
Document name:	<i>Complete Ophthalmic Services CIC: Conflict of Interest Policy</i>	
Date created:	<i>June 2015</i>	<i>Review date: June 2017</i>
Author:	<i>The Directors, Complete Ophthalmic Services CIC</i>	
Approved by:		

Complete Ophthalmic Services CIC: Conflict of Interest Policy

Complete Ophthalmic Services CIC ("the Company") has been established to specifically act as the lead ("prime contractor") for a network of local optical practices ("subcontractors") dedicated to delivering excellent eye care in the local community.

The Company requires its directors to complete a Conflict of Interest Declaration Template. This acts as a register of directors' interests. Directors will review and confirm interests to the Company at least annually or following any material change of circumstance within twenty-eight days. Its directors are optical professionals with a complete understanding of their responsibilities when carrying out duties for the Company.

Where a director becomes aware of a potential or actual conflict of interest he/she must report this to the Company immediately. The remaining Board of Directors will consider whether it is necessary for this director to be excluded from the service or to resign from the Company. Where the Company becomes aware of a potential or actual conflict of interest that is likely to have an adverse effect on the commissioner continuing to contract with the Company on the terms of the service contract, it will immediately declare this to the commissioner. Directors understand that the commissioner can take action under the terms of the contract it deems necessary without affecting any other rights under law.

The Company will endeavour to prevent conflicts of interest before they arise. Perceived conflicts can have an adverse impact on service provision as well as actual conflicts.

The Company's policy regarding conflict of interests is to, where doubt exists, assume a conflict and manage this accordingly. Directors recognise that financial gain is not required for conflicts to exist.

The Board of Directors has overall responsibility for the Company's clinical governance programme. They will appoint a Clinical Governance and Performance Lead to provide clinical leadership and oversee service delivery including day-to-day monitoring of all clinical governance and quality assurance arrangements. The Clinical Governance and Performance Lead will maintain a productive dialogue with the commissioner to ensure full understanding on both sides of each party's activities in order to identify and minimise the risk of conflicts of interest at the earliest possible stage.

The Company recognises that individuals may in good faith hold an unrecognised conflict of interest. The clinical governance and performance lead will work with the Company's directors to ensure full declarations reduce the possibility of this.

While the Company promotes robust conflict of interest prevention and management an overly prescriptive approach is not desirable. The declaration form has been structured accordingly.

Directors' Conflict of Interest Declarations will be made available upon request.

Complete Ophthalmic Services CIC Conflict of Interest Policy will be reviewed annually from commencement date April 2014.