



Standards of Service and Conduct

Summary

This document sets out the standards of service and behaviour expected of staff and members.

Five parts

The '**Standards of Service and Conduct**' consist of five parts as set out below.

Core Standards of Service and Conduct

Staff and members are expected to abide by the BDA's Core Standards of Service and Conduct. These reflect the Nolan principles of public service, and professional standards in regard to working and professional relationships. The 'Core Standards of Service and Conduct' can be found in **Appendix 1**.

Dignity at Work Policy

The Dignity at Work Policy addresses issues concerned with unacceptable behaviour in the workplace. The workplace for these purposes is not confined to the environment occupied by staff, but includes BDA members in any capacity in which they engage with the BDA professionally or in an elected position within the Association. The 'Dignity at Work Policy' can be found in **Appendix 2**.

Conflicts of Interest Policy

Staff, and members who are committee members or officers, must put the interests of the BDA first. This means they should declare any existing or potential conflict between their outside interests and their duties to the BDA, and agree with their colleagues how the situation should be managed. The 'Conflicts of Interest Policy' can be found in **Appendix 3**.

Political neutrality guidelines

The BDA asserts no party political allegiance. This policy provides guidance for members and staff on reconciling private political views and activity with their responsibilities to the BDA. See **Appendix 4**.

Reporting and disciplinary procedures

Staff and members must have the means to report any potential breaches of these standards of service and conduct; the expectation that reports will be investigated independently and in a fair manner; and for appropriate disciplinary sanctions to be applied when this is merited. 'Reporting and disciplinary procedures' can be found in **Appendix 5**.

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Appendix 1

Core Standards of Service and Conduct

The British Dental Association's (BDA) 'Core Standards of Service and Conduct' are inspired by the Nolan principles of public service, and are applicable to all members and staff (referred to throughout the remainder of this document as 'All those affected by this policy'). These are:

Selflessness

All those affected by this policy should act solely in terms of the BDA's interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.

Integrity

All those affected by this policy should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity

All those affected by this policy, in carrying out the business of the BDA, should make choices on merit, including the awarding of contracts, appointment or recruitment to positions within the Association, or recommending individuals for rewards and benefits.

Accountability

All those affected by this policy are accountable for their decisions and actions and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

All those affected by this policy should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only in the wider interest of the BDA.

Honesty

All those affected by this policy have a duty to declare any private interests relating to their duties to the BDA and to take steps to resolve any conflicts arising in a way that protects the BDA's interest.

Leadership

All those affected by this policy should promote and support these principles by leadership and example.

Professional behaviour

All those affected by this policy should conduct themselves in accordance with the highest standards of professional behaviour in regard to their working relationships with all those similarly engaged in advancing the interests of the Association, or in the provision of services to members.

Appendix 2

Dignity at work

All members and staff are entitled to be treated with dignity and respect in their place of work or in their dealings with the Association. This means freedom from behaviour that can be interpreted as bullying or harassment, and access to redress if such behaviour does arise. It also means standards of everyday behaviour that contribute to a working environment in which mutual respect and individual dignity are maintained.

Bullying and harassment

Behaviour can constitute bullying or harassment where it violates the dignity of an individual on the grounds of their race, colour, ethnic origin, gender, sexuality, disability, or age, or where it creates an intimidating, hostile and degrading, humiliating or offensive environment. Individual or accumulative acts can seriously undermine the dignity, confidence, and work satisfaction of the subject to such an extent that it has an effect on his/her performance, and general happiness both inside and outside the work environment.

Conduct becomes harassment if it persists and it has been made clear that it is regarded as offensive by the recipient, although a single offensive act can amount to harassment if it is sufficiently serious.

This definition of bullying and harassment is given further definition below by reference to particular forms of harassment.

Harassment based on race, colour or ethnic origin

Harassment based on race, colour or ethnic origin is conduct at work directed towards a colleague by another colleague or group of colleagues which is racist in nature, and which is regarded as unwelcome or offensive by the recipient.

The following are examples that illustrate such conduct, though this is not an exhaustive list:

- Jokes about race, colour or ethnic origin
- Use of offensive names
- References to colleagues by offensive racist descriptions
- Use of offensive or insensitive stereotypes
- Verbal abuse based on race, colour, or ethnic origin
- Circulation, or display, of offensive material based on race, colour or ethnic origin
- Detrimental behaviour because of a colleague's race, colour or ethnic origin.

Harassment based on religion

Harassment based on religion is conduct at work directed towards a colleague by another colleague or group of colleagues which is based on the colleague's religious beliefs, or non-religious beliefs, and which is regarded as unwelcome or offensive by the recipient.

The following are examples that illustrate such conduct, though this is not an exhaustive list:

- Jokes about religion
- Use of offensive names
- Use of offensive or insensitive stereotypes

- Verbal abuse based on religion
- Circulation, or display, of offensive material based on religion
- Detrimental behaviour because of a colleague's religious, or non-religious, beliefs.

Sexual harassment

Sexual harassment is conduct directed towards a colleague by another colleague or group of colleagues which is of a sexual nature, or which is based on a colleague's gender, and which is regarded as unwelcome or offensive to the recipient.

The following are examples which illustrate such conduct, though this is not an exhaustive list:

- Unwanted physical contact
- Conduct which is intimidatory, or physically or verbally abusive
- Jokes that are based on sexual or gender issues
- Non-verbal conduct, such as staring or gestures
- Suggestions that sexual favours may further a person's career, or that refusal may hinder it
- Sexual advances, propositions, suggestions or pressure for sexual activity at or outside work
- Derogatory or demeaning remarks based on gender
- Circulation, or display, of offensive material that is sexual in nature.

Harassment based on disability

Harassment based on disability is conduct directed towards a colleague by another colleague or group of colleagues which is based on the colleague's disability and which is unwelcome to the recipient.

The following are examples which illustrate such behaviour, though this is not an exhaustive list:

- Jokes about disability
- Use of offensive names
- Use of offensive or insensitive stereotypes
- Verbal abuse based on disability
- Circulation, or display, of offensive material based on disability
- Deliberate actions designed to hinder a colleague's ability to undertake his/her duties because of their disability.

Harassment based on sexuality

Harassment based on sexuality is conduct directed towards a colleague by another colleague or group of colleagues which is based on the sexuality or perceived sexuality of the colleague and which is unwelcome by the recipient.

The following are examples which illustrate such behaviour, though this is not an exhaustive list:

- Jokes about sexuality
- Use of offensive names
- Use of offensive or insensitive stereotypes
- Verbal abuse based on sexuality
- Circulation, or display, of offensive material based on sexuality.

Harassment based on age

Harassment based on age is conduct directed towards a colleague by another colleague or group of colleagues which is based on the age or perceived age of the colleague and which is unwelcome by the recipient.

The following are examples which illustrate such behaviour, though this is not an exhaustive list:

- Jokes about age
- Use of offensive names
- Use of offensive or insensitive stereotypes
- Verbal abuse based on age
- Circulation, or display, of offensive material based on age.

Bullying and harassment may not be based on the fact that a colleague belongs to a particular group, but simply because the individual has been singled out for such treatment. This may take the following forms, though again this is not intended as an exhaustive list:

- Limiting or withdrawing verbal communication
- Isolating a colleague by unfriendly behaviour
- Behaviour designed to belittle or produce anxiety in a colleague
- Unreasonable scrutiny of work
- Unreasonable criticism of work, and adopting double standards in expectations of work performance
- Unreasonable denial of leave and/or special leave requests
- Unreasonable denial of requests for flexible working
- Work or staff social activities that deliberately exclude a colleague
- Jokes or inappropriate humour at the expense of a colleague.

Standards of work behaviour

All colleagues are expected to behave in a manner that is consistent with the values of the BDA's Standards of Service and Conduct, and that is conducive to a professional working environment. This includes the following:

- Courtesy towards colleagues
- Consideration and understanding of the work demands of colleagues
- Maintaining a temperate tone, and temperate language, in all verbal and written communication with colleagues
- Avoidance of the use of foul language
- Awareness of language and conduct which have the potential to offend a colleague
- Obtaining the express or implied permission of a colleague before adopting familiarity in conduct or language.

Appendix 3

Conflicts of Interest Policy 2022

Introduction

1. The BDA is a Special Register Body, it has a duality of purpose, to act as the Trade Union for dentists and to operate as a company to provide goods and services to dentists. It is subject to both trade union and company law.
2. Resultantly, individuals are required to assess whether the interests that they have may be in conflict with either or both of the BDA's roles.
3. A conflict of interest is any situation in which an individual's personal interests (or those of defined close relations), or interests which they owe to another body, and those of the BDA arise simultaneously or appear to clash.
4. It may help those covered by this policy to consider the interests of the BDA as being the provision of advice and the seeking of influence among individual dentists, stakeholders, politicians. It is against these that an individual must consider the impact of their own interests.
5. It is inevitable that conflicts will arise and there is a need to manage any potential to ensure that the BDA's aims of advice and influence are neither compromised, nor perceived to be compromised by other interests.
6. Identifying and managing conflicts is a dynamic process. Events can cause the BDA to quickly develop or shift policy. As changes are made then members are obliged to reconsider their interests to determine if they remain managed in light of shifts in the BDA's position.
7. The BDA recognises the complexity of members' outside roles and will seek to identify how interests can be best managed and work with members to negate any impact this may have on both the BDA and the role of the individual member in question.
8. Members are encouraged to seek the advice of the Chief Executive if they are unsure about the status of an interest.
9. Individuals are not necessarily best placed to assess whether their interests have indeed strayed into conflict. The PEC, advised by the Audit Committee retains the ultimate arbiter of whether a conflict is unmanaged.

Other documentation and guidance

10. The BDA Code of Conduct includes the duty to act in the best interests of the Association nor to seek individual benefit from a position. The code is underpinned by

the 'seven principles of public life' established by the Committee on Standards in Public life. Both of these can be found as an annex to this policy.

11. The provisions of the Companies Act 2006 (175) require directors to avoid conflicts.

Those covered by this policy

12. PEC members are the legal directors of the BDA. They are obliged to comply with the provisions of this policy.
13. All members of BDA elected bodies, that is committees and councils are obliged to comply with the provisions of this policy.
14. Appointed members of advisory committees and cross-representatives are also obliged to comply with the provisions of this policy.
15. All PEC/Committee/Council members must declare their interests at the start of any meeting (or when asked to do so by the Secretariat) and must be mindful of developments in discussion that may change the status of their interest and if this occurs individuals must inform the meeting if discussion veers into areas where they have an interest.

Examples of conflict of interest

16. The nature of the BDA's business should lead individuals to consider two distinct types of interests that should be declared and managed. These are financial interests and relationship interests.
17. Below are examples of conflicts of interest, although this is not an exhaustive list. Members should at all times when considering their interests recognise whether an interest will (or be perceived to) impair the BDA's ability to lobby for change or will cause a member to consider the advice provided by the BDA as somehow 'flawed' because of the interest.
18. Interests held by close relations (i.e. spouse/partner, parents, siblings, and children) must also be considered in the same light.

Direct or indirect financial interests

Examples of direct or indirect financial interests may include but are not limited to;

- payment for services provided to the organisation, e.g writing for a publication in their BDA elected role, providing training, consultancy

- the award of a contract to another organisation in which the individual has an interest and from which a financial benefit could be gained
- taking part in a decision to create or continue a staff post for which the office holder may wish to apply
- the employment of an office holder in a separate post within the BDA, whilst still in office
- a forum working with a commercial partner from whom a forum committee member receives any payment or sponsorship for their professional work, or indeed other commercial relationships, outside the BDA
- a forum commissioning a member of the committee, past or present, a work colleague, family member or close associate of a committee member to do some paid work.
- Ownership of more than 15% of the equity of any company with any of its operations focussed in oral health.

Relationship interests

19. All those affected by this policy should bear in mind that when they are dealing with the business of the BDA, their overriding duty is to act in the best interests of the BDA. Such relationship conflicts may cause a conflict of interest.
20. For the sake of clarity, membership of Local Dental Committees must be declared.

Examples of relationship interests may include but are not limited to,

- Executive, Leadership or Strategic roles in other dental or oral health representative or lobbying organisations that hold a membership list
 - Ordinary membership of such organisations is typically not a conflict, however, if the policies of said organisation become antithetical to the aims of the BDA then membership itself would be a conflict
- Paid employment or contractual arrangements with Departments of Health/Chief Dental Officers or other Arms Length bodies with a material impact on dentistry or oral health
- Executive, Leadership or Strategic roles with regulators that have a material impact on dentistry or oral health
- Executive, Leadership or Strategic roles within any company with any of its operations focussed on dentistry or oral health
- Membership of any political forum that holds a budget for dentistry or oral health
- Loyalty to a particular stakeholder constituency that influences their decisions unduly in their BDA role.

21. Unlike financial interests where specific recusal from debate and decision making is often a suitable management, it may be the case that some relationship interests cannot be managed.
22. Once in post individuals should discuss with the Chair of the PEC any approach that may generate a relationship interest prior to accepting said approach.

Service users as office-holders

23. The BDA is a membership organisation. Most office holders are BDA members and therefore also users of the BDA's services. This presents its own challenges, because in this context, defining a personal interest can be difficult.
24. Essentially, the question is whether decisions regarding the services provided by the BDA to be taken by anyone affected by this policy will confer a direct benefit on the decision maker, or a close friend or family member, which is exclusive to them, but instead will add utility or value to other members unknown to the individual in question.

Employment

25. By virtue of the BDA being a membership organisation, representing the professional needs of dentists, its members may wish to consider applying for employment with the organisation, where members' skills and experiences are relevant.
26. The legal definition of a 'benefit' extends to the acceptance of an employment position by an office holder within the organisation. The rationale for this is that it may be perceived that the office holder could exert unfair influence in being considered for a position of employment, or in ensuring resources are available to create a new position of employment.
27. Within the BDA there is fair and equal recruitment policy and practice, and all candidates for all positions are judged on their individual merit, against a predetermined job description and person specification and criteria.
28. However, to ensure against the perception of a conflict of interest, the BDA requires that any office holder must declare an interest and withdraw from any discussion or decision about a staff post that s/he may later apply for. In addition all covered by this policy must resign all elected office if successfully accepted for employment or secondment or consultancy within the BDA, whether the offer is for part or full time work. This protects both the organisation and office holders against breach of trust and the perception of influence or wrong doing.

Gifts and Hospitality

29. Whilst it is recognised that accepting hospitality as a representative of the BDA is unlikely to be perceived as having an actual or potential influence on anyone affected by this policy, it is important that receipt of more substantial gifts (£50 and above) or acts of hospitality are viewed as a benefit and should be declared and recorded.
30. However, individuals receiving either substantial or frequent hospitality or gifts from an individual, organisation or company out-with the BDA could be perceived as having the potential to influence the course of decision making or debate, either then or later. All those affected by this policy need to ensure that they are seen as taking decisions based upon facts and evidence.
31. The BDA maintains a Register of hospitality and this will be published on the BDA website.

Managing conflicts of interest

32. All those affected by this policy must complete their declarations of interest form prior to first meeting of the triennium, or for PEC members by the end of January of each year and submit these to the Committee Secretary.
33. At their first meeting of the triennium and prior to the election of officers, committees and councils must consider the interests of members and determine whether any conflicts arise.
34. Members will be asked to update their interests at the start of all subsequent meetings.
35. If a conflict arises committees and councils must subsequently determine a resolution that manages the conflict. The management must be recorded in the minutes of the meeting and also reported to the PEC Secretary at the conclusion of the meeting.
36. Where individual members are believed to have conflicts it is appropriate that they are absent from discussions regarding the management of said conflict.
37. Whilst individuals are those with a conflict, if these are not managed the committee itself is at risk of being conflicted.
38. If a committee cannot reach a conclusion about the management of a conflict of interest, then the issue must be referred to the Audit Committee for guidance. The Audit Committee will if necessary direct the committee concerned on appropriate actions.
39. If the majority view in any committee is that an individual's conflict of interest is so significant that it should exclude him or her from office within a committee, or from membership of the committee itself, then the matter should be referred to the Audit Committee for consideration.

40. Declarations of gifts or hospitality should be noted, with a clear record that the declaration has been regarded as producing a conflict (and so a record of how the conflict will be managed) or agreement that the gift or hospitality does not entail a conflict of interest.
41. A culture of challenge is encouraged. A committee member should question whether a conflict of interest has arisen for another member, and if accepted as a conflict, its management should be considered in accordance with the policy.
42. Committee Secretaries are encouraged to contact the Audit Committee for advice if they believe that a committee has not appropriately considered a member's interest.

Register of interests

43. The Register of Interests will be held in electronic form and will be accessible for amendment by committee secretaries and the Human Resources Manager. The Register, in whole or part, will be accessible by any member of the Association on the website. The Register will be held by the Chief Executive.
44. The Register will contain all declarations of interests whether they relate to an ongoing conflict of interest or an individual instance.

Role of the Audit Committee and the PEC

The PEC believe that committee members are typically best placed to consider whether one of their colleagues has a conflict and how this should be managed given committee business. As such, the PEC does not wish to take an active role in monitoring individual declarations.

45. On behalf of the PEC, the Audit Committee will review declarations of interest referred to it by committee secretaries and also retains the right to scrutinise the declarations made by individual members should it wish to do so.
46. If, following discussion with an individual, agreement on the management of an interest cannot be found the Audit Committee will instruct the individual as to the minimum standards required for management and will report this to both the individual and the PEC.
47. On behalf of the PEC the Audit Committee will review all conflict management strategies agreed by committees.
48. If, following discussion with the committee, the Audit Committee cannot be satisfied that the proposed strategy is suitable it will direct the committee in question as to an alternative resolution and report this to both the entire committee in question and the PEC.

49. On behalf of the PEC the Audit Committee will be required to sanction any committee management strategy that requires removal (or prevention) from office alongside removal from the committee.
50. Any BDA member may refer a perceived unmanaged conflict to the Audit Committee for consideration. The Audit Committee will consider if any action is required.
51. Decisions of the Audit Committee regarding conflicts may be appealed against by petition to the PEC
52. Decisions of the PEC regarding conflicts are final and must be observed by all members of the BDA's representative and governance bodies.

Appendix 4

Political neutrality guidelines

These guidelines have been produced for staff and elected members to ensure their professional activities on behalf of the Association do not contravene the Association's stance of political neutrality, and to help colleagues identify any potential conflicts with this Policy in their activities outside of the BDA.

What does political neutrality mean for staff and elected members?

The BDA asserts that it is free of any party political allegiance, and sets its policies in the best interests of the profession and the patients it serves. Staff are expected to implement those policies to the best of their ability, and it is a mark of professional behaviour that no political bias or indication of private conviction is evident in the manner in which staff discharge their duties. Staff should also avoid any overt manifestations of political allegiance in the workplace, such as wearing clothing with political slogans or displaying posters.

Elected members should contribute to debate on policy issues in the best interests of the profession, and their patients and constituents. Again, elected members should not exhibit any party political bias in the democratic and policy making processes of the Association, and should accept cabinet responsibility for the policies of the BDA in all public forums.

Does this mean that staff or elected officials cannot be members or activists of political parties?

Staff and elected officials can join, and actively support, a political party in a private capacity.

However, colleagues should be mindful of joining any public platform or engaging in any public debate that may associate their private opinions with those of the BDA. Usually this means sensitivity about any public debate or party policy relating to dental matters or possibly wider health issues. If any member of staff or elected member anticipates individual exposure to the media or in a public forum that may bring them into conflict with BDA policy, then they should alert the Chief Executive who will advise and support the colleague concerned in the most appropriate way. Advice and support will take into account the extent to which a conflict arises, the likely reaction or level of media interest, and the sensitivity or seniority of the position held by the member of staff or elected member.

Does a conflict mean that a member of staff or elected member will be asked to choose between their employment/involvement with the BDA and their private political activities?

So long as the Chief Executive is advised of any potential conflict, the aim will be to manage the situation as effectively as possible. It is anticipated that in the great majority of cases, with good sense on both sides, any difficulties can be resolved or minimised. However, it is possible that where strong private convictions are expressed in public and conflict with core policies of the BDA, then continued employment or democratic involvement with the Association may be incompatible. Again, this is likely to depend on the extent to which a conflict arises, the likely media reaction, and the sensitivity or seniority of the position held.

In these circumstances any action taken in regard to a member of staff will be consistent with the demands of employment law. Any action against an elected official will be given careful consideration by the Ethics Committee, observing both the demands of natural justice and the fact that any decision taken by the Ethics Committee in this regard will set a precedent for the future.

Does a conflict arise if a member of staff or elected member belongs to a political party that has policies that conflict with those of the BDA?

Generally no – it is not the business of the BDA to restrict the right of a member of staff or elected official to join a legally constituted political party in a private capacity. However, individuals may be held accountable for their own words or actions, and this includes their acceptance of the values of the Association. For example, the BDA serves a diverse profession, and of course there is increasing diversity in the patient population the profession itself serves. As such the BDA is committed to equality of opportunity and treatment, and does not tolerate discrimination on the grounds of ethnicity, gender, religion, disability, age, marital status, sexual orientation, or any other irrelevant consideration. Any public actions or statements that contravene these values may call into question the continued employment of an individual or their involvement as an elected official. Again, any action taken against an individual will be consistent with the demands of employment law and natural justice.

Can a member of staff or elected official be a candidate for a political party in an election?

Yes, though again the Chief Executive should be alerted as soon as possible about a candidate selection. The Chief Executive will facilitate appropriate advice and support, taking into account

potential conflicts and the likely media interest in the individual's connection to the BDA. Again in most cases this should be handled effectively with good sense on both sides, and may also involve liaison between the individual and the political party they are representing.

However, continued employment with the BDA or in an elected position may be called into question in some circumstances, most likely where a very senior member of staff or elected official is a candidate and who may be involved in high-profile criticism of the profession or the policies of the Association in the conduct of an election campaign.

These guidelines address common questions about the policy of political neutrality adopted by the BDA. Other questions may arise, and in these circumstances issues should be referred to the Chief Executive who shall provide an interpretation of the Policy. Any potential conflict that involves the Chief Executive should be referred for interpretation to the Chair of the Principal Executive Committee.

Appendix 5

Reporting and disciplinary procedures

Reporting

What to do if you consider you are subject to bullying or harassment, or conduct that falls short of the BDA's standards of work behaviour

The BDA is committed to ensuring that all members and staff are treated with dignity and respect, and in particular that there is no harassment or bullying in the workplace. The examples of harassment provided in the Dignity at Work Policy will be treated as disciplinary matters, though every complaint will be investigated independently in order to establish the facts.

Your first step is to decide whether the inappropriate behaviour can be dealt with informally by yourself. This might be because the act itself is relatively minor, isolated, or clearly unintentional. In these situations it is possible that the matter can be resolved immediately by letting your colleague know that the behaviour in question is unacceptable to you, and should be avoided in future.

If you feel uncomfortable about raising the issue directly with your colleague, or if you consider the behaviour is more serious because it was deliberate, part of a persistent pattern, or serious in nature, or has been repeated despite having discussed a previous incident informally, then you should report the matter in the first instance to your line manager (for staff) or committee chair (for members). If it is inappropriate to discuss the matter with your line manager or chair, or if you are dissatisfied with their response, then you should seek advice, as appropriate as set out below.

For staff

- Human Resources Manager
- Staff representative
- Your line manager's line manager
- A trusted colleague.

For members

- The Chair of the Principal Executive Committee (PEC)
- The Chair of the Audit Committee
- The Secretary to the PEC
- The Chief Executive.

Staff or members may formally raise a complaint through the grievance procedure, available from either the Human Resources Manager (for staff) or the Secretary to the PEC (for members). Even if a complaint is raised without invoking the grievance procedure, the recipient of the complaint will treat the matter as a grievance if they consider the matter is sufficiently serious.

Members who have a complaint about the behaviour of a member of staff when using the services of the Association, or when in contact with a member of staff in their capacity as a member, should address their complaint to the Secretary of the PEC, who will investigate the matter in liaison with the Human Resources Manager. The member may appeal to the Chief Executive if they are dissatisfied with the response to their complaint.

What to do if you know or suspect that staff or members may be involved in activities that breach the BDA's Standards of Service and Conduct

If you know or suspect breaches of the BDA's Standards of Service and Conduct by others then you should share your concerns with an appropriate contact within the Association (options are set out above), and you can also refer to the procedural advice set out in the Association's Whistleblowing Policy, available from either the Human Resources Manager or the Secretary to the PEC.

What to do if you have a potential conflict of interest, or suspect that conflicts of interest are not being managed by others

The Conflicts of Interest Policy (**Appendix 3**) sets out the actions that should be taken if an individual has a potential conflict of interest or wishes to share their concerns about the suspected existence of conflicts elsewhere.

Disciplinary procedures

Members of staff may be subject to disciplinary action and appropriate sanctions in regard to breaches of the BDA's Standards of Service and Conduct. All such actions will be managed by the Human Resources Manager within the policies of the Association.

BDA members may be subject to referral to the Association's Ethics Committee in regard to breaches of the Standards of Service and Conduct Policy. A decision on referral will be made by the Chief Executive, and the Ethics Committee may, following investigation, apply appropriate sanctions provided to it by the Articles of Association.