

National Council of Osteopathic Research  
Policy – Conflict of interest

**1. Policy Statement**

- 1.1. This policy applies to Trustees and Executive team members,
- 1.2. The policy is designed to provide guidance as to:
  - How to identify a potential or perceived conflict of interest.
  - How the organisation will manage a conflict of interest; and
  - How declared conflicts of interest will be recorded, reviewed and monitored.
- 1.3. The purpose of NCOR's Conflict of Interest Policy is to encourage transparency, accountability and probity, in line with the Nolan principles and good governance, in requiring regular and considered declarations of any conflicts, or perceived conflicts of interest.
- 1.4. NCOR subscribes to the Nolan Committee's principles: 'Standards in Public Life' which sets out the seven principles of public life. These are set out at **Appendix 2**.
- 1.5. Conflicts of interest are a normal and unavoidable part of decision-making and seeking to eliminate them is unlikely to be feasible or desirable. At the same time, for all professional bodies, it is essential to maintain members and stakeholder trust, and confidence in the organisation and individuals associated with it. Where a conflict of interest does arise NCOR requires disclosure of such conflicts to allow the organisation to manage the conflict accordingly.
- 1.6. The policy aims to ensure that conflicts of interests are managed consistently to: protect the integrity of decision making in the organisation, limit the risk of successful challenge to any NCOR decision and ensure that all members are able to act consistently with their responsibility to act in the best interest for the members.
- 1.7. Making appropriate declarations, in relation to actual or potential conflicts of interest, is vital given the roles that NCOR members play in administering NCOR business.

## 2. Definitions

- 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*'. A conflict of interest could relate to any professional, personal or business activity.
- 2.2. A '**connected person**' is a person with whom you have a personal or business relationship which could be perceived as influencing your decision making for or on behalf of the organisation.
- 2.3. An '**irreconcilable conflict of interest**' will be interests which are significant, ongoing and would impede the ability of the individual to carry out the duties of their role in the organisation in line with their obligations. These interests will not be able to be managed by the organisation without action to remove the conflict.
- 2.4. A '**prejudicial interest**' will be those interests which may affect a member's ability to consider the subject fairly and objectively at hand. This might be a perceived or apparent. Council and Committee members should not be involved in decisions which directly affect them or those connected to them, or which benefit or may appear to benefit them or those connected to them. This is because these external factors could be seen to impact the integrity of the decision-making process.
- 2.5. A '**perceived conflict of interest**' will be present if a member of the public, with knowledge of the relevant facts, would reasonably regard the interest or connection as sufficiently significant that it would be likely to prejudice judgement. This member of the public might interpret the actions of the member as serving their own purposes, those of a person or organisation connected to them and not serving the interests of the NCOR.
- 2.6. An '**indirect conflict of interest**' will be present where the decision-making in question might confer an indirect benefit on the member, but this benefit will be universal to all relevant groups, or only a minimal benefit will arise. All should declare a potential conflict of interest in these circumstances but may participate in these discussions and decisions.

### **3. Declaring interests - Periodically**

- 3.1. All members must:
- On appointment, declare all conflicts of interest or potential conflicts of interest by completing the Register of Interest form found at **Appendix 1**.
  - They must also update their declaration as soon as they are aware of any change in circumstances, or at least every **12 months**.
- 3.2. For all that fall within this policy, declarations of interest should be submitted by email to the Director to ensure that they are centrally captured and logged. The declaration can confirm that nothing has changed in the preceding 12 months and the policy guidance can be shared to assist all concerned in ascertaining what needs to be declared and how the declarations will be treated.
- 3.3. These declarations of interest will be reviewed in line with the overarching governance document.
- 3.4. The Director will liaise with the Chair of the Board of Trustees to determine whether declared conflicts are being managed appropriately.
- 3.5. The Director will maintain the registers of interests for members that fall within this policy, ensure that declarations are published appropriately and report on them annually to the Board of Trustees.

### **4. Declaring Interests – As they arise**

- 4.1. All conflicts of interest or potential conflicts of interest should be declared as soon as the individual becomes aware of it.
- 4.2. Any Members with a prejudicial interest in a case must not be present for the discussions of the particular case and will be advised accordingly.
- 4.3. All members must bring any interest relevant to their particular role at the NCOR to the attention of the Director as soon as they become aware of it. All declarations of interest by members that are made in response to circumstances that arise (rather than the periodic declarations) should be reported as follows to the Director to ensure a centralised record can be

maintained.

## **5. Determination of Conflicts of Interest**

- 5.1. When a conflict of interest or perceived conflict of interest is declared, it will be reviewed as follows:
  - 5.1.1. The Director will conduct an initial review to determine whether the conflict can be managed appropriately and make a recommendation as to how it should be approached.
  - 5.1.2. If there remains any dispute as to how the declared interest should be managed, the matter should be referred to the Chair of Board of Trustees whose decision will be final.
- 5.2. Where an individual who falls within this policy is unsure of the effect of an interest or has a prejudicial interest which he or she believes to be significant to ensure that appropriate action is taken, the member should consult with the Director who will liaise with the Chair of Board of Trustees if appropriate.
- 5.3. The decisions of the Chair of Board of Trustees on these matters will be final.

## **6. Monitoring of Conflicts of Interest**

- 6.1. The Director will record and maintain the declarations of interest received in connection that fall within this policy.
- 6.2. When annual declarations are made by members, they will be reviewed as follows:
  - 6.2.1. The Chair will make any appropriate recommendations as to how conflicts should be managed.
  - 6.2.2. If there remains any dispute as to how the declared interest should be managed, the matter should be referred to the Chair of Board of Trustees, whose decision will be final.

## **7. Register of Interests**

- 7.1. The Director will manage declarations of interest in line with this policy.
- 7.2. It will maintain the registers of interests that fall within this policy, ensure

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that declarations are published appropriately and report on them annually to the Board of Trustees.

**8. Non-Compliance**

- 8.1. Non-compliance with this policy will be dealt with under the Code of Conduct for members.

**9. Review**

- 9.1. This document will be reviewed every two years by the Board of Trustees.

Appendices: Appendix 1 – Register of Interests  
Appendix 2 – Nolan Principles

National Council for  
**NCOR**  
Osteopathic Research

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**INTERESTS REGISTER**

**NCOR REGISTER OF  
INTERESTS OF  
TRUSTEES AND STAFF**

Date of  
Publica < INSERT >  
tion:

Name	Role	Description of Interest	Relevant Dates		Comments
			From	To	

## **Appendix 2 - The Seven Principles of Public Life**

The Seven Principles of Public Life (also known as the Nolan Principles) apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies (NDPBs), and in the health, education, social and care services. All public office-holders are both servants of the public and stewards of public resources. The principles also apply to all those in other sectors delivering public services.

### **1.1 Selflessness**

Holders of public office should act solely in terms of the public interest.

### **1.2 Integrity**

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

### **1.3 Objectivity**

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

### **1.4 Accountability**

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

### **1.5 Openness**

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

### **1.6 Honesty**

Holders of public office should be truthful.

### **1.7 Leadership**

Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.