

Agenda item:	2
Date of meeting:	16 July 2025
Report to the:	Group Trust Board
Title of report:	Disclosure of Interests
Report author:	Sarah Feal, Company Secretary
Executive sponsor:	Rachel Hawkins, Director of Corporate Affairs
Recommendation:	Approve
The members are asked to:	<ul style="list-style-type: none"> <li>▪ <b>Declare</b> any new declarations of interest or declarations relating to matters on the agenda.</li> <li>▪ <b>Reconfirm</b> current declarations on the Group Trust Board Register of Interests are accurate and up to date.</li> <li>▪ <b>Confirm</b> that all offers of Gifts and Hospitality received in the last 28 days have been registered with the Company Secretary.</li> </ul>

Assurance level:	<b>Substantial</b> <input type="checkbox"/> <b>Reasonable</b> <input checked="" type="checkbox"/> <b>Partial</b> <input type="checkbox"/> <b>Minimal</b> <input type="checkbox"/>
Rationale:	A rating of 'reasonable' assurance was achieved by Cambridgeshire Community Services NHS Trust from internal audit for Governance including Fit and Proper [14 January 2025].

## 1.0 Executive Summary

- 1.1 A conflict of interest is defined as a set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of delivering, commissioning, or assuring taxpayer funded health and care services is, or could be, impaired or influenced by another interest they hold.
- 1.2 A conflict of interest may be '**actual**': there is a material conflict between one or more interests or '**potential**': there is the possibility of a material conflict between one or more interests in the future.
- 1.3 Staff may hold interests for which they cannot see potential conflict. However, caution is always advisable because others may see it differently. It will be important to exercise judgement and to declare such interests where there is otherwise a risk of imputation of improper conduct.

1.4 Interests fall into the following categories:

Financial interests	Non-financial professional interests	Non-financial personal interests	Indirect interests
Where an individual may get direct financial benefit from the consequences of a decision, they are involved in making	Where an individual may obtain a non-financial professional benefit from the consequences of a decision, they are involved in making, such as increasing their professional reputation or promoting their professional career	Where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit, because of decisions they are involved in making in their professional career	Where an individual has a close association with another individual who has a financial interest, a non-financial professional interest or a non-financial personal interest who would stand to benefit from a decision they are involved in making

## 2.0 How the report supports tackling Health Inequalities

2.1 Not applicable.

## 3.0 Links to Board Assurance Framework / Trust(s) Risk and Issue Registers

3.1 **3682:** There is a risk that conflicts of interest between both CCS and NCHC Boards could exist at both, at an individual board member and organisational level that would then lead to poor governance and a risk that the transaction leading to a single organisation being compromised.

## 4.0 Legal and Regulatory requirements

4.1 The following legal and regulatory requirements apply:

- The Bribery Act 2010.
- The Fraud Act 2006.
- NHS England Managing Conflicts of Interest in the NHS.
- NHS England Code of Governance for Provider Trusts (2.10).

## 5.0 Previous consideration by Committee or Executive

5.1 21 May 2025, Disclosure of Interests, Group Trust Board

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## Appendices

Appendix 1. Register of Interests for Group Trust Board