 6 months until 30 June 2024, following her leaving date on 31 December 2023.

### 3.0 How the report supports achievement of the Strategic Objectives:

Provide outstanding care:	Not applicable.
Be collaborative:	Not applicable.
Be an excellent employer:	Failure to manage conflicts of interest could lead to criminal proceedings including for offences such as fraud, bribery, and corruption. This could have implications for the organisation concerned and linked organisations, and the individuals who are engaged by them.
Be sustainable:	Not applicable.

#### **4.0 How the report supports tackling Health Inequalities**

4.1 Not applicable.

#### **5.0 Links to Board Assurance Framework / Trust Risk Register**

5.1 There are none identified.

#### **6.0 Legal and Regulatory requirements**

- The Bribery Act 2010.
- The Fraud Act 2006.
- NHS England Managing Conflicts of Interest in the NHS.
- NHS England Code of Governance for Provider Trusts (2.10).

#### **7.0 Previous report**

7.1 Register of Interests, 22nd November 2023.