

Integrated Care Board

Date of meeting	15 January 2025
Title of paper	Annual Review and publication of Conflicts of Interest Registers
Presented by	Debra Atkinson, Company Secretary/Director of Corporate Governance
Author	Debra Atkinson, Company Secretary/Director of Corporate Governance Claire Moore, Head of Risk, Assurance and Delivery
Agenda item	18
Confidential	No

Executive summary

The purpose of this report is to provide the board with the annual review and publication of the ICB's registers of interests including gifts, hospitality and commercial sponsorship and the register of procurement decisions, which are published on the ICB's website: [LSC Integrated Care Board :: Lists and registers \(icb.nhs.uk\)](https://www.lsc.nhs.uk/lists-and-registers).

The report provides an overview of the activity undertaken since the last report to the board in March 2024 including key updates to the ICB's policies and procedures to ensure the statutory requirements for managing Conflicts of Interest (including gifts and hospitality) are met.

Also included within the report is an update on the ICB's arrangements for staff training in relation to the NHS England's (NHSE) online training modules for Managing Conflicts of Interests for ICB staff. As previously reported, Module 1 became mandatory for all ICB staff on 1 April 2024 as part of the ICB's core mandatory training requirements.

NHSE is currently working to release Modules 2 (for decision making staff) and Module 3 (for ICB chairs). Once released, any further updates to the ICB's policy requirements for mandatory training will be implemented.

Recommendations

The Board is requested to:

- **Note** the contents of the report
- **Approve** the annual review and publication of the ICB's registers of interests
- **Note** the improving position on staff compliance rates with training module 1
- **Note** the release and implementation of training modules 2 and 3 once released

Which Strategic Objective/s does the report contribute to		Tick
1	Improve quality, including safety, clinical outcomes, and patient experience	✓
2	To equalise opportunities and clinical outcomes across the area	✓
3	Make working in Lancashire and South Cumbria an attractive and desirable option for existing and potential employees	✓
4	Meet financial targets and deliver improved productivity	✓
5	Meet national and locally determined performance standards and targets	✓
6	To develop and implement ambitious, deliverable strategies	✓

Implications				
	Yes	No	N/A	Comments
Associated risks			N/A	
Are associated risks detailed on the ICB Risk Register?			N/A	
Financial Implications			N/A	

Where paper has been discussed (list other committees/forums that have discussed this paper)		
Meeting	Date	Outcomes
Audit Committee	26 September 2024	Noted the contents of the report and received assurance on the systems and processes for the management of conflicts of interests.

Conflicts of interest associated with this report
N/A

Impact assessments				
	Yes	No	N/A	Comments
Quality impact assessment completed			N/A	
Equality impact assessment completed			N/A	
Data privacy impact assessment completed			N/A	

Report authorised by:	Debra Atkinson Director of Corporate Governance
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Integrated Care Board – 15 January 2025

ICB Managing Conflicts of Interest (including gifts and hospitality) Annual Review of ICB Registers

1. Introduction

- 1.1 The purpose of this report is to present the Board with the annual review of the ICB's registers of interests including gifts and hospitality, commercial sponsorship and register of procurement decisions (over £20k) which are published on the ICB's website.
- 1.2 The report provides an overview of the activity undertaken during the reporting period to ensure the ICB's systems and processes are effective and, the statutory requirements for managing conflicts of interest are met.
- 1.3 Also provided is an update on compliance against the NHS England's (NHSE) Conflicts of Interest training module 1 (for all ICB staff), and information on the expected release and implementation of a further two training modules in the new year.

2. Background

- 2.1 Following the publication of NHSE's updated national guidance¹ in September 2024, the ICB's policy for Managing Conflicts of Interest (including gifts and hospitality) was updated and approved by the board at its meeting in November 2024.
- 2.2 The board also noted the work undertaken to develop the ICB's new Contracting and Procurement Policy which has now been approved. This includes the principles for managing conflicts of interest in relation to procurement as set out in the Provider Selection Regime statutory guidance².
- 2.3 In accordance with the above policies, the ICB holds registers of interests declared for all staff; the following registers are made available via the ICB's website:
 - Registers of interests for members of the board and its committees and those defined in the policy as "decision makers".
 - Registers of Gifts, Hospitality and Commercial Sponsorship.

¹ [NHS England » Managing conflicts of interest in the NHS](#)

² [NHS England » The Provider Selection Regime \(PSR\) statutory guidance](#)

- Register of Procurement Decisions (over £20k).

3. Registers of Interests for the Board, Committee and Decision Makers

- 3.1 The ICB's Audit Committee receives bi-annual assurance reports that the systems and processes for the management of conflicts of interests (including gifts and hospitality) are in place and operating effectively.
- 3.2 Registers of interests for members of the board and its committees are also circulated as part of the meeting agenda and papers with the full combined register published on the ICB website. [LSC Integrated Care Board Register of Interests Decision Makers \(combined\)](#).

4. Register of Gifts, Hospitality and Commercial Sponsorship

- 4.1 The ICB's register of gifts, hospitality and commercial sponsorship is reviewed bi-annually by the ICB's Audit Committee. This includes a report of any new entries to the register to provide assurance that any gifts or hospitality are accepted (or declared and declined) in accordance with the ICB's policy.
- 4.2 The register is updated and re-published on the ICB's website following any new entries made.

[LSC Integrated Care Board registers of gifts and hospitality](#)

5. Register of Procurement Decisions (Over £20k)

- 5.1 The ICB's register of procurement decisions (over £20k) is presented to each meeting of the ICB's Audit Committee and re-published as required on the ICB's website:

[LSC Integrated Care Board Register of Procurement Decisions over £20k](#)

6. Annual Review and compliance against requirements

- 6.1 The corporate team maintains and holds oversight for the ICB's systems and processes for managing conflicts of interests. This includes the provision of advice and guidance on all matters concerning compliance with the ICB's policy including providing support where required on individual declarations of interests including the acceptance of gifts or hospitality.
- 6.2 To further support staff and raise awareness of the requirements, a dedicated staff intranet page has been developed. This provides step-by-step guidance for staff on when/how to report any changes to declarations as well as other information in relation to gifts and hospitality.

- 6.3 There are a total of 188 staff whose interests are required to be held on the published registers. These include members of the board, its committees and those defined as decision makers as set out in the ICB's policy.
- 6.4 Of those interests held (at the time of reporting) 92% have been reviewed by the relevant individuals within the last 12 months. The remaining 8% (16 staff) whose interests require annual review have been directly contacted by a member of the corporate team to offer support in providing their updated declarations.

7. NHS England Conflicts of Interest Training

- 7.1 NHSE's online training module (level 1) became mandatory training for all ICB staff on 1 April 2024 as part of the ICB's mandatory training requirements.
- 7.2 Using information drawn from the ICB's ESR system, the current compliance rates for module 1 is reporting a steadily improving position since the update presented to Audit Committee in September 2024 from 59.1% to 75%.
- 7.3 Whilst all staff receive automated reminders through the ESR system when mandatory training becomes due, the improved position in compliance rates follows additional communications provided through the staff newsletters, staff briefings and information provided via the dedicated intranet page.
- 7.4 NHSE are also currently working on releasing a further two e-learning modules early in the new year (no date confirmed as yet). Module 2 is designed to guide and support staff managing conflicts of interest throughout the commissioning cycle and is recommended for those involved in decision making roles, or those who have influence in decision making.
- 7.5 Module 3 has been designed to support ICB chairs, both those already established in their role as a refresher, and to support new chairs as part of their induction process. The aim of the module is to support chairs deliver their responsibilities across their broader system leadership role and, discharge their duties in ensuring effective ICB corporate governance and the specific functions exercised under legislation and guidance are complied with.
- 7.6 Once released, any further updates to the ICB's policy requirements for mandatory training will be implemented.

8. Recommendations

- 8.1 The Board is requested to:
- **Note** the contents of the report
 - **Approve** the annual review and publication of the ICB's registers of interests.
 - **Note** the improving position on staff compliance rates with module 1.
 - **Note** the release and implementation of training modules 2 and 3 once released.