



AGENDA ITEM

3.1.6

CTM BOARD

**AMENDMENT TO THE STANDARDS OF BEHAVIOUR FRAMEWORK
POLICY – DECLARATIONS OF INTEREST FORM**

Date of meeting	26 th January 2023
FOI Status	Open/Public
If closed please indicate reason	Not Applicable - Public Report
Prepared by	Cally Hamblyn, Assistant Director of Governance & Risk
Presented by	Cally Hamblyn, Assistant Director of Governance & Risk
Approving Executive Sponsor	Chief Executive
Report purpose	FOR APPROVAL

Engagement (internal/external) undertaken to date (including receipt/consideration at Committee/group)

Committee/Group/Individuals	Date	Outcome
Audit & Risk Committee	12.12.2022	Endorsed for Approval

ACRONYMS

DOI	Declarations of Interest
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1. SITUATION/BACKGROUND

- 1.1 The purpose of the Standards of Behaviour Framework Policy is to set out the Cwm Taf Morgannwg University Health Boards (CTMUHB) commitment to ensuring that its Employees and Independent Board Members practice the highest standards of conduct and behaviour.
- 1.2 The Director of Corporate Governance is responsible for ensuring that a Register of Interests is established and maintained as a formal record of

interests declared by Employees and Independent Board Members and that there are arrangements in place to prompt specific groups within the Health Board to complete a Declaration of Interest Form on initial employment with the Health Board and at periodic intervals thereafter.

- 1.3 The purpose of this report is to put forward proposed changes to strengthen the self-declaration aspects of the Declaration Forms for Declaring Interests and Gifts, Hospitality, Sponsorship and Honoraria.

2. SPECIFIC MATTERS FOR CONSIDERATION BY THIS MEETING (ASSESSMENT)

- 2.1 **Declaration Section** - Revised wording received from Welsh Government (December 2022) in terms of the narrative used in the ESR system for Declaring Interests. It was suggested that Health Bodies reflect the change in its own applications where ESR is not used for this purpose.
- 2.2 The new wording aims to reflect that interests are published for the purposes of "performance of a task carried out in the public interest".
- 2.3 It was further suggested that advice is sought from the Information Governance Function to consider whether a Data Protection Impact Assessment (DPIA) is required to identify and minimise any risks in publishing data received via the declaration forms. In response to this suggestion the Interim Head of Information Governance provided the following advice:

A DPIA is only required when it involves systematic and 'high risk' processing. This activity are deemed low risk as Declarations are subject to Freedom of Information requests, however, to further mitigate the risk it is advisable to only publish 'job titles' and not first and last names, this also prevents the direct identification of data subjects. In conclusion, a DPIA is not required.

For noting, the Health Board is classed as the Data Controller in this activity.

- 2.4 **Section D of the Declaration of Interest Form** - The amendments in red made to this section are in response to a request from the Research, Development and Innovation Team to capture further detail in terms of Academic Titles and Research activity.
- 2.5 The amended declaration forms are included as Appendices to this report. The changes are identified in red.
- 2.6 The full policy has not been included as an appendix to this report; however, it is available via this [link](#).
- 2.7 Once approved by the Board the amended policy will be published on SharePoint and the Health Board's website.

3. KEY RISKS/MATTERS FOR ESCALATION TO BOARD/COMMITTEE

3.1 It should be noted that the change to Section D as outlined in 2.4 was received after the Audit & Risk Committee meeting, however, it is considered that all the changes proposed will further strengthen the process for capturing declarations under the Standards of Behaviour Framework Policy and therefore the further additions are presented to Board for approval.

4. IMPACT ASSESSMENT

Quality/Safety/Patient Experience implications	Yes (Please see detail below) The Register and Declaration of Interests is the method by which the Health Board safeguards against conflict or potential conflict of interest where private interests and public duties of members of staff do not concur. The Health Board must be impartial and honest in the conduct of its business and must ensure that employees remain beyond suspicion at all times.
Related Health and Care standard(s)	Governance, Leadership and Accountability If more than one Healthcare Standard applies please list below:
Equality Impact Assessment (EIA) completed - Please note EIAs are required for <u>all</u> new, changed or withdrawn policies and services.	No (Include further detail below) An EIA has been completed on the full policy.
Legal implications / impact	There are no specific legal implications related to the activity outlined in this report.
Resource (Capital/Revenue £/Workforce) implications / Impact	There is no direct impact on resources as a result of the activity outlined in this report.
Link to Strategic Goals	Improving Care

5. RECOMMENDATION

5.1 The Board are asked **APPROVE** the amendments to the Standards of Behaviour Framework Policy outlined in section 2.