

Register of Breaches of Conflicts of Interest Policy

2018/19

Date of breach	Details of how and by whom the breach was investigated	Details of breach of the conflicts of interest policy	Action taken to mitigate breach	Date breach reported to Audit Committee	Date of breach reported to NHS England if material as defined by the Policy
None to date					

2017/18

Date of breach	Details of how and by whom the breach was investigated	Details of breach of the conflicts of interest policy	Action taken to mitigate breach	Date breach reported to Audit Committee	Date of breach reported to NHS England if material as defined by the Policy
06/02/18	Investigated by Executive Governance Engagement. Lead and	Minutes of a meeting were erroneously distributed to an individual with a conflict for a particular agenda item discussed in that meeting but	Attempted to recall email but unsuccessful as already opened. Member of staff was advised on the need to	20 th March 2018	Does not meet criteria for material so not reported.

		<p>had not been appropriately edited to remove the section of the minutes.</p>	<p>maintain confidentiality.</p> <p>Report author reviewed section of minutes where conflict arose to identify any risks arising from additional knowledge gained by member but none were identified.</p> <p>Exec Lead Governance and Engagement investigated. Formal agenda setting meetings with admin for meetings to be undertaken to identify who can and cannot receive papers/minutes.</p> <p>Those members of staff with live conflicts are moved to a different distribution list to ensure papers are not sent without checking first.</p>		
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2016/17

Date of breach	Details of how and by whom the breach was investigated	Details of breach of the conflicts of interest policy	Action taken to mitigate breach	Date breach reported to Audit Committee	Date of breach reported to NHS England if material as defined by the Policy

03/01/17	Breach identified in a Board Committee. Investigated by Executive Governance and Engagement. Lead and	Papers were erroneously distributed to an individual with a conflict for a particular agenda item.	Ensuring individual conflicts highlighted on covering report and checked by administrators with either Exec Lead for Governance and Engagement, Chair of meeting or Conflicts of Interest Guardian	21/02/17	Not material, therefore not reported.
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