

Managing Interests Policy

Version: 1.0

Status Approved

Policy Owner People Services and Governance

Applicable to (tick all that apply) ☒ ELT only ☒ Statutory Committee Members

☒ Staff only (not ELT) ☒ Associates

☒ Council Members ☐ Third Parties (state who)

☒ Independent Governance Associates

Approving forum

(tick all that apply) ☐ Chief Executive/Registrar/Accounting Officer ☒ Audit & Risk Committee

☒ Executive Leadership Team (ELT) ☐ Finance & Performance Committee

☐ Senior Management Team ☐ Remuneration & Nomination Committee

☐ Head of Function ☐ Statutory Panellists Assurance Committee

☐ Senior Information Risk Owner ☐ Council

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1. Introduction

- 1.1. Conflicts of interest are a normal and unavoidable part of decision-making for any organisation 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. This means that interests need to be declared and where a real or potential conflict is identified, it is well managed. Failure to recognise or mitigate against conflicts of interest can damage our reputation and undermine confidence in the GDC.
- 1.2. Where a conflict of interest (actual or perceived) does arise, the GDC value of 'Transparency' applies, and the GDC expects full disclosure of interests to allow us to manage any conflicts accordingly.
- 1.3. This policy aims to ensure that conflicts of interest are managed consistently to protect the integrity of decision making, limit the risk of successful challenge to decision making and ensure that we can all act in line with our responsibilities to act in the public interest.
- 1.4. The policy and its accompanying appendices are designed to provide guidance on:
 - How to declare a conflict of interest.
 - How we will assess and manage conflicts of interest.
 - How declared conflicts of interest will be recorded and, where applicable, published.
- 1.5. This policy applies to GDC staff, Council Members, Independent Governance Associates (that is members of our non-statutory Committees or the Statutory Panellists Assurance Committee) and the wider Associates group.

2. What is a conflict of interest?

- 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'*.
- 2.2. A conflict of interest could relate to any professional, personal or business activity. It is a set of circumstances that creates a risk that an individual's ability to apply judgement or act in a role is - or could be - impaired or influenced by a secondary interest. That conflict can be real or perceived. Either way, it will need to be managed.
- 2.3. A full breakdown of the different types of conflicts and some examples of them can be found on the table below. Each category should be taken into account when considering what to declare.

Table 1 – Categories of conflicts of interests

Category of conflict	Description	Examples
Reconcilable conflict of interest	This arises where a conflict exists, but it can be managed, disclosed or mitigated in a way that allows you to remain in your role without compromising integrity or public trust.	<ul style="list-style-type: none"> • A family member or close friend is a Dental Professional • Ownership of publicly traded shares • Membership of a professional body • Council Members, Independent Governance Associates or Associates holding secondary employment.
Irreconcilable conflict of interest	<p>These are interests which are significant, ongoing and would impede your ability to carry out your role.</p> <p>These interests will not be able to be managed and action would have to be taken to remove the conflict.</p>	<ul style="list-style-type: none"> • Holding a Board or senior management/strategic position at a representative body, such as the BDA. • A GDC Fitness to Practise Panellist sitting on a case where they had a personal relationship with the registrant in question. • A member of GDC staff having secondary employment in healthcare regulation where that role has conflicting interests to those of the GDC.
Perceived conflict of interest	Where a situation exists that would lead a reasonable person to believe there is, or could be, a conflict of interest, even if the individual does not have a real or potential conflict.	<ul style="list-style-type: none"> • Having a close relationship with a person who is the subject of regulatory proceedings, even though you are not part of that process. • Publishing academic material or endorsing social media publications favouring certain procedures or treatment methods.
Potential conflict of interest	Situations where a conflict could arise in the future due to the nature of your role or the changes to the organisation or service in which the interest is held.	<ul style="list-style-type: none"> • Holding shares in a company that could move into health. • Academic research into an area that could fall under regulatory review • Provision of Continuing Professional Development Courses • Membership of political pressure groups that might conflict with the GDC's statutory purposes.
Prejudicial interest	Interests which may affect your ability to fairly and	Providing advice on an issue where you have expressed a

Category of conflict	Description	Examples
	objectively consider the subject at hand as it may benefit, or appear to benefit you or those connected to you.	strong personal belief about an organisation's practices or having prior knowledge of an individual's conduct.
Indirect conflict of interest	Where the decision in question might confer an indirect benefit on you, but this benefit will be universal to all relevant groups, or only a minimal benefit will arise.	Where there is a decision to be taken around whether the GDC will move a proportion of its operations to another site. The member of staff should declare their interest in this discussion but can still participate in it.
Relationship with a connected person	<p>Where the decision-maker has a personal or business relationship with someone which could be perceived as influencing your decision making for or on behalf of the organisation.</p> <p>Examples of connected persons will be:</p> <ul style="list-style-type: none"> • Spouses, civil partners or those in long term relationships • Relatives (parents, siblings, ancestors, children etc) • Relatives of spouses or civil partners • Business partners 	<ul style="list-style-type: none"> • Spouse runs a large scale Dental Corporate Body. • Brother tenders for a service procured by the organisation. • Business partner offers Overseas Registration Examination preparatory courses.

3. Declaring your interests

- 3.1. Making appropriate declarations, in relation to actual or potential conflicts of interest, is vital given the roles that GDC staff members, Council Members, Independent Governance Associates and the wider Associates group play in administering the GDC's statutory functions.
- 3.2. The table below illustrates the functions that are delivered by the organisation and the types of groups or individuals who deliver them. For each group, it is imperative that they adhere to the principles set out in their respective policies to ensure that the decisions they take or advise on are robust, transparent and accountable.

Function or role	Examples of individuals or groups that fulfil this role
Strategic decision making for the organisation as a regulator	<ul style="list-style-type: none"> • Council Members • Independent Governance Associates

	<ul style="list-style-type: none"> • Chief Executive and ELT Members
Operational Management of the organisation	<ul style="list-style-type: none"> • Chief Executive and ELT Members • Senior Management • GDC Managers
Exercising a statutory discretion or taking statutory decisions for the organisation	<ul style="list-style-type: none"> • The Registrar (and his delegates) • Fitness to Practise Panellists • Case Examiners
Providing expert advice to the statutory decision makers for the organisation	<ul style="list-style-type: none"> • Education Associates • Registration Assessment Panellists
Operational delivery of the GDC as a public sector regulator	<ul style="list-style-type: none"> • Staff • Associates

3.3. To enable us to manage conflicts, it is essential that you regularly declare any and all relevant interests. Prior to starting, all new joiners are sent a copy of this policy and a declaration of interest form for completion. Declarations are then collected every six or twelve months, depending on the role you occupy within the GDC.

Table 2 – Frequency of declarations

Group	Team responsible	Frequency	Publication on GDC website?
Council members	Governance team	Every six months, and if circumstances change.	Yes
Independent Governance Associates (IGAs)	Governance team	Every twelve months, and if circumstances change.	Yes
Associates	People team	Every twelve months, and if circumstances change.	Yes
Executive Leadership Team (ELT)	Governance team	Every six months, and if circumstances change.	Yes
GDC staff	People team	Every twelve months, and if circumstances change.	No

3.4. Conflicts of interest (whether real or perceived) must also be declared as and when they arise. The process for declaring interests can be found in the following appendices:

- Appendix 1 - Council Members and IGAs

- Appendix 2 – Associates
- Appendix 3 – GDC Staff, including the ELT

4. Assessment and management of declared interests

- 4.1. All declared interests will be formally reviewed using a structured and proportionate process. The purpose of the assessment is to determine:
 - Whether a conflict exists (actual, potential or perceived) or could exist in the future
 - Whether it is manageable or irreconcilable
 - What action, if any, can be taken to effectively manage the conflict of interest
- 4.2. Declarations are considered by the People Team (for staff and Associates) and the Governance Team (for Council Members, IGAs and ELT Members) in the first instance.
- 4.3. The declared interest will be assessed against the following:
 - The nature of the interest (financial, personal or professional)
 - The relevance to your role within the GDC
 - Whether it is time sensitive i.e. past, current or future
 - Your degree of influence and role in decision making
 - Whether the interest is shared or unique i.e. whether others within the GDC hold similar interests
- 4.4. Following this initial review of all declarations, if any potential conflicts are identified, the People Services team and/or the Governance Team will collaborate with the prescribed person to determine whether the conflicts can be effectively managed and make a recommendation as to how it should be approached. The prescribed person for each category (Council Member, Associates and GDC Staff) is set out in the appendices.
- 4.5. The prescribed person will vary depending upon your role, but in each case the person identified will be close enough to your role to be able to determine whether there is a conflict and whether that conflict can be managed.
- 4.6. For example:
 - For Council Members and the ELT, the prescribed person is the Chair of Council.
 - For SMT Members and Heads of department, it is the relevant Executive Director, with the agreement of the Chief Executive.
 - For Associates it is the relevant staff lead, with the agreement of the relevant Executive Director.
 - For GDC staff it is the line manager and Executive Director for that area.
- 4.7. The process for determining whether a conflict of interest can be managed or is irreconcilable will vary depending upon your role¹. However, in accordance with our values and commitment to transparency, the assessment and final decision

¹ See the [Determination of Conflicts of Interest] section of appendix 1, 2 or 3

will be communicated in writing.

4.8. Where management of a conflict is required, actions may include:

- Stepping down from an external role
- Recusal or withdrawal from discussions, votes or decisions
- Reassignment to a different committee or role
- Divestment of conflicting financial interests
- Withdrawal from conflicted projects or activities

4.9 Failure to declare or appropriately manage an interest may lead to action under the relevant policies.

- For staff, this will be the GDC's disciplinary policies.
- For Council Members and IGAs, this will be the Conduct Policy.
- For Associates, this will be through management of their contracts.

5. Transparency and reporting

5.1. The Governance team maintains a Register of Interests for Council Members, IGAs and the ELT and ensures that declarations are published appropriately and report on them annually (or by exception, if appropriate) to the Audit and Risk Committee.

5.2. The People Services team maintain the Register of Interests for Associates, ensures that declarations are published by the Associate staff owners appropriately and report on them annually (or by exception if appropriate) to the Audit and Risk Committee.

5.3. The People Services team also record and maintain the declarations of interest received in connection with the GDC staff group (excluding the ELT). GDC staff group declarations are not published on the GDC's website.

5.4. Aggregate data in respect of the staff and Associate declarations will be included in reporting to the Audit and Risk Committee.

6. Equality, Diversity and Inclusion

6.1. As part of the development of this policy and its accompanying appendices, its impact on Equality, Diversity and Inclusion has been assessed.

6.2. The assessment is to minimise and, if possible, remove any disproportionate impact on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. No detriment to these groups has been identified.

7. Related Policies

7.1. Anti-Fraud, Bribery and Corruption Policy

7.2. Gifts and Hospitality Policy

7.3. Whistleblowing Policy

8. Monitoring and review

8.1. This policy is reviewed every two years collaboratively by People Services and the Governance Team. Any substantive amendments are proposed to the Audit and Risk Committee for approval. Minor amendments may be implemented by the Associate Director, People and Organisational Development and/or the Head

of Governance as outlined below.

8.2. Any updates to this policy will be made available to the relevant stakeholders and included in the Governance Manual and Governance Handbook.

9. Appendices

- Appendix 1 – Process for declaring and monitoring Conflicts of Interest for GDC Council Members and IGAs ('Members')
- Appendix 2 – Process for declaring and monitoring Conflicts of Interest for GDC Associates ('Associates')
- Appendix 3 – Process for declaring and monitoring Conflicts of Interest for GDC Staff ('Staff')
- Appendix 4 – Declaration of Interest form for GDC Council Members and IGAs
- Appendix 5 - Declaration of Interest form for GDC Associates
- Appendix 6 – Declaration of Interests form for GDC Staff

Minor Changes – approved by Associate Director, People and Organisational Development and/or the Head of Governance	Significant Changes – approved by ARC
Correction of spelling errors or typos Changes to layout Change of policy owner Updates to links and external references Addition of definitions Addition of external links	Changes to who the policy applies to Change to approving forum, particularly if moving “down” a tier (e.g. ARC to ELT) Changes to the scope Change to the substance of the policy Changes to procedure/process Changes to roles or responsibilities within the policy

Date of review	Type of review	Approval forum	Version number

Appendix 1 – Council Members and Independent Governance Associates

Process for Declaring and Managing Conflicts of Interest

1 Declaring interests – periodically

1.1 All members must:

- On appointment, declare all actual, potential and/or perceived conflicts of interest by completing the Declaration of Interest form found at **Appendix 4**.
- **For Council members:** They must update their declaration form as soon as they are aware of any change in circumstances, or at least every six months (including nil declarations or where declarations remain unchanged).
- **For Independent Governance Associates (IGAs):** They must update their declaration form as soon as they are aware of any change in circumstances, or at least every **12 months** (including nil declarations or where declarations remain unchanged).

1.2 For all Members, declarations of interest should be submitted by email to the Governance Team via governance@gdc-uk.org to ensure that they are centrally captured and logged.

1.3 For the avoidance of doubt, should a staff member, Council Member, Independent Governance Associate or Associate be involved in a personal relationship with another member of staff, an Associate, or a Council Member or Independent Governance Associate, then that interest must be declared. All secondary employment must also be declared.

2. Declaring interests – As they arise

2.1 The Standing Orders² make provision for the way in which Council Members and IGAs should declare any actual, potential and/or perceived conflicts of interest that arise during Board meetings.

2.2 Council Members and Independent Members of non-statutory Committees should declare interests arising at meetings as set out in Standing Order 7 of the General Dental Council Standing Orders for the Conduct of Business for Council and Committees 2022.

2.3 All actual, potential and/or perceived conflicts of interest should be declared at the beginning of the relevant meeting.

2.4 If it becomes clear during the meeting that there is or may be a conflict, this must also be declared as soon as the Member becomes aware of it.

2.5 If a Member has a prejudicial interest in the agenda item under discussion, they should declare it and withdraw from the discussion and/or the meeting (for that item), in line with the Standing Orders and the decision of the Chair.

2.6 All declared actual, potential and/or perceived conflicts of interest will be recorded in the minutes for the meeting. Members who have a prejudicial interest in relation to a particular item of business shall not count towards the quorum for that item.

2.7 If the conflict declared relates to an item on the agenda for discussion, it will be recorded in the meeting minutes.

² Standing Orders for the Conduct of Business for the Council and Committees 2022, Standing Order 7, Declarations of Interest

- 2.8 If the conflict declared relates to a broader conflict of interest, this should be added to the Member's declarations of interest form and reviewed by the appropriate individual in the usual way.
- 2.9 If there is any doubt as to whether a conflict of interest is broader than a specific agenda item, advice should be sought from the Head of Governance.
- 2.10 The Chair of the Council's decision on the issue will be final. If the matter relates to the Chair of Council, the decision of the Senior Independent Council Member will be final.

3. Determination of Conflicts of Interest

- 3.1 When an actual, potential and/or perceived conflict of interest is declared (periodically or as they arise), the relevant individual set out below will review, advise on and determine whether the interest is irreconcilable:

Individual	Prescribed reviewer
Chair of the Council	Senior Independent Council Member and notified to the Accounting Officer
Council Members, Independent Members of non-statutory Committees and the Chair of the SPC	Chair of the Council
SPC members	Chair of the SPC

- 3.2 Where a Member is unsure of the effect of an interest or has a prejudicial interest which they believe to be significant, to ensure that appropriate action is taken, the Member should consult with the relevant individual set out below:

Individual	Reviewer
Chair of the Council	Senior Independent Council Member
Council Members, Independent Members of non-statutory Committees and the Chair of the SPC	Chair of the Council
SPC members	Chair of the SPC

- 3.3 The decisions of the respective Chairs/Senior Independent Council Member on these matters will be final. If the conflict identified involves the Chair of Council and the Senior Independent Council Member, advice can be sought from the Chair of the Audit & Risk Committee, other appropriate Committee Chair or Member of Council or the Executive (who may seek external advice).

4. Monitoring of Conflicts of Interest

- 4.1 The Governance Team will record, maintain and publish on the GDC's website the declarations of interest received from Council Members and IGAs.
- 4.2 The Governance team will conduct an annual review of Council Member and IGAs declarations of interest and provide a report to the Head of Governance, who will review the interests declared to ensure that they are being appropriately managed.

The results of this exercise will be reported to the Audit and Risk Committee annually or by exception if required.

Appendix 2 – GDC Associates

Process for declaring and monitoring conflicts of interest

1. Declaring interests – Periodically

- 1.1 All associates must:
 - on appointment, declare all actual, potential or perceived conflicts of interest by completing the Register of Interest form found at **Appendix 5**.
 - update their declaration form as soon as they are aware of any change in circumstances, or at least **every 12 months** (including nil declarations or where declarations remain unchanged).
- 1.2 For all Associates, declarations of interest should be submitted by email to People Services via associates@gdc-uk.org to ensure that they are centrally captured and logged.
- 1.3 The People Services team will maintain the Register of Interests for Associates, ensure that declarations are published by the associate owners appropriately and report on them annually (or by exception if appropriate) to the Audit and Risk Committee.
- 1.4 For the avoidance of doubt, should a staff member, Council Member, Independent Governance Associate or Associate be involved in a personal relationship with another member of staff, an Associate, or a Council Member or Independent Governance Associate, then that interest must be declared. All secondary employment must also be declared.

2. Declaring interests – As they arise

- 2.1 All Associates should declare all actual, potential or perceived conflicts of interest to their relevant staff lead as soon as the Associate becomes aware of it, for example, a Quality Assurance Inspector who is asked to inspect an educational establishment with which they have personal connections should declare this to the Head of Education and Quality Assurance as soon as they are aware of the potential conflict of interest.
- 2.2 Statutory Committee Members with a prejudicial interest in a case must not be present for the discussions of the particular case.
- 2.3 Clinical advisers and expert witnesses should declare any actual, potential or perceived conflicts of interest as soon as it becomes apparent or at the point of instruction to their staff owner.
- 2.4 Registration Assessment Panellists will be expected to declare any actual, potential or perceived conflicts of interest upon receipt of an application to be assessed and at the commencement of a panel session.
- 2.5 Staff leads should report declarations that arise to People Services via associates@gdc-uk.org to ensure that they are centrally captured and logged.
- 2.6 Staff leads are set out in the table below:

Directorate	Associate group	Staff lead
Regulation		
Registration	Registration Assessment Panellists	Associate Director, Registration
	ORE Chief External Examiners	Associate Director, Registration
		Associate Director, Registration
	Overseas Exam Expert Advisory Group (OREAG)	Associate Director, Registration
Fitness to Practise	Clinical Advisors (External – at assessment stage)	Associate Director, FtP Case Progression
	Clinical Expert Witnesses	For ILPS and ELPS cases: Head of Legal Presentation Services
	Fitness to Practise Legal Advisors	Head of Hearings and DCS
	Fitness to Practise Professional Advisors	Head of Hearings and DCS
	Fitness to Practise Panellists	Head of Hearings and DCS
	Specialist List Appeals Panel Members	Head of Hearings and DCS
	Director of Special List Appeals	Head of Hearings and DCS
	DCS Panellists	Head of Hearings and DCS
Strategy		
Education Quality assurance	Education Associates (Education Visitors/QA Inspectors)	Head of Education and Quality Assurance

3. Determination of Conflicts of Interest

3.1 When an actual, potential or perceived conflict of interest is declared (periodically or as they arise), it will be reviewed as follows:

- The People Services team will conduct an initial review of all interests declared, including nil declarations.
- Following an initial review of all declarations, the People Services team will collaborate with the relevant staff lead to determine whether any identified conflicts of interest can be effectively managed and make a recommendation as to how it should be handled.
- If there are questions about whether the issue identified is a conflict of interest or how it should be managed, these should be referred to the Head of People Services in the first instance, who will liaise with the Head of Governance for a consistent organisational approach.
- Where an interest has been declared, the People Services team will send a copy of the form and recommendation to the relevant Executive Director for review and approval. The relevant Executive Director will reviews all interests declared.

- If there remains any dispute as to how the declared interest should be managed, the matter should be referred to the Chief Executive and Registrar, whose decision will be final.
- 3.2 Where an Associate is unsure of the effect of an interest or has a prejudicial interest which they believe to be significant, or if the staff owner and/or Head of People Services believes it to be so, to ensure that appropriate action is taken, the member should consult with the Associate Director, People and Organisational Development, who will liaise with the Chief Executive and Registrar if appropriate. If the query is complex or novel, the Head of Governance can also support in resolving it. The decisions of the Chief Executive and Registrar on these matters will be final.

4. Monitoring of Conflicts of Interest

- 4.1 The Peoples Services team will record, maintain, and publish on the GDC's website the declarations of interest received from Associates.
- 4.2 The People Services team will conduct an annual review of Associate declarations of interest and provide a report to the Associate Director, People & Organisational Development, who will review the interests declared to ensure that they are being appropriately managed. The results of this exercise will be reported to the Audit and Risk Committee annually or by exception if required.

Appendix 3 – GDC Staff

Process for declaring and monitoring Conflicts of Interest

1. Declaring Interests – Periodically

1.1 All members of GDC staff must:

- On appointment, declare all actual, potential or perceived conflicts of interest by completing the Declaration of Interest form found at **Appendix 6**. New employees will be sent a copy of this policy and the declaration of interest form with their offer of employment. All staff should complete a declaration prior to their agreed start date, even if they have nothing to declare.
- **ELT Members:** They must update their declaration form as soon as they are aware of any change in circumstances, or at least every **six months** (including nil declarations or where declarations remain unchanged).
- **For the wider GDC staff members:** They must update their declaration form as soon as they are aware of any change in circumstances (but no later than a month), or at least every **12 months**.

1.2 For **ELT Members**, bi-annual declarations of interest should be submitted by email to the Governance Team via governance@gdc-uk.org to ensure that they are centrally captured and logged.

1.3 For **wider GDC staff members**, annual declarations of interest should be submitted as part of the annual Declarations of Interest exercise via employee self-service within the Connect system.

1.4 All secondary employment must be declared.

1.5 The Governance team will maintain the register of interests for ELT Members, ask for bi-annual updates, ensure that declarations are published appropriately and report on them annually to the Audit and Risk Committee.

1.6 The People Services team will maintain the register of interests for wider GDC staff members, ask for annual updates and report on them annually to the ELT Board.

2. Declaring Interests – As they arise

2.1 **All members of GDC staff** should declare all actual, potential or perceived conflicts of interest as soon as they become aware of it.

2.2 For the avoidance of doubt, should a staff member, Council Member, Independent Governance Associate or Associate be involved in a personal relationship with another member of staff, an Associate, or a Council Member or Independent Governance Associate, then that interest must be declared.

2.3 **ELT Members and SMT Members** should discuss with the Head of Governance and the Chief Executive and Registrar whether they have an interest that may need to be declared.

2.4 **The Chief Executive** should discuss this with the Head of Governance and/or the Chair of the Council.

- 2.5 **For ELT and the Chief Executive** - Ad-hoc declarations of interest should be submitted by email to the Governance Team via governance@gdc-uk.org to ensure that they are centrally captured and logged.
- 2.6 **Wider GDC staff members** should, in the first instance, seek guidance from their line manager. If further assistance or advice is required, individuals can seek guidance from their Head of department and relevant People Partner. For wider staff, ad-hoc declarations of interest should be submitted by email to People Services via peopleservices@gdc-uk.org to ensure that they are centrally captured and logged.

3. **Determination of Conflicts of Interest**

- 3.1 When an actual, potential or perceived conflict of interest is declared (periodically or as they arise), it will be reviewed as follows:
- 3.2 For **ELT Members**, whether or not an interest has been declared on the form, the Governance team will send a copy of the form to the Chief Executive and Registrar for review and approval.
- 3.3 In the case of the Chief Executive and Registrar, the Governance team will send a copy of the form to the Chair of the Council for review and approval.
- 3.4 Secondary employment for ELT and SMT Members must be authorised in advance by the Chief Executive and Registrar. In the case of the Chief Executive and Registrar, secondary employment must be authorised in advance by the Chair of the Council.
- 3.5 **For wider GDC staff members, including SMT Members**, where an interest has been declared, the line manager and the People Services team will conduct an initial review to determine whether the conflict can be effectively managed and make a joint recommendation as to how the conflict should be approached.
- 3.6 The People Services team will send a copy of the form and joint recommendation to the relevant Executive Director for review and approval.
- 3.7 For budget holders, a copy will also be sent to the Finance Department for noting.
- 3.8 All secondary employment must be authorised, in advance, by the line manager, Senior People Partner and the relevant Executive Director. Due consideration will be given by the Executive Director and relevant Senior People Partner as to whether the secondary employment is a potential or actual conflict of interest.
- 3.9 If there remains any dispute as to how the declared interest should be managed, the matter should be referred to the Chief Executive and Registrar, whose decision will be final.
- 3.10 Where a member of GDC staff is unsure of the effect of an interest or has a prejudicial interest which they believe to be significant, or if the line manager and/or Head of People Services believes it to be so, to ensure that appropriate action is taken, the member should consult with the Associate Director, People and Organisational Development, who will liaise with the Chief Executive and Registrar if

appropriate. If the query is complex or novel, the Head of Governance can also support in resolving it.

3.11 The decisions of the Chief Executive and Registrar on these matters will be final.

4. Monitoring Conflicts of Interest

- 4.1 The Governance Team will record, maintain and publish on the GDC's website the declarations of interest received from **ELT Members**.
- 4.2 The People Services team will record and maintain the declarations of interest received in connection with the **wider GDC staff group**. Wider GDC staff group declarations are **not** published on the GDC's website.
- 4.3 In relation to Case Examiners, as they perform a statutory function that was previously conducted by a statutory Committee, their declarations of interest will be published (as appropriate) on the GDC website.
- 4.4 When bi-annual declarations are made by ELT Members, the Chief Executive and Registrar will review the interests declared to ensure that they are being managed appropriately. The Chair of the Council will review the declarations made by the Chief Executive and Registrar. The Governance team will conduct an annual review of ELT Members' declarations of interest and provide a report to the Head of Governance, who will review the interests declared to ensure that they are being appropriately managed. The results of this exercise will be reported to the Audit and Risk Committee annually or by exception if required.
- 4.5 When annual declarations are made by the wider GDC staff group, the People Services team will conduct an annual review of staff declarations of interest and provide a report to the Associate Director, People & Organisational Development, who will review the interests declared to ensure that they are being managed appropriately. The results of this exercise will be reported to the ELT Board annually or by exception if required.

Appendix 4 – Declaration of Interest form for GDC Council Members and Independent Governance Associates

Declaration of Interest Form for GDC Council Members and Independent Governance Associates

Title: (Dr, Mr, Mrs, Ms, Prof):

Full name:

Assigned role with the GDC:

Declaration:

I understand and take responsibility for acting in accordance with the [seven principles of public life](#) (the Nolan Principles). I understand that I must not receive any financial or non-financial benefit that is not explicitly authorised in my appointment letter and should not exert any influence to acquire any preferential treatment for myself or other connected persons.

Areas of interest	Details relating to you and/or a connected person (as set out in the GDC's Managing Interests Policy)
<p>Please provide details of all paid employment:</p> <ul style="list-style-type: none"><input type="checkbox"/> Non-Executive positions<input type="checkbox"/> Full/Part-time employment<input type="checkbox"/> Consultancies<input type="checkbox"/> Self-employed<input type="checkbox"/> Directorships <p>Why? Decisions need to be taken in an open and transparent manner, therefore, Council Members and IGAs are required to declare positions so that any actual, potential and/or perceived conflicts of interest can be managed.</p>	

Areas of interest	Details relating to you and/or a connected person (as set out in the GDC's Managing Interests Policy)
<p>Please give details of all unpaid work, for example:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Roles in organisations associated with healthcare <input type="checkbox"/> Public service offices <input type="checkbox"/> Roles held in local or national organisations <input type="checkbox"/> Trusteeships <p>Why? Decisions need to be taken in an open and transparent manner, therefore, Council Members and IGAs are required to declare positions so that any actual, potential and/or perceived conflicts of interest can be managed.</p>	
<p>Please list all businesses you are involved in which have a direct contract with the GDC or are a potential contractor with the GDC.</p> <p>Why? Decisions need to be taken in an open and transparent manner, therefore, Council Members and IGAs are required to declare positions so that any actual, potential and/or perceived conflicts of interest can be managed.</p>	

Areas of interest	Details relating to you and/or a connected person (as set out in the GDC's Managing Interests Policy)
<p>Do you have close personal ties with the GDC's Council Members, IGAs, Associates, advisers, directors or employees?</p> <p>Why? Council members and IGAs who have close ties with the GDC's advisors, directors or employees may be perceived as having an undue influence on decisions. These close personal ties must be declared so that any actual, potential or perceived conflict of interest can be managed in an open and transparent manner.</p>	
<p>FOR COUNCIL MEMBERS ONLY:</p> <p>All membership bodies and associations including political parties, pressure groups and professional bodies of which you are a member or are associated.</p> <p>Why? Council Members are free to engage in political activities or to maintain associations with professional organisations. Council members are required to declare such positions to give assurance</p>	
<p>Any other conflicts not covered by the above?</p>	

Council Members:

- I have read the Managing Interests Policy and confirm that the information provided below is complete and accurate. I acknowledge any changes in these declarations must be notified to the GDC as soon as practicable.
- I will update my form every 6 months and more frequently if any significant changes occur.
- I will, as soon as practicable but not more than five working days after, alert the Head of Governance/Executive Director, Legal and Governance or relevant Director if I meet the criteria for disqualification as set out in the GDC (Constitution) Order 2009 or the GDC (Constitution of Committees) Order 2009.

Independent Governance Associates (including independent Members of non-statutory Committees (ARC, FPC, RemNom) and Members of the Appointments Committee - SPC):

- I will update my register every 12 months and more frequently if any significant changes occur.
- I will, as soon as practicable but not more than five working days after, alert the Head of Governance/Executive Director, Legal and Governance or relevant Director if I meet the criteria for disqualification as set out in the GDC (Constitution) Order 2009 or the GDC (Constitution of Committees) Order 2009.

Signed:

Date:

Reviewed by:

Date:

Data Protection

- The information provided will be processed in accordance with data protection principles as set out in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The basis on which the GDC processes personal data in connection with employment is that the processing is necessary for the exercise of the GDC's statutory functions.
- Information about how the GDC will use and share the information you give us, the various rights you have in connection with any personal data about you that is held by the GDC, and how long we will keep your information for can be found in the privacy notice on our website at www.gdc-uk.org/privacy.

Appendix 5 Declaration of Interest form for GDC Associates

Declaration of Interest Form for GDC Associates

Title: (Dr, Mr, Mrs, Ms, Prof):

Full name:

Assigned role with the GDC:

Declaration

I have declared my interests on the form below. All actual, potential and perceived conflicts have been disclosed.

Areas of interest	Details relating to you and/or a connected person (as set out in the GDC's Managing Interests Policy)
<p>Please provide details of all paid employment:</p> <ul style="list-style-type: none"><input type="checkbox"/> Non-Executive positions<input type="checkbox"/> Full/Part-time employment<input type="checkbox"/> Consultancies<input type="checkbox"/> Self-employed<input type="checkbox"/> Directorships <p>Why? Decisions need to be taken in an open and transparent manner, therefore, Associates are required to declare positions so that any actual, potential and/or perceived conflicts of interest can be managed.</p>	

Areas of interest	Details relating to you and/or a connected person (as set out in the GDC's Managing Interests Policy)
<p>Please give details of all unpaid work, for example:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Roles in organisations associated with healthcare <input type="checkbox"/> Public service offices <input type="checkbox"/> Roles held in local or national organisations <input type="checkbox"/> Trusteeships <p>Why? Decisions need to be taken in an open and transparent manner, therefore, Associates are required to declare positions so that any actual, potential and/or perceived conflicts of interest can be managed.</p>	
<p>Please list all businesses you are involved in which have a direct contract with the GDC or are a potential contractor with the GDC.</p> <p>Why? Decisions need to be taken in an open and transparent manner, therefore, Associates are required to declare positions so that any actual, potential and/or perceived conflicts of interest can be managed.</p>	
<p>Do you have close personal ties with the GDC's Council Members, IGAs, Associates, advisers, directors or employees?</p> <p>Why? Associates who have close ties with the GDC's advisors, directors or employees may be perceived as having an undue influence on decisions. These close personal ties must be declared so that any actual, potential or perceived conflict of interest can be managed in an open and transparent manner.</p>	

Areas of interest	Details relating to you and/or a connected person (as set out in the GDC's Managing Interests Policy)
Any other conflicts not covered by the above?	

Associates:

- I have read the Managing Interests Policy and confirm that the information provided below is complete and accurate. I acknowledge any changes in these declarations must be notified to the GDC as soon as practicable.
- I will update my form every 12 months and more frequently if any significant changes occur.
- I will, I will, as soon as practicable but not more than five working days after, alert the Head of People Services/Director of Organisational Development or relevant Director if I meet the criteria for disqualification as set out in the GDC (Constitution) Order 2009 or the GDC (Constitution of Committees) Order 2009.

Signed:

Date:

Reviewed by:

Date:

Data Protection

- The information provided will be processed in accordance with data protection principles as set out in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The basis on which the GDC processes personal data in connection with employment is that the processing is necessary for the exercise of the GDC's statutory functions.
- Information about how the GDC will use and share the information you give us, the various rights you have in connection with any personal data about you that is held by the GDC, and how long we will keep your information for can be found in the privacy notice on our website at www.gdc-uk.org/privacy.

Appendix 6 – Declaration of Interest form for GDC Staff

Declaration of Interest Form for GDC Staff – Part 1

Name (Print):

Directorate:

Job Title:

Budget Holder:

All GDC staff must complete **one** of the following statements and return the form as set out above. New starters should return their forms with their acceptance of the appointment.

EITHER

- a) I have reviewed the form below and have no interests to declare. I will inform the People Services Team/Governance Team (delete as appropriate) as soon as possible of any changes to the information provided.

Signed:

Date:

OR

- b) I have declared my interests on the form below. All actual, potential and perceived conflicts have been disclosed. I will inform the People Services Team/Governance Team (delete as appropriate), as soon as possible of any changes to the information provided. A copy of this form will be sent to your Executive Director for approval and to the Finance Department if you are a budget holder.

Signed.....

Date.....

Declaration of Interest Form – Part 2

To be completed if you have an interest to declare

Areas of interest	Details relating to you and/or a connected person (as set out in the GDC's Managing Interest Policy)
Give details of all paid employment outside the GDC Why? All secondary employment must be declared and approved	
Give details of all unpaid (including pro bono) work e.g. <input type="checkbox"/> Roles in organisations associated with healthcare <input type="checkbox"/> Public service offices <input type="checkbox"/> Roles of posts held in local or national organisations <input type="checkbox"/> Trusteeships Why? Decisions need to be taken in an open and transparent manner, therefore, staff are required to declare positions so that any perceived interests can be easily managed	

Declaration of Interest Form – Part 2

Areas of interest	Details relating to you and/or a connected person (as set out in the GDC's Managing Interest Policy)
<p>A business that you or a connected person are involved in which has a direct contract with the GDC or is a potential contractor with the GDC.</p> <p>Why? Staff members may derive benefit from such a direct conflict and by declaring the relationship steps can be taken to manage the situation.</p>	
<p>Do you have close personal ties with the GDC's Council Members, IGAs, Associates, advisers, directors or employees?</p> <p>Why? Staff members who have close ties with Council Members, IGAs Associates, advisers, directors or other employees may be perceived as having an undue influence on decisions. This must be declared so that it can be managed in an open and transparent manner.</p>	
<p>FOR ELT MEMBERS ONLY:</p> <p>All membership bodies and associations including political parties, pressure groups and professional bodies of which you are a member or are associated.</p> <p>Why? ELT Members are free to engage in political activities or to maintain associations with professional organisations. ELT members are required to declare such positions to give assurance that these do not conflict with the Council's statutory functions.</p>	

Areas of interest	Details relating to you and/or a connected person (as set out in the GDC's Managing Interest Policy)
Any other conflicts not covered by the above?	

Declaration of Interest Form – Part 2

Are you Budget Holder?

☐ Yes

☐ No

Have you declared these interests before?

☐ Yes

☐ No

☐ N/A

Have you informed your line manager of the areas of interest you have outlined in Part 2:

☐ Yes

☐ No

Please note if you have answered no, we reserve the right to inform the line manager unless there is a specific reason not to.

Data Protection

- The information provided will be processed in accordance with data protection principles as set out in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The basis on which the GDC processes personal data in connection with employment is that the processing is necessary for the exercise of the GDC's statutory functions.
- Information about how the GDC will use and share the information you give us, the various rights you have in connection with any personal data about you that is held by the GDC, and how long we will keep your information for can be found in the privacy notice on our website at www.gdc-uk.org/privacy.