

## Conflicts of Interests Policy

### Introduction

Agreement to this Policy is a condition of membership of the Committee and all new members are required to sign a statement to this effect on appointment.

Integrity and the requirement to declare any relevant interests or circumstances, including those that could, or could be perceived to, compromise the Committee's work, is a principle of the Values and Behaviours and any breach of this policy therefore constitutes a breach of the Code of Conduct.

### Aim

The aim of this policy is to ensure that all Committee members act in the best long-term interests of community pharmacy by understanding their duties in respect of making collective decisions and declaring and managing any interests, including those that may, or may be perceived to, impact the decisions they make as members of the CPE Committee.

Potential risks of conflict of interest include poor decision making, loss of trust amongst members and the wider sector, and reputational damage and legal challenge.

### General Principles

1. Members of the Committee are elected and appointed to bring their membership constituency, professional and business knowledge and experience, to inform the work of CPE and the Committee.
2. All decisions must be made by Committee members together in the best interest of the overall sector and not in a member's own interest or those of their related retail pharmacy business or appointing body or own constituency. (For the avoidance of doubt, this means that a member of the committee may express views on behalf of an appointing body or constituency or other person, but may not be bound to vote or decide an issue in a particular way. This means the member is free to amend their views in the light of the debate.)
3. Committee members must declare any personal interests (and those of immediate family members or other closely connected persons), including those that could, or could be

perceived to, impact any decisions that they make as a member of the Committee in order that any potential conflicts can be managed appropriately.

4. Committee members must not use any confidential knowledge or information acquired through their role to inappropriately benefit themselves or others.
5. Committee members must ensure that they are not open to (or perceived to be open to) improper influence through the acceptance of gifts or hospitality.

### Arrangements

Most Committee members will have a multiplicity of interests, personal, professional or those of family members, that may, on occasion, compete with the best interest of community pharmacy in England. It is impossible to avoid conflicts altogether, particularly in the context of the Committee's purpose which is to bring together representatives of the sector. However, any potential conflicts, can be minimised and managed effectively in an open and transparent way if they are known.

All members are therefore required to complete a declaration of interests on appointment. The declaration of interests asks members to consider and declare, for example, any personal, financial and professional interests, as well as any pharmacy/NHS-related interests of close family members, such as spouse/partner, child or parent, or another close connection (eg business partner). These declarations will be held securely by CPE.

Members will be asked to review and confirm their declaration annually and should inform CPE of any changes that arise in the meantime. Any questions regarding the completion of the declaration of interest form, including what needs to be declared, should be addressed to Gordon Hockey, Director, Legal.

Committee members should highlight any real or perceived conflict (whether already recorded or new) at the earliest opportunity when carrying out CPE activity and agree with the Independent Chair (or appropriate alternate, eg chair of a subcommittee), how it should be handled. This may include the member not receiving particular documents, not participating in a discussion and/or withdrawing from a decision or vote, or not being involved in a particular piece of work or project. Any such potential conflicts and agreed actions will be recorded. Other Committee members will be informed of the potential conflict and how it is being managed.



Members should also report any gifts or hospitality valued at £100 or above received in connection with their Committee role, or in relation to non-CPE activity that could be perceived to be related to their CPE role. This should be reported to Gordon Hockey, Director, Legal.

### **More information**

Please contact Gordon Hockey, Director, Legal, for further information regarding this Policy.