



Norfolk and Suffolk
Integrated Care Board

NHS Norfolk and Suffolk Integrated Care Board

Standards of Business Conduct and Conflicts of Interest Policy



1. Version Control

Version	Date	Author and Role	Detail of Change
0.1	01/04/2026	Agnes Earl, Corporate Governance and Risk Management Officer	Initial draft
1.0	05/05/2026	Audit and Risk Committee	Approved

Policy Owner: Tom McColgan, Corporate Governance Manager

Responsible Committee: Audit and Risk Committee

2. Next Review Date

The date this policy is due for review is: 31 March 2028

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4. Statement of Overarching Principles

4.1 All Policies, Procedures, Guidelines and Protocols of the Norfolk and Suffolk Integrated Care Board (ICB) are formulated to comply with the overarching requirements of legislation, policies or other standards relating to equality and diversity

5. Introduction

5.1 Integrated Care Boards must ensure that public confidence in their integrity is not harmed in any way by maintaining high standards of conduct at all times. This policy reinforces national guidance relating to the conduct of business within Norfolk and Suffolk Integrated Care Board and underpins the ICBs Constitution, Standing Financial Instructions and relevant national legislation.

6. Purpose

6.1 The purpose of this policy is to ensure that all staff understand their responsibilities in relation to business conduct and the management of conflicts of interest within the ICB.

7. Scope

7.1 This policy applies to all employees of the ICB when working within the ICB and whilst on ICB business.

8. Cross Reference to Other Policies

8.1 This policy should be read in conjunction with:

- I. The ICBs Constitution and Standing Financial Instructions (SFI's)
- II. Managing Conflicts of Interest: Revised Statutory Guidance – NHS England: 2017
- III. ICB Procurement Policy
- IV. Whistleblowing Policy
- V. Counter Fraud and Anti-Corruption Policy
- VI. Anti-Bribery Policy
- VII. Intellectual Property Policy
- VIII. Code of Conduct for NHS Managers
- IX. Professional Codes of Conduct

- X. Standards of Business Conduct for NHS Staff
- XI. Commercial Sponsorship – Ethical Standards for the NHS
- XII. Association of British Pharmaceutical Industries Code of Practice
- XIII. Chartered Institute of Purchasing and Supply Ethical Code
- XIV. Guidelines for the Download & Use of Images from the Internet

9. Policy Details

9.1 Definition of an interest

A conflict of interest occurs where an individual's ability to exercise judgement, or act in a role is, could be, or is seen to be impaired or otherwise influenced by his or her involvement in another role or relationship. In some circumstances, it could be reasonably considered that a conflict exists even when there is no actual conflict. In these cases it is important to still manage these perceived conflicts in order to maintain public trust.

Conflicts of interest can arise in many situations, environments and forms of commissioning, as members of the ICB may find themselves in a position of being at once commissioner and provider of services. Conflicts of interest can arise throughout the whole commissioning cycle from needs assessment, to procurement exercises, to contract monitoring.

Interests can be described within four different categories:

9.2 Financial interests: This is where an individual may get direct financial benefits from the consequences of a commissioning decision. This could, for example, include being:

- 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
- 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

This could also include an individual being:

- In secondary employment
- In receipt of secondary income from a provider
- 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

- 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).

9.3 Non-financial professional interests: 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:

- An advocate for a particular group of patients
- A GP with special interests e.g., in dermatology, acupuncture etc.
- A member of a particular specialist professional body (although routine GP membership of the 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)
- A medical researcher

9.4 Non-financial personal interests: 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:

- A voluntary sector champion for a provider
- A volunteer for a provider
- 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

9.5 Indirect interests: 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:

- Spouse / partner
- Close relative e.g., parent, grandparent, child, grandchild or sibling
- Close friend
- Business partner
- A declaration of interest for a “business partner” in a GP partnership should include all relevant collective interests of the partnership, and all interests of their fellow GP partners.
- Whether an interest held by another person gives rise to a conflict of interests will depend upon the nature of the relationship between that person and the individual, and the role of the individual within the ICB.

9.6 Hospitality

When accepting hospitality during the course of business, it should be justified and appropriate and in line with what ICB staff, Board and committee members and individuals might reasonably provide to employees. Individuals should also be able to demonstrate that the acceptance or provision of hospitality would benefit the ICB or NHS more widely.

Modest hospitality provided in normal and reasonable circumstances may be acceptable, although it should be on a similar scale to that which the ICB might offer in similar circumstances (e.g., tea, coffee, light refreshments at meetings). A common-sense approach should be adopted as to whether hospitality offered is modest or not. Hospitality of this nature does not need to be declared for inclusion in the register of gifts and hospitality, nor recorded on the register, unless it is offered by suppliers or contractors linked (currently or prospectively) to the ICB's business in which case all such offers (whether or not accepted) should be declared and recorded.

There is a presumption that offers of hospitality which go beyond modest or of a type that the ICB might offer, should be politely refused. A non-exhaustive list of examples includes:

- Hospitality of a value above £25
- Offers of foreign travel and accommodation.

There may be some limited and exceptional circumstances where accepting the types of hospitality referred to in this paragraph may be contemplated. Express prior approval must be sought from the line manager before accepting such offers, and the reasons for acceptance must be recorded in the ICBs register of gifts and hospitality. Hospitality of this nature must be declared to the Executive Director of People, Governance and Corporate Services recorded on the register, whether accepted or not. In addition, particular caution should be exercised where hospitality is offered by suppliers or contractors linked (currently or prospectively) to the ICB's business. Offers of this nature can be accepted if they are modest and reasonable but advice should always be sought from the line manager and Executive Director of People, Governance and Corporate Services. All offers of hospitality from actual or prospective suppliers or contractors (whether or not accepted) should be declared and recorded.

In cases where such hospitality is accepted and exceeds the value of £25, staff must record the hospitality in the Hospitality, Gifts and Sponsorship Register held by the Executive Director of People, Governance and Corporate Services. Hospitality between £25 and £75 can be accepted but must be declared and hospitality over £75 should be refused unless senior approval is given.

Expenditure on or the acceptance of hospitality or entertainment should be considered in the light of the Bribery Act 2010 and the ICB Anti-Bribery Policy that provides further guidance. If there is any doubt about the acceptable level of hospitality, staff should seek advice from their line manager or the Executive Director of People, Governance and Corporate Services.

9.7 Commercial Sponsorship

ICB staff, Board and committee members may be offered commercial sponsorship for courses, conferences, post/project funding, meetings and publications in connection with the activities which they carry out for or on behalf of the ICB. All such offers (whether accepted or declined) must be declared so that they can be included on the ICBs register of interests, and the Executive Director of People, Governance and Corporate Services will provide advice on whether or not it would be appropriate to accept any such offers. If offers are reasonably justifiable and otherwise in accordance with the NHS England statutory guidance, then they may be accepted.

Notwithstanding the above, 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. Sponsors should not have any influence over the content of an event, meeting, seminar, publication or training event. The ICB should not endorse individual companies or their products. It should be made clear that the fact of sponsorship does not mean that the ICB endorses a company's products or services. During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection legislation. Furthermore, 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.

Where commercial sponsorship or collaborative partnerships involve a pharmaceutical company then the proposed arrangements must comply fully with the Medicines (Advertising) Regulations 1994 (Regulation 21 "Inducements and Hospitality") attached as **Appendix 1**

9.8 Gifts

Under the Bribery Act 2010, it is an offence for staff to corruptly accept any gifts or consideration as an inducement or reward for:

- Doing, or refraining from doing, anything in their official capacity; or
- Showing favour or disfavour to any person in their official capacity.

A 'gift' is defined as any item cash or goods or any service, which is provided for personal benefit, free of charge or at less than its commercial value.

All gifts of any nature offered to ICB staff, Governing Body and committee members and individuals within GP member practices by suppliers or contractors linked (currently or prospectively) to the ICB's business should be declined, whatever their value. The person to whom the gifts were offered must also declare the offer to the Executive Director of People, Governance and Corporate Services via the online form who has designated responsibility for maintaining the register of gifts and hospitality so the offer which has been declined can be recorded on the register.

Gifts offered from other sources should also be declined if accepting them might give rise to perceptions of bias or favouritism, and a common-sense approach should be adopted as to whether or not this is the case. The only exceptions to the presumption to decline gifts relates to items of little financial value (less than £6) such as diaries, calendars, stationery and other gifts acquired from meetings, events or conferences and items such as flowers and small tokens of appreciation from members of the public to staff for work well done. Gifts of this nature do not need to be declared, nor recorded on the register.

Any personal gift of cash or cash equivalents (e.g. vouchers, tokens, offers of remuneration to attend meetings whilst in a capacity working for or representing the ICB) must always be declined, whatever their value and whatever their source and the offer which has been declined must be and recorded on the register.

9.9 Register of Gifts and Hospitality

The ICB has a Gifts and Hospitality online form to be completed when declaring gifts and hospitality available on the [Conflicts of Interest Intranet page](#). All hospitality or gifts declared will be transferred to the ICBs register of gifts and hospitality. This includes any gifts and hospitality declared in meetings.

The ICB publishes the register of gifts and hospitality on its website.

9.10 Declaration and Recording of Conflicts of Interest

Whilst the off-duty hours of staff are their own concern, they should ensure that they do not put themselves in a position where their private interests conflict with their job.

The Executive Director of People, Governance and Corporate Services will maintain registers of the interests of:

- The Members of its Board available on the ICB's website.
- The Members of its committees or sub-committees and the committees or sub-committees of its Board maintained by the committee secretariat.

- Its Employees maintained through the NHS Electronic Staff Record system. Details of how staff can submit an interest can be found in the ESR Declarations of Interest Guide attached as **Appendix 2**.

The Executive Director of People, Governance and Corporate Services on behalf of the Chief Executive will ensure that the registers of interests are reviewed regularly and updated as necessary. **Staff with budgetary and/or decision-making responsibilities at a level of £5000 and above will be required to make a statutory declaration** upon appointment and twice each year, in April and October and on the prescribed declaration form on ESR provided by the Executive Director of People, Governance and Corporate Services.

All attendees are required to declare their interests as a standing agenda item for every Board, committee, or group meeting, before the item is discussed. Even if an interest has been recorded in the register of interests, it should still be declared in meetings where matters relating to that interest are discussed. Declarations of interest will be recorded in minutes of meetings. The minutes will also record any action taken by the Chair to manage potential or actual conflicts of interest.

Outside of the prescribed declaration rounds in April and October each year, individuals will declare any interest that they have, in relation to a decision to be made in the exercise of the commissioning functions of the ICB as soon as they are aware of it and in any event no later than 28 days after becoming aware.

Where an individual is unable to provide a declaration in writing, for example, if a conflict becomes apparent during a meeting, they will make an oral declaration immediately and provide a written declaration, on the prescribed form, as soon as possible thereafter.

Whenever an individual's role, responsibility or circumstances change in a way that affects their interests (e.g., where an individual takes on a new role outside the ICB or enters into a new business or relationship), a further declaration should be made to reflect the change in circumstances as soon as possible, and in any event within 28 days. This could involve a conflict of interest ceasing to exist or a new one materialising. It is the individual's responsibility to make a further declaration as soon as possible rather than waiting to be asked.

Staff must declare any interest that they, their immediate family, partner or close associate may have in a contract, or other similar matter under consideration by the ICB. A declaration should be made to the Executive Director of People, Governance and Corporate Services as soon as the interest is known and at any meeting where this association may compromise the outcome.

Similarly, staff must also declare to the Executive Director of People, Governance and Corporate Services any shareholding that they, or their immediate family, partner or close associate may have in a company that may provide products or services to the ICB as soon as it is known and at any meeting where this association may compromise the outcome.

Staff must declare an interest if there is an item on an agenda where there is potential for either a pecuniary or non-pecuniary advantage to that staff member. At the discretion of the Chair, the member of staff may need to leave the room for that agenda item and have no input into the decision-making process around that issue.

It is essential that all employees notify their line manager if they work elsewhere or take up further work whilst on the staff of the ICB who will then be responsible for judging whether there may be a potential conflict of interest or whether it may be detrimental to their NHS work.

9.11 Managing Breaches

It is the duty of every ICB employee, Board member, committee or sub-committee member to speak up about genuine concerns in relation to the administration of this policy and to report these concerns. These individuals should not ignore their suspicions or investigate themselves, but rather speak to the Executive Director of People, Governance and Corporate Services at the earliest opportunity.

Any non-compliance with this policy should be reported immediately to the Executive Director of People, Governance and Corporate Services (who will report the matter to the Conflicts of Interest Guardian) or in accordance with the terms of the ICB's whistleblowing policy (where the breach is being reported by an employee or worker of the ICB) or with the whistleblowing policy of the relevant employer organisation (where the breach is being reported by an employee or worker of another organisation).

Investigations into reported or suspected breaches of this policy will be undertaken by the Executive Director of People, Governance and Corporate Services or a person designated to undertake the investigation on her/his behalf.

The Conflicts of Interest Guardian will be fully briefed whenever a breach of the policy is reported or suspected and will oversee the investigatory process, providing advice as necessary.

Where a breach is found to be material and substantiated, the matter will then be managed in accordance with the ICBs disciplinary policy with appropriate action taken thereafter. This may also include criminal or professional regulatory implications.

Where a breach is found to be material and substantiated, NHS England will be notified and anonymised details of the breach will be published on the ICBs web site for the purpose of openness, transparency, learning and development.

9.12 Decision making when a member is conflicted

When a member of the meeting (including the chair) has a conflict of interest in relation to one or more items of business to be transacted at the meeting, the chair (or remaining non-conflicted members where relevant as described above) must decide how to manage the conflict. The

appropriate course of action will depend on the particular circumstances, but could include one or more of the following:

- Where the chair has a conflict of interest, deciding that another non-conflicted member of the meeting should chair all or part of the meeting
- Requiring the individual who has a conflict of interest (including the chair if necessary) not to attend the meeting
- Ensuring that the individual concerned does not receive the supporting papers or minutes of the meeting which relate to the matter(s) which give rise to the conflict
- Requiring the individual to leave the discussion when the relevant matter(s) are being discussed and when any decisions are being taken in relation to those matter(s). In private meetings, this could include requiring the individual to leave the room and in public meetings to either leave the room or join the audience in the public gallery
- Allowing the individual to participate in some or all of the discussion when the relevant matter(s) are being discussed but requiring them to leave the meeting when any decisions are being taken in relation to those matter(s). This may be appropriate where, for example, the conflicted individual has important relevant knowledge and experience of the matter(s) under discussion, which it would be of benefit for the meeting to hear, but this will depend on the nature and extent of the interest which has been declared
- Noting the interest and ensuring that all attendees are aware of the nature and extent of the interest but allowing the individual to remain and participate in both the discussion and in any decisions. This is only likely to be the appropriate course of action where it is decided that the interest which has been declared, is either immaterial or not relevant to the matter(s) under discussion.

9.13 Conflicts of Interest Guardian and Management Support

To further strengthen scrutiny and transparency in the decision-making processes, the ICB has a Conflicts of Interest Guardian, a role undertaken by the ICB Audit Committee Chair.

The Conflicts of Interest Guardian is supported by the Executive Director of People, Governance and Corporate Services who has responsibility for the day-to-day management of conflicts of interest matters and queries and for keeping the Guardian well briefed on conflicts of interest matters and issues arising.

The Conflicts of Interest Guardian in collaboration with the Executive Director of People, Governance and Corporate Services:

- Act as a conduit for staff, members of the public and healthcare professionals who have any concerns with regards to conflicts of interest
- Provides a safe point of contact for employees or workers of the ICB to raise any concerns in relation to this policy

- Support the rigorous application of conflict-of-interest principles and policies
- Provide independent advice and judgment where there is any doubt about how to apply conflicts of interest policies and principles in an individual situation
- Provide advice on minimising the risks of conflicts of interest

Whilst the Conflicts of Interest Guardian has an important role within the management of conflicts of interest, executive members of the ICB Board have an on-going responsibility for ensuring the robust management of conflicts of interest, and all ICB employees, Board and committee members have individual responsibility in playing their part on an ongoing and daily basis.

9.14 Mandatory Training

It is a requirement for all ICB employees, Board and committee members with involvement in ICB business to complete mandatory on-line conflicts of interest training provided by NHS England. The Human Resources Department will maintain a record of ICB staff training.

9.15 Register of Procurement Decisions

To further enhance transparency and openness, the ICB maintains a Register of Procurement Decisions taken, either for the procurement of a new service or any extension or material variation of current contracts. The register includes:

- The details of the decision
- Who was involved in making the decision (including the name of the ICB clinical lead, the ICB contract manager, the name of the decision making committee and the name of any other individuals with decision-making responsibility)
- A summary of any conflicts of interest in relation to the decision and how this was managed by the ICB
- The award decision taken

The register of procurement decisions is updated whenever a procurement decision is taken and is made publicly available and easily accessible to patients and the public by:

- Publishing the register in a prominent place on the ICB's website
- Making the register available upon request for inspection at the ICBs headquarters

9.16 Intellectual Property

From time to time during the normal course of employment a member of staff may generate intellectual property that could have value in delivering better patient services. Intellectual property (patents, copyright, design rules, trademarks, know how) which arise in, or could reasonably be

expected to arise from, the course of duties of a member of staff, belong to the ICB unless an existing contract with an external sponsor overrules this.

The ICB policy is to encourage and enable a member of staff to participate in the generation of intellectual property as part of its commitment to delivering the best possible patient care. However, a balance needs to be achieved between the legitimate needs of the ICB to protect its interests and the provision of a creative environment for staff.

The following paragraph will be included in all new contracts with staff:

“You must disclose any matter developed as part of your normal duties and capable of being patented. While the patent will belong to the ICB you will be able to benefit from it as defined in the Patents Act 1977. You are under a contractual obligation to do all in your power to claim and defend patent rights and the ICB will pay all costs involved. Where the ICB does not wish to apply for a patent, you may request permission to do so at your own cost. Should the ICB refuse on grounds of confidentiality you may seek compensation under the provisions of the Patents Act.”

In spite of statutory provision whereby the copyright in any work produced by an employee in the course of employment belongs to the employer, the ICB normally reassigns ownership of copyright in any work to be published to the author and will waive any claim they may have to benefits arising from publication, with the exception of the following which will always belong to the ICB:

- Copyright of training materials produced in the course of employment for the ICB that are produced, used or disseminated within the organisation.
- Copyright in any software programme generated during the normal course of employment.
- Copyright in any designs, specification or other works that may be necessary to protect rights in commercially exploitable intellectual property.

No steps should be taken, including the establishment of companies, to exploit any ICB intellectual property without the specific approval of the Board. Staff are required to co-operate with the ICB with regard to identifying and developing intellectual property that may be exploitable.

The use of images downloaded from the internet on a website or in a presentation or publication could mean breaking copyright law. Many organisations, including ICBs, are now inadvertently falling foul of the law in the use of copyright images and are being fined. The pursuit of organisations for unauthorised use of images is becoming more prevalent and the ICBs guidelines document provides background to copyright law and details of how to use images legally and find free images that are available for public use.

9.17 Roles and Responsibilities

It is the responsibility of the ICB to ensure that this policy is brought to the attention of all staff and those who might attend committees and other groups of the ICB.

It is also the responsibility of the ICB to ensure that the mechanisms are in place for effective policy implementation.

It is the responsibility of all staff to ensure that they are familiar with this policy and their responsibilities within it. In summary staff will:

- Ensure that the interest of patients' remains paramount at all times.
- Be impartial and honest in the conduct of official business.
- Use public funds entrusted to them to the best advantage of the service, always ensuring best value for money.
- Not abuse their position for personal gain or to benefit family or friends.
- Not seek to advantage or further private business or other interests in the course of their official duties.

Failure by staff to comply with this policy may lead to disciplinary action that in certain circumstances could include dismissal. It may also be reported to the ICBs' Local Counter Fraud Specialist for investigation and may lead to a criminal prosecution being commenced.

10. Equality Statement

10.1 This Policy will operate alongside the ICBs Equal Opportunities, Diversity at Work Policy, and Equality Delivery System. The ICB values the diversity of its employees, volunteers and people who are entitled to our services, irrespective of their race, disability, age, gender including sexual orientation, religion or belief, status, or grade.

10.2 The ICB assures employees, volunteers and people entitled to our services are treated fairly, equally and with respect and dignity. The ICB will challenge discriminatory attitudes and provide rules and standards of behaviour.

10.3 The use of this Policy will not discriminate directly or indirectly on the grounds of race, gender, sexual orientation, ethnic or national origin, religion, culture, disability, age, membership of a trade union or staff organisation or political affiliation.

10.4 The ICB will monitor the use of this Policy, as far as it is able, and take action if it appears that it has a disproportionate effect.

Standards of Business Conduct and Conflict of Interest Policy - **Appendix 1**

Extract from the Medicines (advertising) Regulations 1994

Inducements and Hospitality

Staff and independent contractors working in the NHS should follow existing codes of conduct. Staff who are not covered by such a code are expected to:

- Act impartially in all their work.
- Refuse gifts, benefits, hospitality or sponsorship of any kind which might reasonably be seen to compromise their personal judgement or integrity, and to avoid seeking exert influence to obtain preferential consideration. All such gifts should be returned and hospitality refused.
- Declare and record financial or personal interest (e.g. company shares, research grant) in any organisation with which they have to deal, and be prepared to withdraw from those dealings if required, thereby ensuring that their professional judgement is not influenced by such considerations.
- Not misuse their official position or information acquired in the course of their official duties, to further their private interests or those of others.
- Ensure professional registration (if applicable) and/or status are not used in the promotion of commercial products or services.
- Beware of bias generated through sponsorship, where this might impinge on professional judgement and impartiality.

Any person who contravenes regulation 21(1) is guilty of an offence, and liable, on summary conviction to a fine not exceeding £5,000, and on conviction on indictment to a fine, or to imprisonment for a term not exceeding two years, or both. Anyone contravening regulation 21(5) is also guilty of an offence and liable, on summary conviction to a fine not exceeding £5000'. The MCA Guidelines on Promotion and Advertising set out the standards to be followed.

Declarations of Interest

ESR Process

Declarations of Interest

A Declaration of Interest (DOI) is a way for staff to be open and transparent about any personal, financial, or professional interests that might influence, or appear to influence their decision making in the NHS.

Declaring an interest isn't meant to discourage from outside activities; we recognise and value the diverse experiences that staff bring to the NHS. Declaring simply ensures that any potential conflicts are managed responsibly.

Your line manager should be made aware of any declarations before you submit. DOIs are required annually from all staff.

Declarations will now be submitted on ESR, this guide will show you how to do this.

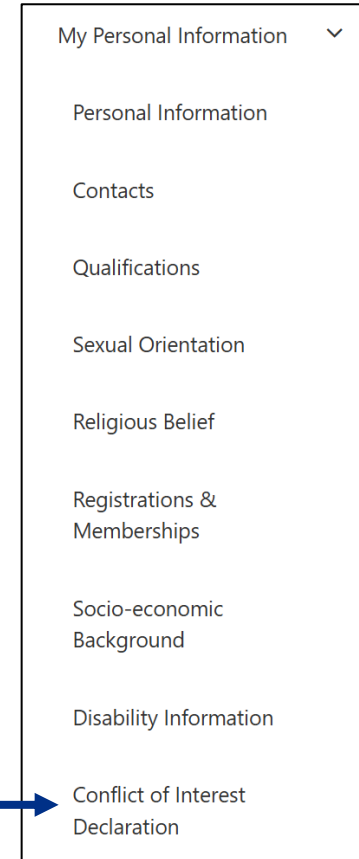
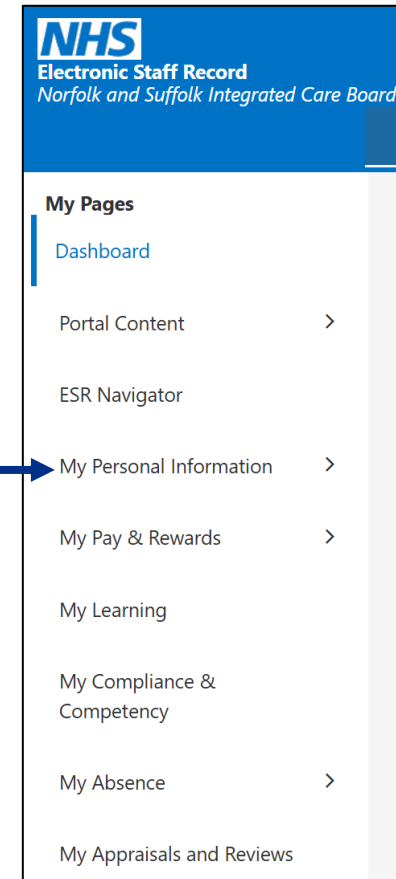
ESR

Log in to ESR as normal

Navigate to the lefthand side menu and select **My Personal Information**

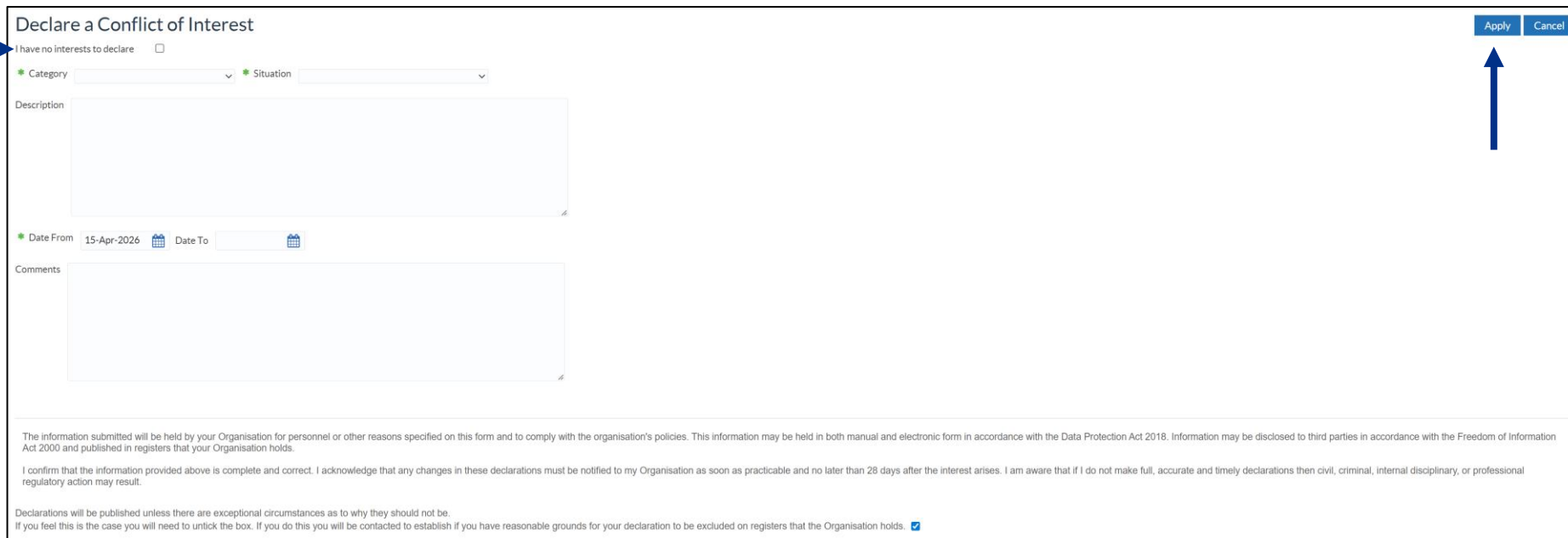
This opens a drop down menu, from here select **Conflict of Interest Declaration**

The Conflicts of Interest Declarations page will open, to add your declaration click the box on the righthand side **Add Declaration**



No interest to declare

If you have no interests to declare tick the first box at the top and then select **Apply**



The screenshot shows a web form titled "Declare a Conflict of Interest". At the top left, a blue arrow points to the checkbox "I have no interests to declare". At the top right, another blue arrow points to the "Apply" button. The form contains several input fields: "Category" and "Situation" (both dropdown menus), a "Description" text area, "Date From" (set to 15-Apr-2026) and "Date To" (calendar icons), and a "Comments" text area. At the bottom, there is a disclaimer and a confirmation statement with a checked checkbox.

Declare a Conflict of Interest

I have no interests to declare

Category Situation

Description

Date From 15-Apr-2026 Date To

Comments

The information submitted will be held by your Organisation for personnel or other reasons specified on this form and to comply with the organisation's policies. This information may be held in both manual and electronic form in accordance with the Data Protection Act 2018. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and published in registers that your Organisation holds.

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to my Organisation 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 civil, criminal, internal disciplinary, or professional regulatory action may result.

Declarations will be published unless there are exceptional circumstances as to why they should not be.
If you feel this is the case you will need to untick the box. If you do this you will be contacted to establish if you have reasonable grounds for your declaration to be excluded on registers that the Organisation holds.

Apply Cancel

Declaring an Interest

Interest type descriptions can be found on **slide 7**, further information about interests can be found in the Standards of Business Conduct and Conflicts of Interest Policy

To declare an interest select from the **Category** and **Situation** drop downs

Add a description with the details, including the organisation of the interest (if applicable)

Complete the date from and to and select **Apply**

Declare a Conflict of Interest

I have no interests to declare

Category Situation

Description

Date From 15-Apr-2026 Date To

Comments

The information submitted will be held by your Organisation for personnel or other reasons specified on this form and to comply with the organisation's policies. This information may be held in both manual and electronic form in accordance with the Data Protection Act 2018. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and published in registers that your Organisation holds.

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations must be notified to my Organisation 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 civil, criminal, internal disciplinary, or professional regulatory action may result.

Declarations will be published unless there are exceptional circumstances as to why they should not be. If you feel this is the case you will need to untick the box. If you do this you will be contacted to establish if you have reasonable grounds for your declaration to be excluded on registers that the Organisation holds.

Declaring an Interest

If you have more than one declaration you will need to submit a new form for each one.

Once you have submitted either your declaration(s) or confirmation of no declaration they will display on your Conflicts of Interest page.

To edit an existing declaration select the pencil icon.



Conflict of Interest Declarations

Employee Summary

Employee Name Position
Assignment

...

Add Declaration

Category	Situation	From Date	To Date	Date Submitted/Last Updated	Manager Actions	Update	Delete
I have no interests to declare		15-Apr-2026		15-Apr-2026	N		

Interest Types

Interest Type	Description	Examples
Financial interests	This is where an individual may get direct financial benefits from the consequences of a commissioning decision.	<ul style="list-style-type: none">• In secondary employment• In receipt of secondary income from a provider• A management consultant for a provider
Non-financial professional interests	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.	<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.
Non-financial personal interests	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.	<ul style="list-style-type: none">• A voluntary sector champion for a provider• Suffering from a particular condition requiring individually funded treatment
Indirect interests	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)	<ul style="list-style-type: none">• Spouse / partner• Close relative e.g., parent, grandparent, child, grandchild or sibling• Close friend

Further Information

For further information about Conflicts of Interest please visit the [Conflicts of Interest Intranet page](#).

For any queries please contact the Corporate Governance Team at nwicb.corporateaffairs@nhs.net



Norfolk and Suffolk
Integrated Care Board

Gifts and Hospitality Guide

Contents

This guide is to help you navigate the gifts and hospitality process. Read through the slides or click below for specific topics.

If you have any queries, please contact the Corporate Governance Manager Tom.mccolgan@nhs.net

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What is a gift or hospitality?

Gift

Any item of cash or goods, or any service which is provided for personal benefit, free of charge or at less than its commercial value.

Hospitality

Meals/drinks/visits/entertainment/lecture courses organised by potential suppliers. It must only be accepted when there is legitimate reason, must be proportionate to the nature and purpose of the event and must be recorded.

What can I accept?

Meals and refreshments:

- Under £25 may be accepted and need not be declared.
- £25 - £75 may be accepted but must be declared.

Travel and accommodation:

Modest offers to pay for some travel and accommodation costs related to attendance may be accepted and must be declared.

Low cost branded promotional aids e.g. pens and keyrings under £6.

Modest gifts under £25 from non-suppliers, and non-contractors.

What can't I accept?

Gifts from suppliers or contractors doing business with the ICB (or likely to) whatever the value

Cash and vouchers

Meals and refreshments:

Over £75 must be refused (unless exceptional and senior approval is given – reason for approval must be recorded on the register)

Travel and accommodation:

If it's beyond modest and not normal for the ICB, it should only be accepted in exceptional circumstances and must be declared with a clear reason recorded on the register – for example business or first-class travel, foreign travel and accommodation.

Offer of Gift or hospitality

What to do if I am offered a gift or hospitality:

Within no later than 28 days you must complete a which will be sent to the Corporate Governance Team.

[Norfolk and Suffolk ICB Gift and Hospitality Form – Fill in form](#)

How do I refuse a gift?

Politely refuse, explaining the policy and advise the donor that, if they wish, they are welcome to contribute to a charitable cause instead.

Gifts and Hospitality Register

- The information from your form is included in the master register.
- The master register must be published on the ICB's website and in the Annual Report and Accounts.
- You can ask that your information is not published.
- The ICB must report quarterly on its management of interests, gifts and hospitality and this information will be shared with regulators as part of this process.

When to apply caution

What must you not do

- You must not ask for any gifts or hospitality.
- You should not accept gifts that may affect or be seen to affect your professional judgement.

When to be cautious

- When hospitality is offered by actual or potential suppliers or contractors. If it's modest and reasonable it can be accepted (subject to senior approval).
- Gifts over £25 can only be accepted on behalf of the ICB (i.e. to a charitable fund) but not in a personal capacity. They must be declared.
- Multiple gifts from the same source, over a 12-month period, must be treated the same as single gifts over £25 where the cumulative value exceeds £75.

Declaration of Interest Form

Required Information	Response
Name	To be completed
Position within or relationship with the ICB	To be completed
Do you have any interests to declare?	To be completed

- If **Yes** Please document them in the table below adding additional rows as required, sign the declaration, forward to your line manager to sign
- If **No** Please go straight to the declaration section, no signature required from line manager

Declared Interest (Name of the organisation and nature of business)	Interest Type (Financial, Financial-Professional or Professional – Personal)	Is the interest direct or indirect?	Nature of Interest	From	To	Action taken to mitigate risk
To be completed	To be completed	To be completed	To be completed	To be completed	To be completed	To be completed

- Definitions are included on the final page of this form

Declaration

I confirm the information provided above is complete and correct. I acknowledge that any changes in this declaration 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 civil, criminal, or internal disciplinary action may result.

Signed:	To be completed	Date:	To be completed
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Data Protection and Freedom of Information

The information provided in this form will be held by the ICB in accordance with Data Protection Act 2018 and will be processed to enable compliance with the ICB's statutory duties and its Conflict of Interest Management & Standards of Business Conduct Policy.

Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000.

If you would like to request that your declaration is kept confidential, please state the reasons below:

- Add reasons here

If the request to withhold the information is approved, any identifiable information will be removed from the record and the interest will be published anonymously.

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; • A shareholder (or similar owner 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; • In secondary employment (see paragraph 56 to 57); • In receipt of secondary income from a provider; • 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. • A member of a particular specialist professional body (although routine GP membership of the RCGP, BMA or a medical defence organisation would not usually by itself amount to an interest which needed to be declared); • An advisor for Care Quality Commission (CQC) or National Institute for Health and Care Excellence (NICE); • A medical researcher.
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; • 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 groups with an interest in health.
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, this should include:</p> <ul style="list-style-type: none"> • Spouse / partner; • Close relative e.g., parent, grandparent, child, grandchild or sibling; • Close friend; • Business partner.



Name	Role	Declared Interest- (Name of the organisation and nature of business)	Interest Type	Is the interest direct or indirect?	Nature of Interest	From	To	Action taken to mitigate risk

EQUALITY IMPACT ASSESSMENT

Step 1: Aims and purpose of the proposal / policy being assessed (This should reflect what the policy is intending to achieve and how it seeks to achieve, it is this intention that the assessment seeks to measure, consider who benefits and how and who doesn't and why, also consider the impact of associated aims).

Policy Aim: The purpose of this policy is to ensure that all staff understand their responsibilities in relation to business conduct and the management of conflicts of interest within the ICB.

Step 2: Screening process for relevance to equality & diversity issues. Does this proposal / policy have any equality & diversity relevance in the following areas? (This should be considered in relation to the formulation and application of the policy. As far as possible engagement with the relevant staff network groups should take place to identify any potential areas of relevance).

Characteristic	Implications
Age	Yes
Disability	Yes
Gender reassignment	Yes
Marriage and Civil Partnership	Yes
Pregnancy and maternity	Yes
Race	Yes
Religion or belief	Yes
Sex	Yes
Sexual orientation	Yes
Other issues	Yes

Step 3: If you have answered, "Yes", to any of the protected characteristic boxes in Step 2, a full impact assessment is required

Are any of the protected characteristic boxes in Step 2 marked "Yes"?

Yes

Step 4: Examination of available information (sources can include but are not restricted to – ESR data; MI relating to Recruitment /Employee Relations/Attrition; Industry best practice; legal overview; research articles; matters arising from judgements tested during consultation; consider four-fifths rule to assess difference).

This policy is designed to assist the ICB in meeting it's legal requirements as set out under the public sector equality duty.

Step 5: Full Impact Assessment Process

Step 5a: Consultation Log

Where are the consultation records stored?

Date of consultation	Method	Who was consulted	What was the outcome
N/A	N/A	N/A	N/A

Step 5b: EIA Action Plan: Workforce Impacts (internal). Potential issues or impacts (positive and negative)

Positive/negative	Description of issue/impact	Mitigating actions	Risk (Low/Medium/High)	Outcome
Positive	The policy ensures decisions are made in a fair way and not influenced by outside bias.	N/A	N/A	Staff can be confident in the decisions made across the organisation, creates more trust.

Step 5c: EIA Action Plan: Service Delivery Impacts (external). Potential issues or impacts (positive and negative)

Positive/negative	Description of issue/impact	Mitigating actions	Risk (Low/Medium/High)	Outcome
Positive	The policy ensures decisions are made in a fair way and not	N/A	N/A	The policy strengthens the fairness and transparency of

	influenced by outside bias.			commissioning decisions. This reduces the likelihood of bias or unequal treatment to protected groups.
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Step 6: Monitoring and review arrangements

How will the implementation of the proposal / policy be monitored, and by whom?

The executive director of People, Governance and Corporate Services will oversee all declarations and deal with any breaches.

The Corporate Governance Team will review all interests submitted and provide advice and guidance to staff.

What is the timetable for monitoring (with dates)?

2 yearly review of policy

Is there a plan to undertake an evaluation of this policy (with dates)?

2 years from the date of publication.

Step 7: Public availability of reports / result

N/A