## **Conflicts of Interest indicator: Part one (annual assessment)**

Name of CCG: \_Aylesbury Vale/Chiltern \_\_\_\_ Date: \_April 2018

Conflicts of Interest Annual Assessment			
Requirements	Please complete	Additional comments	
		(If non-compliant in any areas, please outline the reasons why, the planned actions and any support needed from NHS England)	
The CCG has a clear policy for the management of conflicts of interest (in line with the statutory guidance on managing conflicts of interest for CCGs) and the policy includes a robust process for the management of breaches.	Y/N	Revised Conflicts of Interest Policy approved by CCG's Audit Committee 28/09/16 and ratified by Governing Body 13/10/16.	
		Section 11 refers to management of breaches.	
		31 January 2018: Audit Committees in common <b>NOTED</b> review undertaken of Conflicts of Interest policy:	
		<ol> <li>No relevant recommendations within annual internal audit (December 2017)</li> <li>No further amendments to published guidance that warrants amendment.</li> <li>Next annual review January 2019 unless guidance or experience requires amendments in between.</li> </ol>	
		26 July 2017: Audit Committees in common NOTED review undertaken after updated NHS England guidance for CCGs was published, and APPROVED retrospectively minor amendments which resulted.	
		<ul> <li>a. Updating registers annually rather than six monthly</li> <li>b. Website published registers to include only "decision-making" staff.</li> <li>c. Tightened definition on breaches.</li> </ul>	

The CCG has a minimum of three lay members. Please confirm the:	Y/N	Two lay members are the respective Audit Committee chairs for each CCG, with a further two lay members who are members of the Governing Bodies meetings in common.
<ul> <li>Number of CCG lay members:</li> </ul>	4	
<ul> <li>Number of days per month all CCG lay members are employed:</li> </ul>	13	These are all non-clinical and this figure excludes the Registered Nurse and Secondary Care Doctor.
		In terms of number of days per month, this breaks down as:
		Aylesbury Vale: 11
		Chiltern: 2
		This is on the basis that more of the current lay members in the federated CCGs were historically Aylesbury Vale lay members. All 4 lay members are anticipated to transfer to NHS Buckinghamshire CCG as of 1 April 2018.
The CCG Audit Chair has taken on the role of the Conflicts of Interest Guardian, supported by a senior CCG manager(s).	Y/N	Both Audit chairs were appointed in 2016.
		Evidence from Governing Body seminar minutes 21/07/2016:
		Conflict of Interest Guardians: Robert Parkes noted Audit Committee discussed and recommended at its meeting on 14/07/2016 the appointment of Audit Committee chairs Tony Dixon (Chiltern) and Robert Parkes (Aylesbury Vale) as conflict of interest guardians. The Governing Body approved and ratified the appointments.
From April 2017/18, 100% of staff have been offered the mandatory training and a minimum of 90% of CCG staff have completed the mandatory online conflicts of interest training (at the relevant level) by 31 January each year.	Y / <b>N</b>	Training published January 2018. Deadline 31 May 2018.
		Staff have been selected for one or more modules based on where the role meets certain criteria; may be a voting member of a committee which makes commissioning decisions (not just awarding contracts, but such areas as IFR), and/or a clinician or staff member involved in purchasing services for patients.

Annex: Assessment self-certification