

<b>Meeting: Primary Care Commissioning Committee</b>			
<b>Meeting Date</b>	23 February 2022	<b>Action</b>	Receive
<b>Item No.</b>	2	<b>Confidential</b>	No
<b>Title</b>	Declarations of Interest Register		
<b>Presented By</b>	Mr Peter Bury, Chair		
<b>Author</b>	Lindsay Johnson, Committee Secretary		
<b>Clinical Lead</b>			

### Executive Summary

The Clinical Commissioning Group (CCG) has a statutory requirement to keep, maintain and make publicly available a register of declarations of interest under Section 140 of the National Health Service Act 2006 (as inserted by section 25 of the Health and Social Care Act 2012).

The requirement to make declarations of interest also includes any offer of gifts and hospitality received.

This paper sets out a flow chart for declaring and managing conflicts of interest, as outlined within the CCG's Conflict of Interest Policy and also reflects those declarations made by all members and colleagues in attendance at Committee meetings.

There is also a requirement on the CCG to ensure for each conflict declared, appropriate management arrangements are in place and for those to be communicated.

Until all arrangements are confirmed, all conflicts should be declared with any specific management arrangements required during the course of the meeting being determined by the Chair, with an accurate record of action taken recorded in the minutes. The current register reflects the latest attendees.

### Recommendations

It is recommended that the Primary Care Commissioning Committee

- Receive the update provided; and
- Raise any further conflicts of interest, gifts or hospitality

### Links to CCG Strategic Objectives

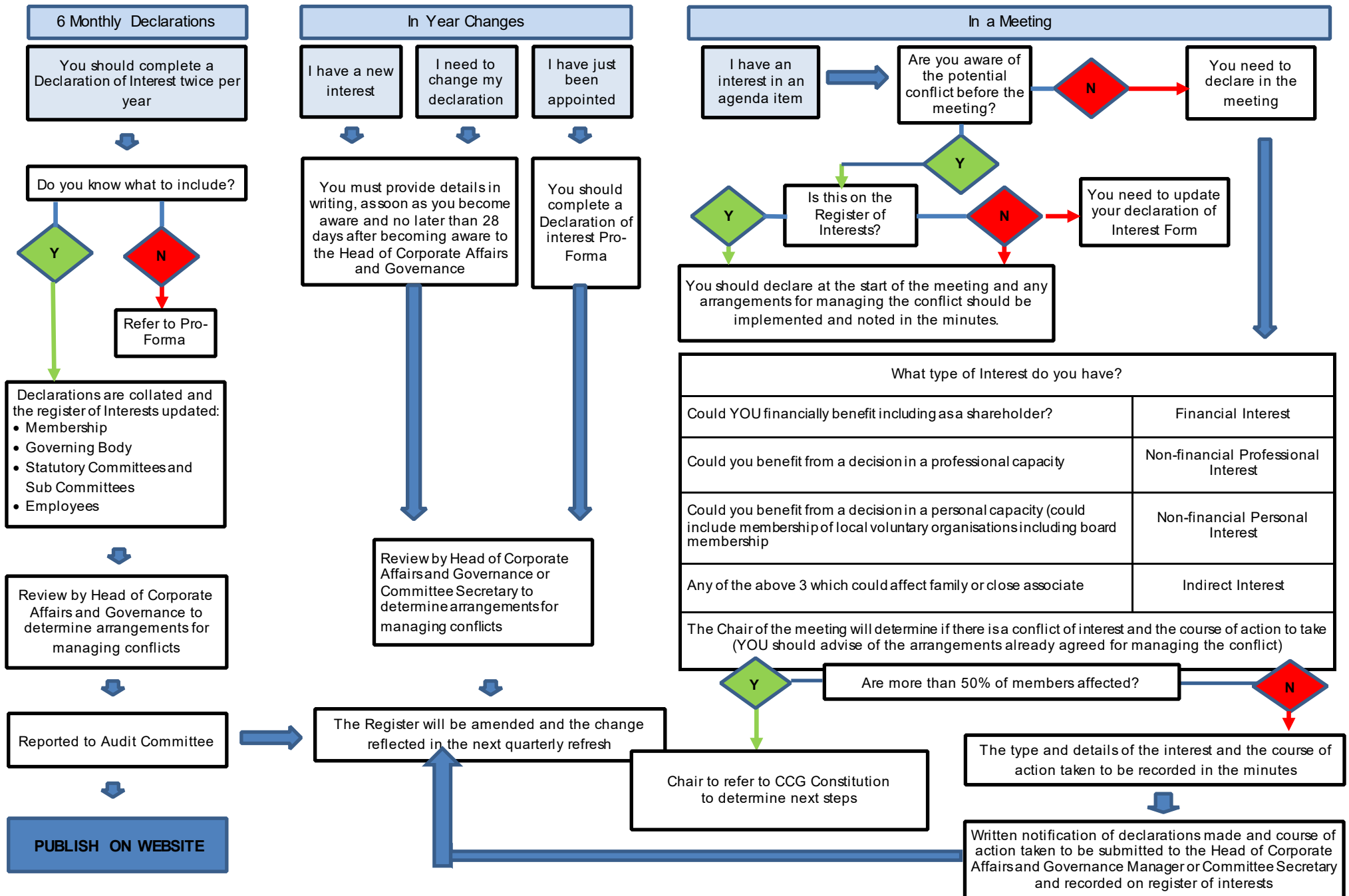
<b>SO1 - To support the Borough through a robust emergency response to the Covid-19 pandemic.</b>	☒
<b>SO2 - To deliver our role in the Bury 2030 local industrial strategy priorities and recovery.</b>	☒

Links to CCG Strategic Objectives	
<b>SO3 - To deliver improved outcomes through a programme of transformation to establish the capabilities required to deliver the 2030 vision.</b>	<input checked="" type="checkbox"/>
<b>SO4 - To secure financial sustainability through the delivery of the agreed budget strategy.</b>	<input checked="" type="checkbox"/>
Does this report seek to address any of the risks included on the Governing Body Assurance Framework? If yes, state which risk below:	
GBAF	

Implications						
Are there any quality, safeguarding or patient experience implications?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Has any engagement (clinical, stakeholder or public/patient) been undertaken in relation to this report?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Have any departments/organisations who will be affected been consulted ?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Are there any conflicts of interest arising from the proposal or decision being requested?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Are there any financial Implications?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Has an Equality, Privacy or Quality Impact Assessment been completed?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Is an Equality, Privacy or Quality Impact Assessment required?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Are there any associated risks including Conflicts of Interest?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
Are the risks on the CCG's risk register?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
The main risk associated with this paper relates to Conflicts of Interest, in terms of process, implementation and assurance. There are policies in place, however there is always a risk a declaration may not be captured. The process for seeking declarations at each meeting acts as a safeguard, however the CCG could be challenged on the robustness of arrangements.						

Governance and Reporting		
Meeting	Date	Outcome

# Conflicts of Interest Flowchart



**6 Monthly Declarations**

You should complete a Declaration of Interest twice per year

Do you know what to include?

**Y** → Declarations are collated and the register of Interests updated:

- Membership
- Governing Body
- Statutory Committees and Sub Committees
- Employees

**N** → Refer to Pro-Forma

Review by Head of Corporate Affairs and Governance to determine arrangements for managing conflicts

Reported to Audit Committee

**PUBLISH ON WEBSITE**

**In Year Changes**

I have a new interest | I need to change my declaration | I have just been appointed

You must provide details in writing, as soon as you become aware and no later than 28 days after becoming aware to the Head of Corporate Affairs and Governance

You should complete a Declaration of interest Pro-Forma

Review by Head of Corporate Affairs and Governance or Committee Secretary to determine arrangements for managing conflicts

The Register will be amended and the change reflected in the next quarterly refresh

**In a Meeting**

I have an interest in an agenda item → Are you aware of the potential conflict before the meeting?

**N** → You need to declare in the meeting

**Y** → Is this on the Register of Interests?

**Y** → You should declare at the start of the meeting and any arrangements for managing the conflict should be implemented and noted in the minutes.

**N** → You need to update your declaration of Interest Form

**What type of Interest do you have?**

Could YOU financially benefit including as a shareholder?	Financial Interest
Could you benefit from a decision in a professional capacity	Non-financial Professional Interest
Could you benefit from a decision in a personal capacity (could include membership of local voluntary organisations including board membership)	Non-financial Personal Interest
Any of the above 3 which could affect family or close associate	Indirect Interest

The Chair of the meeting will determine if there is a conflict of interest and the course of action to take (YOU should advise of the arrangements already agreed for managing the conflict)

**Y** → Are more than 50% of members affected? → Chair to refer to CCG Constitution to determine next steps

**N** → The type and details of the interest and the course of action taken to be recorded in the minutes

Written notification of declarations made and course of action taken to be submitted to the Head of Corporate Affairs and Governance Manager or Committee Secretary and recorded on register of interests

Primary Care Commissioning Committee									
Name	Declared Interest- (Name of organisation and nature of business)	Type of Interest			Is the Interest direct or indirect?	Nature of Interest	Date of Interest		Comments
		Financial Interests	Non-Financial Professional Interests	Non-Financial Personal Interests			From	To	
Peter Bury, Lay Member Quality and Performance (Chair and Voting Member)	Labour Party		X		Direct	Member	1979	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Bury College		X		Direct	Member of Board of Governors	2008	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Unite the Union		X		Direct	Member	1974	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
David McCann, Lay Member (Vice Chair and Voting Member)	Praxis Real Estate Management LTD, Manchester	X			Direct	Director and General Legal Counsel	2011	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	PCL (CIP) GP LTD - Nature of Business Asset Management	X			Direct	Director	2014	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	Praxis Capital LTD - Nature of Business Asset Management	X			Direct	Director and majority shareholder	2014	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	Hanover Law Limited – (changed name from Praxis Law )	X			Direct	Director and 50% shareholder	2018	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	The Airfields Residential Management Company Limited	X			Direct	Director	Oct-19	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	The Aldermaston Estate Management Company Ltd	X			Direct	Director	Oct-19	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	Praxis Residential Limited	X			Direct	Director	Oct-19	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	Praxis Facilities Management Ltd	X			Direct	Director	Nov-19	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	Praxis Group Limited	X			Direct	Director	Oct-20	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	The Airfields Commercial Management Company Limited	X			Direct	Director	Feb-20	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
PCP III Number 2 Limited	X			Direct	Director	Mar-21	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.	

	PCP III Number 1 Limited	X			Direct	Director	Mar-21	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	PCP III Number 4 Limited	X			Direct	Director	Apr-21	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	PCP III Number 3 Limited	X			Direct	Director	Apr-21	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
	PCP III Holdco Limited	X			Direct	Director	Mar-21	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Bury Council			X	Indirect	Daughter is an employee	2012	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Geoff Little, Chief Executive for Bury Council & Accountable officer Bury CCG <b>(Voting Member)</b>	Ratio Research			X	Indirect	Close family member is an employee	Apr-19	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Sam Evans, Executive Director of Finance <b>(Voting Member)</b>	None declared					Nil Interest	05/05/2021	Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
Will Blandamer, Executive Director of Strategic Commissioning <b>(Voting Member)</b>	Ashton on Mersey Football Club			X	Direct	Chairman	2018	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Manchester Football Association			X	Direct	Board Champion for Safeguarding	2018	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Lesley Jones, Director of Public Health, Bury Council <b>(Voting Member)</b>	Bury Social Care Provider			X	Indirect	Daughter is employed	Oct-20	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Fiona Boyd, Governing Body Nurse - <b>(Voting Member)</b>	NHS England / NHS Improvement (Cheshire & Merseyside)		X		Direct	Senior Clinical Manager	Sep-21	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	DWF Law - <b>Interest ended but will remain on register until April 2022.</b>		X		Direct	Medical Assessor	Aug-20	Sep-21	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises. <b>Interest ended but will remain on register until April 2022.</b>
	Real Staffing - <b>Interest ended but will remain on register until June 2022.</b>		X		Direct	Interim Patient Safety Support	Sep-21	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises - <b>Interest ended but will remain on register until June 2022.</b>
Cathy Fines, CCG Chair <b>(Non Voting Member)</b>	Bury GP Federation	X			Direct	Practice is a member	2013	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Tower Family Health Care	X			Direct	Member practice is part of Tower Health Care	2017	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.

	Horizon Clinical Network	X			Direct	Practice is a member	2019	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Central Manchester Foundation Trust			X	Indirect	Husband is employed		Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Gail Henshaw, GMHSC (Non Voting Member)	None Declared					Nil Interest		Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Dr Mohammed Jiva, LMC Representative (Non Voting Member)	Rochdale and Bury Local Medical Committee		X		Direct	CEO	Pre 2008	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	GP Federation - Chair Rochdale Health Alliance		X		Direct	Chair Rochdale Health Alliance	2016	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Peterloo Medical Centre, Middleton		X		Direct	GP Principle	1999	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Mohammed Patel, Primary Care Commissioning Committee Member (Non Voting Member)	L A Johnson Ltd	X			Direct	Director	2002	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Blundell's Pharmacy Ltd	X			Direct	Director	2005	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Alan Robinson (Cheshire) Ltd	X			Direct	Director	2005	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Horns Dispensing Chemists Ltd	X			Direct	Director	2005	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Freshphase Ltd	X			Direct	Director	1998	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Manor News Point Ltd	X			Direct	Director	2015	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Abbeydale Holding Ltd	x			Direct		2020	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Horns Property Ltd	X			Direct		2021	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Ruth Passman, Primary Care Commissioning Committee (Non Voting Member)	None Declared					Nil Interest		Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Richard Rawlinson, Primary Commissioning Committee Member (Non Voting Member)	Primary Eyecare Services Ltd	X			Direct	Director	20/12/2017	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Local Optical Committee Support Unit	X			Direct	Commissioning Lead	03/03/2016	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Association of British Dispensing Opticians	X			Direct	Regional Lead	01/01/2017	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.

	Greater Manchester East Local Optical Committee		X			Member	04/04/2018	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	UK Domiciliary Eyecare Committee		X		Direct	Member	01/05/2009	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Tameside & Glossop		X		Direct	Locality Lead	01/04/2019	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
	Manchester Health & Care Commissioning Team			X	Indirect	Spouse is Executive Clinical Director	25/10/2014	Present	Specific arrangements in respect of potential conflicts arising to be given further consideration when situation arises.
Zoe Alderson, Head of Primary Care <b>(voting member deputising for Director of Primary Care)</b>	None declared					Nil Interest		Present	General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.
Rachele Schofield, Primary Care Manager	None declared					Nil Interest	Nil Interest		General guidance to be followed in respect of declaring conflicts of interest where identified. In advance and during the meeting.