

### Management of Interests policy

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Author:	Lisa Harmshaw, Governance Manager
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Linked policies:	<ul style="list-style-type: none"> <li>• Allocation of Roles and Responsibilities</li> <li>• Code of Conduct</li> <li>• Conduct, Attendance and Performance (employees only)</li> <li>• Member complaints</li> <li>• Standing Orders (for Council)</li> <li>• Council meeting protocol</li> <li>• Council and Committee Appointments Process</li> <li>• Interim internal whistleblowing policy</li> </ul>
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## 1. Statement

- 1.1 We are committed to ensuring well defined and transparent arrangements for managing conflicts of interest, both real and perceived, in order to demonstrate to the public and stakeholders that our decisions are made in the best interests of the public.
- 1.2 This policy supports the principles of transparency and probity to maintain confidence in the GOC and protect our employees and members from any appearance of impropriety, to ensure that those who work for and on behalf of us make decisions in the best interests of the public. This means decision making is independent, fair and free from improper influence and bias.
- 1.3 Employees and members are free to hold a range of outside personal interests including political activities and involvement, financial or otherwise with commercial, professional and other optical organisations provided that such interests do not conflict (or give rise to a conflict) with our public protection role or conflict with their role as an employee or member. However, to ensure that these personal interests do not conflict with their role, employees and members must:
  - 1.3.1 declare any relevant interests in accordance with this policy and ensure they review and update their declarations as they change, and at a minimum annually;
  - 1.3.2 not put themselves or their colleagues in a position where their duties and personal interests conflict;
  - 1.3.3 avoid making decisions or situations where they have an interest which might influence, or be perceived to influence their judgement; and
  - 1.3.4 act and be seen to act impartially and objectively.
- 1.4 We are responsible for promoting and setting standards for optometrists, dispensing opticians, optical students and optical businesses as well as making decisions about whether their fitness to practice has been impaired. Therefore our conduct both as an organisation and as individuals must reflect the same high standards.
- 1.5 Our approach to managing interests is undertaken in a staged manner as follows:
  - 1.5.1 consider whether you (or a connected person) have any actual or potential interests;
  - 1.5.2 declare any actual or potential interests which are connected to the GOC;
  - 1.5.3 identify whether each declared interest is (or could be viewed by others as) a conflict;
  - 1.5.4 determine how any identified conflicts of interest will be managed; and
  - 1.5.5 review your interests regularly.

## **2. Purpose**

- 2.1 This policy provides guidance on:
  - 2.1.1 what interests must be declared;
  - 2.1.2 how and when to declare interest(s);
  - 2.1.3 how to identify and manage a conflict of interest; and
  - 2.1.4 how we will publish interests.

## **3. Scope**

- 3.1 This policy applies to employees and members and to individuals making an application to become an employee or member.
- 3.2 For the vast majority of our employees and members, it is unlikely that a conflict of interest will occur. Therefore employees and members will only need to be aware of this policy and know what to do should they hold a declarable interest and that interest conflicts with their duties. Those most likely to be affected are our trustees, those in more senior roles with public facing responsibilities (SMT), those who exercise our statutory decision making powers as set out in the GOC Scheme of Delegation (such as case examiners, some committees and Council), or those roles authorised to procure services on behalf of the GOC.
- 3.3 As the GOC's trustees, Council members have a legal duty to act only in the best interests of the GOC and must not put themselves in any position where their duties as a trustee may conflict with any personal interest.
- 3.4 It is not possible to anticipate every situation that might arise when a personal interest could conflict with the duties of an employee or member – consequently this policy must retain a degree of flexibility in order to allow the exercise of judgment in individual cases.

## **4. Glossary of terms**

- 4.1 The following terms are used in this policy:
  - 4.1 **Conflict of interest:** Any situation in which an employee or members personal interests, could or could be seen to, prevent them from making a decision in the best interests of the GOC (ultimately in protecting the public), including where the loyalty or duty of an employee or member to another person or organisation could prevent them from making a decision in the best interests of the GOC (known as a conflict of loyalty).
  - 4.2 **Connected person:** family, relatives or business partners of employees or members, as well as businesses in which they have an interest through ownership or influence. This includes: spouse, partner, adult children, siblings, grandchildren and grandparents.
  - 4.3 **Employees:** Permanent or temporary employees, contractors or consultants working with the GOC.

- 4.4 **FTP:** fitness to practise.
- 4.5 **Members:** individuals who work with the GOC who are neither employees nor contractors (as defined by their contract with us).
- 4.6 **Optical Education Institution (OEI):** undergraduate optical education providers that are currently accredited by the GOC or seeking/anticipating seeking GOC accreditation, or providers of post-graduate or Continuing Education and Training (CET) in optics.
- 4.7 **Optical sector:** Includes optical education, businesses, organisations, optical services, charities and NHS bodies.
- 4.8 **Senior Management Team (SMT):** includes the Chief Executive and Registrar, the Director of Strategy, the Director of Resources and the Director of Fitness to Practise (FTP).
- 4.9 **Trustee benefit:** Any instance where money or other benefit which has a monetary value is received by Council members (the GOC's trustees), excluding expenses.
- 4.10 **User trustee:** Any trustee who makes use, as a beneficiary of the equipment, facilities, services or support provided by the GOC – i.e. registrant Council members.

## **5. What interests must be declared?**

- 5.1 There are a number of different types of interest:
  - 5.1.1 Direct – interests with direct relevance to specific items of business such that a fair minded observer, having considered the facts, would conclude that there was a real possibility that the individual could be influenced in any discussion or decision;
  - 5.1.2 Indirect – interests which do not directly relate to specific issues for discussion or to individuals personally;
  - 5.1.3 Anticipatory – interests where actions may be perceived to put an individual in a more favourable position in relation to another party or where the interest has not yet fully materialised;
  - 5.1.4 Loyalty – interests which may arise in respect of another person or organisation with which there is a personal or professional relationship which may influence judgment or actions, or could be perceived to do so; and
  - 5.1.5 Prejudicial – interests where actions could be perceived to prejudice judgment and/or decision making.
- 5.2 Employees and members have a personal responsibility to identify the interests they have and declare to the GOC any which:
  - 5.2.1 are relevant to their role and/or duties at the GOC or could be perceived to be relevant; and
  - 5.2.2 could affect or be perceived to affect their judgment, actions or decisions taken as part of their role. Annex one provides some helpful examples when considering which interests employees and members might have.

- 5.3 Employees and members should ask themselves the following questions in relation to current interests or interests which they have held previously but which are likely to have the perception of conflicting with their role at the GOC. If the answer is 'yes' to any of the questions you must answer yes in the declaration form and provide information on the interest:
- A. in addition to your employee or member contract do you (or a connected person) have a contract with the GOC as an employee or member or a contract to provide services to the GOC?
  - B. do you (or a connected person) have any close personal ties with GOC employees, members or advisors?
  - C. are you (or a connected person) employed, were previously employed or hold a position of professional practice (inc. paid and unpaid) in an organisation in the optical sector?
  - D. are you (or a connected person) employed as a consultant, director or advisor by an organisation which advises the GOC or organisations/ individuals in the optical sector?
  - E. do you (or a connected person) own (or have significant control over) any organisation in the optical sector?
  - F. do you (or a connected person) hold any shareholdings or investments of any company either regulated by the GOC or contracted to work with the GOC?
  - G. do you (or a connected person) hold office, are appointed to a position in, are a member of or affiliated to a professional body, specialist society, charity or other regulator etc related to the optical sector (i.e. ABDO, AOP, BCLA, FODO, FLMA, royal colleges, Worshipful Company of Spectacle Makers, Tribunals, Ombudsmen etc.)?
  - H. do you (or a connected person) hold office, are appointed to a position in, are a member of or affiliated to a professional body, specialist society, charity or other regulator etc related to your role (i.e. Solicitors Regulation Authority, Financial Conduct Authority, CIPD, ICSA etc.)?
  - I. are you (or a connected person) associated with an educational institution which is currently accredited by the GOC (or is anticipating applying for accreditation) – including UK, overseas and online providers?
  - J. are you (or a connected person) acting as a lay/non-expert character witness on behalf of a registrant who is appearing before the GOC Fitness to Practice (FTP) Committee?
  - K. are you (or a connected person or organisation in which you are a Responsible Officer) subject to investigation by the GOC relating to FTP concerns which have been referred to the FTP Committee?
  - L. are you (or a connected person or organisation in which you are a Responsible Officer) subject to investigation by a professional body relating to disciplinary processes?
  - M. do you (or a connected person) hold any other interest which may be relevant and not covered by the above which might lead a fair-minded

observer, having considered the facts, to conclude that there was a real possibility that such an interest might influence your judgment?

- 5.4 For each declarable interest employees and members must declare:
- 5.4.1 whether the interest is theirs or the interest belongs to a connected person (family, relative or business partner) – providing their name;
  - 5.4.2 the name of the organisation;
  - 5.4.3 the position held;
  - 5.4.4 the level of shareholding / investment (if relevant);
  - 5.4.5 the date the interest started; and
  - 5.4.6 any previous interest which is still applicable.
- 5.5 Where the answer to the questions in 5.3 are no, employees and members should complete a declaration confirming no for each question. However they should keep the interest in mind should it need to be declared in the future if circumstances change. For example the GOC may procure the services of a company in which an interest is held. Employees and members must declare the interests of connected persons where these interests are known.
- 5.6 If employees and members are not sure whether the answer to the questions in 5.3 is a yes or no – they should seek guidance from the Governance Team [governance@optical.org](mailto:governance@optical.org). If in doubt employees and members should be open in declaring the issue and discussing it.

## **6. How and when to declare interests**

- 6.1 When making an application for a role as an employee or member, applicants should declare on the application form (or in a covering letter if there is no application form) any interests they hold which must be declared under this policy.
- 6.2 On appointment all employees and members should complete a declaration form (attached at Annex three) with details of any interests they hold which must be declared under this policy. Employees should provide the declaration form to HR and if they are a member of the SMT, Head of Department, case examiner, budget holder or if their role includes authority to exercise a statutory decision making power as set out in the GOC Scheme of Delegation, they should advise the Governance Team so that their interest can be entered onto the Register of Interests and a decision made on how the interest will be managed. Members should provide the form to the Governance Team.
- 6.3 If any new interests arise or employees/members become aware of an interest held by a connected person, which must be declared under this policy, they should be notified to HR/the Governance Team as soon as possible using the form at annex three.

- 6.4 Employees and members have a personal responsibility to review business and operational plans and forward plans for meetings to identify any situations in which their interests may conflict with their duties, and advise the Governance Team of any potential conflicts which have not already been identified, to enable a decision to be made on how the interest will be managed.
- 6.5 If a non-declared interest is identified at the point at which it is in conflict with an employee or members duties, the employee/member should declare it immediately to their line manager/Chair and then to HR/the Governance team as soon as possible by completing the declaration form (attached at Annex three). This could happen at the point at which papers are received, including meeting papers, case files, hearings notice or contract/tender documents. If this happens the employee/member should not continue to read, discuss, make any decisions or attempt to influence others in relation to the conflicted issue until a decision has been made as to how to manage the interest.
- 6.6 Additionally, when an employee or member holds an interest which is in conflict with items being discussed at meetings/hearings they must formally declare their interest at the start of the meeting, or as soon as the conflict of interest is recognised.
- 6.7 The declarations should be reviewed regularly (at a minimum, annually) to ensure they remain up to date.

## **7. How to identify and manage a conflict of interest**

- 7.1 A conflict of interest arises where a personal interest or loyalty might influence, or be perceived to influence, their judgement, actions or decisions. In UK law, the legal test for bias is where *“a reasonable, fair-minded and informed observer would conclude that there is a real possibility that an individual’s judgement, actions or decision-making is or could be biased because of a particular interest”*.
- 7.2 Conflicts of interest usually arise where either:
- 7.2.1 there is a potential financial or measurable benefit to the employee, member or connected person; or
  - 7.2.2 the employee’s/member’s duty to the GOC competes with a duty or loyalty they owe to another organisation or person.
- 7.3 Interests which are declared as part of an application for a role as an employee or member will be fully explored by the selection panel at shortlisting and interview stage. Applicants will be given an opportunity to propose how they would manage or eliminate a conflict should they be offered appointment.

- 7.4 All declared interests by employees and members will be reviewed by the employee's line manager/relevant Council/committee Chair and the Head of Governance, in conjunction with the employee/member to consider whether it is a possible conflict and agree how the interest will be managed. A decision on how the interest will be managed will be communicated to the employee or member and recorded in their HR/Governance file. Where an employee or member disagrees with the outcome on how to manage their interest they should refer this to the Head of Governance who will consider any points raised with the relevant Director/Chair of Council.
- 7.5 It is possible that certain interests will not be manageable and will need to be removed, for example giving up the conflicting interest as a condition of appointment, resignation or a permanent change in decision making responsibilities. This could be where the conflicting interest includes a competing legal obligation to another organisation or person, where the decision is viewed as significant, controversial or high risk, where the existence of the conflict would be seen to significantly affect the decision making process, or where the conflict will arise so frequently it would undermine effective decision making. Interests that are likely to require the conflicting interest to be removed include:
- 7.5.1 individuals cannot be an employee and a member e.g. case examiners cannot be a member on an advisory committee;
  - 7.5.2 individuals must be suspended from office as a member if they are subject to investigation by the GOC or other professional body in relation to fitness to practice concerns which have been referred to the GOC FTP Committee/disciplinary committee;
  - 7.5.3 members cannot be on Council or a statutory advisory committee and on the hearings panel or the Investigations Committee;
  - 7.5.4 employees and members cannot act as a lay/non-expert character witness on behalf of a registrant who is appearing before the GOC Fitness to Practice (FTP) Committee; and
  - 7.5.5 employees and members cannot provide references for individuals applying to be an employee or member.
- 7.6 In order to ensure that there is an appropriate separation between roles the GOC may decide that there should be period of time between an employee/member leaving one role and taking on another. Roles that require separation by a period of time include:
- 7.6.1 a gap of two years between being a Council member and other roles which are listed as one a Council member is not able to hold.
- 7.7 There may be situations where a decision is made to go ahead with a decision affected by a serious conflict of interest, or where a significant proportion of the decision makers are conflicted. In such situations the decision making body

should seek authority from the body to which it reports, unless the benefit has been authorised in advance or in governing documents. For example the Education committee should seek authority from Council, and Council should seek authority from the Charity Commission, unless they are able to demonstrate clearly how the decision was made in the best interests of the GOC.

- 7.8 Usually interests can be managed, which could include:
  - 7.8.1 being asked to provide any information necessary to help decision makers to make a decision in the best interests of the GOC;
  - 7.8.2 leaving a meeting for the discussion and decision, or just the decision;
  - 7.8.3 receiving redacted minutes and papers or not receiving papers or other related material;
  - 7.8.4 being unable to form part of a quorum (during a meeting); and/or
  - 7.8.5 agreeing an alternative decision maker.
  
- 7.9 Where the decision relates to a potential financial or measurable benefit to the employee, member or connected person (not where the benefit arises as a user trustee) the conflict of interest must be managed by ensuring that the conflicted employee or member withdraws from the meeting for the discussion and decision and does not take any part in subsequent discussion or decision making on the issue.
  
- 7.10 There may be instances where despite there being a conflict of loyalty it is appropriate for an employee or member to continue to take part in a decision where the risk is negligible and that having their involvement in the discussion or decision would be in the best interests of the GOC. In these circumstances this will be agreed as the way in which the interest should be managed and employees/members will be notified.
  
- 7.11 If an interest is identified and declared at a meeting, where the interest could be in conflict with an issue being discussed/decided, it is the responsibility of the Chair of the meeting to determine, with the other members present, whether the interest is or could be perceived to be a conflict and how it should be managed, taking into account any previous decisions on how the conflict of interest should be managed. It is always recommended that if there is any uncertainty as to the level of the conflict or the risk of the decision being made, the employee or member does not take part in the discussion or decision until the full facts of the interest can be established and an appropriate way to manage the interest agreed. In such circumstances the Chair must ensure all relevant factors are taken into account and explain the agreed approach if asked.

## **8. Compliance**

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- 8.1 Compliance with this policy is mandatory. Instances where interests which are in conflict with a role are not declared and managed in accordance with this policy will be taken seriously. Non-compliance for employees may be considered to be gross misconduct (and could result in summary dismissal) as stated in paragraph 5.2 of the Conduct, Attendance and Performance policy. Non-compliance for members is a breach of the terms of appointment which could result in removal from office.
- 8.2 Council members, as our trustees, could be held legally liable if they fail to identify and declare any conflicts and therefore fail to comply with their personal legal responsibility to avoid conflicts of interest and act only in the interests of the GOC.
- 8.3 All employees and members are encouraged to speak up if they suspect that a member or employee has not complied with this policy. Concerns regarding undeclared interests should be reported to a line manager/Director/Chair as well as the Head of Governance and will be investigated in accordance with the GOC internal investigation policy.
- 8.4 All concerns raised in relation to this policy will be reported to the Audit and Risk Committee in the quarterly exceptions report, irrelevant of whether they are founded or not.

## **9. Transparency**

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- 9.1 The interests declared by applicants will be kept confidential by HR (employees) and Governance (members) and only shared with individuals involved in the selection process. Applicants not offered a role will have their declaration destroyed six months after the position has been filled.
- 9.2 The interests declared on appointment will be kept by HR (employees) and Governance (members) and shared with individuals identified in this policy for the purpose of considering whether it is a possible conflict, agreeing how the interest will be managed and recorded on the Register of Interests. Declarations and associated decisions on how the interest will be managed held in HR/governance files will be destroyed two years after the employee/member has left the GOC.
- 9.3 The interests declared by members and employees will be entered onto a Register of Interests.
- 9.4 In order to ensure transparency in our arrangements for managing conflicts of interest, to demonstrate to the public and stakeholders that our decisions are

made in the best interests of the public we will publish and maintain a Register of Interests on the GOC website, which will include the interests held by:

9.4.1 all members;

9.4.2 the SMT; and

9.4.3 case examiners.

Interests held by other employees will remain on the Register of Interests held internally, which will not be published.

- 9.5 In order to ensure transparency in our decision making, the details of interests which are in conflict with items being discussed at meetings/hearings must be formally recorded in the minutes of the meeting, including the nature of the conflict, who was affected, whether the conflict of interest was declared in advance, a description of how the interest was managed and how the decision taken was in the best interests of the GOC.
- 9.6 The Register of Interests will be used annually to prepare calculations of payments made to Council and SMT members and connected persons in accordance with the related party transactions rules. These payments are published in our annual report.
- 9.7 Any concerns raised in relation to compliance with this policy will be kept confidential in accordance with the GOC internal investigations policy and reported to the Audit and Risk Committee. The identity of the person who raised the concern will be kept confidential.

## **10. Annexes**

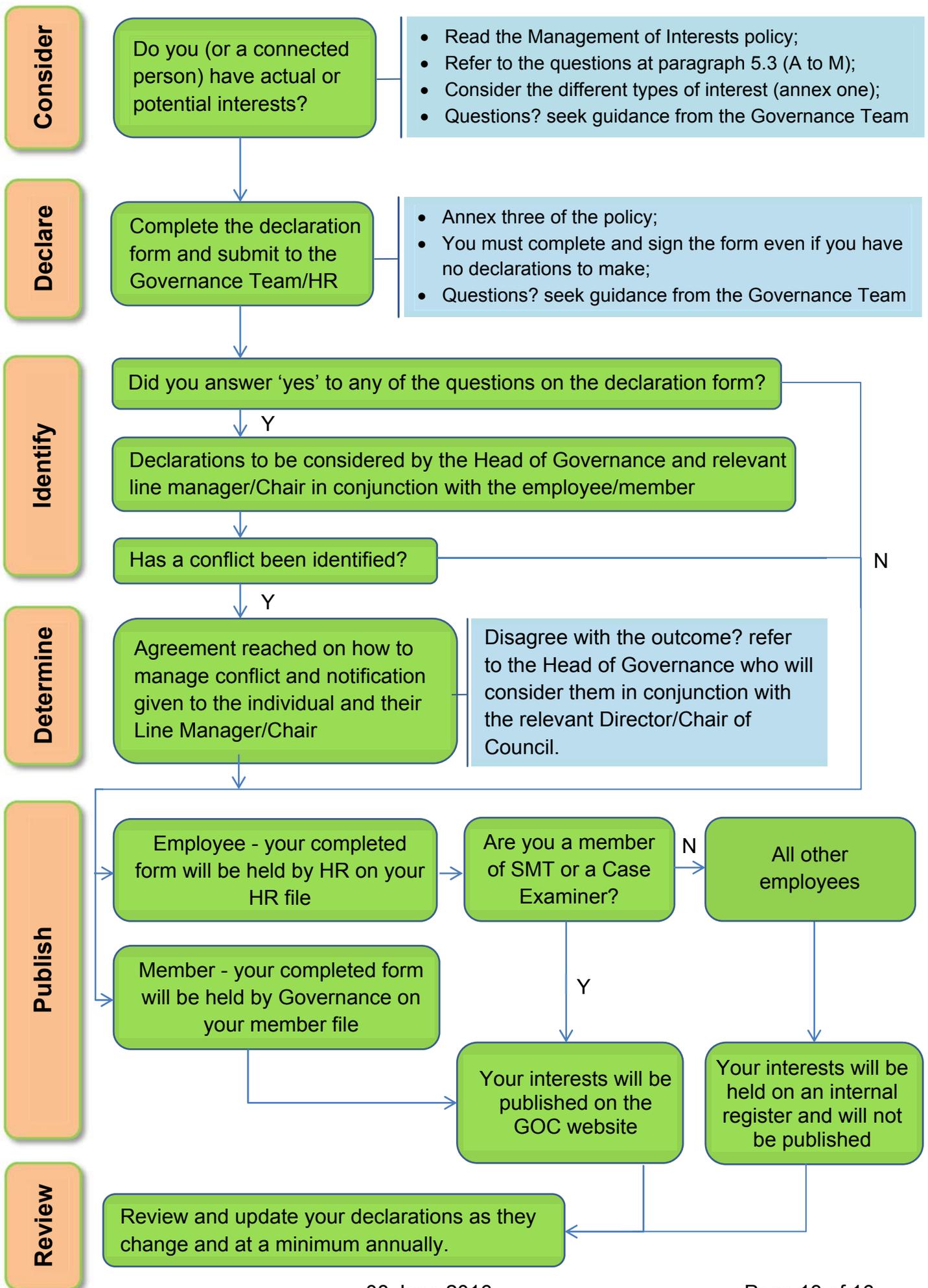
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- 10.1 The following appendices are attached to this policy:
- Annex one: types of interest
  - Annex two: process flowchart
  - Annex three: declaration form

11. Annex 1: types of interest

Type of Interest	Examples
<b>Indirect:</b> interests which do not directly relate to specific issues for discussion or to individuals personally.	<ul style="list-style-type: none"> <li>• where your personal benefit is minimal (i.e. a payment to a spouse or partner); and/or</li> <li>• where the benefit is universal to all relevant groups (i.e. expenses limits) .</li> </ul>
<b>Direct:</b> interests with direct relevance to specific items of business such that a fair-minded observer, having considered the facts, would conclude that there was a real possibility that the individual was biased in any discussion or decision.	<ul style="list-style-type: none"> <li>• direct personal financial gain or benefit via remuneration, contracts, purchasing and tendering;</li> <li>• involvement in recruitment or appointment of a colleague, friend or relative;</li> <li>• influencing decisions for your own advantage or because you know someone who uses the GOC's services (or those which it regulates) and/or</li> <li>• influencing the award of a contract where you are connected to any tenderer/applicant and/or carrying out business on behalf of the GOC with your own or a connected persons company.</li> </ul>
<b>Anticipatory:</b> interests where actions may be perceived to put an individual in a more favourable future position in relation to another party or where the interest has not yet fully materialised.	<ul style="list-style-type: none"> <li>• working for an OEI who is considering seeking GOC accreditation;</li> <li>• applying / being shortlisted for a role or contract which could impact on your GOC role; and/or</li> <li>• being involved in decision-making which could have a favourable impact on you as a result of another position you hold</li> </ul>
<b>Loyalty:</b> interests which may arise in respect of another person or organisation with which there is a personal or professional relationship which may influence judgement or actions, or could be perceived to do so.	<ul style="list-style-type: none"> <li>• holding a role in an organisation with a different purpose to the GOC and being a Council/Committee member;</li> <li>• membership of a professional body, specialist society or optical charity which holds differing views on GOC policy; and/or</li> <li>• being a GOC trustee and a member where there are legal duties which may conflict</li> </ul>
<b>Prejudicial:</b> interests where actions could be perceived to prejudice judgment and/or decision making.	<ul style="list-style-type: none"> <li>• being a member of a Hearings Panel where you know the defendant or have publically commented on their work previously;</li> <li>• providing advice on an issue where you have expressed a strong personal belief about an organisation's practices (i.e. when someone could perceive you as not being able to approach a matter with an open mind); and/or</li> <li>• having prior knowledge of an individual's conduct.</li> </ul>

12. Annex 2: process flowchart



13. Annex 3: Declaration of Interests form

Name: \_\_\_\_\_

I am a : Choose an item.

I am a member  
of the following:

Choose an item.

and

Choose an item.

and

Choose an item.

**A. Do you (or a connected person) have a contract with the GOC as an employee or member or a contract to provide services to the GOC?**

Choose an item.

Please declare the interest here:

**B. Do you (or a connected person) have any close personal ties with GOC employees, members or advisors?**

Choose an item.

Please declare the interest here:

**C. Are you (or a connected person) employed, were previously employed or hold a position of professional practice (inc. paid and unpaid) in an organisation in the optical sector?**

Choose an item.

Please declare the interest here:

**D. Are you (or a connected person) employed as a consultant, director or advisor by an organisation which advises the GOC or organisations / individuals in the optical sector?**

Choose an item.

Please declare the interest here:

**E. Do you (or a connected person) own (or have significant control over) any organisation in the optical sector?**

Choose an item.

Please declare the interest here:

<b>F. Do you (or a connected person) hold any shareholdings or investments of any company either regulated by the GOC or contracted to work with the GOC?</b>	Choose an item.
Please declare the interest here:	

<b>G. Do you (or a connected person) hold office, are appointed to a position in, are a member of or affiliated to a professional body, specialist society, charity etc related to the optical sector?</b>	Choose an item.
Please declare the interest here:	

<b>H. Do you (or a connected person) hold office, are appointed to a position in, are a member of or affiliated to a professional body, specialist society, charity which is related to your role?</b>	Choose an item.
Please declare the interest here:	

<b>I. Are you (or a connected person) associated with an educational institution which is currently accredited by the GOC (or is anticipating applying for accreditation), including UK, overseas and online providers?</b>	Choose an item.
Please declare the interest here:	

<b>J. Are you (or a connected person) acting as a lay / non-expert character witness on behalf of a registrant who is appearing before the GOC Fitness to Practice (FTP) Committee?</b>	Choose an item.
Please declare the interest here:	

<b>K. Are you (or a connected person or organisation in which you are a Responsible Officer) subject to investigation by the GOC relating to FTP concerns which have been referred to the FTP Committee?</b>	Choose an item.
Please declare the interest here:	

<b>L. Are you (or a connected person or organisation in which you are a Responsible Officer) subject to investigation by a professional body relating to disciplinary processes?</b>	Choose an item.
Please declare the interest here:	

<b>M. Do you (or a connected person) hold any other interest which may be relevant and is not covered by the above, such as might lead a fair-minded observer, having considered the facts, to conclude that there is a real possibility that such an interest might influence your judgment?</b>	Choose an item.
Please declare the interest here:	

By signing this declaration I confirm that:

- I have read and understood the GOC Management of Interests policy;
- I have sought guidance from the Governance Team where applicable;
- the declarations made above are accurate to the best of my knowledge; and
- should my declarations change I will notify the GOC at the earliest possible opportunity.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_