



CONFLICT OF INTEREST POLICY

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Approval

Version	Name	Position	Signature	Approved Date
V2.0	S Longland	HR Employee Relations manager		13 Jan 2011
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Glossary

Term	Description

1 INTRODUCTION

- 1.1 Badger is responsible for ensuring that the services provided to patients meet the highest standards and that staff do not abuse their official position for personal gain, or to benefit their family, or friends.
- 1.2 A “conflict of interest” occurs when the private or personal interests of a member of staff could affect the decision making process in such a way that could undermine the quality of services provided and/or is in some other way detrimental to the organisation, or profits the individual, or their family, or friends.
- 1.3 Badger employees should avoid withholding, misrepresenting or falsifying relevant information required to be reported to external parties or to be used internally for decision making purposes, in order to derive personal benefits.
- 1.4 Badger staff have a personal responsibility for their conduct and are expected to anticipate and declare any potential conflict of interest.
- 1.5 A large proportion of Badger staff work in circumstances that give them discretion and autonomy. This policy should not be seen as a barrier to preventing decisions being made but to ensure the best interests of patients and staff are being served. It is in the best interests of staff who do experience a conflict of interest to declare that interest early on so that steps may be taken to clarify, for all concerned, what is appropriate in the circumstances.
- 1.6 If staff are unsure about their personal position regarding a potential conflict of interest, it should be discussed, in the first instance, with their line manager, and the Human Resources Manager, thereafter if necessary.
- 1.7 A Register of declared interests for employees within Badger will be held by the Human Resources Manager.
- 1.8 This Register will only be seen in its entirety by the Chief Executive and will be confidential. Managers may only view entries which relate to their own members of staff.
- 1.9 This policy does not seek to address the issue of confidentiality of information. Any member of staff who is unsure whether the information to which they have access is confidential or not, should raise the matter with their line manager in the first instance.

2 SCOPE AND APPLICATION

- 2.1 The policy applies to all existing staff as well as to those seeking employment with Badger. All applicants to any Badger post are required to indicate any involvement, either direct or indirect, with any firm, company or organisation that has a contract with Badger, in so far as the applicant is aware. Failure to do so may result in the job application being rejected. If it is discovered after appointment that such information has been withheld, this may lead to dismissal.

Badger employees must declare all private interests that could potentially result in personal gain as a consequence of the employee’s position in the organisation. Interests which might appear to be in conflict should also be declared.

- 2.2 Badger employees are obliged to avoid any conflict of interest and should not disclose ethical, legal, financial or any other information that may constitute a conflict of interest involving the company. Employees should remove themselves from any position where they may be part of a decision making process with respect to the above in terms of any potential conflict of interest involving the organisation.

3 CO-OPERATION WITH PRODUCT SUPPLIERS

- 3.1 All requests for cooperation from product suppliers which are received by members of staff should be referred to their senior managers. There are occasions when it may be beneficial to patients and clients for staff to participate in trials of products and appliances which may be used in the delivery of our services. Patients or clients may ultimately benefit from the development of new products, and being involved in such trials, ensures our staff are up to date with current product development.
- 3.2 Any financial incentives offered to staff to participate in any trials should be dealt with in the same way as monetary gifts, and deposited in Badger's appropriate charitable funds. For incentives in kind, refer to the examples above. Staff are reminded that if they are asked to participate in any research or trials, the research protocol must be submitted to the Chief Executive before any agreement to participation is given.
- 3.3 Suppliers of products and appliances may offer staff opportunities to update on current developments. Pharmaceutical company representatives often entertain medical staff, for example, by providing lunches during which the representative will attempt to sell the product. These opportunities are useful from a service delivery point of view, ensuring that staff are up to date with the availability of different products. However, while staff receiving such invitations should make full use of the opportunity, they should bear in mind the guidance on hospitality above. Product samples may not normally be given to patients or clients.

4 IMPLEMENTATION

- 4.1 It remains the responsibility of individual employees to inform their senior manager of any conflict of interest. Staff should also be informed of the possible consequences of failing to notify their manager i.e. disciplinary action.
- 4.2 Where an employee declares a conflict of interest, appropriate safeguards will be drawn up and agreed by the Chief Executive and the post-holder. The Human Resources Manager must be notified when a conflict of interest has been declared and a copy of the form attached to this policy must be completed and returned to the Human Resources Manager at the earliest opportunity.

To establish a consistent approach across departments within Badger, the Human Resources Manager will inform managers where a similar conflict of interest is being, or has been dealt with, in another department. Departments may wish to devise their own appropriate operational procedures for handling declarations of interest within the overall policy framework. The Human Resources Manager can provide advice if necessary.



HR-F-091 - CONFLICT OF INTEREST REGISTER

Name: _____

Post: _____

Nature of Conflict of Interest:

Signature of member of staff: _____

Date: _____

Declaration by manager of above member of staff:

I have discussed this conflict of interest with _____ (insert name of above member of staff) and we have agreed procedures which will ensure that this conflict will not undermine the quality of patient care or be in some other way detrimental to the service provided by Badger.

Signature: _____

Full name: _____
(In Block Capitals)

Position: _____

Date: _____