



QCIDD CONFLICT OF INTEREST POLICY

Policy Statement

QCIDD will ensure that its organisational and clinical decisions are made in an impartial way based on a reasonable judgement of what is best for the service user or the organisation. To this end, it will ensure that any conflicts of interest by staff are declared either at the time of the staff member's appointment, or as they arise. Furthermore it will ensure that these conflicts of interest are dealt with appropriately by ensuring that the person with the conflict of interest does not make decisions on issues where they have a conflict, or that decisions they make are subject to review by impartial staff members.

Rationale

Conflicts of interest can arise in QCIDD's work in variety of ways.

- the conflict can involve a financial matter, where a QCIDD staff member has a financial interest in another company or organisation with which QCIDD does business
- it can involve a personal matter, where a QCIDD staff member has a close personal relationship (eg parent, partner, child, sibling) with another person with whom QCIDD has business.

The existence of a conflict of interest puts the person in a difficult situation in that they may have to make a decision which has the potential to benefit them personally, or to benefit someone close to them. Even if their decision is entirely the appropriate one, the existence of the conflict of interest can create doubt as to the probity of the organisation or the individual. Conflicts of interest can arise over clinical matters, financial transactions (eg equipment purchase decisions), and human resource matters. There is no clear "black and white" way of dealing with conflicts of interest, and each situation needs to be dealt with on its merits.

Procedure

Conflict of Interest Register

QCIDD will keep a Conflict of Interest register which records details of any involvements staff have which have the potential to affect their work at QCIDD. These involvements may include:

- board memberships or paid roles in organisations with which QCIDD does business or which refer clients to QCIDD
- personal relationships with staff or board members of such organisations
- financial interests in companies with which QCIDD does business – eg suppliers of materials or equipment
- personal relationships with users of QCIDD's services
- personal relationships with key staff in QCIDD's main funding organisations

- prior close personal relationships with current QCIDD staff or staff of the Southern School of Medicine who have a direct involvement in QCIDD's work.

Conflicts arising in the course of QCIDD's work

Where a conflict of interest arises during the course of QCIDD's work, the staff member who is experiencing the conflict will advise the Director as soon as possible, and will take the Director's advice about the most appropriate way of dealing with the conflict, as per the section below.

Managing conflicts of interest

Where a conflict of interest arises in the course of QCIDD's business, whether this is on the Conflict of Interest Register or not, the person affected by the conflict of interest should take the following steps.

- They should immediately notify their direct supervisor or the Director of the conflict of interest
- Where the conflict is sufficiently serious to cast doubt on the probity of the transaction (eg being on a selection panel and discovering your ex-partner is a candidate, buying equipment from a company in which you own shares) the staff member should immediately withdraw from dealings on the issue and pass responsibility to another staff member
- Where the conflict is deemed less serious (eg treating a patient whose carer is a close friend) the staff member may continue to deal with the matter, but should ensure that their actions are clearly documented and can be reviewed by a supervisor or peer.

Attachment A – Conflict of Interest Register

Purpose

On appointment, staff members will advise the Director of any potential conflicts of interest, and the Director will ensure they are added to the register, as set out below. Any new interests that arise after appointment should be added to the register as they arise.

To ensure that the Register remains up-to-date, staff will be asked to review their Declaration of Interests on an annual basis.

The Register is available to the public by written application to the Director.

Year	Staff Member's Name and Position	Date of Entry or Amendment	Declared Interests and Relationships
2006/2007			