

Declarations of Interest – Annual Report 2019

Executive Director	Lisa Marie Williams, Executive Director, Legal & Governance
Author(s)	Katie Spears, Interim Head of Governance Polly Button, Governance Manager
Type of business	To note
Issue	<p>Section 2E of the Dentists Act 1984 places an obligation on the Council to establish and maintain a system for the declaration and registration of the private interests of its members and to publish entries recorded in relation to Council Members.</p> <p>The GDC also subscribes to the ‘Seven Principles of Public Life’ (the Nolan Principles) and expects that those who lead, work with and for the organisation to act with integrity and in a way that is open, transparent and accountable.</p> <p>This paper seeks to provide an overview of interests declared by Council Members, Independent Associates, members of staff and the wider Associate group and to provide an assurance that those affiliated with the GDC are acting in line with the requirements set out in the GDC’s Managing Interests policies for their respective groups.</p>
Recommendation	The Council is asked to note the interests declared as at 31 December 2019.

1. Key considerations

- 1.1 As a regulator committed to transparency, openness and propriety, the General Dental Council (GDC) has established systems and processes to manage the relevant and material interests of its Council Members, all Associates and staff. In requiring regular and considered declarations of any conflicts, or perceived conflicts of interest, the GDC seeks to promote public confidence in the regulatory process.
- 1.2 Conflicts of interest are a normal and unavoidable part of decision-making and seeking to eliminate them is unlikely to be feasible or desirable. At the same time, for all public bodies, it is essential to maintain public trust and confidence in the organisation and individuals associated with it. Where a conflict of interest does arise, the principles of transparency and integrity apply, and the GDC requires disclosure of such conflicts to allow the organisation to manage the conflict accordingly.

2. Definitions

- 2.1 A ‘conflict of interest’ is defined by the International Standards for the Professional Practice of Internal Auditing as *‘any relationship that is or appears to be not in the best interests of*

the organisation. A conflict of interest would prejudice an individual's ability to perform his or her duties and responsibilities objectively'. A conflict of interest could relate to any professional, personal or business activity.

- 2.2 In this paper, 'Independent Associates' are defined as Members of the Statutory Panellists Assurance Committee ('SPC') and Independent Members of the non-statutory Committees of the Council, such as the Audit and Risk Committee, Remuneration Committee or Finance and Performance Committee. The 'wider Associate group' will include all members of statutory Committees, such as Fitness to Practise panellists, QA inspectors, DCS Panellists, DCP Assessment Panellists, Members of the ORE Advisory Group and ORE External Examiners.

3. Pending Policies Review

- 3.1 The GDC has developed policies around Managing Interests for these various groups. These are currently under review by the Governance team and People Services team and will be brought back to this Board for discussion of any proposed variations in due course. Some gaps and areas of uncertainty around process have been discovered and the review will be designed to remedy these areas.
- 3.2 As part of the policy review, it will be proposed that changes are made as to how declared interests are reviewed to align with the area of business by which the various groups are managed. In line with the wider Board Effectiveness work, it will also be proposed that, in relation to Council Members, all Associates and EMT members, the annual report goes to the Audit and Risk Committee rather than to the Council. It will be proposed that, in relation to staff, this report goes to the SLT Board.

4. Requirements

- 4.1 On appointment, all Council Members, independent Associates, members of staff and wider Associates of the GDC must declare all conflicts of interest or potential conflicts of interest by completing a Register of Interest form.
- 4.2 Council Members and EMT members must update their declarations as soon as they are aware of any change in circumstance, or at least every three months.
- 4.3 Independent Associates, the wider Associates group and members of staff must update their declarations as soon as they are aware of any change in circumstance, or at least every 12 months.
- 4.4 For Council Members, Independent Associates and EMT members, declarations of interest should be submitted by email to the Governance Team to ensure that they are centrally captured and logged. The Governance team will maintain the registers of interests for these groups, ensure that declarations are published appropriately and report on them annually.
- 4.5 For members of staff and the wider Associates group, declarations of interest should be submitted by email to the People Services Team to ensure that they are centrally captured and logged. The People Services team will maintain the registers of interests for these groups, ensure that declarations are published appropriately and report on them annually.
- 4.6 Council Members and Independent Associates are required to act in line with the GDC's Standing Orders, the Nolan Principles and the Managing Interests Policy. They are expected to declare any conflicts of interest both periodically and as they become aware of them in Board meetings. Any non-compliance with this will be dealt with in line with the Code of Conduct for Council Members and Associates.

- 4.7 The wider Associates group are expected to act in line with the Nolan Principles and the Managing Interests Policy. They are expected to declare any conflicts of interest periodically and as they arise. Any non-compliance with this will be dealt with in line with the Code of Conduct for Council Members and Associates.
- 4.8 Staff and EMT Members are expected to declare any interests periodically and as they arise. Any staff of EMT members who do not comply with the Managing Interests Policy for Staff will be dealt with in line with GDC disciplinary procedures.

5. Data for 2019

- 5.1 The Governance team sought declarations of interest from all Council members, EMT members and Independent Associates in November 2019. These were reviewed in January 2020. The register of interests for Council members, Independent Associates and EMT members can be found at Appendices 1, 2 and 3, respectively.
- 5.2 The People Services team sought updates to the declarations of interest for the wider Associates group in October 2019. This is the first time that the People Services team have managed this exercise, which involves the collation of the declarations for several hundred individuals. Apart from a small group of Associates, attached the Hearings function, those declarations that have been returned have not yet been reviewed by GDC staff owners. This does raise an issue around ownership of this activity and the wider management of the Associates group that we aim to address within the policy review that will be brought back to the SLT in April 2020. The information we currently hold around the declarations returned for the Associates group can be found at **Appendix 4**.
- 5.3 The People Services team sought updates from staff in November 2019 and these were reviewed in December 2019 and January 2020. The relevant data captured in relation to those register of interests for staff can be found at **Appendix 5**.

6. Monitoring and review

- 6.1 The Governance team facilitates the managing interests process for the Council Members, Independent Associates and the EMT and the People Services team facilitates the process for staff and the wider Associates group.
- 6.2 For Council Members and Independent Associates:
- A register of interests is maintained.
 - A copy of the *Governance Manual for Council Members of the GDC*¹ is provided upon induction. This includes the 'Managing Interests Policy for Council Members and Associates' and practical guidance for managing interests.
 - Reminders are sent periodically to complete or update declarations of interest.
 - The Chair¹ reviews completed declarations from new members and those of existing members where changes have taken place.
 - Once reviewed by the Chair, new declarations and changes to existing declarations are published on the GDC website.
 - Council and Committee agendas include 'Declarations of Interest' as a standing item.

¹ The Chair of Council will review the quarterly declarations of interest of Council members and annual declarations of the independent members of the non-statutory Committees. The Chair of SPC will review the annual declarations of the SPC members.

6.3 For Associates:

- A register of interests is maintained.
- A copy of the *Governance Manual for Associates of the GDC* is provided upon induction. This includes the 'Managing Interests Policy for Council Members and Associates' and practical guidance for managing interests.
- Reminders are sent periodically to complete or update declarations of interest.
- It will be proposed that the GDC staff owners review the declarations of new Associates and those of existing Associates where changes have taken place. It is unclear how this review is currently taking place.
- It will also be proposed that GDC staff owners review the annual declarations of interest that are made by this group and produce a report for the appropriate Executive Director² to review. This review will be to scrutinise the process followed and will contain a selected review of any declarations received.

6.4 For Staff and EMT Members:

- A register of interests is maintained.
- A copy of the Managing Interests for Staff Policy is provided during the corporate induction and it is available on the intranet site.
- Reminders are sent periodically to complete or update declarations of interest.
- For staff, the People Services team will review the declarations received from new members or existing members, where there have been changes, and provide a report to the appropriate Executive Director³ for scrutiny of the process and any guidance around irreconcilable interests or complex issues.
- In relation to EMT Members, the Chief Executive will review declarations from new members, or existing members where there have been changes, scrutinise the interests declared and determine any irreconcilable interests.
- For EMT members, once reviewed by the Chief Executive, new declarations and changes to existing declarations are published on the GDC website.
- For EMT and staff members attending Board meetings, the Council, Committee and SLT agendas include 'Declarations of Interest' as a standing item.

6.5 The Council currently receives an annual report on declarations of interest for all groups. Following a review of the policies, it will be proposed that this report on declarations relating to Council Members, Independent Associates, EMT Members and the wider Associates group is presented to the Audit and Risk Committee (who can scrutinise the processes followed and, in turn, provide assurance to the Council) and the report in relation to staff is presented to the SLT Board.

² Currently the Executive Director, Legal and Governance but proposed to change to Executive Director, Organisational Development as Associates fall within the remit of the OD directorate.

³ For staff, currently the Executive Director, Legal and Governance but proposed to change to the Executive Director, Organisational Development as staff fall within the remit of the OD directorate. The Chief Executive will review declarations from members of the EMT and the Chair of the Council will review the declarations of the Chief Executive.

7. Legal, policy and national considerations

- 7.1 The managing interests process for organisation seeks to ensure that decision making by the GDC is pursuant to our legal obligations, statutory aims and in line with best practice across the public sector.
- 7.2 The Dentists Act 1984 requires the publication of Council members' declarations of interest and these are available on the GDC website.

Appendices

- a. Appendix 1 - Register of Interests for Council Members (as at 31 December 2019).
- b. Appendix 2 - Register of Interests for Independent Associates
- c. Appendix 3 - Register of Interests for EMT Members
- d. Appendix 4 - Data on the declarations of interest of the wider Associates Group
- e. Appendix 5 - Data on the declarations on interest of GDC staff.

Katie Spears, Interim Head of Governance
kspears@gdc-uk.org
Tel: 0207 167 6151

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Appendix 1- Register of Interest for Council Members (as at 31 December 2019)

Name	Position	Declared Interest(s)
William Moyes	GDC Chair of Council Lay Member	<p><u>Employment</u> Chair of the Gambling Commission, part time, non-executive (remunerated)</p> <p><u>Memberships/associations</u> Fellow, The Royal College of Medicine The Cockburn Association, Edinburgh Civic Trust</p> <p><u>Connected Persons</u> None declared</p>
Anne Heal	Council Member Lay Member	<p><u>Employment</u> Chair, Thames Water Customer Challenge Group (remunerated) Non-Executive Director, Office of Rail & Road (remunerated) Non-Executive Director, Elexon/Elexon Clear (remunerated) Independent Member, Bank of England EDMC (remunerated) Member, Regulatory Decisions Committee, Financial Conduct Authority Director, Anne Heal & Associates (remunerated)</p> <p>Chair, Volunteering Matters (non-remunerated) Chair, NCVO (non-remunerated) Non-trustee Chair, Governance and Nominations Committee. Diabetes UK (non-remunerated) Trustee, Balletboyz (non-remunerated) Trustee/Chair, London Design & Engineering UTC (non-remunerated) Director, 27/29 Church Road (non-remunerated) Trustee, Charities Aid Foundation CAF (non-remunerated)</p> <p><u>Memberships/associations</u> Fellow, The Royal Society of Arts</p> <p><u>Connected Persons</u> None declared</p>
Caroline Logan	Council Member Registrant Member	<p><u>Employment</u> Internal Verifier, part time, Leeds Teaching Hospitals Trust, School of Dental Nursing and Technology at Leeds Dental Institute (remunerated)</p>

Name	Position	Declared Interest(s)
		<u>Connected Persons</u> None declared
Catherine Brady	Council Member Registrant Member	<u>Employment</u> Director, Bloxdent Ltd (remunerated) Dental Performer, Bloxham Dental Practice (remunerated) Training Programme Director for Foundation Dentists, Health Education Thames Valley and Wessex (remunerated) Chief Clinical Officer, Rodericks Ltd (remunerated) <u>Memberships/associations</u> Dental Protection Society <u>Connected person(s)</u> Daughter - Dental Student at Newcastle Dental School
Crispin Passmore	Council Member, Lay Member and Audit and Risk Committee (ARC) Chair	<u>Employment</u> Board Member and ARC Chair, West Midlands Housing (registered Social Landlord) (remunerated) Founder and Principle Passmore Consulting Ltd (remunerated) <u>Memberships/associations</u> Labour Party <u>Connected Persons</u> None declared
Geraldine Campbell	Council Member, Lay Member and Remuneration Committee (Remco) Chair	<u>Employment</u> Lay Assessor for Northern Ireland Medical Dental Training Agency medical trainees only (remunerated) <u>Memberships/associations</u> None declared <u>Connected Persons</u> None declared
Jeyanthi John	Council Member Registrant Member	<u>Employment</u> Consultant in Dental Public Health, Public Health England (remunerated) Honorary Senior Lecturer, King's College London (non-remunerated)

Name	Position	Declared Interest(s)
		<p>Board Member/Governor, Southampton City College (non-remunerated)</p> <p><u>Memberships/associations</u> British Dental Association Faculty of Public Health British Association for the Study of Community Dentistry</p> <p><u>Connected Persons</u> None declared</p>
Kirstie Moons	Council Member, Registrant Member, Policy and Research Board (PRB) Chair	<p><u>Employment</u> Associate Director for Dental Team Workforce Planning & Development, Health Education & Improvement Wales (HEIW) (remunerated) Member of the Welsh Dental Committee (non-remunerated) School Governor for Islwyn High School (non-remunerated) Member of Healthcare Inspectorate Wales (HIW) Stakeholder Reference group (non-remunerated)</p> <p><u>Memberships/associations</u> Member of Unison</p> <p><u>Connected Persons</u> None declared</p>
Simon Morrow	Council Member Registrant Member	<p><u>Employment</u> Director – Scottish Sedation Training (remunerated) Dental Practice Advisor & Inspector, NHS Ayrshire and Arran, contract work (remunerated) Dental Practice Inspector, Healthcare Improvement Scotland (HIS), contract work (remunerated) Sedation Inspector, NHS Boards (various and including HIS), contract work (remunerated) Lecturer NHS Education for Scotland, contract work (remunerated) Committee member, National Dental Advisory Committee, Scotland (remunerated) Working group member, Oral Health Improvement Plan, SG (remunerated) Working group member, SDNAP, older adults (remunerated) Associate Dentist, Three Towns and Kilwinning Dental Care (remunerated) Advice and Support for Clyde Munro Dental Group, contract work (remunerated)</p> <p>Church Elder, St John's Church Largs, Church of Scotland (non-remunerated)</p>

Name	Position	Declared Interest(s)
		<p><u>Memberships/associations</u> Ayrshire & Arran Local Dental Committee</p> <p><u>Connected Persons</u> None declared</p>
Margaret Kellett	Council Member Registrant Member	<p><u>Employment</u> NHS pension payments (remunerated) GDC registrant member remunerated Occasional invitation to provide expert reports (remunerated)</p> <p>Honorary clinical contract to permit clinical voluntary work-based Leeds Dental School (non-remunerated) Trustee of Oral and Dental Research Charity (non-remunerated) Honorary Secretary of the Manchester Dental Alumni Society (SOMANDA) (non-remunerated) Honorary Secretary of the Elland and Greenland district RBL (non-remunerated)</p> <p><u>Memberships/associations</u> British Dental Association Medical Defence Union British Society of Periodontology Royal College of Surgeons, England</p> <p><u>Connected Persons</u> None declared</p>
Sheila Kumar	Council Member Lay Member	<p><u>Employment</u> CEO, Council for Licensed Conveyors, regulatory body (remunerated)</p> <p><u>Memberships/associations</u> None declared</p> <p><u>Connected Persons</u> None declared</p>

Name	Position	Declared Interest(s)
<p>Terry Babbs</p>	<p>Council Member, Lay Member and Finance and Performance Committee (FPC) Chair</p>	<p><u>Employment</u> Non-Executive Director, HMRC Valuation Office Agency and member of Audit and Risk Committee (remunerated) Vice Chair, Oxfam Enterprise Development Programme (non-remunerated) Trustee, Hertford County Yacht Club (non-remunerated)</p> <p><u>Memberships/associations</u> None declared</p> <p><u>Connected Persons</u> None declared</p>

Appendix 2 - Register of Interest for Independent Associates (as at 31 December 2019)

Name	Position	Declared Interest(s)
Ann Brown	Independent Member of the Remuneration Committee (from October 2019)	<p><u>Employment</u> Hourly paid lecturer, Kingston University (Business School) (remunerated) Trustee and Chair of Remco – City & Guilds of London Institute (unremunerated)</p> <p><u>Memberships/associations</u> Fellow of Chartered Institute of Personnel and Development. Election support activities for Liberal Democrats. Not a member of any political party.</p> <p><u>Connected Persons</u> None declared</p>
Rajeev Arya	Independent Member of the Audit and Risk Committee	<p><u>Employment</u> Chief Finance Officer, Motor Insurers Bureau (remunerated)</p> <p><u>Memberships/associations</u> Fellow of the Institute of Chartered Accountants in England and Wales</p> <p><u>Connected Persons</u> Daughter's Father-in-law to be is a dentist</p>
Rosie Varley	Chair of the Statutory Panellists Assurance Committee	<p><u>Employment</u> Self-employed Independent Assessor for Public Appointments working across government departments in England and Wales as Senior Independent Panel Member on Ministerial Appointments to Public Bodies (remunerated)</p> <p>Chair of the Members of SENDAT – an Academy of Schools providing education to pupils with Special Needs in East Anglia (unremunerated)</p> <p><u>Memberships/associations</u> None declared</p> <p><u>Connected Persons</u> None declared</p>
Martyn Green	Member of the Statutory Panellists	<p><u>Employment</u> Non-executive Director of Dentists' Provident (remunerated)</p>

Name	Position	Declared Interest(s)
	Assurance Committee	<p>Lay member of the Probate Committee of the Institute of Chartered Accountants of England and Wales (ICAEW) (remunerated) Lay chair of Medical Practitioners Tribunal Service (remunerated) Professional member of the First-tier Tribunal Primary Health Lists (remunerated)</p> <p>Adviser to the charity Bridge2Aid (unremunerated)</p> <p><u>Memberships/associations</u> Member of British Dental Association Member of Christian Dental Fellowship Fellow of Royal College of Physicians and Surgeons of Glasgow Member of the Faculty of General Dental Practice of the Royal College of Surgeons of England</p> <p><u>Connected Persons</u> None declared</p>
Nigel Fisher	Member of the Statutory Panellists Assurance Committee	<p><u>Employment</u> Part-time (6 sessions per week) Associate Postgraduate Dental Dean for London and Kent, Surrey and Sussex. Health Education England. NHS (remunerated) Member of the GDC Registration Panel (remunerated)</p> <p><u>Memberships/associations</u> None declared</p> <p><u>Connected Persons</u> None declared</p>
Tim Skelton	Member of the Statutory Panellists Assurance Committee	<p><u>Employment</u> Member of NMC, RCVS, and Social Work England Fitness to Practice Committees (remunerated) Selection Exercise Chair for Judicial Appointments Committee (remunerated) Chair of Independent Review Panels for NHS England Continuing Healthcare (remunerated)</p> <p><u>Memberships/associations</u> None declared</p> <p><u>Connected Persons</u> None declared</p>

Appendix 3 - Register of Interest for EMT Members (as at 31 December 2019)

Name	Position	Declared Interest(s)
Ian Brack	Chief Executive, Registrar and Accounting Officer of the GDC	<u>Employment</u> None declared <u>Memberships/associations</u> Fellow of the Royal Geographical Society <u>Connected Persons</u> Clare Callan, Head of FtP Casework, is an acquaintance
Gurvinder Soomal	Executive Director, Registration and Corporate Resources	<u>Employment</u> None declared <u>Memberships/associations</u> None declared <u>Connected Persons</u> None declared
Lisa Marie Williams	Executive Director, Legal and Governance	<u>Employment</u> None declared <u>Memberships/associations</u> None declared <u>Connected Persons</u> None declared
Sarah Keyes	Executive Director, Organisational Development	<u>Employment</u> Trustee of the True Athlete Project - a charity (unremunerated) <u>Memberships/associations</u> Fellow of the CIPD and a chartered member of the Association of Chartered Secretaries <u>Connected Persons</u> None declared
Stefan Czerniawski	Executive Director, Strategy	<u>Employment</u> None declared <u>Memberships/associations</u> Fellow of the Royal Society of the Arts

Name	Position	Declared Interest(s)
		<p><u>Connected Persons</u> None declared</p>
Tom Scott	Executive Director, Fitness to Practise Transition	<p><u>Employment</u> Member of the National Advisory Board of Human Factors in Dentistry (NABHFD). This is an informal, unincorporated body with an emerging terms of reference and position that is seeking to engage, influence and ultimately advise the various dental professional groups and dentistry in general regarding the potential applications and benefits of employing 'Human Factors' within the sector. (Unremunerated)</p> <p><u>Memberships/associations</u> None declared</p> <p><u>Connected Persons</u> None declared</p>

Appendix 4 - Data on the declarations of interest of the wider Associates Group

Wider Associates Group				Declarations of Interest			
Total Associates Group ⁴	Total Number of Associates	% completed DOI forms by end 2019	Total number of Associates who declared no interests	Total number of Associates who declared interests	Number of Associates who declared secondary employment	Number of Associates who declared memberships or associations	Number of Associates who declared connected people
Total Group	464	87% (405/464)	Information not yet available	Information not yet available	Information not yet available	Information not yet available	Information not yet available

⁴ Due to the way in which data is collected and reported in Dynamics CRM, it has not been possible to provide a breakdown of Associates affiliated to each Directorate. The People Services team are working with the IT team to devise a solution to this issue.

Appendix 5 - Data on the declarations on interest of GDC staff.

Staff Data				Declarations of Interest			
Directorate	Total Number of Staff	% completed DOI forms by end 2019	Total number of staff who declared no interests	Total number of staff who declared interests	Number of staff who declared secondary employment	Number of staff who declared memberships or associations	Number of staff who declared connected people
Fitness to Practise	103	84% (83.5%)	65	21	15	11	2
Legal & Governance	74	93% (93.2%)	50	19	7	11	5
Organisational Development	18	100%	10	8	2	8	0
Registration & Corporate Resources	115	90% (90.4%)	84	20	8	10	6
Strategy	38	92% (92.1%)	25	10	5	8	0