



North East London
Integrated Care Board

Standards of Business Conduct and Conflicts of Interest Policy

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Dissemination of this Policy	<p>This policy will be:</p> <ul style="list-style-type: none"> • Contained in the ICB's Governance Handbook, published on the ICB's Website. • Referred to in terms of reference. • Published on the staff intranet. • Circulated by email to Board, Committee and Sub-Committee members and participants. Proactively communicated to all staff in accordance with NHS England (NHSE) Requirements <p>In accordance with the ICB's constitution, individuals contracted to work on behalf of the ICB, or otherwise providing services or facilities to the ICB, will be made aware of their obligation to declare conflicts or potential conflicts of interest. This requirement will be written into their contract for services.</p>

¹ Note that NHS England is expected to issue conflicts of interest guidance specifically for ICBs in 2023/24 – as was done for CCGs.

CONTENTS

1. Introduction	1
1.1 Background	1
1.2 Scope	2
1.3 Decision Making Officers	3
2. Conflicts and declarations of interest	4
2.1 Legal and policy requirements	4
2.2 Principles for managing conflicts of interest	5
2.3 What are conflicts of interest?	8
2.4 Declarations	9
2.5 Annual declarations	10
2.6 Register of Interests	10
2.7 Management of conflicts - general	11
2.8 Management of meetings and meeting minutes	12
2.9 Procurement	13
2.10 Conflict of Interest Guardian	13
3. Gifts, hospitality and sponsorship	14
3.1 Gifts	14
3.2 Gifts from suppliers and contractors	15
3.3 Gifts from other sources	15
3.4 Hospitality	15
3.5 Hospitality from suppliers and contractors	16
3.6 Commercial sponsorship/Sponsored events	17
3.7 How to declare	18
3.8 Gifts, Hospitality and Sponsorship Register	18
4. Other conduct	19
5. Compliance and investigation	22
5.1 Failure to comply with this policy	22
5.2 Raising concerns and breaches	22
5.3 Anonymous reports	25
5.4 Investigation	26
6. Training	26
Appendix 1: Guidance on types of interest	27
Appendix 2: Template Declaration of Interest form	29
Appendix 3: Template meeting minutes	30
Appendix 4: Gifts, Hospitality and Sponsorship Declaration Form	31

1. Introduction

1.1 Background

1.1.1 This policy describes the public service values, which underpin the work of the NHS and reflects current guidance and best practice to which all individuals within the NHS North East London Integrated Care Board (**‘the ICB’**) must have regard to in their work for the ICB.

1.1.2 As a publicly funded organisation, we have a duty to set and maintain the highest standards of conduct and integrity. The ICB aspires to the highest standards of corporate behaviour and responsibility.

1.1.3 The [NHS Constitution](#) sets out some of the key responsibilities for all NHS staff, and all Officers are expected to act in the spirit set out in the seven principles of public life, known as the Nolan Principles:

Selflessness. Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity. Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity. In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for awards or benefits, holders of public office should make choices on merit.

Accountability. Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness. Holders of public office should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty. Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership. Holders of public office should promote and support these principles by leadership and example.

1.1.4 In addition, those to whom this policy applies shall comply with the Code of Conduct contained in the ICB’s Governance Handbook.

- 1.1.5 As well as promoting the standards of business conduct expected of public bodies, this policy aims to protect our organisation and Officers from any suggestion of corruption, partiality or dishonesty by providing a framework through which the organisation can provide guidance and assurance that its staff conduct themselves with honesty, integrity and probity.
- 1.1.6 The policy should be read in conjunction with all relevant organisational policies and governance documentation which are developed and agreed in line with the principles set out in this policy. In particular, the following key ICB policies will be relevant:
- a) The ICB's Constitution
 - b) Standing Financial Instructions
 - c) Procurement Policy
 - d) Anti-Fraud and Bribery Policy
 - e) Freedom to Speak Up Policy
 - f) Disciplinary Policy

1.2 Scope

- 1.2.1 All our staff and those performing a role for the ICB or participating in its business are within the scope of this policy.
- 1.2.2 This includes members of the Board of the ICB, its committees, sub-committees and employees of the ICB. For the avoidance of doubt, this also includes those who are members of the Board or a governance structure of the ICB, but who are ordinarily employed or otherwise working for another organisation within the wider-ICS.
- 1.2.3 In addition, where an individual (including any individual directly involved with the business or decision making of the ICB, but who is not in one of the above categories) has an interest or becomes aware of an interest which could lead to a conflict of interests in the event of the ICB considering an action or decision in relation to that interest, that must be considered as a potential conflict, and is subject to the provisions of the ICB's Constitution and the individual falls within the scope of this policy.
- 1.2.4 This will include without limitation:
- a) Members of non-decision-making governance structures (e.g. task and finish/working groups);
 - b) Members of joint committees where exercising ICB functions;

- c) Third parties acting on behalf of the ICB under any contract arrangement;
- d) Agency staff engaged by the ICB;
- e) Secondees and other associates and honorary appointees;
- f) Advisory group members (who may not be directly employed or engaged by the organisation);
- g) Jointly appointed roles.
- h) Independent Clinicians

1.2.5 In the context of this policy, all those to whom this policy applies are referred to as **Officers**.

1.3 Decision Making Officers

1.3.1 Some Officers are more likely than others to have a decision-making role or influence on the use of public money because of the requirements of their role. In the context of this policy, such officers are referred to as 'Decision Making Officers.'

1.3.2 Without limitation, this category of Officers is likely to include:

- a) Members of the Board of the ICB and all the ICB's committees and sub-committees;
- b) Members of advisory groups which contribute to direct or delegated decision making on the commissioning or provision of taxpayer funded services such as working groups involved in service redesign or stakeholder engagement that will affect future service provision;
- c) Management, administrative and clinical staff who have the power to enter into contracts on behalf of the ICB and/or are involved in decision making concerning the commissioning of services, purchasing of goods, medicines, medical devices or equipment, and formulary decisions;
- d) Those at Agenda for Change Band 8b and above, or operating at that level on an interim basis;
- e) Executive and Senior Management Team roles;
- f) Budget holders, as set out in the ICB's Standing Financial Instructions and/or Scheme of Delegation.

2. Conflicts and declarations of interest

2.1 Legal and policy requirements

- 2.1.1 In accordance with section 14Z30 of the National Health Service Act 2006 ('2006 Act') (as reflected in the ICB's Constitution), the ICB must:
- a) maintain one or more **registers of the interests** of—
 - (i) members of the Board of the ICB
 - (ii) members of its committees or sub-committees, and
 - (iii) its employees.
 - b) publish those registers or make arrangements to ensure that members of the public have access to them on request.
 - c) make arrangements to ensure those mentioned above declare any conflict or potential conflict of interest that the person has in relation to a decision to be made in the exercise of the commissioning functions² of the ICB. Such declarations must be made as soon as practicable after the person becomes aware of the conflict or potential conflict and, in any event, within 28 days of the person becoming aware. Once made they must be entered on to the ICB's registers.
 - d) make arrangement for managing conflicts and potential conflicts in such a way as to ensure that they do not, and do not appear to, affect the integrity of the ICB's decision-making processes.
- 2.1.2 In accordance with paragraph 13 of Schedule 1B of the 2006 Act, the ICB's Constitution includes provision made by the ICB to give effect to the above, and contains a statement of principles to be followed by the ICB in implementing those arrangements. In addition, the Constitution requires that:
- a) Terms of office and/or employment for all Board, committee and sub-committee members, and employees of the ICB require that they will comply with the ICB policy on conflicts of interest;
 - b) All delegation arrangements made by the ICB under Section 65Z5 of the 2006 Act will include a requirement for transparent identification and management of interests and any potential conflicts, in accordance with suitable policies and procedures comparable with those of the ICB.

² i.e. the functions of the ICB in arranging for the provision of services as part of the health service.

- c) Individuals' declared interests will be considered as part of the appointment process for members of the Board to determine whether, in line with any guidance issued by NHS England or other relevant bodies, there are any conflicts that warrant individuals being excluded from appointment to the Board.
- d) In accordance with paragraph 4 of schedule 1B of the 2006 Act, the person(s) appointing someone as a member of the Board must not do so if they consider that the appointment could reasonably be regarded as undermining the independence of the health service because of the individual's involvement with the private healthcare sector or otherwise. Similarly, the Chair must approve the membership of the ICB's committees and sub-committees and must not grant approval where they consider that the independence of the health service could reasonably be regarded as being undermined by the appointment.

2.1.3 NHS England also has a duty under section 14Z51 of the 2006 Act to issue guidance to ICBs relating to the discharge of their functions, which each ICB must have regard to. Accordingly, it is expected that Managing Conflicts of Interest in the NHS: Guidance for Staff and Organisations will be updated during 2023/24 and, in the meantime, the current version of that document should be construed accordingly and complied with by Officers. This ICB policy must be read alongside the nationally applicable guidance as updated or replaced from time to time. If in doubt, a copy of the current guidance that is in force can be requested from the Head of Governance.

2.1.4 Further guidance to be published by NHS England is also likely to be relevant to the management of conflicts of interest and must have regard to by Officers. For instance, national guidance that will be published in relation to the provider selection regime and guidance on joint working and delegation arrangements.

2.2 Principles for managing conflicts of interest

2.2.1 The ICB and its Officers will subscribe to the following seven principles which have been recommended by NHS England³:

- a) Decision-making must be geared towards meeting the statutory duties of ICBs at all times, and the 'triple aim.' Any individual involved in decisions relating to ICB functions must be acting clearly in the interests of the ICB and of the public, rather than furthering direct or indirect financial, personal, professional or organisational interests.
- b) ICBs have been created to give trust/foundation trust, local authority, and primary medical services (general practice)

³ e.g. In the [Guidance](#) to CCGs on preparing ICB constitutions (page 23).

provider nominees a role in decision-making. These individuals will be expected to act in accordance with the first principle above, and while it should not be assumed that they are personally or professionally conflicted just by virtue of being an employee, director, partner or otherwise holding a position with one of these organisations, the possibility of actual and perceived conflicts of interests arising will remain.

For all decisions, ICBs will need to carefully consider whether an individual's role in another organisation could result in actual or perceived conflicts of interest and whether or not these outweigh the value of the knowledge they bring to the process.

- c) The personal and professional interests of all ICB board members, ICB committee members and ICB staff who are involved in decision-taking need to be declared, recorded and managed appropriately. Declarations must be made as soon as practicable after the person becomes aware of the conflict or potential conflict and, in any event, within 28 days of them becoming aware. This includes being clear and specific about the nature of any interest, and about the nature of any conflict that may arise regarding a particular decision.
- d) If an interest is declared but there is no risk of a conflict arising, then no further action need be taken (although the interest will still need to be recorded). However, if a material interest is declared, then it should be considered to what extent it affects the balance of the discussion and decision-making process. In doing so the ICB should ensure conflicts of interest (and potential conflicts of interest) do not, and do not appear to, affect the integrity of the ICB's decision making processes.
- e) ICBs should consider the composition of decision-making forums and clearly distinguish between those individuals who should be involved in formal decision-taking and those whose input informs decisions. In particular, ICBs should consider the perspective the individual brings and the value they add to both discussions around particular decisions and in actually taking part in the decision, including the ability to shape the ICB's understanding of how best to meet resident needs and deliver care for their populations. The way conflicts of interest are managed should reflect this distinction. For example, where independent providers (including the VCSE sector) hold contracts for services, it would be appropriate and reasonable for the ICB to involve them in discussions, eg about pathway design and service delivery, particularly at place level. However, this would be clearly distinct from any considerations around contracting and commissioning, from which they would be excluded.

- f) Actions to mitigate conflicts of interest should be proportionate and should seek to preserve the spirit of collective decision-making wherever possible. Mitigation should take account of a range of factors including the perception of any conflicts and how a decision may be received if an individual with a perceived conflict is involved in that decision, and the risks and benefits of having a particular individual involved in making the decision. Potential options in relation to mitigation could include:
- (i) including a conflicted person in the discussion but not in decision-making
 - (ii) excluding a conflicted person from both the discussion and the decision-making
 - (iii) including a conflicted person in the discussion and decision where there is a clear benefit to them being included in both – however, including the conflicted person in the actual decision should be done after careful consideration of the risk and with proper mitigation in place. The rationale for inclusion should also be properly documented and included in minutes
 - (iv) excluding the conflicted individual and securing technical or local expertise from an alternative, unconflicted source.
- g) The way conflicts of interest are declared and managed should contribute to a culture of transparency about how decisions are made. In particular, when adopting a specific approach to mitigate any conflicts of interest (including perceived conflicts), ICBs should ensure that the reason for the chosen action is documented in minutes or records.

2.2.2

Furthermore, and in addition to the Nolan Principles and other principles set out in the ICB's Constitution which should guide the management of Conflicts of Interest, the ICB and its Officers will comply with the following additional principles to support the management of conflicts of interest, which have been adopted by the ICB:

- a) **Do business appropriately:** Conflicts of interest become much easier to identify, avoid and/or manage when the processes for needs assessments, consultation mechanisms, commissioning strategies and procurement procedures are right from the outset, because the rationale for all decision-making will be clear and transparent and should withstand scrutiny;

- b) **Be proactive, not reactive:** Officers should seek to identify and minimise the risk of conflicts of interest at the earliest possible opportunity;
- c) **Be balanced, sensible and proportionate:** Rules should be clear and robust but not overly prescriptive or restrictive. They should ensure that decision-making is transparent and fair whilst not being overly constraining, complex or cumbersome;
- d) **Be transparent:** Document clearly the approach and decisions taken at every stage in the commissioning cycle so that a clear audit trail is evident;
- e) Create an **environment and culture** where individuals feel supported and confident in declaring relevant information and raising any concerns.
- f) **Be prudent:** A perception of wrongdoing, impaired judgement or undue influence can be as detrimental as any of them actually occurring. If in doubt, it is better to assume the existence of a conflict of interest, ensure a declaration in the fullest terms and manage it appropriately.

2.2.3 Moreover, individuals shall NOT:

- a) Misuse their position to further their interests or the interests of those related to them.
- b) Be influenced, or give the impression that they have been influenced, by outside interests.
- c) Allow outside interests to inappropriately affect the decisions.
- d) Interpret policies and procedures with a view to stifling collaboration and innovation.

2.3 What are conflicts of interest?

2.3.1 A conflict of interest is a set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of carrying out their role is, or could be, impaired or influenced by another interest they hold.

2.3.2 A conflict of interest may be **Actual** (there is a relevant and material conflict between one or more interests now) or **Potential** (there is the possibility of a material conflict between one or more interests in the future).

2.3.3 Officers may hold interests for which they cannot see a potential conflict. However, caution is always advisable because others may see it differently. It is important to exercise judgement and to declare

such interests where there is otherwise a risk of suggestion of improper conduct.

- 2.3.4 Interests can arise in a number of different contexts. Financial gain is not necessary. A material interest is one which a reasonable person would take into account when making a decision regarding the use of taxpayers' money because the interest has relevance to that decision.
- 2.3.5 Conflicts can arise from personal or professional relationships with others, e.g. where the role or interest of a family member, friend or acquaintance may influence an individual's judgement or actions, or could be perceived to do so.
- 2.3.6 Interests can generally be considered in the following categories, which are explained further at Appendix 1:
- a) Financial interests
 - b) Non-financial professional interests
 - c) Non-financial personal interests
 - d) Indirect interests
 - e) Loyalty Interests

2.4 Declarations

- 2.4.1 Declarations must be made **as soon as practicable** after the person becomes aware of the conflict or potential conflict and, in any event, within 28 days of the person becoming aware.
- 2.4.2 Interests must also be declared:
- a) before appointment to a role;
 - b) when an individual moves to a new role or their responsibilities change significantly;
 - c) at the beginning of a new project/piece of work;
 - d) at the commencement of a meetings;
 - e) as soon as circumstances change and new interests arise (for instance: in a meeting when interests held are relevant to the matters under discussion);
 - f) at least annually, in accordance with the arrangements for made by the ICB set out at paragraph 2.5 below;
 - g) in any formal appraisal/annual reviews.

2.4.3 ICB employees, Officers and any external partners involved in ICB decision-making are required to complete a declaration of interests form annually as set out in paragraph 2.5. The declaration of interest submission will be completed through the electronic system, Disclose, which ICB employees access via the Workforce application. External staff that are required to complete a form can do so at the website <https://nhsnel.disclose.org.uk/>. A guide on how to complete the form can be found at https://intranet.northeastlondon.icb.nhs.uk/wp-content/uploads/2022/10/Disclose_User_Guide_v3-staff.pdf and can be requested through the conflicts of interest mailbox nelondonicb.coi@nhs.net.

2.4.4 Declaration of interests templates (Appendix 2 and Appendix 4) should only be used in the event that the electronic system is unavailable. ICB staff need to inform their line manager and appropriate director of the declaration they have made. Individuals should seek advice from the governance team if required at nelondonicb.coi@nhs.net.

2.5 Annual declarations

2.5.1 As a matter of course, to ensure declarations of interest are made, confirmed or updated at least annually, the ICB's governance team will ask staff to review their previous declarations and provide any new declarations in order that the register(s) of interest can be updated accordingly. A response is required from all employees, Officers and decision-makers, even where they have no interest to declare.

2.5.2 Staff will also be reminded periodically (at least once per year) of their obligations to declare their interests within the required timeframe.

2.5.3 Notwithstanding the above, it is the responsibility of all staff to regularly consider what interests they have in the context of the role they are performing, and to declare their interest as they arise.

2.6 Register of Interests

2.6.1 Once made, declarations must be entered on to the register of interests. The interests of all staff will be recorded.

2.6.2 After expiry of a declaration, an interest will remain on the register for a minimum of six months and a private record of historic interests will be retained for a minimum of six years.

2.6.3 Such information may be made available to the public on request, subject to any applicable information governance safeguards and per the ICB's [Privacy Policy](#). Additionally, the interests of Decision Making Officers will be published prominently on the ICB's website (at least annually).

2.6.4 In exceptional circumstances, where the public disclosure of information could give rise to a real risk of harm or is prohibited by law, an individual's name and/or other information may be redacted from the publicly available register. Where an individual believes that substantial damage or distress may be caused (i.e. to him/herself or somebody else) by the publication of information about them, they are entitled to request that the information is not published. Such requests must be made in writing. Decisions not to publish information must be made by the Conflicts of Interest Guardian, who should seek appropriate legal advice where required, and the ICB should in such circumstances retain a confidential un-redacted version of the registers.

2.7 Management of conflicts - general

2.7.1 All declarations of interest must be reviewed by the appropriate line manager, with consideration given to any actions required to mitigate the conflict in the individual circumstances.

2.7.2 Decisions about how declarations are managed will be taken by the Head of Governance with input from the ICB's in-house legal adviser, who will seek advice or escalate matters for senior input depending on the materiality of the interests. Matters can also be raised with the Conflicts of Interest Working Group which is a sub-committee of the Audit and Risk Committee.

2.7.3 If an interest is declared but there is no risk of a conflict arising then no action is warranted. However, if a material interest is declared then the general management actions that could be applied include:

- a) restricting an individual's involvement in associated discussions and excluding them from decision making;
- b) removing an individual from the whole decision making process;
- c) removing an individual's responsibility for an entire area of work;
- d) removing an individual from their role altogether if they are unable to operate effectively in it because the conflict is so significant.

2.7.4 Each case will be different and context-specific, and the ICB will always clarify the circumstances and issues with the individuals involved.

2.7.5 An audit trail of the actions taken must be maintained by the ICB and the individuals concerned should maintain their own written record of the information considered and actions taken.

2.8 Management of meetings and meeting minutes

2.8.1 The following should guide the management of conflicts of interest in the context of ICB meetings:

- a) Chairs should consider any known interests of individuals in advance and begin each meeting by asking for declaration of relevant interests. Such matters should be a standing agenda item.
- b) Those present should take personal responsibility for declaring their interests at the beginning of each meeting.
- c) Where an actual or potential conflict of interest arises during the course of any meeting it is the responsibility of the relevant individual to notify the chair at the soonest possible opportunity.
- d) Any new interests identified should be added to the relevant register of interests.
- e) The deputy chair (or other non-conflicted member) should chair all or part of the meeting if the chair has an interest that may prejudice their judgement. If the deputy chair is also conflicted, then the remaining non-conflicted voting members of the meeting should unanimously agree how to manage the conflict(s).
- f) Any specific requirements for management conflicts of interest which are contained in the applicable terms of reference must be complied with.

2.8.2 If an individual has an actual or potential interest, the chair should consider the following approaches:

- a) Requiring the individual to not attend the meeting.
- b) Excluding the individual from receiving meeting papers relating to their interest.
- c) Excluding the individual from all or part of the relevant discussion and decision.
- d) Noting the nature and extent of the interest but judging it appropriate to allow the member to remain and participate.
- e) Removing the individual from the group or process altogether.

2.8.3 It is acknowledged that it will not always be appropriate to exclude individuals with interests, as this may have a detrimental effect on the quality of the decision being made. Good judgement is required to ensure proportionate management of risk.

2.8.4 To ensure transparency in decision-making, declarations of interest should be recorded in minutes of meetings. The chair of the relevant meeting (with support from the relevant secretariat) must ensure minutes record as a minimum:

- a) Who has the interest.
- b) The nature and magnitude of the interest.
- c) The agenda items to which the interest relates.
- d) How the conflict was agreed to be managed.
- e) Evidence that the conflict was managed as intended.

2.8.5 Template meeting minutes which aim to accommodate the above can be found at Appendix 3: below.

2.9 Procurement

2.9.1 Conflicts of interest need to be managed appropriately through the whole procurement process. At the outset of any process, the relevant interests of individuals involved should be identified and clear arrangements put in place to manage any conflicts. This includes consideration as to which stages of the process a conflicted individual should not participate in, and in some circumstances, whether the individual should be involved in the process at all.

2.9.2 Note that the ICB will also retain a publishable Register of Procurement Decisions & Contracts awarded, which makes provision for conflicts of interest, and management of such interests, to be noted.

2.9.3 Further detail about procurement matters is contained in the ICB's Procurement Policy and the ICB's Standing Financial Instructions.

2.10 Conflict of Interest Guardian

2.10.1 Staff should be aware that the ICB has appointed the Chair of its Audit and Risk Committee to be its conflict of interest guardian. In accordance with the ICB's constitution their role is to:

- a) act as a conduit for members of the public and members of the ICB who have any concerns with regards to conflicts of interest;
- b) be a safe point of contact for employees or workers to raise any concerns in relation to conflicts of interest;
- c) support the rigorous application of conflict of interest principles and policies;

- d) provide independent advice and judgement to staff and members where there is any doubt about how to apply conflicts of interest policies and principles in an individual situation;
- e) provide advice on minimising the risks of conflicts of interest.

2.10.2 To that end, the Conflict of Interest Guardian contact details can be found in section 5.2.3 of this policy.

2.10.3 Further information about raising concerns connected with matters set out in this policy can be found at paragraph 5.2 below.

3. Gifts, hospitality and sponsorship

3.1 Gifts

3.1.1 Officers should ensure that they are not placed in a position that risks, or appears to risk, compromising their role or the ICB's public and statutory duties or reputation. The over-arching principle that ICB staff should not accept gifts that may affect, or be seen to affect, their professional judgement should apply in all circumstances.

3.1.2 Officers should not ask for or accept gifts, gratuities or honoraria (such as grants, scholarships) from any individual or organisation that may be capable of being construed as being able to influence any decision or cast doubt on the integrity of such decisions. Officers are reminded that it may be considered to be a breach of the organisation Disciplinary Policy to solicit gifts. It may also be illegal, under the Bribery Act 2010 and staff that are found to have done so may face disciplinary action and prosecution.

3.1.3 The Bribery Act 2010 makes it a criminal offence to give or offer a bribe, or to request, offer to receive or accept a bribe. The Act reformed the criminal law of bribery, making it easier to tackle this offence proactively in both the public and private sectors. It introduced a corporate offence which means that commercial organisations, including NHS bodies, will be exposed to criminal liability, punishable by an unlimited fine, for failing to prevent bribery.

3.1.4 Officers should always refuse gifts or other benefits which might reasonably be seen to compromise their personal judgement or integrity. Under no circumstances should Officers accept a personal gift of cash or cash equivalents (e.g. tokens, vouchers, gift cards, lottery tickets or betting slips) regardless of value. If for any reason it has not been possible to decline the gift at source (e.g. it has arrived by post) then this should be given immediately to the Head of Governance who will arrange for its return via a recorded delivery or transfer.

3.1.5 A common sense approach should be applied to the valuing of gifts, using the actual amount if known, or an estimate that a reasonable person would make as to its value. If there is any doubt about the appropriateness of accepting a gift, Officers should either politely decline or consult their line manager or the governance team.

3.2 Gifts from suppliers and contractors

3.2.1 Gifts of low value (up to £6 in total), such as promotional items, can be accepted and do not need to be declared, but all other gifts from suppliers or contractors must be declined and declared.

3.3 Gifts from other sources

3.3.1 This section applies to gifts from those who are neither suppliers nor contractors. For example, gifts from patients, families, service users, foreign dignitaries. The following shall apply:

- a) The acceptance of gifts with a value of over £50 should be treated with caution and only accepted on behalf of the organisation, not in a personal capacity. A clear reason should be recorded as to why it was considered permissible to accept the gift, alongside the actual or estimated value and include line manager approval. Accepted gifts should be sent to the Head of Governance who will consider the following options:
 - (i) share the gift with all staff;
 - (ii) raffle the gift for charity;
 - (iii) donate the gift to charity; or
 - (iv) make an equivalent donation to charity and keep the gift.
- b) Multiple gifts from the same source over a 12-month period with a cumulative value exceeding £50 should be treated in the same way as single gifts over £50 value.
- c) Modest gifts under £50 can be accepted from non-suppliers and non-contractors and do not need to be declared.

3.4 Hospitality

3.4.1 Hospitality in this context means the provision of meals and refreshments, invitations to functions such as ceremonies, receptions, presentations and conferences as well as invitations to social, cultural and sporting events. Some offers may include overnight accommodation and travel to and from a venue at which an event is being held.

3.4.2 Hospitality must only be accepted when there is a legitimate business reason and it is proportionate to the nature and purpose of the event.

Officers should exercise discretion in accepting offers of hospitality in case it would, or might appear to:

- a) place them under any obligation to the individual or organisation making the offer;
- b) compromise their professional judgement and impartiality; or
- c) otherwise be improper.

3.4.3 A common sense approach should be applied to the valuing of hospitality, using the actual amount if known, or an estimate that a reasonable person would make as to its value. If there is any doubt about the appropriateness of accepting a hospitality, staff should either politely decline or consult their line manager or the governance team.

3.5 Hospitality from suppliers and contractors

3.5.1 Particular caution should be exercised when hospitality is offered by actual or potential suppliers or contractors. The following shall apply:

- a) Modest and reasonable hospitality (meals/refreshments) (under £25) provided in normal and reasonable circumstances during the course of working visits may be accepted and need not be declared. However, it should be on a similar scale to that which the ICB might offer in similar circumstances, (e.g. hospitality provided at meetings, events, seminars).
- b) Hospitality (meals/refreshments) between £25 and £75 can be accepted but must be declared.
- c) Hospitality (meals/refreshments) of a value in excess of £75 must be declared and should be refused unless (in exceptional circumstances) senior approval is given. A clear reason should be recorded on the declaration as to why it was permissible to accept hospitality of this value.
- d) Modest offers to pay some or all travel and accommodation costs related to attendance at events may be accepted and must be declared.
- e) Offers which go beyond modest or are of a type that the ICB itself might not usually offer, should be declined unless (in exceptional circumstances) senior approval is given. A non-exhaustive list of examples includes business class/first class travel and accommodation and foreign travel. These should be declared with a clear reason for acceptance and a copy of any senior approval.

3.6 Commercial sponsorship/Sponsored events

3.6.1 Sponsorship of NHS events by external parties is valued. Offers to meet part of the cost of running an event secures their ability to take place, benefitting NHS staff and residents. However, there is potential for conflicts of interest between the organiser and the sponsor, particularly regarding the ability to market commercial products or services. As a result, the ICB has safeguards in place to prevent conflicts occurring.

3.6.2 When sponsorships are offered, the following principles must be adhered to:

- a) Sponsorship of ICB events by appropriate external bodies should only be approved if a reasonable person would conclude that the event will result in a clear benefit for the ICB or the NHS.
- b) Acceptance of commercial sponsorship should not in any way compromise commissioning decisions of the ICB or be dependent on the purchase or supply of goods or services.
- c) During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection legislation. Moreover, no information should be supplied to a company for their commercial gain unless there is a clear benefit to the NHS. As a general rule, information which is not in the public domain should not normally be supplied.
- d) At the ICB's discretion, sponsors or their representatives may attend or take part in the event, but they should not have a dominant influence over the content or the main purpose of the event.
- e) The involvement of a sponsor in an event should always be clearly identified in the interests of transparency.
- f) The ICB will make it clear that sponsorship does not equate to endorsement of a sponsor or its products and this needs to be made visibly clear on any promotional or other materials relating to the event.

3.6.3 Staff may accept commercial sponsorship for courses, conferences, post/project funding, meetings and publications if they are reasonably justifiable and in accordance with the spirit of, and principles set out in, this policy. Staff members should declare their involvement with arranging sponsored events to their line manager (with details of the proposed sponsorship) and permission must be obtained from the Head of Governance in writing in advance.

3.7 How to declare

- 3.7.1 All declarations relating to hospitality, gifts and sponsorship must be made, as soon as is practicable, through the electronic system, Disclose as outlined in paragraph 2.4.3.
- 3.7.2 Consistent with paragraph 2.5 above, as a matter of course, the governance team will seek confirmation that declarations have been made but the responsibility to declare falls to individual members of staff.

3.8 Gifts, Hospitality and Sponsorship Register

- 3.8.1 Declarations will be entered on to the Gifts, Hospitality and Sponsorship Register which is maintained by the governance team.
- 3.8.2 The Gifts, Hospitality and Sponsorship register of decision making staff will be published on the ICB's website and maintained by the ICB's governance team.
- 3.8.3 Such information may be made available to the public on request, subject to any applicable information governance safeguards. Additionally, the interests of Decision Making Officers will be published prominently on the ICB's website (at least annually).
- 3.8.4 In exceptional circumstances, where the public disclosure of information could give rise to a real risk of harm or is prohibited by law, an individual's name and/or other information may be redacted from the publicly available register. Where an individual believes that substantial damage or distress may be caused, to him/herself or somebody else by the publication of information about them, they are entitled to request that the information is not published. Such requests must be made in writing. Decisions not to publish information must be made by the Conflicts of Interest Guardian, who should seek appropriate legal advice where required, and the ICB should in such circumstances retain a confidential un-redacted version of the registers.

4. Other conduct

4.1.1 The table below sets out the ICB's expectations of Officers in relation to other areas of personal and professional conduct which may be relevant:

<p>Outside employment and private practice</p>	<p>Employees of the ICB (depending on the details of their contract as regards outside employment and private practice) are required to inform the ICB if they are engaged in or wish to engage in outside employment in addition to their work with the ICB. This shall include standing for election as a member of parliament, or in local elections. The purpose of this is to ensure that the ICB is to be aware of any potential conflict of interest with their ICB employment.</p> <p>Examples of work which might conflict with the business of the ICB include:</p> <ul style="list-style-type: none"> • employment with another NHS body; • employment with another organisation which might be in a position to supply goods/services to the ICB; and • self-employment, including private practice, in a capacity which might conflict with the work of the ICB or which might be in a position to supply goods/services to the ICB. <p>The ICB will send an annual reminder to all ICB staff about this requirement.</p> <p>Permission to engage in outside employment/private practice will be required and the ICB reserves the right to refuse permission where it believes a conflict will arise.</p>
<p>Initiatives</p>	<p>As a general principle any financial gain resulting from external work where use of ICB time or title is involved (e.g., speaking at training events/conferences, writing articles etc) and/or which is connected with ICB business must be forwarded to the governance team.</p> <p>Any patents, designs, trademarks, or copyright resulting from the work (e.g., research) of an employee of the ICB carried out as part of their employment by the ICB shall be the Intellectual Property of the ICB.</p> <p>Approval from the appropriate line manager or the governance team should be sought prior to entering into an obligation to undertake external work connected with the business of the ICB, e.g. writing articles for publication, speaking at conferences.</p>

	Where the undertaking of external work, gaining patent or copyright or the involvement in innovative work, benefits or enhances the ICB's reputation or results in financial gain for the ICB, consideration will be given to rewarding employees subject to any relevant guidance for the management of Intellectual Property in the NHS issued by the Department of Health.
Lending or borrowing	<p>The lending or borrowing of money between staff should be avoided, whether informally or as a business, particularly where the amounts are significant.</p> <p>It is a serious breach of discipline for any member of staff to use their position to place pressure on someone in a lower pay band, a business contact, or a member of the public to loan them money.</p>
Gambling	No member of staff may bet or gamble when on duty or on ICB premises, with the exception of small lottery syndicates or sweepstakes related to national events such as the World Cup or Grand National among immediate colleagues.
Trading on official premises	Trading on official premises is prohibited, whether for personal gain or on behalf of others. Canvassing within the office by, or on behalf of, outside bodies or firms (including non-ICB interests of staff or their relatives) is also prohibited. Trading does not include small tea or refreshment arrangements solely for staff.
Collection of money	Charitable collections must be authorised by the director responsible for governance. Collection tins or boxes must not be placed in offices. With line management agreement, collections may be made among immediate colleagues and friends to support small fundraising initiatives, such as raffle tickets and sponsored events. Permission is not required for informal collections amongst immediate colleagues on an occasion like retirement, marriage or a new job.
Bankrupt or insolvent staff	Any Officer who becomes bankrupt, insolvent, has active CCJ, or has made individual voluntary arrangements with organisations must inform Human Resources and the Head of Governance, as soon as possible. Officers who are bankrupt or insolvent cannot be employed, or otherwise engaged, in posts that involve duties which might permit the misappropriation of public funds or involve the approval of orders or handling of money.
Arrest or conviction	An Officer who is arrested, subject to continuing criminal proceedings, or convicted of any criminal offence must inform Human Resources as soon as is practicably possible.

<p>Social media</p>	<p>Officers should be aware that social networking websites are public forums and should not assume that their entries will remain private. Officers communicating via social media must not:</p> <ul style="list-style-type: none"> • conduct themselves in a way that brings the ICB into disrepute; • disclose information that is confidential to the ICB, staff or patients.
<p>Political activities</p>	<p>Any political activity should not identify an individual as an officer of the ICB. Conferences or functions run by a party-political organisation should not be attended in an official capacity, except with prior written permission from the Chief Executive or Chair of the ICB.</p>
<p>Pharmaceutical Industry transparency initiatives</p>	<p>In relation to declarations of conflicts, gifts, hospitality and sponsorship, particular care should be taken when in contact with the pharmaceutical and devices sector.</p> <p>A code of practice is published by the Association of British Pharmaceutical Industry ('ABPI'), which sets out arrangements which ABPI members must comply with. This includes prohibitions against inducements and a scheme of disclosure of certain transfers of value made directly or indirectly to health professionals and relevant decision-makers (e.g. within healthcare organisations such as the ICB).</p> <p>Officers working in or with the pharmaceutical and devices sector should familiarise themselves with the requirements of the ABPI's scheme.</p> <p>Officers are reminded that it is mandatory that when undertaking work with the Pharmaceutical Industry, in whatever capacity, and receiving any transfer of value or benefit in kind, they should consent for this to be declared on the ABPI Disclosure UK Database, as well as making any other declarations in accordance with the usual requirements of the ICB policy as set out above. Failure to provide the necessary consent will be considered as a breach of this policy and appropriate action will be taken.</p> <p>The ICB will consider ABPI data as part of its periodic counter fraud reviews.</p>

5. Compliance and investigation

5.1 Failure to comply with this policy

- 5.1.1 Failure to comply with the requirements set out in this policy may result in action being taken in accordance with the ICB's Disciplinary Policy procedures. Such disciplinary action may include termination of employment (or such other arrangement or engagement as applicable).
- 5.1.2 Additionally, where an individual is a regulated professional, a regulatory referral may be made and where an act or omission may constitute a criminal offence, it will be referred for criminal investigation.
- 5.1.3 In particular, any financial or other irregularities or impropriety which involve evidence or suspicion of fraud, bribery or corruption by any Officer, will be reported in accordance with Standing Financial Instructions and the Counter-Fraud, Bribery and Corruption Policy, with a view to an appropriate investigation being conducted and potential prosecution being sought.
- 5.1.4 The Conflicts of Interest Working Group which reports into the ICB Audit and Risk Committee will monitor compliance with the policy and will provide the Committee with assurances and escalate any issues.

5.2 Raising concerns and breaches

- 5.2.1 Officers shall speak up about any genuine concerns in relation to compliance with this policy, or otherwise relating to criminal activity, breach of a legal obligation (including negligence, breach of contract or breach of administrative law), danger to health and safety or the environment, and the cover up of any of these in the workplace. This shall also include concerns relating to interests that have not been identified, declared or managed appropriately and effectively.
- 5.2.2 This applies where the concerns arise from actions or omissions which are perceived to be deliberate, and those which may have happened innocently or deliberately.
- 5.2.3 Concerns should be raised without delay, as follows:

Contact	Scope	Contact details
Head of Governance	The Head of Governance can: <ul style="list-style-type: none">Offer advice about the application of this policy or related policies;	Annemarie.keliris@nhs.net

Contact	Scope	Contact details
	<ul style="list-style-type: none"> Discuss concerns in general terms on an informal basis; Escalate concerns (e.g. to the Conflict of Interest Guardian, to Local Counter Fraud Specialist) and raise breach reports. 	
Conflict of Interest Guardian	<p>Actual or suspected failures to manage conflict of interest matters appropriately and effectively should be raised with the Conflict of Interest Guardian, either via the Head of Governance in the first instance or directly.</p> <p>The Conflict of Interest Guardian provides impartial and unconflicted advice and judgement to the ICB in cases where it is not obvious whether a material conflict exists or how best to manage it. The Conflict of Interest Guardian is also the chair of the ICB's Audit & Risk Committee and a non-executive member of the Board of the ICB.</p>	<p>Chair of the Audit and Risk Committee – can be contacted via Annemarie.keliris@nhs.net</p>
Freedom to Speak up Guardian Service	<p>The Freedom to Speak up (FTSU) Guardian Service supports the organisation in becoming a more open and transparent place to work, where all staff are actively encouraged and enabled to speak up safely.</p> <p>The Freedom to Speak up Guardian Service has been designated by the ICB to act as an independent and impartial source of advice to staff at any stage of raising a concern, and for the purposes of fulfilling their role has access to anyone in the organisation (including the Chair of the ICB and the Chief Executive) or if necessary others outside the ICB. The Freedom to Speak up Guardian Service will be supported by an Executive and Non-executive member of the Board in fulfilling its responsibilities.</p>	<p>The NHS NEL FTSU Guardian is Anuska Casas Pinto 0333 577 5588 contact@theguardianservice.co.uk</p> <p>Executive lead responsible for Freedom to Speak Up –Charlotte Pomery, Chief Participation and Place Officer, charlotte.pomery@nhs.net</p> <p>Clinical Executive Lead, Diane Jones, Chief Nursing Officer, diane.jones11@nhs.net</p> <p>Non-executive member responsible for Freedom to Speak Up - Diane Herbert, diane.herbert3@nhs.net</p>

Contact	Scope	Contact details
	<p>To ensure that interests and offers of gifts, hospitality and sponsorship are effectively managed, individuals are encouraged to speak up about actual or suspected breaches. Every individual has a responsibility to do this.</p> <p>The ICB has developed a Freedom to Speak Up Policy setting out the arrangements for raising and handling staff concerns.</p>	
<p>Local Counter Fraud Specialist</p> <p>and/or</p> <p>Chief Finance and Performance Officer</p>	<p>The ICB has an accredited, nominated and appropriately trained person to conduct the full range of counter fraud, bribery and corruption work its behalf.</p> <p>It will be the duty of all Officers having evidence of, or reason to suspect, financial or other irregularities which may amount to or involve fraud, bribery or corruption, to report these suspicions to the Chief Finance and Performance Officer and/or the Local Counter Fraud Specialist. Officers should not investigate matters themselves.</p> <p>Unless the circumstances require otherwise, the Local Counter Fraud Specialist will inform the Chief Finance and Performance Officer (or failing that the Chief Executive or Chair of the ICB).</p> <p>Concerns may also be referred directly to the Chief Finance and Performance Officer, who will involve the Local Counter Fraud Specialist as required.</p> <p>As referred in the Standing Financial Instructions, the ICB has developed a comprehensive Anti-fraud and Bribery Policy which contains further relevant information.</p>	<p>Mark Kidd 07528 970 251</p> <p>mark.kidd@nhs.net</p> <p>henryblack@nhs.net</p>
NHS Fraud and	The reporting line provides an easily accessible and confidential route for	<p>https://cfa.nhs.uk/reportfraud</p> <p>0207 404 6609</p>

Contact	Scope	Contact details
Corruption Reporting Line	<p>the reporting of genuine suspicions of fraud within or affecting the NHS.</p> <p>All calls are dealt with by experienced trained staff and any caller who wishes to remain anonymous may do so.</p>	

5.2.4 The Public Interest Disclosure Act (PIDA) 1998 - This act provides protection for workers who raise legitimate concerns about specified matters:

- A criminal offence has been committed, is being committed or is likely to be committed;
- A person has failed, is failing, or is likely to fail to comply with any legal obligation to which the worker is subject;
- A miscarriage of justice has occurred, is occurring or is likely to occur;
- The health or safety of any individual has been, is being, or is likely to be damaged;
- Information tending to show any matter falling within any one of the proceeding paragraphs has been, is being or is likely to be deliberately concealed.

These are called “qualifying disclosures”. A qualifying disclosure of information is a disclosure that, in the reasonable belief of the worker, is made in the public interest. In order for the disclosure to be protected, the worker must show that he or she reasonably believed that the malpractice falls within the matters for which the person is prescribed and that the information disclosed, and any allegation contained in it, are substantially true. It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be committed, a reasonable belief is sufficient. PIDA only offers protection to workers.

5.3 Anonymous reports

5.3.1 Anonymous letters, telephone calls, etc. are occasionally received from individuals who wish to raise matters of concern, but not through official channels. While the suspicions may be erroneous or unsubstantiated, they may also reflect a genuine cause for concern and will be taken seriously.

5.4 Investigation

- 5.4.1 All reported concerns will be treated with the appropriate confidentiality, and escalated and investigated appropriately according to their specific facts and merits. Human Resources, the Local Counter Fraud Specialist, NHS England, senior Officers and auditors and/or independent advisors will be involved as required.
- 5.4.2 All reports, referrals, investigations and notes of related meetings will be documented and an appropriate audit trail maintained.
- 5.4.3 The Head of Governance may maintain and make available on request standard form templates to facilitate consistency of record keeping (e.g. breach reporting forms).

6. Training

- 6.1.1 An annual training package to raise awareness and understanding of this policy is provided to staff by the ICB's internal audit counter fraud service. The ICB is waiting for updated national training guidance relative to ICBs and this will be made available via the internal Workforce system, expected in 2023/24.

Appendix 1: Guidance on types of interest

Type of Interest	Description
Financial Interests	<p>This is where an individual may get direct financial benefits from the consequences of a commissioning decision. This could, for example, include being:</p> <ul style="list-style-type: none"> • A director, including a non-executive director, or senior employee in a private company or public limited company or other organisation which is doing, or which is likely, or possibly seeking to do, business with health or social care organisations. This includes involvement with a potential provider of a new care model; • A shareholder (or similar ownership interests), a partner or owner of a private or not-for-profit company, business, partnership or consultancy which is doing, or which is likely, or possibly seeking to do, business with health or social care organisations; • A management consultant for a provider; or • A provider of clinical private practice. <p>This could also include an individual being:</p> <ul style="list-style-type: none"> • In employment outside of the ICB; • In receipt of secondary income; • In receipt of a grant from a provider; • In receipt of any payments (for example honoraria, one-off payments, day allowances or travel or subsistence) from a provider; • In receipt of research funding, including grants that may be received by the individual or any organisation in which they have an interest or role; and • Having a pension that is funded by a provider (where the value of this might be affected by the success or failure of the provider).
Non-Financial Professional Interests	<p>This is where an individual may obtain a non-financial professional benefit from the consequences of a commissioning decision, such as increasing their professional reputation or status or promoting their professional career. This may, for example, include situations where the individual is:</p> <ul style="list-style-type: none"> • An advocate for a particular group of patients; • A GP with special interests e.g., in dermatology, acupuncture etc.; • An active member of a particular specialist professional body (although routine GP membership of the Royal College of General Practitioners (RCGP), British Medical Association (BMA) or a medical defence organisation would not usually by itself amount to an interest which needed to be declared); • An advisor for the Care Quality Commission (CQC) or the National Institute for Health and Care Excellence (NICE); • Engaged in a research role; • The development and holding of patents and other intellectual property rights which allow staff to protect something that they create, preventing unauthorised use of products or the copying of protected ideas; or • GPs and practice managers, who are members of the committees of the ICB, should declare details of their roles and responsibilities held within their GP practices.
Non-Financial Personal Interests	<p>This is where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit. This could include, for example, where the individual is:</p> <ul style="list-style-type: none"> • A voluntary sector champion for a provider; • A volunteer for a provider;

	<ul style="list-style-type: none"> • A member of a voluntary sector board or has any other position of authority in or connection with a voluntary sector organisation; • Suffering from a particular condition requiring individually funded treatment; • A member of a lobby or pressure group with an interest in health and care.
Indirect Interests	<p>This is where an individual has a close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest in a commissioning decision (as those categories are described above) for example, a:</p> <ul style="list-style-type: none"> • Spouse / partner; • Close family member or relative e.g., parent, grandparent, child, grandchild or sibling; • Close friend or associate; or • Business partner.
Loyalty Interests	<p>As part of their role, officers may need to build strong relationships with colleagues across the NHS and in other sectors. These relationships can be hard to define as they may often fall into the category of indirect interests. They are unlikely to be directed by any formal process or managed via any contractual means, however these 'loyalty' interests can influence decision making.</p>

Appendix 2: Template Declaration of Interest form

To only be used in the event that the electronic system is unavailable

Return this form to: nelondonicb.coi@nhs.net

Name:				
Position(s) within or relationship with the ICB				
Type of Interest* (Per Appendix 1)	Description of Interest, including nature of business; and for indirect Interests, details of the relationship with the person who has the interest. Details of other work e.g. GP Federation, time commitment of such external roles, patents, shareholdings/ownership issues and loyalty interests.	Date interest relates From & To		Actions to be taken to manage and mitigate risk

The information submitted will be held by the ICB to comply with the ICB's Constitution, Standards of Business Conduct and Conflicts of Interest Policy and in accordance with the law. This information may be held in both manual and electronic form. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 or other applicable law and, in the case of 'Decision Making Officers' may be published.

I confirm that:

- I have read the ICB's Standard of Business Conduct and Conflicts of Interest Policy;
- The information provided above is complete and correct;
- Any changes to these declarations must be notified to the ICB as soon as practicable and no later than 28 days after the interest arises;
- I am aware that if I do not make full, accurate and timely declarations then such matters may be treated as a breach of the policy; and disciplinary or other action may result

Signed by declarant:

Date:

Signed by recipient:

Date:

Appendix 3: Template meeting minutes

Minutes of the NHS North East London ICB meeting [NAME OF COMMITTEE / SUB-COMMITTEE]

[date of meeting]

Members:	
Eg Jane Smith (JS)	Chair of the X Committee
Attendees:	
Eg Carl Jones (CJ)	XYX practice
Apologies:	

Item No.	Item title	Action
1.0	Welcome, introductions and apologies	
	The chair welcomed all to the meeting and apologies were noted as above.	
1.1	Declaration of conflicts of interest	
	<p><i>The Chair reminded members of their obligation to declare any interest they may have on any issues arising at the meeting which might conflict with the business of the [insert board/committee].</i></p> <p><i>No additional conflicts were declared. [or]</i></p> <p><i>The following update was received at the meeting:</i></p> <ul style="list-style-type: none"> <i>With reference to business to be discussed at this meeting, CJ declared that he is a shareholder in XXX Care Ltd.</i> <p><i>The Chair declared that the meeting is quorate and that CJ would not be included in any discussions on agenda item X due to a direct conflict of interest which could potentially lead to financial gain for CJ.</i></p> <p><i>The Chair and CJ had discussed the conflict of interest, which is recorded on the register of interest, before the meeting and CJ agreed to remove himself from the table and not be involved in the discussion around agenda item X.</i></p>	
1.2	Minutes of the last meeting	
2.0	XX Item relating to the conflict above	
	<i>CJ left the meeting, excluding himself from the discussion regarding xx.</i>	
3.0	AOB	
	Date of Next meeting – XX	

Appendix 4: Gifts, Hospitality and Sponsorship Declaration Form

To only be used in the event that the electronic system is unavailable

Return this form to: nelondonicb.coi@nhs.net

Recipient Name	Position(s)	Date of Offer	Date of Receipt (if applicable)	Details of Gift/Hospitality/ Sponsorship	Estimated Value	Supplier/ Offeror name and nature of business	Details of previous offers or acceptance by this Offeror/ Supplier	Details of the officer reviewing and approving the declaration made and date	Declined or Accepted	Reason for Accepting or Declining	Other Comments

The information submitted will be held by the ICB to comply with the ICB's Constitution, Standards of Business Conduct and Conflicts of Interest Policy and in accordance with the law. This information may be held in both manual and electronic form. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 or other applicable law and, in the case of 'Decision Making Officers' may be published.

I confirm that:

- I have read the ICB's Standard of Business Conduct and Conflicts of Interest Policy;
- The information provided above is complete and correct;
- Any changes to these declarations must be notified to the ICB as soon as practicable and no later than 28 days after the interest arises.
- I am aware that if I do not make full, accurate and timely declarations then such matters may be treated as a breach of the policy, and disciplinary or other action may result

Signed by declarant:

Date:

Signed by recipient:

Date: