

## **Coventry Local Involvement Network (LINK) Declaration of Interests and Conflict of Interest Policy**

### **Scope**

This policy applies to all people who are active members of Coventry LINK. It aims to ensure that there is transparency within the LINK and that the LINK can demonstrate to the local community that the LINK is not unduly influenced by people with undeclared interests in health and social care services.

### **Policy Statement**

Coventry LINK is committed to implementing the Nolan Principles of Public Life and has devised a Code of Conduct based around these principles. The LINK strives to ensure that its work represents the varied and broad issues and interests of communities using health and social care services in Coventry, but recognises that people who become involved in LINK may have other interests of relevance to health and social care services and their commissioning and delivery which may lead to a conflict of interest. Such other interests do not usually prevent people from being involved in LINK, but it is important that checks and balances are put in place, and this policy sets out the framework for declaring and assessing conflicts of interest and how conflicts will be dealt with in terms of LINK work.

### **Examples of conflicts of interests**

Coventry LINK is involved in work to ensure that people's views and experiences of health and social care services in Coventry are collected and represented. The LINK will also from time to time be involved in cross boundary working outside Coventry. Coventry LINK therefore has a broad remit and may be engaged in looking at any aspect of health or social care provision within Coventry. This will cover many different services, services providers, as well as those who commission services:

#### **Health services**

The providers of health services range from the local hospital to individual GP practices, chemists, opticians, the PCT provider arm etc. Some are public bodies and others are run as businesses. There are also some voluntary sector providers, for example some Hospices.

#### **Social care services**

Social care services are provided by many different providers: local authority; private sector business; social enterprise; or a voluntary organisation.

#### **Service commissioners**

Coventry City Council and Coventry Primary Care Trust act as commissioners or purchasers of health and social care services. There are also GP

commissioning groups which can make decisions about how money is spent to treat patients.

Therefore conflicts of interest can arise in different ways and LINK members' connections with either service providers or commissioners can be of significance. Political interests can also lead to conflict due to the Local Authority's role as commissioner and provider of services.

Two examples of possible conflicts are:

**1. A Specific Piece of work:**

The LINK is looking at A&E services and a LINK member's wife (or other close relative) works in the A&E team

**2. More general potential conflicts:** may be that a member or a close relative is:

- a member of a Foundation Trust;
- employed by a commercial organisation delivering social care services;
- a City Council employee involved in delivering/planning social care
- a NHS employee (dependent on role)
- employed by or volunteers on the management committee of a voluntary sector organisation which holds a contract to deliver social care services.
- on a decision making panel which has influence over health and social care services in another capacity;
- the owner or part-owner of a private company, businesses or consultancies likely or possibly seeking to do business with the NHS (eg selling to a pharmacy).
- elected as a local councillor.

Such conflicts may create problems as they can:

- Inhibit free discussion;
- Result in decisions or actions that are not in the interests of LINK and the people it serves
- Risk the impression that LINK has acted improperly.

However, indirect benefits such as changes to services which benefit a group of service users or the wider population that result of LINK work are not conflicts of interest.

LINK aims to put in place mechanisms to enable individuals and members of interest groups to feed in their perspectives about health and social care services including relevant/specialist knowledge about services. Such specialist knowledge does not represent a conflict of interest if it is facilitated in a transparent way.

**For example:** LINK is looking at health services for people with mental health issues. The knowledge and experience of voluntary sector organisations, which provide services and support to this client group will be valuable in identifying potential issues and could feed into the design of the project. However, if a voluntary sector organisation holds a contract or receives funding for delivering any health services this should be noted and considered in terms of how the organisation is involved in the planning of the project and what contribution it makes.

## **Declaring Interests**

You should declare any political or personal interest which could put you at risk of being accused of bias if you do not declare it.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. A simple and usually reliable test is the tabloid test: how would this look if it was ever reported by a journalist determined to make the story look as bad as possible. If you would like to discuss this issue, please contact the LINK Project Manager for confidential guidance.

All active LINK members will be asked to submit a written declaration of any financial, business, Political, personal and family interests that could be relevant to LINK's work of commenting on and influencing the delivery and commissioning of local health and social care services. A declaration of interests form is provided for this purpose.

To be effective, the declaration of interests needs to be updated at least annually and also when any changes occur.

If a matter arises during a meeting where a member thinks they may have an interest to declare they should notify the Chair or facilitator straight away. Any interest should be recorded in the minutes/notes of the meeting. It will be the decision of the rest of the group whether the member can still participate in the matter under discussion.

A member must not take part in any related decision making when an interest has been identified.

Interests will be recorded on the LINK's register of interests, which will be maintained by the LINK Host organisation

## **Failure to declare an Interest**

If you fail to declare an interest, which is known to the LINK Host, in a meeting the LINK Project Manager/worker will declare that interest.

If a member has failed to register/declare an interest they will be asked to provide a written explanation of the reasons why. The LINK may decide that either:

- no action other than ensuring the register of interests is up to date is required
- or may decide to suspend or terminate an individual's active membership.

