

Managing Conflicts of Interest at Somerset NHS Foundation Trust A Practical Guide for Managers

Purpose

To support SFT managers, alongside the existing [Code of Conduct and Managing Conflicts of Interest and Personal Conduct Policy](#), to identify, discuss, and manage conflicts of interest (COI), private work, and external engagements in a consistent and proportionate way.

Your Role as a Manager

As a manager, you play a key role in protecting:

- SFT's reputation and contractual obligations
- public trust and transparency
- colleagues, by ensuring risks are identified early and managed appropriately



Conflicts are not wrongdoing - failing to identify or manage them is the risk.

What is a Conflict of Interest?

A conflict of interest arises where a colleague's external interests or private work could:

- influence, or be perceived to influence, their SFT role
- create reputational, contractual, or ethical risk to SFT

Interests fall into the following categories:

- **Financial interests:**

Where an individual may get direct financial benefit (this may be a financial gain, or avoidance of a loss) from the consequences of a decision they are involved in making.

- **Non-financial professional interests:**

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.

- **Non-financial personal interests:**

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.

- **Indirect interests:**

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 and could stand to benefit from a decision they are involved in making. A common-sense approach should be applied to the term “close association”. Such an association might arise, depending on the circumstances, through relationships with close family members and relatives, close friends and associates and business partners.

Examples include:

- paid or unpaid work for pharmaceutical or life-sciences companies
 - advisory roles, consultancy, speaking engagements
 - receipt of payments, hospitality, or benefits
 - contractual arrangements confirmed by external organisations
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Using MyDeclare Effectively

 **Access MyDeclare here:** <https://somerseftt.mydeclarations.co.uk/home>

Line Managers will receive a notification when a member of staff has submitted a declaration which requires their review/approval. MyDeclare is not a tick-box exercise - it is a prompt for discussion.

When reviewing a declaration, ask:

- Is the declaration complete and specific?
- Does it align with the colleague's SFT role and responsibilities?
- Is the scale, frequency, or nature of the private work clear?
- Do I need further information before approving?



If something is unclear, pause approval and ask questions.

Having Meaningful Conversations

You are encouraged to have open, professional conversations with colleagues. Helpful questions include:

- What does the external work involve in practice?
- Who is the work for and how often does it occur?
- Does it overlap with your SFT responsibilities or decision-making?
- Have you received any confirmations or contracts from external organisations?
- Could this be perceived as a conflict by others?



Document key points and agreed actions.



External Notifications and Red Flags

If you receive notifications from external bodies (e.g. pharmaceutical companies):

- Do not ignore them
- Discuss them with the colleague
- Consider whether the scope and impact have been fully declared

Common red flags include:

- incomplete or vague declarations
 - multiple external contracts
 - industry links connected to the colleague's SFT role
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When to Seek Advice or Escalate

You should seek advice if:

- you are unsure whether something constitutes a conflict
- the declaration feels incomplete or inconsistent
- there may be contractual or reputational implications for SFT



Escalation is supportive, not punitive.

Key Messages for Managers

- Conflicts of interest are common and manageable
 - Early discussion prevents future issues
 - You are not expected to be an expert - ask and escalate when unsure
 - Good management protects colleagues and SFT
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For any queries/advice, please contact:

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Kindness, Respect, Teamwork
Everyone, Every day