

## Conflicts of Interest – Breach Register

<b>Date of Breach</b>	<b>Details of Breach of the Conflicts of Interest Policy</b>	<b>Details of how and by whom the breach was investigated</b>	<b>Action taken to mitigate the breach</b>	<b>Date breach reported to Col Committee</b>	<b>Date breach reported to NHS England if material as defined by the Policy</b>
September 2017	<p>A mini procurement process was undertaken for Personal Health Budget brokerage services to ensure that the CCG fulfilled its obligations on patient choice</p> <p>A potential conflict of interest was identified due to the link between the interim manager leading the CCG process and one of the bidders.</p>	<p>The line manager produced a report detailing how the breach was managed. This was reviewed and agreed by the CCG Executive and the Conflicts of Interest Committee.</p>	<p>The interim manager excluded themselves from the scoring process, due to their conflict of interest.</p> <p>However, it subsequently came to light that there had been potential for involvement in price negotiation with the providers, so the contract award process was halted and restarted. This process was overseen by the CCG Executive and a resolution was in place by the end of September.</p>	September 2017	October 2017