Effective: 20 December 2019

WA Country Health Service Interest Register (WIRe) Business Rules

1. Policy Statement

This policy provides the business rules concerning the recording and management of interest declarations in HP Records Manager and the WA health system, Conflicts of Interest Declaration Registry (COIR).

2. Purpose

The purpose of the WA Country Health Service (WACHS) Interest Register (WIRe) is to provide WACHS with a central repository to record and manage interest declarations utilising HP Records Manager (RM). This will allow information to be securely stored and available for external audit and monitoring purposes. Utilising RM will ensure compliance with the *State Records Act 2000*, the WACHS Recordkeeping Plan and the WA Health Code of Conduct.

In addition, it will provide guidance on how interest declarations will be recorded in the COIR, as required by the mandatory WA health system, *Managing Conflicts of Interest Policy* (MP 0113/19).

3. Background

The WA health system, *Code of Conduct Policy* (MP 0124/19) requires staff to disclose any personal or professional matters that may lead to an actual or perceived Conflict of Interest (COI). Staff must familiarise themselves and act in accordance with the WA health system Managing Conflict of Interest and Gifts, Benefits and Hospitality policies.

The WACHS WIRe has been created in RM which will provide nominated approver's with oversight of interest declarations. Electronic folders have been created within RM for each region as well as one for the Central Office. Access to the electronic folders is only granted to key persons within each region and the Central Office to ensure confidentiality. Regions are only able to view their respective interest declarations.

The following business rules are provided to assist staff in the process of effectively recording, managing and approving interest declarations within RM and the COIR. The key steps in the process are consistent with the WA health system Managing Conflict of Interest Policy.

All interest declarations must be recorded in the WIRe and the COIR, irrespective of whether the declaration is already recorded in another location or as part of a separate process (i.e. recruitment, procurement).

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4. Process and Responsibilities

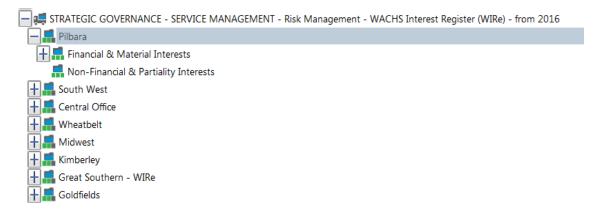
Step 1

- a) The staff member declares an interest and must notify their Line Manager, in writing, with details of the interest. The declaration is to be made by completing a Conflict of Interest (COI) Assessment Guide and Record Form which can be found at ED-CO-19-80815.
- b) The staff member should include their proposed strategy for resolving or managing the interest.

Step 2

- a) The Line Manager acknowledges the interest declaration and signs the relevant section of the COI Assessment Guide and Record Form. The Line Manager is to provide comment in relation to the staff member's proposed action for resolving/managing interest.
- b) The Line Manager must save the COI Assessment Guide and Record Form within the relevant HP Records Manager (RM) sub folder together with any supporting information received. If the Line Manager does not have access to RM, it is their responsibility to contact their Regional Executive Office to arrange for the information to be recorded into the WIRe in RM. The folder location is found at the following link: CHS-SGO/SM/RM/4

Folder Structure has been set out as below:



The documentation should be uploaded in RM using the following naming conventions:

SURNAME, first name, current position, current worksite

e.g. BLOGGS, Joe - Registered Nurse - Narrogin Hospital

c) The Line Manager is to cause the documentation to be provided to the Head of Department for endorsement.

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Step 3

- a) The Head of Department/Director is to consider the interest declaration and endorse the relevant section of the COI Assessment Guide and Record Form, including providing comment in relation to the proposed action for resolving/managing interest.
- b) The Head of Department/Director returns the endorsed COI Assessment Guide and Record Form to the staff member who made the declaration, together with the RM reference for the saved COI Assessment Guide and Record Form.

Step 4

- a) The staff member is to enter the information from the endorsed COI Assessment Guide and Record Form into the System Manager Conflict of Interest Declaration Registry (COIR). The COIR may be accessed through the following link: http://coi.hdwa.health.wa.gov.au. It is a requirement that the RM reference is included in the Comments/Notes section, beneath the strategy for resolving or managing the conflict of interest. The RM reference is required so that the nominated approver can check the COI Assessment Guide and Record Form has been endorsed.
- b) The staff member should submit the information for approval to the appropriate nominated approver; within WACHS the nominated approver is the staff members Executive Officer (Tier 3 or above).

Step 5

- a) The Executive Officer (nominated approver) is to review the interest declaration and ensure the details of the declaration are considered carefully and determine whether the proposed action is appropriate.
- b) If the Executive Officer believes that some of the information is inaccurate or misleading, or that the staff member making the declaration has failed to consider relevant factors, it is appropriate that they discuss this directly with the staff member who made the declaration.
- c) If the Executive Officer is unclear about the information in the declaration, it is important that they discuss the matter with the staff member making the declaration to enable them to make a fully informed decision.
- d) If the Executive Officer feels the declaration is not sufficient, they should select "Require changes" at the bottom of the screen, to enable the staff member who made the declaration to edit their declaration. The option is available to enter comments that will be added to the declaration, providing further information to the declarer.
- e) If the Executive Officer is satisfied with the declaration select "Approve". This will notify the staff member who made the declaration that their declaration has been reviewed and approved.

5. Advice and Assistance Contact Details

- RM queries Contact Records Management Service on (08) 9223 8717.
- COI queries Contact your Regional Executive Office or the WACHS Integrity Unit on (08) 6553 0895, (08) 6553 0894 or <a href="https://www.uscalenterscore.org/www.uscalenters

For additional information please refer to the WIRe Process Map: <u>ED-CO-16-46818</u>.

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6. Compliance

It is a requirement of the WA Health <u>Code of Conduct</u> that employees "comply with all applicable WA Health policy frameworks."

A breach of the Code may result in Improvement Action or Disciplinary Action in accordance with the WA Health <u>Discipline Policy</u> or Breach of Discipline under Part 5 of the *Public Sector Management Act*.

WACHS staff are reminded that compliance with all policies is mandatory.

7. Evaluation

This policy is to be reviewed by the Manager WACHS Integrity Unit every three (3) years or sooner if required.

8. Related WA Health System Policies

Managing Conflict of Interest Policy and Guidelines
Gifts, Benefits and Hospitality Policy and Information
WA Health Staff Air Travel Policy
Code of Conduct

9. Policy Framework

Integrity Policy Framework
Procurement Policy Framework

This document can be made available in alternative formats on request for a person with a disability

Contact:	Manager WACHS Integrity Unit		
Directorate:	Business Services	TRIM Record #	ED-CO-16-80221
Version:	2.00	Date Published:	20 December 2019

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