West Pennine Local Medical Committee

Conflict of Interest Policy

Status	For adoption at the Committee meeting on 13 October 2026
Next review due	By October 2028
Area	Oldham and Tameside & Glossop

Draft for Committee review. The financial thresholds for shareholdings (section 4) and for gifts and hospitality (section 9) need confirming before adoption. Placeholders in **[square brackets]** need completing.

Introduction

West Pennine Local Medical Committee ("the LMC") represents general practice in Oldham and Tameside & Glossop. Its authority depends on practices and partners being confident that it acts in their collective interest and not in the private interest of any member. This policy sets out how the LMC identifies, records and manages conflicts of interest. It is made under section 13 of the Constitution.

1. Purpose and Principles

1.1 This policy aims to ensure that decisions of the LMC are taken, and are seen to be taken, openly and in the interests of the practitioners and practices it represents.

1.2 Everyone covered by this policy shall follow the Seven Principles of Public Life (the Nolan Principles): selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

1.3 Having an interest is not wrong in itself. Many members hold other roles in general practice, PCNs, federations and the wider NHS, and this experience is valuable to the LMC. What matters is that interests are declared openly and managed properly.

1.4 This policy follows the principles of NHS England's guidance, Managing Conflicts of Interest in the NHS, adapted to the role of an LMC.

2. Who This Policy Applies To

This policy applies to:

- Elected members, GP Registrar members and co-opted members of the Committee;
- Officers;
- LMC employees;
- Anyone representing the LMC on an external body; and
- Members of any sub-committee or working group.

3. What Is a Conflict of Interest

3.1 A conflict of interest arises where a person's ability to act impartially in the interests of the LMC and its constituents is, or could reasonably be seen to be, affected by another interest they hold.

3.2 Interests fall into four types:

(a) Financial interests: where a person may gain financially from a decision, for example as a director, shareholder, partner, consultant or paid adviser of an organisation affected;

(b) Non-financial professional interests: where a person may gain professionally, for example through a role with an ICB, PCN, federation, provider organisation or professional body;

(c) Non-financial personal interests: where a person may benefit personally in a way that is not financial or professional, for example as a trustee or member of a campaigning group; and

(d) Indirect interests: where a close family member, partner or close business associate holds any of the above interests.

3.3 A conflict may be actual, potential or perceived. A perceived conflict must be declared and managed in the same way as an actual one.

4. What Must Be Declared

Everyone covered by this policy shall declare interests including, but not limited to:

- Partnership, directorship, ownership or employment in any GP practice, PCN, federation, GP provider company or other healthcare provider;
- Any paid or unpaid role with an Integrated Care Board, NHS England, a local authority, a place-based partnership or any commissioning committee;
- Any role that involves holding or bidding for NHS contracts, including as a subcontractor;
- Shareholdings or other ownership in companies supplying goods or services to general practice or the NHS, above **[£5,000 in value or 1% of the company]**;
- Paid work, consultancy, speaking fees or sponsorship from pharmaceutical, medical technology, IT or other commercial suppliers to general practice, received in the last 12 months;
- Ownership of, or financial interest in, GP premises, including as landlord;
- Roles with other LMCs, the BMA, RCGP or other professional or representative bodies;
- Any other interest that a reasonable person might think could influence their judgement; and
- Indirect interests of close family members or business associates in any of the above, so far as the person is aware.

5. When to Declare

5.1 On joining the Committee, taking up an Officer role, starting employment, or being appointed to represent the LMC.

5.2 Within 28 days of any new interest or change in an existing interest.

5.3 At least annually, when the Secretary asks all members to review and confirm their declarations.

5.4 At the start of any meeting, where an item on the agenda relates to a declared or undeclared interest.

5.5 As soon as a person becomes aware of a conflict during discussion of an item.

6. The Register of Interests

6.1 The Secretary shall maintain a Register of Interests recording, for each person: their name and role, a description of each interest, the type of interest, and the date the interest began and, where relevant, ended.

6.2 The Register shall be published on the LMC website and updated at least quarterly.

6.3 Interests shall remain on the published Register for 6 months after they end, and on the internal record for 6 years.

6.4 In exceptional circumstances, where publication would create a real risk to a person's safety, the Chair and one other Officer may agree that an interest is recorded internally but not published. The fact that an entry has been withheld shall be noted on the published Register.

7. Managing Conflicts at Meetings

7.1 At the start of each meeting, the Chair shall ask for declarations of interest in any agenda item. All declarations, and the action taken, shall be recorded in the minutes.

7.2 The person chairing the meeting shall decide how each declared conflict is managed, taking into account the nature of the interest and the decision being made:

(a) Where the interest is minor or indirect: the member may take part in discussion and voting, with the declaration recorded;

(b) Where the interest is material but the member's knowledge is useful: the member may contribute to discussion but shall not vote;

(c) Where the interest is significant, for example a direct financial interest or where the member or their organisation would benefit from the decision: the member shall take no part in discussion or voting and shall leave the meeting, or the remote meeting, for that item.

7.3 Where the person chairing has a conflict, the Vice-Chair or another Officer without a conflict shall chair that item and decide how the conflict is managed.

7.4 Papers relating to an item on which a member has a significant conflict may be withheld from that member.

7.5 Where so many members are conflicted that the meeting would be inquorate, the item shall be deferred, referred to the Officers' Group if its members are not conflicted, or decided under the Standing Orders with the conflicts recorded.

8. Decisions Outside Meetings

8.1 Officers, employees and representatives shall not take any decision, or give any advice on behalf of the LMC, on a matter in which they have a significant conflict. They shall pass the matter to another Officer.

8.2 Anyone acting for the LMC with an interest in the matter shall declare it to the other party at the outset, where relevant.

8.3 No member, Officer or employee with a conflict of interest shall take part in any decision about the award of an LMC contract, the appointment of staff or suppliers, or the payment of honoraria or expenses in which they have an interest.

9. Gifts, Hospitality and Sponsorship

9.1 No one covered by this policy shall accept a gift, hospitality or benefit that could reasonably be seen to influence their LMC role.

9.2 Gifts from suppliers or commissioners shall be declined, except items of low value (under **[£6]**) such as pens or diaries.

9.3 Modest hospitality, such as refreshments at a meeting or event, may be accepted. Hospitality worth more than **[£25]** shall be declared to the Secretary. Hospitality worth more than **[£75]** shall be declined unless an Officer agrees in advance that it is appropriate.

9.4 The Secretary shall keep a register of gifts and hospitality declared and declined.

9.5 Sponsorship of LMC events or activities by commercial organisations shall be accepted only in accordance with clause 12.3 of the Constitution. It shall be approved by the Officers' Group, shall not give the sponsor any influence over LMC policy or content, and shall be disclosed publicly.

10. Breaches

10.1 Anyone who believes this policy has not been followed shall raise it with the Chair or, where the concern involves the Chair, with the Vice-Chair or Secretary.

10.2 A failure to declare an interest, or to follow the arrangements for managing a conflict, may be a breach of the Constitution. Serious or persistent breaches shall be dealt with under section 9 of the Constitution. Breaches by employees shall be dealt with under the LMC's employment policies.

10.3 Where a decision is found to have been affected by an undeclared conflict, the Committee shall review the decision and may revisit it.

11. Review

11.1 This policy shall be reviewed at least every two years, or sooner if national guidance or the Constitution changes.

12. Declaration of Interests Form

Each person shall complete the following declaration on joining, annually, and within 28 days of any change:

- Name and LMC role;
- For each interest: the organisation, the nature of the interest, the type (financial, professional, personal or indirect), and the date it started and, if relevant, ended;
- A statement that the person has no interests to declare, where that is the case;
- Confirmation that the declaration is complete and accurate, and that the person will notify the Secretary of any change within 28 days; and
- Signature and date.

Adopted by the Committee

Chair	Signed: _____	Date: _____
Secretary	Signed: _____	Date: _____