**North East Lincolnshire Clinical Commissioning Group**

**Conflicts of Interest Breach Register**

**December 2020– November 2021**

Definition of 'breach': There will be situations when interests will not be identified, declared or managed appropriately and effectively. This may happen innocently, accidentally, or due to the deliberate actions of staff or organisations. These situations are referred to as ‘breaches’

| Date of breach | Reported to | Details of Breach | Investigation | Action(s) Taken |
| --- | --- | --- | --- | --- |
| November 2021 | IG&A Committee (Conflict of interest Guardian)  Chair of Council of Members | x1 Council of Members (CoM), members failed to make an updated disclosure and return their annual declarations of interest | Member informed of breach of the CCG’s Standard of Business Conduct and Conflict of Interest Policy. | Reported to IG&A Committee  Exclusion (and by default the practice, they represent at CoM) from any CoM meetings, until such time as a completed declaration has been received  Published on CCG website (via this register) |
| January 2020/2021 | IG&A Committee Chair (Conflict of interest Guardian)  Chief Finance Officer | x4 high level members are not compliant with their statutory and mandatory annual Conflict of Interest training for 2020.  Members have yet to meet compliance of their training for 2021. | Individuals have been sent various reminders.  Non-compliance escalated to the COI Guardian and the Chief Finance Officer. | Reported to IG&A committee  IG&A Committee Chair (Conflict of interest Guardian) to address the non-compliance and remind the individuals of their responsibilities in management of conflict of interest.  Published on CCG website (via this register |