

**WOLVERHAMPTON CCG**

**GOVERNING BODY**  
**13 DECEMBER 2016**

**Agenda item 2**

<b>Title of Report:</b>	<b>Declaration of Interest</b>
<b>Report of:</b>	CCG Chairman
<b>Contact:</b>	Dr Dante DeRosa
<b>(add board/ committee) Action Required:</b>	<input checked="" type="checkbox"/> <b>Decision</b> <input checked="" type="checkbox"/> <b>Assurance</b>
<b>Purpose of Report:</b>	To advise the Governing Body of a potential Conflict of Interest for the Chairman in relation to discussions taking place between his practice and Royal Wolverhampton Trust in relation to entering into an arrangement for GP services to be sub-contracted to the Trust and for the Governing Body to discuss how this conflict will be managed.
<b>Public or Private:</b>	This Report is intended for the public domain
<b>Relevance to CCG Priority:</b>	Developing and Strengthening Leadership Capacity and Capability.
<b>Relevance to Board Assurance Framework (BAF):</b>	Outline which Domain(s) the report is relevant to and why – See <a href="#">Notes</a> for further information
<ul style="list-style-type: none"> <li>• <b>Domain 1:</b> A Well Led Organisation</li> </ul>	Effective management of conflict of interests is a key element of ensuring the CCG has robust governance arrangements.



## 1. BACKGROUND AND CURRENT SITUATION

- 1.1. Royal Wolverhampton Trust (RWT) have entered into arrangements with four GP practices in the city to deliver GP services through a sub-contracting arrangement. This arrangement includes RWT employing GPs (and the other staff) working at the practice to deliver the services.
- 1.2. My Partners and I are currently in discussion with the Trust to enter into a similar arrangement, subject to appropriate approval through the Joint Commissioning Committee. I have recently declared this as a material change to my entry in the Register of Interests and I am now bringing this to the attention of the Governing Body.

## 2. MANAGEMENT OF POTENTIAL CONFLICT

- 2.1. As Chair of the CCG, one of my key roles is providing leadership in upholding the highest standards of integrity in line with the principles set out in our constitution and Governing Body Code of Conduct. As such, I recognise that I must set an example in proactively managing conflicts of interest that may affect my role leading the organisation. I have discussed this issue with the CCG's Conflict of Interest Guardian and agreed that the most appropriate way to manage the potential conflict that now arises is for the Governing Body to discuss the way forward.
- 2.2. It is clear that, as RWT is the CCG's main provider, it would not be possible for me to remain Chairman should I become an employee of the Trust. However, whilst my partners and I continue to discuss this proposal and come to a collective and personal decision on the next steps, the Governing Body need to be involved in agreeing how I will manage this conflict of interest in the meantime.
- 2.3. The Governing Body needs to consider whether at this stage, the potential conflict outweighs the advantages of me remaining as chair of the CCG. Should the Governing Body conclude that it is appropriate for me to remain, I am proposing that we take the following steps to manage this conflict:-
  - I will continue to actively declare the conflict at the beginning of each meeting.
  - With the support of the Conflict of Interest Guardian and the Corporate Operations Manager, the Governing Body will determine if my conflict of interest in any item relating to RWT means any action should take place.
  - Actions which could take place could include me taking part in the discussion but stepping down from the chair for that item of business or leaving the meeting for particular items of business.
  - This will apply to discussions of RWT's Finance and Quality Performance and in particular to any discussions of action to be taken by the CCG in relation to RWT's performance.



- I will not take part in discussions which relate directly to RWT's delivery of Primary Care Services or any approval or assurance process that they or the practices they are working with are conducting.

2.4 The general provisions of the CCG's Policy for declaring and managing conflicts of interest will apply to any action taken to manage this conflict of interest. In particular, this will mean that I will not receive copies of papers when the level of conflict means that this is not appropriate. The Corporate Operations Manager will be responsible for managing this process and how it applies to meetings of the Governing Body and its agendas.

### **3. CLINICAL VIEW**

3.1. Not applicable.

### **4. PATIENT AND PUBLIC VIEW**

4.1. Not applicable.

### **5. RISKS AND IMPLICATIONS**

#### ***Key Risks***

5.1. There is a risk that failing to maintain adequate measures for managing conflicts of interest will leave the CCG and its decision making open to challenge.

#### ***Financial and Resource Implications***

5.2. There are no specific financial implications associated with this report.

#### ***Quality and Safety Implications***

5.3. There are no specific quality and safety implications arising from this report.

#### ***Equality Implications***

5.4. There are no specific equality implications arising from this report.

#### ***Medicines Management Implications***

5.5. There are no specific medicines management implications arising from this report.

#### ***Legal and Policy Implications***

5.6. There are no specific legal or policy implications arising from this report.



**6. RECOMMENDATIONS**

**That the Governing Body consider and discuss the approach outlined to managing the potential conflict of interest.**

**Name** Dr Dante DeRosa  
**Job Title** Chair of CCG  
**Date:** November 2016



**REPORT SIGN-OFF CHECKLIST**

**This section must be completed before the report is submitted to the Admin team. If any of these steps are not applicable please indicate, do not leave blank.**

	<b>Details/ Name</b>	<b>Date</b>
Clinical View	N/a	
Public/ Patient View	N/a	
Finance Implications discussed with Finance Team	N/a	
Quality Implications discussed with Quality and Risk Team	N/a	
Medicines Management Implications discussed with Medicines Management team	N/a	
Equality Implications discussed with CSU Equality and Inclusion Service	N/a	
Information Governance implications discussed with IG Support Officer	N/a	
Legal/ Policy implications discussed with Corporate Operations Manager	<b>Peter McKenzie This report has also been discussed with Jim Oatridge, Conflict of Interest Guardian</b>	<b>16/11/16</b>
<b>Signed off by Report Owner (Must be completed)</b>	<b>Dr Dante DeRosa</b>	

