

Item: 8.3

REPORT CLASSIFICATION	✓	CATEGORY OF PAPER	✓
Official	✓	Proposes specific action	✓
Official: Sensitive Commercial		Provides assurance	
Official: Sensitive Personal		For information only	

BOARD

26 March 2024

Report Title:

Standards of Business Conduct and Declarations of Interest Policy

Purpose of report

To provide the Board with an updated policy for the standards of business conduct and declarations of interest.

Key points

Providing best value for taxpayers and ensuring that decisions are taken transparently and clearly, are both key principles in the NHS Constitution. As an organisation and as individuals within the organisation, the ICB has a duty to ensure that all its services are conducted to the highest standards of integrity and that NHS monies are used wisely so that the organisation is using its finite resources in the best interest of patients.

The attached policy sets out the standards of business conduct and responsibilities and expectations in the management of conflicts of interest by board members, committee and subcommittee members and employees of the ICB (including individuals contracted to work on behalf of the ICB or otherwise providing services or facilities to the ICB such as those within commissioning support services).

The policy sets out individual responsibilities as well as the ICB's responsibilities as a corporate body and as an employer, taking account of the individual and corporate obligations set out in the Bribery Act 2010.

The policy has been reviewed to ensure it remains up to date and reflective of the ICB's operating model and some changes have been made as a result. The changes within the policy include:

- Updated job titles to reflect the ICB 2.0 programme changes
- Reference to the newly launched conflicts of interest training which will be launched on ESR
- A revised Fraud/Theft section as per advice from AuditOne.
- A flowchart included in the Policy on a Page as a visual aid.
- Reference to the Fit and Proper Person Test Criteria, Procurement Policy and PSR Guidance.

Risks and issues

There is a risk that the ICB does not have a clear and robust policy in place for the management of conflicts of interest and this will impact in the ICB's ability to demonstrate clear and transparent decision-making throughout the governance framework.

Assurances

The policy has been updated in line with current national guidance in relation to standards of business conduct and the management of declaration of interests.

- AuditOne as reviewed the counter fraud element of the policy to ensure it reflects current legislation and best practice.
- The conflicts of interest training module will be recorded and non-compliance managed electronically through the ESR system.
- The Executive Committee recommend the submission of the policy to the Board for formal approval.

Recommendation/action required

The Board is asked to review and approve the updated policy.

Acronyms and abbreviations explained

2.0 – ICB 2.0 organisational change
 DOI – Declarations of Interest
 COI – Conflicts of Interest

Sponsor/approving executive director	C Riley, Executive Director of Corporate Governance, Communications and Involvement
Date approved by executive director	08/03/2024
Report author	K Sutherland, Senior Governance Lead T Taylor, Governance Officer
Date approved by Executive Committee	12/03/2024

Link to ICP strategy priorities (please tick all that apply)

Longer and Healthier Lives	✓
Fairer Outcomes for All	✓
Better Health and Care Services	✓
Giving Children and Young People the Best Start in Life	✓

Relevant legal/statutory issues

Note any relevant Acts, regulations, national guidelines etc

Any potential/actual conflicts of interest associated with the paper? (please tick)	Yes		No	✓	N/A	
---	-----	--	----	---	-----	--

If yes, please specify

Equality analysis completed (please tick)	Yes		No		N/A	✓
If there is an expected impact on patient outcomes and/or experience, has a quality impact assessment been undertaken? (please tick)	Yes		No		N/A	✓

Key implications

Are additional resources required?	None identified
Has there been/does there need to be appropriate clinical involvement?	None identified
Has there been/does there need to be any patient and public involvement?	None identified
Has there been/does there need to be partner and/or other stakeholder engagement?	None identified