



Royal College of
General Practitioners

Declarations of Interests Policy

Declarations of Interest Policy	
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Contents

1. Introduction and purpose.....	3
2. Who needs to make declarations of interest?	3
3. What is a conflict of interest?	3
4. When and how to make declarations of interests	5
5. Managing conflicts of interests for decision makers	5
6. Roles and responsibilities	7
7. Compliance and breaches	8
8. Representing the RCGP at external meetings.....	8
9. Related policies	8

1. Introduction and purpose

The purpose of the policy is to ensure transparency, and the open and proportionate management of any actual or perceived conflict of interest to protect both the College and individuals from any appearance of impropriety.

The policy sets out to:

- explain the principles of declarations of interests and conflicts of interest
- explain who and how individuals at the RCGP should make declarations of interests
- explain how conflicts of interest, whether actual or perceived, can be identified and managed and who is responsible for doing what.

The policy covers two different types of declarations of interests:

- Declarations made by decision-makers at the RCGP, and
- Declarations made by those who are not decision-makers at the RCGP.

The underlying principles of this policy are those of the [Nolan Seven Principles of standards in public life](#).

2. Who needs to make declarations of interest?

The policy applies to all decision-makers at the RCGP, including:

- Trustees and all other RCGP Board and Committee members, including any working groups
- College and Council Officers
- Devolved Council Chairs, Vice-Chairs and Devolved Council members
- Council members and Council Committee members, including any working groups
- Faculty board members
- The Executive Management Team and applicants for Executive Management Team positions
- Medical Directors, Clinical Leads and College Representatives and applicants for these positions
- Candidates in RCGP College Officer and Council elections

The policy also applies to:

- Speakers at RCGP events, conferences, educational sessions and contributors to publications
- Individuals recommended for RCGP awards
- RCGP examiners

3. What is a conflict of interest?

A conflict of interest is defined as:

A situation by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of acting on

behalf of the College and fulfilling the College's charitable object is, or could be, impaired or influenced by another interest they hold.

Everyone who is a **decision-maker** at the RCGP has a duty to act in the best interests of the College's charitable object, which is:

to encourage, foster and maintain the highest possible standards in general medical practice.

Conflicts of interests may arise where an individual's personal interests and loyalties are, or are perceived to be, in competition with those of the College.

The College welcomes the diverse range of careers, expertise and outside interests our members bring to roles of responsibility at the RCGP. These different perspectives and expertise bring invaluable breadth to College debates, ensuring that the diversity of our membership is well represented and that decisions are taken robustly.

Whilst the College encourages members to draw on the knowledge and expertise they have gained in their work and outside activities it is important that all decision-makers are transparent about other commitments, roles and activities. This serves to prevent any interference, or perceived interference, with their ability to make judgments impartially and without undue influence from other interests.

When thinking about declarations, it is useful to consider that conflicts of interests can be:

- Potential - there is a possibility that a conflict will arise in the future, or a future interest may be perceived to be a conflict.
- Actual - there is a conflict between one or more of an individual's interests.
- Financial - where an individual may get direct financial benefit, meaning gain or avoidance of loss, from the consequences of a decision they are involved in taking.
- Non-financial professional or personal - where an individual may benefit professionally or personally, such as promoting their professional career or reputation.
- Indirect - where an individual closely associated with the person involved in decision-making may gain financial or non-financial professional or personal benefit from the decision being taken. A closely associated person is defined as a close family member, relative, close friend, associate or business partner. **Senior decision makers including Trustees, are required to make declarations of those defined as related parties.**

- Loyalty interests - where, for example, a senior role in another institution, or membership of a particular organisation, might influence – or might be seen to influence – a member’s judgment or actions in a discussion or decision.

4. When and how to make declarations of interests

Taking into consideration the potential areas of conflicts of interests, all those within scope of the policy should declare their interests on the RCGP Declarations of Interest form:

- As part of the election or recruitment processes for decision-making RCGP roles
- On appointment to any role within scope ([as defined in section 2](#))
- As soon as circumstances change or new interests arise
- In a meeting where an interest is relevant to a particular item on the agenda
- Prior to acting as a speaker at an RCGP event, conference or educational session
- On recommendation to an RCGP award

The responsibility lies with those in the roles within scope of the policy to declare all relevant interests and to ensure declarations are complete and kept up to date. For **decision makers**, declarations of interests should be updated at least once in a calendar year.

The test of relevance for **decision makers** is whether or not an interest might reasonably be seen as influencing a person’s ability to apply independent, unbiased judgement in the context of acting and taking decisions in the best interests of the College’s charitable object.

For declarations by **speakers** the focus is on transparency so that members will be aware of any interests which might influence what an individual says or does.

For declarations by **individuals recommended for RCGP awards** the aim is to manage risk to the RCGP.

Declarable interests are usually current but may on occasion include future interests where there is a clear prospect that a conflict may arise soon. Past interests may exceptionally be declarable if, for example, they are comparatively recently held and might be thought to continue to influence the member.

In the spirit of transparency, when in doubt, the advice is to declare any relevant interest that might reasonably be perceived by others as a conflict.

5. Managing conflicts of interests for decision makers

The Assistant Director Governance has overall responsibility for the implementation and application of the policy.

The Honorary Secretary and Chairs of boards and committees are responsible for managing actual and perceived conflicts within the context of meetings.

The responsible Executive Director will take the lead in managing the declarations of interests for clinical roles, RCGP events, conferences, educational sessions and contributors to publications.

Conflicts can usually be managed with transparency and effective mitigations. These mitigations are often called a **management plan**. All assessments, considerations, and agreed-upon actions will be documented to maintain a clear audit trail.

In summary, the RCGP addresses potential and actual conflicts of interest by:

1. Identifying the conflict of interest
2. Preventing the conflict of interest from affecting decisions
3. Recording the conflict of interest and steps taken in its management

Decisions on how to manage conflicts of interest are taken on a case-by-case basis, considering the specific discussion, decision being taken, or context.

In deciding how to manage conflicts of interest, factors that should be considered include:

1. the extent and nature of any benefit and the degree to which this would set the individual apart from what would be ordinarily expected for a person in their position,
2. whether the person and the meeting or event is advisory or decision-making in nature, and if the latter, the type of the decision being taken,
3. the degree of direct agency or proximity the RCGP has in the matter, and
4. the importance of welcoming diversity of expertise and experience in the RCGPs discussions, as part of ensuring a representative voice and strengthening the quality of the RCGPs discussion and decision making.

In decision making, actions that may be taken to manage conflicts of interest are:

- No action - agreement that there is no conflict or perceived conflict of interest, or that the transparency of declarations of interests is sufficient to manage any risk.
- Monitoring and additional disclosures - where it is uncertain if a conflict is present.
- Exclusion from voting - where the outcome of a discussion or decision being made will or might bring benefit but an individual should be allowed to speak on the subject in order to bring expertise and diversity of opinion to a discussion.

However, the conflict of interest is such that an individual should not be given a vote in the decision-making process.

- Exclusion from the debate and voting - where it is concluded that the outcome of a discussion or decision being made will or might bring benefit it may be necessary for the individual concerned to leave during a debate and vote to avoid the conflict of interest.

6. Roles and responsibilities

Individuals within [scope of the policy](#) must make their declarations on the RCGP Declarations of Interests form.

Declarations will be reviewed, monitored, managed, and published or held:

Who	How will declarations be reviewed, monitored and managed?	Where will declarations be kept?
Trustees, College and Council Officers and Devolved Council officers	By Governance team and Honorary Secretary. Declarations made in meeting will be assessed by the meeting Chair	RCGP website, available publicly
Chief Executive Officer and Executive Directors	By Governance team and Honorary Secretary	RCGP website, available publicly
Council members and Devolved Council members	By Governance team and Honorary Secretary. Declarations made in meeting will be assessed by the meeting Chair	RCGP members' website, available to all members
Faculty board members	By designated Faculty board member with advice from the Governance team and Honorary Secretary. Declarations made in meeting will be assessed by the meeting Chair	Internally
Medical Directors, Clinical Leads and College Representatives	Relevant Executive Director with advice from the Governance team and Honorary Secretary	Internally
Speakers at RCGP events, conferences, educational sessions and contributors to publications	Relevant Executive Director with advice from the Governance team and Honorary Secretary	RCGP website, available publicly and included in conference literature

On recommendation to an RCGP award	By Governance team and Honorary Secretary	Internally
RCGP examiners	Relevant Executive Director with advice from the Governance team and Honorary Secretary	Internally

Declarations of interests are held in line with the RCGP’s retention policy.

7. Compliance and breaches

Situations may arise where interests have not been identified or declared appropriately and effectively. This may happen innocently, or because of deliberate action. These situations are referred to as breaches.

Anyone who is aware of a breach of this policy or who is concerned that there has been or may have been a breach should report these concerns to the Assistant Director Governance and Honorary Secretary.

The RCGP will investigate each reported breach according to its own specific facts and merits and give relevant parties the opportunity to explain and clarify any relevant circumstances. The investigation will be undertaken in line with the procedures set out in the RCGP Code of Conduct.

8. Representing the RCGP at external meetings

When representing the RCGP at external meetings at a senior level representatives should ensure they are prepared to make both personal and College declarations of interests. The RCGP prepares a quarterly report covering areas such as sponsors, income streams and partnerships which representatives can use to identify any declarations which might be necessary.

9. Related policies

- [Whistleblowing policy](#)
- Sponsorship policy
- Gifts and hospitality policy
- [Member Code of Conduct](#)
- [Code of Business Conduct policy](#)
- Donations policy

Declarations of Interests form



Royal College of
General Practitioners

Please read the Declarations of Interests policy and guidance before completing this form.

Name	
RCGP role(s)	

I wish to register the following interests:

Remunerated employment	
Remunerated ad hoc work	
Remunerated directorships	
Shareholdings	
Research, patents and intellectual property	
Commercial land and property	
Remunerated services provided to the RCGP	
Membership of formal groups/organisations	
Non-remunerated directorships and trustee positions	
Any other interests	