

Item: 10

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

**BOARD**  
**30 SEPTEMBER 2025**

<b>Report Title:</b>	<b>ICBP039: Standards of Business Conduct and Declarations of Interest Policy</b>
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**Purpose of report**

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

**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 was revised with minor changes as follows:

- The procurement proforma (appendix E), which is no longer in use, was removed (pages 31, 47-48).
- References to the North of England Commissioning Service Unit were deleted following the transfer of procurement colleagues in-house (pages 1 and 32).
- Relevant procurement guidance was added (page 36).
- Appendix references were adjusted to reflect the removal of appendix E.

**Risks and issues**

There is a risk that in the absence of this policy 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 and supporting documentation**

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

Recommendation/action required						
The Board is asked to approve the updated Standards of Business Conduct and Declarations of Interest Policy.						
Acronyms and abbreviations explained						
DOI – Declarations of Interest COI – Conflicts of Interest MoU – Memorandum of Understanding HINENC – Health Innovation North East and North Cumbria						
<b>Sponsor/approving executive director</b>	Claire Riley, Chief Corporate Services Officer					
<b>Approved by</b>	Deb Cornell, Director of Corporate Governance and Board Secretary					
<b>Report author</b>	Kate Sutherland, Corporate Governance Manager Toni Taylor, Board and Legal Services Officer					
Link to ICP strategy priorities						
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						
<b>Any potential/actual conflicts of interest associated with the paper?</b>	Yes		No	✓	N/A	
<b>Equality analysis completed</b>	Yes		No		N/A	✓
<b>If there is an expected impact on patient outcomes and/or experience, has a quality impact assessment been undertaken?</b>	Yes		No		N/A	✓
Key considerations						
<b>Financial implications and considerations</b>	None identified					
<b>Digital implications</b>	None identified					
<b>Clinical involvement</b>	None identified					
<b>Health inequalities</b>	None identified					
<b>Patient and public involvement</b>	None identified					
<b>Partner and/or other stakeholder engagement</b>	None identified					
<b>Other resources</b>	None identified					