

**Integrated Management Response:**  
**Standards of Business Conduct (Internal Audit) and Secondary Employment/Declarations of Interest (Counter Fraud)**

Ref. No:	Source	Recommendations	Response/Action	Lead	Timescale	Status
1.	Internal Audit	Management should determine and implement a solution to ensure the completeness and accuracy of declarations of interest, including nil returns	<p>Quarterly reminders are sent to the corporate and service group leads to cascade within their teams to remind staff of their responsibilities to declare interests.</p> <p>In addition, declarations of interest and secondary employment are to be created as competencies within the statutory and mandatory training section of ESR with all employees required to complete these once a year and confirm that they have read the standards of business conduct policy.</p>	Head of Corporate Governance/Interim Assistant Director of Workforce and OD (learning and OD)	<p>June 2022</p> <p><del>November 2022</del> <u>March 2023</u></p>	<p>Completed</p> <p>While the capability is in place to create the competencies on ESR, it is yet to be implemented as it needs to tie in the roll-out of supervisor self-service which will alert line managers that the information has been recorded and prompt a discussion with the staff members as to any issues.</p>
2.	Internal Audit	<p>The revised staff handbook should be finalised and circulated to staff.</p> <p>The handbook should contain a checklist which requires completion by new starters and countersignature by the line manager, intended to ensure the initial declarations are received and submitted to the Corporate Governance Team within a specified time from the commencement of their employment.</p>	<p>A previous version of the handbook was considered during the audit. A more recent version has since been published and does now reference the standards of business conduct.</p> <p>Declarations of interest and secondary employment are to be created as competencies within the statutory and mandatory training section of ESR with all employees required to complete these once a year as well as confirm that they have read the standards of business conduct policy. This will be part of the check-box on the checklist for completion of mandatory training.</p>	Head of Corporate Governance/Interim Assistant Director of Workforce and OD (learning and OD)	<p><del>November 2022</del> <u>March 2023</u></p>	<p>While the capability is in place to create the competencies on ESR, it is yet to be implemented as it needs to tie in the roll-out of supervisor self-service which will alert line managers that the information has been recorded and prompt a discussion with the staff members as to any issues.</p>
3.	Counter Fraud	Staff to be asked on an annual bases at Personal Appraisal Development Review (PADR), annual review and job planning meetings, about any secondary employment and declarations of interest	<p>Declarations of interest and secondary employment are to be created as competencies within the statutory and mandatory training section of ESR with all employees required to complete these once a year as well as confirm that they have read the standards of business conduct policy.</p> <p>While there will not be a specific question included on the PADR form for secondary employment and declarations of interest, there is a requirement for mandatory training to be completed and secondary employment and declarations of interest will form part of that.</p>	Head of Corporate Governance/Interim Assistant Director of Workforce and OD (learning and OD)	<p><del>November 2022</del> <u>March 2023</u></p>	<p>While the capability is in place to create the competencies on ESR, it is yet to be implemented as it needs to tie in the roll-out of supervisor self-service which will alert line managers that the information has been recorded and prompt a discussion with the staff members as to any issues.</p>

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4.	Counter Fraud	PADR, annual review and job planning documents to be updated to include questions around secondary employment and declarations of interest.	Declarations of interest and secondary employment are to be created as competencies within the statutory and mandatory training section of ESR with all employees required to complete these once a year as well as confirm that they have read the standards of business conduct policy. While there will not be a specific question included on the PADR form for secondary employment and declarations of interest, there is a requirement for mandatory training to be completed and secondary employment and declarations of interest will form part of that.	Head of Corporate Governance/Interim Assistant Director of Workforce and OD (learning and OD)	<del>November 2022</del> <u>March 2023</u>	While the capability is in place to create the competencies on ESR, it is yet to be implemented as it needs to tie in the roll-out of supervisor self-service which will alert line managers that the information has been recorded and prompt a discussion with the staff members as to any issues.
5.	Counter Fraud	The Standards of Business Conduct to be more widely publicised throughout the Health Board, via the intranet or e-mailed to all staff for example, with emphasis on the sections concerning secondary employment and declarations of interest	<p>Quarterly reminders are sent to the corporate and service group leads to cascade within their teams to remind staff of their responsibilities to declare interests.</p> <p>In addition, declarations of interest and secondary employment are to be created as competencies within the statutory and mandatory training section of ESR with all employees required to complete these once a year and confirm that they have read the standards of business conduct policy.</p>	Head of Corporate Governance/Interim Assistant Director of Workforce and OD (learning and OD)	<del>November 2022</del> <u>March 2023</u>	<p>Quarterly reminders are sent to the corporate and service group leads to cascade within their teams to remind staff of their responsibilities to declare interests. Intranet bulletins are also now published. In addition, regular reminders are sent to board members and senior managers to remind them to update their forms if there have been changes.</p> <p>While the capability is in place to create the competencies on ESR, it is yet to be implemented as it needs to tie in the roll-out of supervisor self-service which will alert line managers that the information has been recorded and prompt a discussion with the staff members as to any issues.</p>

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6.	Counter Fraud	A central point for all declarations of secondary employment to be collated, rather than completed declarations being kept within each Ward/department	Not all secondary employments are relevant to governance as there will be second jobs for staff in non-decision making roles and will have no potential conflict. A focus does need to be given to consultants and the business conduct policy will be reviewed to identify if a process is needed and if so, this will be implemented.	Head of Corporate Governance	November 2022	New form added to the standards of business conduct for private clinical practice. Executive Medical Director has reminded consultant staff of the need to declare any private practice work. Study leave applications will now need to include confirmation that declarations have been submitted as part of an annual programme.
7.	Internal Audit	A register detailing staff with secondary employment should be established and maintained, with a particular focus on those which could impact on the activities of the health board.	Not all secondary employments are relevant to governance as there will be second jobs for staff in non-decision making roles and will have no potential conflict. A focus does need to be given to consultants and the business conduct policy will be reviewed to identify if a process is needed and if so, this will be implemented.	Head of Corporate Governance	November 2022	New form added to the standards of business conduct for private clinical practice. Executive Medical Director has reminded consultant staff of the need to declare any private practice work. Study leave applications will now need to include confirmation that declarations have been submitted as part of an annual programme.
8.	Internal Audit	The health board should periodically undertake appropriate quality / due diligence / completeness checks on declarations.	The declarations of interest for all board members will be checked against the records held by Companies House. A similar exercise will be undertaken for a sample of the other high risk groups and staff declarations. This is caveated by the fact that for names which are more common, it will be more difficult to identify the correct (if any) record held as we don't have the access to other system to triangulate findings. We also recognise that the health board participates in the bi-annual National Fraud Initiative which compares our payroll records, procurement contracts and Companies House records. Any anomalies are investigated by the counter fraud team.	Head of Corporate Governance	December 2022	Quarterly checks are now undertaken on a sample of declarations.
9.	Counter Fraud	The Standards of Business Conduct to be included in the induction packs for all staff, with emphasis on the sections concerning secondary employment and declarations of interest	The health board does not have an induction pack but it does have a staff handbook which does reference the standards of business conduct.	Head of Corporate Governance/Interim Assistant Director of Workforce and OD (learning and OD)	November 2022	Completed

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10.	Internal Audit	Consideration should also be given to introducing a tracking system and reporting the results, including declarations requested but outstanding, to the Management Board and Audit Committee	A tracking system can be developed and reported to the Management Board and Audit Committee for board and service groups but not the high-risk groups or staff as this is dependent on the team having full staffing lists and these being updated on a daily basis by the relevant departments. The team does not have the capacity to pro-actively undertake this work more widely.	Head of Corporate Governance	November 2022	Completed – first tracker to be shared in September 2022
11.	Internal Audit	The health board should also ensure the mitigating actions to manage conflicts of interest arising from declarations are captured and arrangements put in place to monitor their implementation	Mitigating actions are already incorporated into the declarations of interest form and these will be added to the register for 2022-23 from June 2022 for any forms received from this point. Those received prior to this will be added retrospectively over the summer.	Head of Corporate Governance	June 2022	Completed