7-Minute Briefing: Conflict of Interest (COI) Policy

COVENTRY & RUGBY GPALLIANCE

1. Why it matters

This policy ensures that all CRGPA staff understand their responsibilities regarding conflicts of interest. The policy ensures decisions are made in the public interest, trust in CRGPA is maintained and any risks of impropriety are reduced. The intention is to make staff aware of CRGPAs expectations of conduct and behaviours and give staff the knowledge and information they need to protect themselves from situations that may draw criticism or even disciplinary action. The policy provides guidance and support to all staff and all members of the Board whose work brings them into contact with external individuals, companies and organisations of any sort in a business sense about their conduct relating to conflicts or potential conflicts of interest.

2. Who It Applies To

The policy applies to all CRGPA employees (permanent, temporary, agency, contractors), students, secondees, volunteers, honorary contract holders, Alliance Board members, and committee participants. Individuals are required and expected to refer to their respective professional codes of conduct relating to the declaration of conflicts in interest.

3. What is a conflict of interest

A conflict of interest is defined as: A conflict between the private interests and the official responsibilities of an individual in a position of trust, and/or a set of conditions in which a professional judgement concerning a primary interest [such as patients' welfare, committing company funds] tends to be unduly influenced by a secondary interest [such as financial gain]. In a nutshell, a COI occurs when personal interests could influence professional decisions. Types include:

- **Financial Interests**: where an individual may get direct financial benefits from the consequences of a decision. For example; Shareholders, consultancy, secondary income, a provider of clinical private practice
- **Non-Financial Professional Interests**: this is where an individual may obtain a non-financial professional benefit from the consequences of a decision, such as increasing their professional reputation, status or promoting their professional career. For example; Advocacy for a group, GP with special interests, CQC advisor, research roles
- **Non-Financial Personal Interests:** where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit. For example; Volunteering, a personal condition requiring individual funded treatment, membership of a lobby or pressure group
- **Indirect Interests**: this is where an individual has a close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest in a commissioning decision. For example; spouse/partner, close family members or relative, close friend or associate. A declaration of interest for a "business partner" in a GP partnership must include all relevant collective interests of the partnership, and all interests of their fellow GP partners

4. Key Principles in Conflict Management

- **Transparency**
  All staff must openly declare any interests that could influence their professional responsibilities. This builds trust and ensures accountability.
- **Integrity**
  Decisions must be made in the best interests of patients and the organisation, free from personal gain or bias.
- **Proactive Disclosure**
  Interests must be declared at the earliest opportunity—on appointment, at meetings, and when roles or circumstances change.
- **Fairness**
  Conflicts must be managed consistently and fairly, ensuring no individual is unfairly advantaged or disadvantaged.
- **Accountability**
  Everyone is responsible for identifying and declaring conflicts. Managers and leaders must ensure appropriate action is taken.
- **Openness in Decision-Making**
  Meeting chairs must ensure conflicts are declared and managed, with clear records kept in minutes.
- **Zero Tolerance for Impropriety**
  Abuse of position for personal or financial gain is strictly prohibited and may result in disciplinary or legal action.
- **Support and Guidance**
  You are encouraged to seek advice from line managers or the Governance Team if unsure about a potential conflict.

5. What you need to do

Interests must be declared: On appointment and when prompted by the Governance Team, at meetings so that any actual, potential or perceived conflicts of interest are declared and recorded and when roles or circumstances change. Use the Declaration of Interests Form found within the policy and submit to the Governance Team.

Declarations must be made as soon as reasonably practicable and ideally within 28 days after the interest arises.

It is the duty of every individual covered by this policy to speak up about genuine concerns in relation to the administration of this policy on conflicts of interest management, and to report these concerns. Please do not ignore your suspicions or investigate the matter yourself, but rather speak to the Governance Manager.

Individuals wishing to discuss any concerns on a strictly confidential basis are asked initially make contact with the Governance Team by email crgpa.corporate@nhs.net and arrangements will be made to speak to the Governance Manager or an Executive Director as required by the situation.

6. Roles and Responsibilities

- CRGPA Board: Overall accountability.
- Chief Executive: Ensures implementation and awareness.
- Managers: Introduces policy at induction and ensures compliance by ensuring declarations and managing any conflicts.
- Governance Team: Maintains the register and provides guidance.
- All Staff: Make a declaration , act with honesty and avoid personal gain. If in doubt - declare it!

7. Consequences of Breach

Breaches may result in disciplinary action, including dismissal, civil or criminal liability under the Companies Act 2006, Bribery Act 2010 or Fraud Act 2006, and professional sanctions for regulated healthcare professionals. Concerns should be raised with the Governance Team or via the FTSU Policy.

8. Where to find more information

- Contact the Governance & Safety Team.
- Visit Staff zone or the L Drive for the declaration form.
- Report suspicions of fraud to the NHS Counter Fraud Authority:
  - Online: https://cfa.nhs.uk/reportfraud
  - Phone: 0800 028 4060

8. Review & Monitoring

Reviewed every 3 years, monitored annually, audited twice yearly.