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## **Primary Eyecare Cheshire Ltd: Conflict of Interest Policy**

Primary Eyecare Primary Eyecare Cheshire Ltd 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.

Primary Eyecare Primary Eyecare Cheshire Ltd’s clinical governance and performance lead will be the coordinating commissioner’s main point of contact within Primary Eyecare Primary Eyecare Cheshire Ltd. Primary Eyecare Primary Eyecare Cheshire Ltd will ensure that it and staff at its subcontractor practices comply with law, guidance and good practice in relation to gifts, hospitality and other inducements and actual, potential, conflicts of interest.

Primary Eyecare Primary Eyecare Cheshire Ltd 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 Primary Eyecare Primary Eyecare Cheshire Ltd 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 Primary Eyecare Primary Eyecare Cheshire Ltd.

Where a director becomes aware of a potential, perceived or actual conflict of interest he/she must report this to Primary Eyecare Primary Eyecare Cheshire Ltd 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 Primary Eyecare Primary Eyecare Cheshire Ltd. Where Primary Eyecare Primary Eyecare Cheshire Ltd becomes aware of a potential, perceived or actual conflict of interest that is likely to have an adverse effect on the commissioner continuing to contract with Primary Eyecare Primary Eyecare Cheshire Ltd 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.

Primary Eyecare Primary Eyecare Cheshire Ltd will endeavour to prevent conflicts of interest before they arise. We recognise that any conflict of interest, even if it is just perceived, can affect service provision.

Primary Eyecare Primary Eyecare Cheshire Ltd 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 Primary Eyecare Primary Eyecare Cheshire Ltd 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.

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

While Primary Eyecare Primary Eyecare Cheshire Ltd 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.

Primary Eyecare Primary Eyecare Cheshire Ltd's Conflict of Interest Policy will be reviewed annually.