

CONFLICTS OF

INTERESTS

FAQS



No.	Question	Answer
1.	Do I need to make a declaration	<p>The below members of staff are classed as ‘decision making staff’ and must make an annual entry to the Declarations of Interests Register, even if it is to confirm that they have no changes to previous declarations or that they have nothing to declare (a nil declaration)</p> <ul style="list-style-type: none"> - All staff at Agenda for Change Band 8C and above; - Executive Directors and Non-Executive Directors; - All Consultant Medical Staff; - The Trust’s Procurement Team. <p>All other staff must complete an annual entry on the Trust’s Declarations of Interests Register <i>only if they have an actual or potential conflict of interest to declare.</i></p>
2.	How do I make a declaration	<p>Declarations, including gifts and hospitality, should be declared via the Trusts online portal (Civica Declare system): https://stockportfht.mydeclarations.co.uk. All new starters will receive an email from Civica Declare with details of your username, this is your email address and your unique password.</p> <p>More information and guidance can be found on the Trust’s microsite – Communications & Corporate Governance – Declarations of Interest</p>
3.	I don’t know what my password is	<p>The email will identify your unique password. Should you wish to change your password (when in the system) you can do so by going to ‘My Details’ on the drop down menu of the Civica Declare system.</p>
4.	I have forgotten my password	<p>When you log onto the system with your username (= your Trust email address), select the ‘Forgotten your password?’ link and the system will send you a password reset email.</p>
5.	How long have I got to declare my interest	<p>Declarations should be made as soon as possible. You have 28 days from the date of which your situation changes or your gift/hospitality etc has been received to declare an interest.</p>
6.	What happens if I don’t declare that I have an interest	<p>This may be classed as a breach and the Trust will investigate each breach according to its own specific facts and merits and give relevant parties the opportunity to explain and clarify any relevant circumstances.</p>
7.	Do I have to declare an interest if I have been sponsored to attend an event if it was done outside of works time or if I take annual leave? What if I have received an honorarium?	<p>Modest offers of accommodation/travel relating to attendance at events may be accepted but need to be declared. Anything other than modest should only be accepted in exceptional cases and needs to be approved by your Directorates Associate Director in the first instance with reasons included in your declaration as to why it was accepted. You will also need to include a description of the nature and value of the hospitality.</p> <p>If you have been paid to attend the event – including honorariums (eg you have presented a paper) then this will also need to be declared under the employment declaration tab.</p> <p>Please refer to the guidance in the policy for what information should be included in your declaration. Being on annual leave does not mean that the requirement is negated as it could be seen as a potential for conflict of interest.</p>

8.	Who from the Trust has to authorise my external employment?	All outside employment needs to be declared but not all needs to be authorised by the Trust. If your contract states that you must seek prior approval to entering into outside employment by the Trust, your line manager should approve it. Please ensure you enter their details into the system.
9.	Who can see the information that I am declaring?	The Trust's Corporate Governance team will regularly review interests declared. Additionally, in line with the NHS Contract, the register of declarations of interest can be accessed by members of the public so being as clear as possible with what you are declaring is important.
10.	Is there a policy that explains to me what I need to declare and why?	Yes, this can be found on the Trust's intranet and is called Conflicts of Interest Policy.
11.	I work as a volunteer and have been given a gift by a patient as a thank you, do I have to declare it	<ul style="list-style-type: none"> • Gifts of cash and vouchers to individuals should always be declined • Gifts valued at over £25 should only be accepted on behalf of Stockport NHS Foundation Trust and not in a personal capacity. These should be declared by staff • Modest gifts with a value up to £25 may be accepted and do not need to be declared
12.	I'm a new starter and can't log into the system, why not?	The Civica Declare system takes its data from the Trust's ESR system and this can take up to 2 weeks to update.
13.	How long will my declaration be kept by the Trust	After expiry, an interest will remain on the register for 6 months and a private record of historic interests will be retained by the trust for a minimum of 6 years.
14.	A supplier to the Trust has sent me a bottle of wine as a thank you, should I declare it as the value of it is under £25	<p>No gifts should be accepted from a supplier (or a company who is hoping to do business with the Trust).</p> <p>However, you can accept very low cost branded goods such as pens/post up to the value of £6 – these do not need to be declared).</p> <p>The gift of wine should be refused.</p>
15.	I'm a school governor do I have to declare this as it has no impact on the Trust?	<p>Yes you do.</p> <p>The policy refers to Loyalty interests and states that if you sit on an advisory group or other paid or unpaid decision making forums that can influence how an organisation spends taxpayers' money Then you have to declare it.</p>
16.	I've been given a gift from a patients' family and I'm sure it must be worth more than £25, can I accept it?	<p>No, you cannot accept a gift from a patient/family member that is valued at over £25 for yourself.</p> <p>However, you can accept it on behalf of the trust charity Stockport NHS Foundation Trust General Fund, to be used for fund raising purposes. You would have to declare that you had accepted the gift on the above premise and then ensure the gift is given to the Charity.</p>
17.	A supplier has asked that I attend a meeting at their office and lunch is being provided, can I accept it?	<p>Yes, hospitality from a supplier can be accepted up to the value of £25 and it does not need to be declared.</p> <p>Hospitality of a value between £25 - £50 may be accepted but must be declared.</p> <p>Hospitality over a value of £50 should be refused unless (in exceptional circumstances) line manager approval is given. A clear reason should be recorded on the Trust's Register of Interests as to why it was permissible to accept.</p>
18.	I'm a director at my wife's company do I need to declare it as the company has nothing to do with the delivery of health	Yes you do as outside employment means employment and other engagements, outside of formal employment arrangements. This can include <i>Directorships</i> , non-executive roles, self-employment, consultancy work, charitable trustee roles, political roles and roles within not-for-profit

	services?	organisations, paid advisory positions and paid honorariums which relate to bodies likely to do business with an organisation.
19.	I have outside employment as I work part time in a local bar, do I need to declare it?	Yes, see s7 in the Conflicts of Interest policy regarding outside employment; all outside employment must be declared.
20.	My sister works at the Trust but I'm not in direct contact with her during my day to day activity, do I need to declare this?	No, you only need to declare if you have a family member (or relative, close friend or business partner) working at the Trust if you are or could be involved in the recruitment or management of them or if you are involved in making financial decisions regarding them.
21.	My husband is transferring into my directorate and as I am a manager (and he is not), it could be seen that I have managerial responsibility (or could have at some point) over him, do I need to declare?	Yes – refer to s7 in the Conflicts of Interest policy. When declaring you will also need to ensure that you include what action you will take to mitigate against conflict.
22.	I carry out clinical private practice when I am not at the trust, do I have to declare this?	Yes, all clinical private practice must be declared.
23.	I witnessed a colleague accept a gift from a supplier what should I do?	The policy is clear that accepting gifts from suppliers is not permitted. There is a facility on the Civica Declare database to report such incidents under 'Whistleblowing'; this can be done anonymously if necessary. This would then be investigated by the Director of Corporate Affairs. You can also refer to the trusts Freedom to Speak Up – Raising Concerns policy or the trust's Local Anti-Fraud, Bribery and Corruption Policy
24.	Are there other things other than the receipt of gifts that I have to declare	The policy identifies the categories that staff may potentially have to declare against. Please refer to the Conflicts of Interest policy for clarity.
25.	How can I find out more about Conflicts of Interests?	<p>Mersey Internal Audit Agency have put together a useful video, exploring:</p> <ul style="list-style-type: none"> • What a conflict of interest is and why it matters • How and when to declare a conflict of interest • Practical tips on keeping transparency at the forefront • The potential risks and consequences of not addressing conflicts properly. <p>You can view the video here: MIAA Fraud Awareness Series - Conflicts of Interest</p> <p>You can also contact the Corporate Affairs Team for further advice – corporateoffice@stockport.nhs.uk</p>