

Surrey Heartlands Clinical Commissioning Group

Conflicts of Interest Breach Register 2020/21



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Serial No:	Date Breach Confirmed	Reported to	Details of Breach	Investigation	Action(s) taken
1	29/05/20	Local Counter-Fraud (LCF) Service, CoI Guardian and CFO	It was reported that a member of staff had created and published a website where they advertised themselves as a provider of specialist services to external health and care organisations, naming themselves as Managing Director for the organisation stated in that website.	<p>The incident was initially investigated by the LCF who found no case to answer.</p> <p>The incident was further investigated by a Conflicts of Interest Investigating Panel in accordance with the Standards of Business Conduct and Conflicts of Interest Policy (including Receipt of Gifts, Hospitality and Inducements, Commercial Sponsorship and Working with Industry) with all subsequent actions being taken in accordance with that policy.</p> <p>Following investigation and interview, where mitigations were offered and heard, the panel found that the individual was in breach of the policy.</p> <p>Outcome: The investigating panel determined that the individual undertook these actions unintentionally. The stated organisation was not formally registered and the panel was satisfied that no material gains had been made by the individual as a consequence of actions taken.</p>	<p>The Panel requested that the following actions be taken:</p> <ul style="list-style-type: none"> • an up-to-date declaration of interest form be raised and submitted; and • any future activities which may lead to an actual or potential conflict of interest be notified within the set time periods as detailed in the policy. <p>The Panel also advised that the individual review the on-line "Managing Conflicts of Interest" training to re-familiarise themselves with its contents.</p> <p>The breach will be reported to NHSE in the CCGs next quarterly return.</p> <p>Additional Note: The individual has now removed the website.</p>

Last updated: 26 Jun 20