

Using Civica Declare – a guide for all staff

Declaring interests, gifts, hospitality and sponsorship

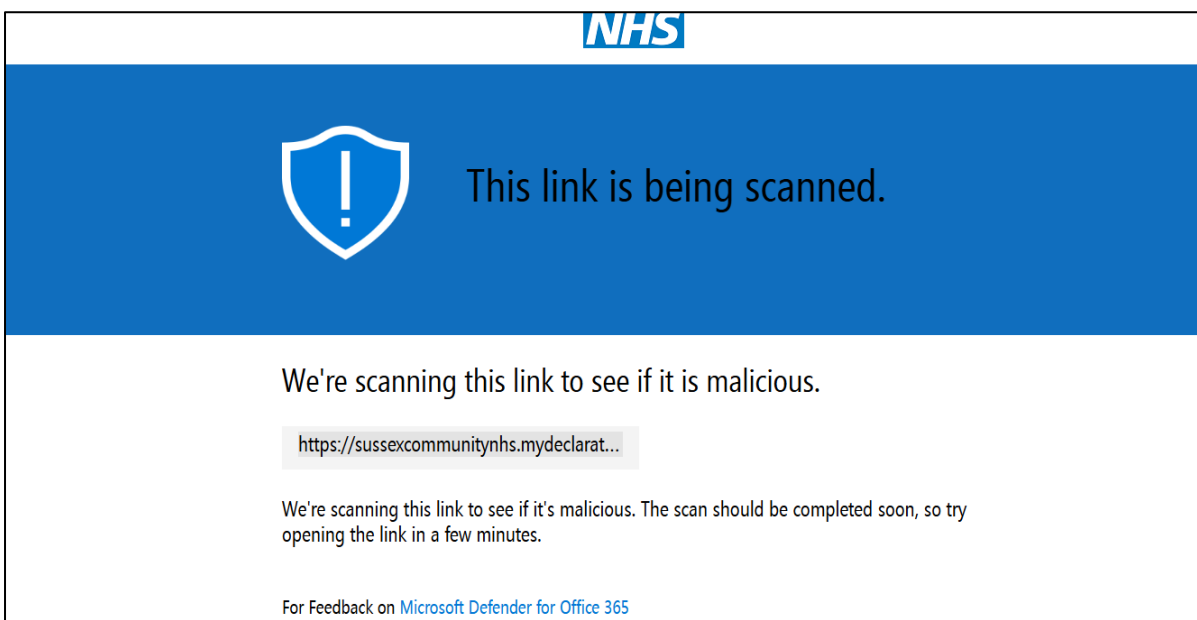
Do I have to declare a 'nil' return if I am not a decision maker?

If you are not a Trust decision maker, then you do not need to make an annual 'nil' declaration. Please refer to the Trust's [Standards of Business Conduct Policy](#) and the [Managing Conflicts of Interest Pulse page](#) which outlines who are confirmed as decision makers.

I don't know what my password is to declare interests on Civica Declare. How do I find this?

Your username is your NHS email address. Should you be unable to locate your password or if you have forgotten what it is, go to the Civica Declare log in page <https://sussexcommunitynhs.mydeclarations.co.uk/home>, enter your NHS email address as your username and press the 'Forgotten password' button. Then follow the process to obtain a new password.

You will then receive an email from sussexcommunitynhs@mydeclarations.co.uk which will ask you to click on a [Password reset link](#). On the first time when you click on the password reset link the below message is likely to appear on your device:



Close down the browser and go back into the email and re-click on the [Password reset link](#). You will then be able to set up your new password and then be able to login. You should not receive the above message again as your device will remember that it is a trusted website.

How soon should I declare my interest(s)?

You have 28 days from the date of which your situation changes, or a gift, hospitality or sponsorship has been received.

Any declaration made outside of this timeframe would be a breach of the policy.

I'm a new starter and can't log into the system, why not?

Civica Declare uses some staff data from the Electronic Staff Record (ESR) system and this can take up to four weeks to update.

What happens if I don't declare that I have an interest?

This may be classed as a breach, and the Trust will investigate each breach according to its own specific facts and merits and give relevant parties the opportunity to explain and clarify any relevant circumstances. See the Trust's [Standards of Business Conduct Policy](#) for more information.

Who can see the information that I am declaring?

Civica Declare can be accessed by members of the public so being as clear as possible with what you are declaring is important.

Declarations are reported to the Audit Committee once a year together with any breaches in policy.

How do I end my declaration when it is no longer deemed a conflict?

Once your declaration has ceased, this requires updating on the system and you need to go into your declarations and add a 'cease' end date. Your declaration will stay 'live' for six months before it is no longer visible. Not all declarations require a 'cease' date to be added, and any declaration in the gifts, hospitality or donations categories do not require a cease date to be included.

How long will my declaration be kept by the Trust after expiry?

The information will stay live on Civica Declare for six months after you add a 'cease date'. The interest will remain on the register for six months and a private record of historic interests will be retained by the Trust for a minimum of six years.

I have made an interim declaration as part of my recruitment process – do I still need to declare the same things on Civica Declare?

Yes, you have 28 days from when your employee ID is recognised on the Civica Declare system. If you are a registered professional, please also refer to your relevant codes of conduct/guidance.

I'm leaving the Trust, what do I do about my declaration?

It would be helpful if you update your declaration prior to leaving the Trust with a cease date of your declaration (e.g. your last day of employment at the Trust). Should a cease date not be entered, the declaration will stay live for six months following your departure from the Trust.

How do I change my declaration after submitting it?

If something material or significant changes in your circumstances after you have submitted your declaration, or you wish to amend the measures section, you can update your declaration within 30 days of first submission.

After that the update link will disappear, your declaration will be locked, and you will need to create a new declaration.

Only update your declaration if something substantial has changed (for example don't use Update to correct small typos).

To update/ change your declaration:

1. Log in and click on Active Declarations and select the down arrow
2. Scroll to the bottom and select the Update Interest button
3. Make your changes
4. Select Update and Submit

Update your manager if they have already approved your declaration

Let your manager know by email or in person that you have updated your declaration. Currently Civica Declare will not automatically notify your manager if an update is made within 30 days following the first submission.

Eligibility for an exemption in the Public Register of Interests

It is possible to apply for an exemption to prevent a declaration of interest from appearing on a public register. Exemptions are granted only in exceptional circumstances where there is a real risk of harm. The process is handled by the Trust/Deputy Trust Secretary.

To qualify for an exemption, you must demonstrate "substantial grounds" for why your information should not be published. The most common reason is that public disclosure would create a "real risk of harm" to you.

The NHS will not redact or withhold information simply due to personal preference.

The process for requesting an exemption:

- Contact the Trust/Deputy Trust Secretary.
- Explain your circumstances and raise any concerns. Clearly explain the substantial grounds for your request and why you believe the publication of your information could put you at risk of harm.
- The Trust/Deputy Trust Secretary will review your request and decide whether to redact your name or other identifying information from the public register. Your interest will still be recorded internally.

I'm no longer a member of a group that is classed as a Decision-Making Group; do I need to update my declaration?

Yes, update your declaration with an end date i.e. the date your membership of the Decision-Making Group ended.

How are breaches dealt with?

Once a breach has been identified, you will be contacted by the Trust Secretary/Deputy Trust Secretary to confirm that a breach has taken place. Your line manager will be contacted and the details of the breach confirmed with them. Your line manager will investigate the breach according to its own specific facts and merits and will ensure relevant parties will have the opportunity to explain and clarify any relevant circumstances. Following the investigation, the Trust will take out appropriate action – see the [Standards of Business Conduct Policy](#) for further details.

Are checks carried out to ensure declarations are accurate?

Quarterly audits of declarations from non-decision makers are undertaken where a random sample of those who have declared are reviewed.

Decision Makers declarations are audited on an annual basis and results shared with Audit Committee.

In addition, a quarterly random sample of staff without any live declarations is taken from the database. These will be contacted individually if simple background checks completed reveal a potential conflict of interest.

The Trust's Counter Fraud partner BDO annually undertakes a check with Companies House to Trust payroll matches on the National Fraud Initiative portal. BDO will report to the Trust should any employee be a Director of a Limited Company and where this has not been declared.

Do I use Civica Declare to declare offers of gifts, hospitality and sponsorship?

Yes. Old paper-based declaration forms are no longer to be used and have been removed from the Pulse. Full information on offers of, acceptance and returned/refused gifts, hospitality and sponsorship is available from the [Managing Conflicts of Interest Pulse page](#) and the Trust's [Standards of Business Conduct Policy](#).

I witnessed a colleague accept a gift from a supplier what should I do?

The policy is clear that accepting gifts from suppliers is not permitted. There is a facility on the Civica Declare database to report such incidents under section 'Report Breaches'.

This would then be investigated by the Trust/Deputy Trust Secretary. You can also refer to the Trust's [Freedom to Speak Up Policy for the NHS](#), [Standards of Business Conduct Policy](#) and [Anti-Fraud, Bribery and Corruption Policy](#).

Are there policies and guidance that explains to me what all of this process means?

Yes, this can be found on the Trust's [intranet Pulse page 'Managing Conflicts of Interest'](#) which also includes access to the Trust's [Standards of Business Conduct Policy](#) and [Anti-Fraud, Bribery and Corruption Policy](#).

Is support available to me if I need more help?

Always make sure you have read the guidance fully and talk to your line manager or their manager in the first instance.

To ask for help or advice about using Civica Declare, click the **Support** button at the top of the page (when logged in). The 'Support' form will appear. Please provide as much information as possible so that your query can be resolved efficiently and effectively.

On submitting your query, the following happens automatically:

- A confirmation webpage will pop up that will confirm your support request.
- An email will be sent to your registered NHS email address that confirms the support request and quotes a Ticket Number.
- An email will be sent to the Administrator Support email address notifying of a new support request.
- You will receive an automated acknowledgement, and a Support team member will answer your query as soon as possible.