

BUCKINGHAMSHIRE CLINICAL COMMISSIONING GROUP

Register of breaches of CCGs Conflicts of Interest policy

Last Updated: 26/09/18

CCG Contact: Russell Carpenter, Head of Governance/Board secretary

Telephone: 01494 586771 Email Russell.carpenter@nhs.net

NB: some breach ID numbers may appear to be missing from the register. Where a breach is perceived to be a breach in the first instance but following investigation deemed not be, these records are not included on published registers though would be available to review on request through usual FOI arrangements.

Definition of 'breach': There will be situations when interests will not be identified, declared or managed appropriately and effectively. This may happen innocently, accidentally, or because of the deliberate actions of staff or organisations. These situations are referred to as 'breaches'.

NHS England reporting and publication on CCG websites - this is undertaken only where a breach is deemed "material" following investigation

Breach ID	Date of breach (and added to register)	Details of the breach of the conflicts of interest policy	Details of how and by whom the breach was investigated, and the action taken	Confirmation published on CCGs websites
18/19-01	24/08/2018 (wording circulated to Audit Committee 26/09/18)	<p>A breach of the CCG Conflicts of Interest policy is defined as "There will be situations when interests will not be identified, declared or managed appropriately and effectively".</p> <p>An email was circulated to a number of locality practices by a member GP which suggested a level of collusion between practices in their negotiations with FedBucks on price in respect of sub-contracts to implement Primary Care Improved Access, a national scheme funded by NHS England, to offer improved access appointments within general practices from 8am to 8pm though the week.</p> <p>FedBucks, the lead provider within the Buckinghamshire NHS provider collaborative, were copied. This prompted their reply to suggest this highlighted a lack of trust between the parties. This was an alleged a breach of CCG policy on the basis that at no point was the member GP's role as a CCG Clinical Director indicated, and on whose organisational behalf the suggestion of collusion between practices was</p>	<p>Who: Accountable Officer and Deputy Vice Chair (Conflicts of Interest Guardian) - July/August 2018</p> <p>How: review of available evidence and interviews with staff/clinicians concerned - breach panel review Accountable Officer and Deputy Vice Chair. Outcome reached following investigation that this was a material breach.</p> <p>Action taken: (1) All staff will be informed that there has been a breach and reminded to familiarise themselves with the Col policy; (2) All Business Support Managers for localities and minute takers will be offered a checklist that sets out in detail a step by step process on how to handle various potential conflicts and their management within meetings; (3) Clinical Commissioning Directors who hold dual roles (i.e. where they are also practice partners and therefore in turn population based shareholders of GP provider companies) reminded of their responsibilities in managing conflicts of interest.</p>	Through this breach register