

## **Breach notification:**

### **What factors that led to a breach being identified**

'Following a review of the Conflicts of Interest register the CCG identified that some Governing Body GP members have not declared indirect interests relating to family members. One member has also declared his own interest in the same companies as non – financial when it is in fact financial though not related to the CCG.

### **How did we respond?**

We carried out an investigation which was led by the Conflicts of Interest Guardian and an action plan, including learning points, were subsequently agreed with the CCG Accountable officer and CCG Chair.

### **What were the outcomes of the investigation?**

We are satisfied that that none of the undeclared interests impacted on the Members abilities to perform their duties as a GP nor as a member of WF CCG and are further satisfied that this was a genuine error.  
We were also satisfied that none of the undisclosed conflicts impacted on any CCG decision making.

### **What are the actions and learning points that arose from the investigation?**

The CCG will again communicate with its members to ensure family interests are declared and interests are classified correctly and consistently and are in line with the latest version of the NHS England published statutory guidance (June 2017).

A CCG officer will periodically undertake an audit of a sample selection of declaration forms to provide assurance and consistency against classification of interest types. This however does not disclaim responsibility for declarations by individual members and employees of the CCG.