

Appendix 8- Notes on search strategy for CCGs

- 1) NHS England has published a standard template for CCGs for staff declaration of interest <https://www.england.nhs.uk/publication/conflicts-of-interest-management-templates/>

These include:

Name, Current Position, Declared Interest, Type of Interest (Financial, Non financial (professional) non financial (personal), whether the interest was direct or indirect, the nature of the interest, the date of the interest, and action taken to mitigate risk. All of these had to be included for the register to be labelled as compliant. Some templates used contained all the requirements of NHSE templates plus additional information.

They have also produced a template for Gifts and Hospitality.

This includes Name, Position, Date of Offer, Declined or Accepted?, Date of Receipt, Details of Gift/Hospitality, Estimated Value, Supplier/Offerer Name and Nature or Business, Action to mitigate against conflict, Reason for Accepting or Declining.

- 2) In category (5), CCGs had to categorise for financial interest, non financial interest (personal) and non financial interest (professional). If all three were not present (as in the template) they were deemed non compliant.
- 3) For action to mitigate risk, category (9), this also included a 'comments' box as per template C, in Gifts and Hospitality.
- 4) In category (10), ability to search relates to either a search box, or an alphabetical list. Alphabetisation by first name was not counted as searchable.
- 5) Category (11), we assessed whether it was possible by design to make a declaration of having no interests; ie by a specific template layout designed to answer 'no', or by virtue of people having made a positive declaration that they have no interests to declare.
- 6) Category (12), Inclusion of a column with request to disclose either pay bands or amounts were included.
- 7) Category (13), some organisations have amalgamated the gifts and hospitality register and others have not: we recorded whether or not this was the case.
- 8) Category (14), any listing of a professional declining to disclose e.g. 'permission not given for publication', any entry where a sentence relating to disclosure was incomplete or information clearly missing. It was not possible to search each register line by line for retractions and we expect to have missed some.

These were marked by two researchers independently and disagreements resolved by discussion.

We also captured the date of publication and the type of register (e.g Staff Gifts and Hospitality, Governors.) It was in date if published in the last 18 months.

Contacting CCGs: where neither researcher was able to find CCG conflicts of interest and a gift and hospitality register, we contacted the media department of the CCG by email, using the same wording as for NHS Trusts. We requested any publicly available register of interests. If there was no reply in 7 days we wrote again. If there was no response we recorded this. If there was a response we recorded that we required to contact the CCG for registers and then extracted the information as before.

