

**CENTRAL SUSSEX AND EAST SURREY COMMISSIONING ALLIANCE - SOUTH PLACE
CONFLICTS OF INTEREST BREACH REGISTER**

High Weald Lewes Havens and Brighton and Hove CCGs' CONFLICTS OF INTEREST BREACH REGISTER - April 2019					
Date breach identified	CCG	Reported to	Details of breach	Investigation	Action(s) taken
January 2017	Brighton and Hove	Local Counter Fraud Service, CFO & COI Guardian	A member of staff was involved in the award of a contract to a company in which they had a non-financial personal interest and failed to declare the interest prior to or after the contract award. The member of staff had attended COI training.	The incident was investigated by the LCF service, but found insufficient evidence for prosecution. The incident was investigated by the CCG that concluded the member of staff was in breach of the CCG's COI Policy.	Sanctions were instigated in accordance with the CCG's Disciplinary Policy.
April 2018	High Weald Lewes Havens	CFO & COI Guardian	An internal audit noted that a Governing Body member had omitted to make a declaration about directorship of a clinical company that has been in existence since 2016. No services are provided or sought in Surrey, Sussex or Kent by this company.	GB member involved informed of the breach and noted it was an unintentional oversight. This was in breach of the CCG's COI Policy.	DOI corrected. Mandatory COI training undertaken. Reported to NHSE in Q1 2018-19 (July) submission Published on CCG website