



Derby and Derbyshire CCG's Breach Declarations Register 2019-21

| Ref No | Date of Breach | Person who reported the breach (including details of the organisation they belong to) | Description of the breach | How the person became aware of the breach | Action taken |
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| 001 | 28-Jun-19 | Assistant Director for Condition Specific & Clinical Pathways, NHS Derby and Derbyshire CCG | <p>A Clinical Lead for a provider organisation attended the Condition Specific QIPP Delivery Meeting on 28 June 2019. The Chair asked whether there were any conflicts of interest, none were raised or identified by the Chair or attendees.</p> <p>The meeting is held monthly as part of the PMO process and is assurance to the PMO that the group are on track to deliver the projects/QIPP schemes as listed on the Project Initiation Documents and workplan.</p> <p>Confidential papers were tabled and discussed at the meeting, which related to QIPP for the CCG as the sheet contained the meeting attendees' QIPP projects and targets. This documentation also contained information relating to the provider organisation, which the Clinical Lead therefore had an interest in. This was not declared and therefore was in breach of the CCG's Standards of Business Conducts and Managing Conflicts of Interest Policy.</p> | After the meeting | <p>The Clinical Lead was asked not to share the information and to destroy all copies. The individual confirmed that they had destroyed all copies and had not received an agenda, so would not be able to share anything further.</p> <p>The Assistant Director for Condition Specific & Clinical Pathways checked to see whether they had received the information electronically, but this was not the case. Meeting circulation lists are being checked and revised if necessary, to ensure that the correct people are being invited to this meeting.</p> <p>The Information Governance Manager was also notified but no action was necessary.</p> |
| 002 | 06-Feb-20 | Head of Medicines Optimisation - Place (Amber Valley, Erewash & South Derbyshire) | Failure of a Pharmacist to declare Directorship and shares in Pharmacy businesses. 2 items discussed at meeting could have been seen as potential advantages for this individual. | Another attendee at the meeting reported to a member of the Medicines Management Team, who subsequently reported it to this person on 13/02/20. | <p>Reported to Corporate Governance Manager and Conflicts of Interest Guardian.</p> <p>Informed Chair of committee and asked this to be brought to the attention of the individual. Further discussion with the chair to be arranged to invite observations on how to avoid a recurrence. The pharmacist concerned will also be asked for their comments.</p> |

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| 003 | 03-Dec-20 | Dr Avi Bhatia NHS Derby and Derbyshire CCG, Clinical Chair. | Governing Body GP Member non-disclosure of conflict of interest in relation to Governing Body Confidential Agenda Item 214 on the 3rd December 2020. | <p>Dr Bhatia was notified by Dr R Cooper of the conflict.</p> <p>Dr Bhatia contacted Ian Gibbard, Conflicts of Interest Guardian and Governing Body Lay Member for Audit on 8th December 2020, 19.09. A telephone conversation was arranged on 9th December to discuss and report the breach.</p> | <p>Reported to Head of Governance on 9th December 2020, 13.25 and 14.08 via email.</p> <p>The breach occurred in relation to Dr R Cooper, Governing Body GP's non-disclosure of her conflict of interest to the 3rd December 2020, Confidential Governing Body Agenda Item 214.</p> <p>The CCG was not aware of the conflict of interest at the time of the meeting on the 3rd December 2020.</p> <p>The conflict is in respect of Staffa Health links with a provider and is a non-financial professional interest.</p> <p>Dr R Cooper retired as a GP Partner at Staff Health on the 30th November 2020, however continues to work as a Locum GP for Staffa Health from 1st December 2020.</p> <p>It has been agreed that in future Dr R Cooper will be required to declare this interest and will remove herself from the virtual Governing Body or Committee meeting in any conversations in relation to the provider and any future funding.</p> <p>Retrospectively, Dr Bhatia and Dr R Cooper considered that there was a clear Conflict of Interest, and that appropriate action would be taken to notify the Conflicts of Interest Guardian and report as a conflicts of interest breach to NHS England within 7 days of being identified and recording on the Breach Declarations register.</p> <p>Further updates will be reported to Dr Bhatia, DDCCG Clinical Chair. Dr R Cooper has agreed and is aware of the actions taken.</p> |
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