

Standards of Business Conduct Policy

November 2025 – November 2027

Policy purpose and key messages

This policy sets out the standards of business conduct required across the three ICBs, providing a clear framework for declaring and managing conflicts of interest, and for handling gifts, hospitality and sponsorship. Its purpose is to ensure decisions are taken with integrity, transparency and impartiality, safeguarding public funds and upholding the Nolan Principles and wider NHS governance requirements.

CONTROL RECORD	
Title	Standards of Business Conduct Policy
Reference number	DLN-GOV-002
Version	1.1
Status	Final
Author	ICB Governance Leads
Sponsor	Amanda Sullivan, Chief Executive
Team	Corporate Governance
Amendments	Not applicable
Superseded documents	<ul style="list-style-type: none"> • NHS Derby and Derbyshire ICB Standards of Business Conduct Policy; Managing Conflicts of Interest Policy; and Gifts, Hospitality & Sponsorship Policy • NHS Lincolnshire ICB Standards of Business Conduct and Conflicts of Interest Policy (including hospitality, gifts and sponsorship) • NHS Nottingham and Nottinghamshire ICB Standards of Business Conduct Policy
Audience	All individuals employed by or appointed to the ICB, including those working for or with the ICB in a temporary capacity.
Consulted with	Not applicable.
Equality Impact Assessment	October 2025
Approving body	Boards of NHS Derby and Derbyshire Integrated Care Board, NHS Lincolnshire Integrated Care Board and NHS Nottingham and Nottinghamshire Integrated Care Board
Date approved	20 November 2025
Date of issue	November 2025
Review date	November 2028
Policy retention period	Life of organisation plus 6 years
<p>This is a controlled document and whilst this policy may be printed, the electronic version available on the ICBs' document management system is the only true copy. As a controlled document, this document should not be saved onto local or network drives.</p>	

Contents

1. Introduction	4
2. Scope	4
3. Purpose and Values	5
4. Definitions	5
5. Roles and Responsibilities	6
6. Decision-Making Officers	8
7. Conflicts of Interest	9
8. Principles	10
9. Partner Members	11
10. Declaring and Registering Interests	11
11. Management of Declared Interests	13
12. Managing Conflicts of Interest at Meetings	14
13. Conflicts of Interest in Procurement Activities and the Provider Selection Regime (PSR)	15
14. Outside Employment	16
15. Patents and Intellectual Property	17
16. Gifts, Hospitality and Sponsorship	17
17. Hospitality provided by the ICBs	21
18. Working with the Pharmaceutical Industry	21
19. Corporate Responsibilities	22
20. Breaches of this Policy	25
21. Equality and Diversity Statement	27
22. Communication, Monitoring and Review	27
23. Training	28
24. Interaction with other policies	28

Appendix 1: The Seven Principles of Public Life set out by the Committee on Standards in Public Life (The Nolan Principles)

Appendix 2: Categories of Interests

Appendix 3: Declaration of Interest Form

Appendix 4: Equality Impact Assessment

1. Introduction

- 1.1 This policy applies to NHS Derby and Derbyshire Integrated Care Board (ICB), NHS Lincolnshire ICB, and NHS Nottingham and Nottinghamshire ICB, hereafter referred to as 'the ICBs'.
- 1.2 As publicly funded organisations, the ICBs have a duty to set and maintain the highest standards of conduct and integrity. We expect the highest standards of corporate behaviour and responsibility from the members of our Boards and their committees and sub-committees and all others working for, with, or on behalf of the ICBs.
- 1.3 Ensuring that decisions are taken transparently and clearly is a key principle in the [NHS Constitution](#). All individuals working within the ICBs, regardless of their role, are expected to act in the spirit set out in the seven principles of public life: the 'Nolan Principles' (Appendix 1).
- 1.4 In how they conduct their business, the ICBs are required to adhere to the [National guidance on managing conflicts of interest in the NHS](#). The ICBs also observe the principles of good governance described in:
 - a) The Good Governance Standards for Public Services (2004), Office for Public Management and the Chartered Institute of Public Finance and Accountancy.
 - b) The seven key principles of the NHS Constitution.
 - c) The Equality Act 2010.
 - d) The UK Corporate Governance Code.
- 1.5 Whilst this policy has been developed for implementation across the ICBs to ensure a consistent approach and aligned working practices, it is important to remember that the legal requirement for the management of conflicts of interest remains the responsibility of each individual organisation. As such, each ICB will need to continue to be able to demonstrate its own compliance with the national guidance on managing conflicts of interests.

2. Scope

- 2.1 The ICBs require this policy to be followed by:
 - a) All employees – this includes all individuals working for the ICBs in a temporary capacity, including agency staff, seconded staff, students and trainees, and any self-employed consultants or other individuals working for the ICBs under a contract for services. Where relevant, it also includes prospective employees who have commenced the recruitment process.

- b) Members of the ICBs' Boards and joint committees and committees of the Boards.
- c) Any other individual directly involved with the business or decision-making of the ICBs.

2.2 Hereafter, the above are referred to throughout this policy as 'individuals'.

3. Purpose and Values

3.1 The purpose of this policy is to:

- a) Safeguard the ICBs' decision-making arrangements and protect the integrity of their workforce by ensuring that robust arrangements are in place for declaring and managing conflicts of interest.
- b) Ensure that all individuals are aware of their own responsibilities with regard to standards of business conduct.
- c) Support the ability of individuals to apply good judgement across the topics included in this policy; understanding when further guidance and support in meeting the requirements of this policy may be needed and where to obtain it.

3.2 This policy supports the ICBs' Constitutions, Standing Orders, Standing Financial Instructions and Scheme of Reservation and Delegation, which set out the statutory and governance framework in which the ICBs operate. All individuals are required to comply with the requirements of the ICBs' Constitutions, Standing Orders, Standing Financial Instructions and Scheme of Reservation and Delegation when carrying out their duties and these shall prevail over the requirements of this policy where conflicting advice is given.

3.3 All clinically qualified individuals employed by or working with or on behalf of the ICBs must also refer to their respective codes of conduct relating to the areas included in this policy.

4. Definitions

4.1 Definitions of key terms referenced in this policy are as follows:

Term	Definition
Bribery	Giving or receiving a financial or other advantage in connection with the 'improper performance' of a position of trust, or a function that is expected to be performed impartially or in good faith (Bribery Act, 2010).

Term	Definition
Conflict of Interest	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 delivering, commissioning, or assuring taxpayer funded health and care services is, or could be, impaired or influenced by another interest they hold (NHS England, 2024).
Actual Conflict of Interest	A material conflict between one or more interests.
Potential Conflict of Interest	The possibility of a material conflict between one or more interests in the future.
Perceived Conflict of Interest	An individual could be incorrectly seen to have a conflict of interest, due to false perceptions about their responsibilities, their interests or their relationships.
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	Offers of meals, refreshments, travel, accommodation and other expenses in relation to attendance at meetings, conferences, education and training events.
Sponsorship	Support (financial or otherwise) of ICB activities by an external body.
Procurement	The process of finding and agreeing to terms, and acquiring goods, services, or works from an external source, often via a tendering or competitive bidding process.

5. Roles and Responsibilities

5.1 Key responsibilities for specific roles and staff groups are described in the table below:

Role	Responsibilities
ICB Boards, Committees and Decision-making Groups	<p>The ICBs' Boards, their committees and decision-making groups are responsible for upholding the principles of good corporate governance and ensuring that the ICBs are acting in the best interests of stakeholders at all times.</p> <p>In particular, the Chairs of these fora are responsible for ensuring that any declared interests in relation to agenda items at meetings are managed in accordance with this policy.</p>
Audit Committees	<p>The Audit Committees are responsible for reviewing the establishment and maintenance of an effective system of integrated governance and internal control. In particular, the Committees are responsible for monitoring compliance with this policy and the organisation's established probity arrangements.</p>
Chief Executive Officer	<p>The Chief Executive has overall accountability for the ICBs' management of conflicts of interest, which includes the requirements for the management of gifts, hospitality and sponsorship.</p>
Director of Finance	<p>The Director of Finance is responsible for ensuring the adequacy of the ICBs' counter fraud arrangements.</p>
ICB Governance Leads	<p>Governance Leads are responsible for:</p> <ul style="list-style-type: none"> • The day-to-day management of matters and queries relating to the application of this policy. • Maintaining the Registers of Interests. • Providing advice, support, and guidance on how conflicts of interest should be managed. • Ensuring that appropriate administrative processes are put in place.

Role	Responsibilities
	<ul style="list-style-type: none"> • Supporting the Conflicts of Interest Guardian in carrying out their roles effectively.
Conflicts of Interest Guardian	<p>The Conflicts of Interest Guardian is in place to further strengthen the scrutiny and transparency of the ICBs' decision-making processes. This role will also:</p> <ul style="list-style-type: none"> • Act as a conduit for anyone with concerns relating to conflicts of interest. • Be a safe point of contact for individuals to raise concerns in relation to conflicts of interest. • Support the rigorous application of the principles and policies for managing conflicts of interest. • Provide independent advice and judgment where there is any doubt about how to apply this policy and principles in individual situations in regard to conflicts of interest. • Provide advice on minimising the risks of conflicts of interest.
Freedom to Speak Up Guardian	<p>The Freedom to Speak Up Guardian is in place to provide an independent and impartial source of advice to individuals at any stage of raising a concern. This can include concerns relating to standards of business conduct.</p>
Executive Management and Senior Leadership Team	<p>Members of the Executive Management Team and Senior Leadership Team have an ongoing responsibility for ensuring the application of this policy within the ICBs.</p>
Individuals	<p>All individuals are responsible for complying with this policy and for seeking advice if unsure how it applies to them.</p>

6. Decision-Making Officers

6.1 Some individuals 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 ‘decision-making officers’ are defined as members of the ICBs’ Boards, joint committees and committees of the Boards, members of formal decision-making groups and ICB Officers with individual decision-making authority. Delegated decision-making arrangements are set out specifically in the ICBs’ Schemes of Reservation and Delegation (SoRD).

6.2 The interests of all decision-makers, which includes the acceptance of gifts and hospitality, will be published on the ICBs’ websites.

7. Conflicts of Interest

7.1 An individual does not need to exploit their position or obtain an actual benefit, financial or otherwise, for a conflict of interest to occur. In fact, a perception of wrongdoing, impaired judgement, or undue influence can be as detrimental as any of them actually occurring. It is important to manage these perceived conflicts in order to maintain public trust.

7.2 Interests fall into the following categories:

Term	Definition
Financial interests	Where an individual may get direct financial benefit ¹ from the consequences of a decision they are involved in making.
Non-financial professional interests	Where an individual may obtain a non-financial benefit from the consequences of a decision, they are involved in making, such as increasing their professional reputation or promoting their professional career.
Non-financial personal interests	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 because of decisions they are involved in making in their professional career.
Indirect interests	Where an individual has a close association ² with another individual who has a financial interest, a non-financial professional interest or a non-financial

¹ This may be a financial gain, or avoidance of a loss.

² A common-sense approach should be applied to the term ‘close association’. Such an association might arise, depending on the circumstances, through relationships with close family members and relatives, close friends and associates, and business partners.

Term	Definition
	personal interest and could stand to benefit from a decision they are involved in making. Indirect interests can also arise through relationships with colleagues from other organisations – see ' <i>loyalty interests</i> ' in section below.

Loyalty Interests

7.3 As part of their jobs, staff 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 in the category of indirect interests. They are unlikely to be directed by any formal process or managed via any contractual means - it can be as simple as having informal access to people in senior positions.

7.4 However, loyalty interests can influence (or be seen to influence) decision making. Conflicts of interest can arise when decision making is influenced subjectively through association with colleagues or organisations out of loyalty to the relationship they have, rather than through an objective process. The scope of loyalty interests is potentially huge, so judgement is required for making declarations.

7.5 The above categories are not exhaustive, and each situation must be considered on a case-by-case basis. Where individuals are unsure whether a situation falling outside of the above categories may give potential for a conflict of interest, they should seek advice from the ICBs' Governance Leads or the ICBs' Conflicts of Interest Guardian. If in doubt, the individual concerned should assume the existence of a conflict of interest and ensure that it is managed appropriately, rather than ignore it.

7.6 Examples of each of the above categories of interest are provided at Appendix 2.

8. Principles

8.1 In discharging their functions, the ICBs will abide by the following principles for managing conflicts of interest to ensure they are handled with integrity and probity, in an open and transparent way:

- All decisions will be made in the best interests of the ICB's population, consistent with the ICBs' statutory duties and responsibilities.
- Conflicts of interest will be identified and declared as early as possible, with clear and specific disclosures.

- (c) Decision-making will be inclusive, ethical, and based on professional advice, with all participants acting with integrity, avoiding undue influence from personal, financial, or organisational interests.
- (d) Conflicts of interest will be managed in a balanced and proportionate way, preserving collective decision-making wherever possible; mitigations will consider both actual and perceived conflicts, and the risks and benefits of individual involvement.
- (e) Clear records will be maintained of declared interests and actions taken, fostering a culture of openness and accountability.
- (f) All Board members and decision-makers will receive appropriate support and guidance to ensure compliance with relevant ICB policies, including procedures for managing breaches.

9. Partner Members

- 9.1 Individuals from partner organisations who have a role in the ICBs' decision-making will be expected to act in accordance with principles set out in section 8. Whilst it will not be assumed that they are personally or professionally conflicted, the possibility of actual and perceived conflicts of interest will remain. For all decisions, the ICBs will need to 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 and knowledge they bring to the process.

10. Declaring and Registering Interests

- 10.1 All individuals must declare any interests as soon as reasonably practicable after the person becomes aware of the conflict or potential conflict and in any event within 28 days.
- 10.2 Processes are in place to support individuals in the declaration of new interests or to amend any existing interests at the following points:
 - a) On appointment - for new starters to the organisation, the completion of the 'Declarations of Interest Form' (provided at Appendix 3) is required prior to commencing in post. Individuals will also be asked about any relevant interests as part of the mandatory questions asked during job interviews. In the event that there are no interests to declare, a 'nil declaration' must be submitted.
 - b) On significantly changing role and/or responsibilities within the organisation.

- c) At each meeting of the ICBs' Boards or their joint committees and committees and other decision-making groups (as described in the section 'Managing Conflicts of Interest at Meetings' in this policy).
- d) Through the annual assurance exercise detailed in section 10.8 of this policy.

10.3 If individuals are in any doubt as to whether they have an interest or whether it is declarable, they should consult their line manager and/or the ICBs' Governance Leads.

10.4 In order to promote confidence in the probity of commissioning decisions and the integrity of those involved, the ICBs will maintain and make publicly available registers that detail the interests of all individuals as defined in section 3.1.

10.5 The ICBs' Governance Leads, supported by the Corporate Governance Teams, will maintain a register of declared interests for each ICB, which will include the following information:

- a) Name of the person declaring the interest.
- b) Position within, or relationship with, the ICB.
- c) Type of interest.
- d) Nature of the interest.
- e) The dates to which the interest relates.
- f) The actions to be taken to mitigate risk.

10.6 The Registers of Declared Interests for decision-makers will be published on the ICBs' websites at least annually. A copy can also be obtained directly from the relevant ICB.

10.7 The Registers of Declared Interests will be updated whenever a new or revised interest is declared. NB: This means that the versions published on the ICBs' websites will not always be the most up-to date.

10.8 The ICBs will assure themselves on an annual basis that their registers of declared interests are accurate and up to date. A request will be sent to all individuals, on behalf of the ICBs' Governance Leads, asking them to check their entry on the registers. Where an individual has no interest to declare, or no interest in addition to those already declared, they must confirm this by way of 'nil return'. The request is designed to prompt individuals and does not negate the responsibility of individuals to proactively declare, as stipulated within this policy.

10.9 Offers/receipt of gifts and hospitality of decision-making staff will remain on the published registers for a minimum of six months. In addition, the ICBs will retain a record of historic interests (including offers/receipt of gifts and

hospitality) for a minimum of six years after the date on which it expired. The ICBs' published registers of interests state that historic interests are retained by the ICBs for the specified timeframe and details of whom to contact to submit a request for this information.

- 10.10 Where an individual has substantial grounds for believing that publication of their interests should not occur, they may request in writing that the information is not published, explaining the reasons why. In exceptional circumstances, the information may be withheld on the public registers. However, this would be the exception, and information will not be withheld or redacted merely because of a personal preference.
- 10.11 The decision as to whether or not to publish information will be made by the Conflicts of Interest Guardian, in consultation with the ICBs' Governance Leads.

11. Management of Declared Interests

- 11.1 The ICBs' Governance Leads (supported by the Corporate Governance Teams) are responsible for ensuring that for every interest declared, arrangements are in place to manage the conflict of interests or potential conflict of interests following an assessment of the:
 - a) **Materiality of the interest:** in particular whether the individual (or family member, close friend or business associate) could be advantaged or disadvantaged from the individual's involvement in a decision.
 - b) **Extent of the interest:** in particular, whether it is related to a business area significant enough that would impact on the individual's ability to make a full and proper contribution to relevant commissioning activities.
- 11.2 These arrangements will confirm the following:
 - a) When an individual should withdraw from a specified activity, on a temporary or permanent basis.
 - b) Monitoring of the specified activity undertaken by the individual, either by a line manager, colleague or other designated individual.
- 11.3 All individuals that have declared interests are responsible for ensuring that they understand any requirements for managing their declared interests before participating in any decision-making activities.
- 11.4 There will be occasions where an individual declares an interest in good faith but upon closer consideration, it is clear that this does not constitute a genuine conflict of interest. The ICBs' Governance Leads will provide advice

on this and decide whether it is necessary for the interest to be added to the Registers of Declared Interests.

12. Managing Conflicts of Interest at Meetings

- 12.1 All formal meetings, including the ICBs' Boards and their joint committees and committees, must have a standing agenda item at the beginning of each meeting to determine whether anyone has any conflicts of interest to declare in relation to the business to be transacted at the meeting. The ICBs' Standing Orders and all Committee terms of reference will incorporate this requirement. Any new interests declared at the meeting should be included in the ICBs' Registers of Declared Interests as soon as practicable after the meeting.
- 12.2 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.
- 12.3 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 ICBs should ensure conflicts of interest (and potential conflicts of interest) do not, and do not appear to, affect the integrity of the ICBs' decision-making processes
- 12.4 In the event that the chair of the meeting has a conflict of interest, the deputy chair is responsible for deciding the appropriate course of action to manage conflicts of interests. 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).
- 12.5 When a member of the meeting (including the chair or deputy chair) has a conflict of interest in relation to one or more items of business to be transacted at the meeting, the chair (or deputy 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:
 - a) Including a conflicted person in the discussion but not in decision-making.

- b) Excluding a conflicted person from both the discussion and the decision-making.
- c) 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.
- d) Excluding the conflicted individual and securing technical or local expertise from an alternative, unconflicted source.

12.6 The rationale for the agreed course of action should be properly documented and included in the minutes of the meeting. This should include:

- a) Who has the interest.
- b) The nature and extent of the conflict.
- c) An outline of the discussion.
- d) The actions taken to manage the conflict; and
- e) Evidence that the conflict was managed as intended.

12.7 In all cases, a quorum must be present for the discussion and decision.

13. Conflicts of Interest in Procurement Activities and the Provider Selection Regime (PSR)

13.1 The appropriate management of conflicts of interest extends to any situation where an individual has, directly or indirectly, an interest which might be perceived to compromise their impartiality and independence in the context of a procurement process.

13.2 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.

13.3 Decision-making processes with regard to procurement and the PSR are subject to the principles described in section 8 and the arrangements detailed in sections 11 ‘Management of Declared Interests’ and 12 ‘Managing Conflicts of Interest at Meetings’.

13.4 The ICBs’ Procurement Policy describes the ICBs’ arrangements for procurement and applying the PSR. This includes where there is a requirement to publish any declared or potential conflicts of interest of

individuals, groups or committees making the decision and how these were managed.

14. Outside Employment

- 14.1 All employees are required to seek approval from their line manager if they are engaged in or wish to engage in outside employment in addition to their work with the ICBs.
- 14.2 Outside employment or private practice must neither conflict with nor be detrimental to the NHS work of the officer in question. Examples of outside employment or private practice which may give rise to a conflict of interest includes, but is not limited to:
 - a) Employment with another NHS body or any organisation which might be in a position to supply goods/services to the ICBs; or
 - b) Self-employment, including private practice, in a capacity which might conflict with the work of the ICBs, or which might be in a position to supply goods/services to the ICBs.
- 14.3 Where a risk of conflict of interest is identified, these should be managed in accordance with the guidance provided in this policy. The ICBs reserve the right to refuse permission where we reasonably believe a conflict will arise or that approval would be detrimental to the work of the officer in question.
- 14.4 In undertaking any outside employment, employees should have regard to the section 'Trading on NHS premises' in this policy.
- 14.5 The ICBs may have legitimate reasons within employment law for knowing about outside employment of employees, even where this does not give rise to the risk of a conflict of interest. Nothing in this policy prevents such enquiries being made.
- 14.6 Where an individual is approached to speak at an externally sponsored event, the individual should ensure that the provisions in the sponsorship section of this policy are observed.
- 14.7 All employees must declare any relevant outside employment or private practice on appointment, and when any new employment arises, in accordance with the guidance above.
- 14.8 Declarations will be documented on the ICBs' Registers of Declared Interests.

15. Patents and Intellectual Property

- 15.1 Individuals should declare patents and other intellectual property rights they hold (either individually, or by virtue of their association with a commercial or other organisation), including where applications to protect have started or are ongoing, which are, or might be reasonably expected to be, related to items to be procured or used by the organisation.
- 15.2 Individuals should seek prior permission from the organisation before entering into any agreement with bodies regarding product development, research, work on pathways etc, where this impacts on the organisation's own time, or uses its equipment, resources or intellectual property.
- 15.3 Where holding of patents and other intellectual property rights give rise to a conflict of interest then the general management actions outlined in this policy should be considered and applied to mitigate risks.

16. Gifts, Hospitality and Sponsorship

Gifts

- 16.1 Individuals should not accept gifts that may affect, or be seen to affect, their professional judgement. This overarching principle should apply in all circumstances.
- 16.2 Gifts from suppliers or contractors:
 - a) Gifts from suppliers or contractors doing business (or likely to do business) with the ICBs should be politely declined. Low cost promotional aids (under the value of £6³ in total) can be accepted and do not need to be declared.
 - b) If a gift from a supplier or contractor (with an estimated value in excess of the £6 limit) arrives without warning, it must be handed over to the ICBs' Governance Leads who will decide whether the gift should be returned (or passed on to a charity or good cause). In such circumstances, action will be taken to ensure that the donor is informed of what has happened.
- 16.3 Gifts from other sources (e.g. patients, families, service users):
 - a) Individuals should not ask for gifts.
 - b) Gifts of cash and vouchers should always be politely declined.

³ The £6 value has been selected with reference to existing industry guidance issued by the Association of the British Pharmaceutical Industry.

- c) Modest gifts under a value of £50 may be accepted and do not need to be declared.
- d) Gifts at a value of £50 or over should be treated with caution and only be accepted on behalf of the ICBs and not in a personal capacity. Such gifts should be declared.
- e) A common-sense approach should be applied to the valuing of gifts – if the actual value is unknown, this should be based on an estimate that a reasonable person would make as to its value.

16.4 Multiple gifts from the same source over a 12-month period should be treated in the same way as single gifts over £50 where the cumulative value exceeds £50.

Hospitality

- 16.5 Individuals should not ask for or accept hospitality that may affect, or be seen to affect, their professional judgement.
- 16.6 Hospitality must only be accepted when there is a legitimate business reason, and it is proportionate to the nature and purpose of the event.
- 16.7 Particular caution should be exercised when hospitality is offered by actual or potential suppliers or contractors. These offers can be accepted if modest and reasonable, but individuals should always obtain approval from a member of the Executive Management and Senior Leadership Team.
- 16.8 Individuals should never put themselves in a position where there could be any suspicion that their business decisions could have been influenced by accepting hospitality from others. With this in mind, individuals should ask themselves what a member of the public, who may be critical or suspicious, might think.
- 16.9 Individuals are advised to consult with the ICBs' Governance Leads if they are unsure as to whether to accept any offers of hospitality.

Meals and refreshments:

- a) Under a value of £25 may be accepted and need not be declared.
- b) Of a value between £25 and £75 may be accepted and must be declared.
- c) Over a value of £75⁴ should be refused unless (in exceptional circumstances) approval from a member of the Executive Management

⁴ The £75 value has been selected with reference to existing industry guidance issued by the Association of the British Pharmaceutical Industry.

and Senior Leadership Team is given. A clear reason for the approval should be recorded on the Register of Interests.

16.10 Individuals should take a common-sense approach to the valuing of meals and refreshments (if actual value is not known) and always adhere to the principles set out in this policy.

Travel and Accommodation

16.11 Modest offers to pay some or all of the travel and accommodation costs related to attendance at events may be accepted and must be declared.

16.12 Offers which go beyond modest or are of a type that the ICBs themselves would not usually offer (e.g. business class or first class travel, offers of foreign travel, etc) need approval from a member of the Executive Management Team and should only be accepted in exceptional circumstances. A clear reason for the approval should be recorded on the Register.

16.13 Where a declaration is required, the following information should be provided:

- a) The staff member/individual's name and their role within the ICBs.
- b) A description of the nature and value of the gift/hospitality, including its source.
- c) Date of offer and receipt of the gift or hospitality.
- d) Any other relevant information (e.g. circumstances surrounding the offer, action taken to mitigate any conflict of interest, details of any approvals given that may conflict with this policy).

Sponsored Events

16.14 Sponsorship of NHS events by external parties is valued, as such offers can secure their ability to take place and ultimately benefit patients, as well as NHS staff. Without this funding, there may be fewer opportunities for learning, development and partnership working.

16.15 Sponsorship of the ICBs' events by appropriate external bodies should only be approved if a reasonable person would conclude that the event will result in clear benefits for the ICBs.

16.16 Sponsorship of events by appropriate external bodies will only be approved if a reasonable person would conclude that the event will result in clear benefit the organisations and the NHS.

- 16.17 During dealings with sponsors there must be no breach of patient or individual confidentiality or data protection rules and legislation.
- 16.18 No information should be supplied to the sponsor from whom they could gain a commercial advantage, and information which is not in the public domain should not normally be supplied.
- 16.19 At the organisations' 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.
- 16.20 The involvement of a sponsor in an event should always be clearly identified.
- 16.21 Staff within the organisation involved in securing sponsorship of events should make it clear that sponsorship does not equate to endorsement of a company or its products and this should be made visibly clear on any promotional or other materials relating to the event.
- 16.22 Staff arranging sponsored events must declare this to the organisation. The organisation will maintain records regarding sponsored events in line with the above principles and rules.

Sponsored Research

- 16.23 Funding sources for research purposes must be transparent and any proposed research must go through the relevant health research authority or other approvals process.
- 16.24 There must be a written protocol and written contract between staff, the organisation, and/or institutes at which the study will take place and the sponsoring organisation, which specifies the nature of the services to be provided and the payment for those services.
- 16.25 The study must not constitute an inducement to prescribe, supply, administer, recommend, buy or sell any medicine, medical device, equipment or service.
- 16.26 Staff should declare involvement with sponsored research to the organisation. The Corporate Governance Teams will maintain records of:
 - a) Their name and their role with the organisation.
 - b) Nature of their involvement in the sponsored research.
 - c) Relevant dates.
 - d) Other relevant information (e.g. what, if any, benefit the sponsor derives from the sponsorship, action taken to mitigate against a conflict, details of any approvals given to depart from the terms of this policy).

Sponsored Posts

- 16.27 External sponsorship of a post requires prior approval from the organisation.
- 16.28 Rolling sponsorship of posts should be avoided unless appropriate checkpoints are put in place to review and withdraw if appropriate.
- 16.29 Sponsorship of a post should only happen where there is written confirmation that the arrangements will have no effect on purchasing decisions or prescribing and dispensing habits. This should be audited for the duration of the sponsorship. Written agreements should detail the circumstances under which organisations have the ability to exit sponsorship arrangements if conflicts of interest which cannot be managed arise.
- 16.30 Sponsored post holders must not promote or favour the sponsor's products, and information about alternative products and suppliers should be provided.
- 16.31 Sponsors should not have any undue influence over the duties of the post or have any preferential access to services, materials or intellectual property relating to or developed in connection with the sponsored posts.
- 16.32 The organisation will retain written records of sponsorship of posts, in line with the above principles and rules.
- 16.33 Staff should declare any other interests arising as a result of their association with the sponsor, in line with the content in the rest of this policy.

17. Hospitality provided by the ICBs

- 17.1 Care should also be taken when providing hospitality from ICBs' funds. Individuals must be able to demonstrate that the hospitality is being provided for a legitimate business reason and is subject to senior manager approval.

18. Working with the Pharmaceutical Industry

- 18.1 It is recognised that cross-sector working can accelerate improvements in patient care, with pharmaceutical companies able to bring expertise, skills and resources to complement the expertise of healthcare organisations. Types of cross-sector working that might be taken by the ICBs include:
 - a) **Joint Working** – this is defined by the Department of Health and Social Care as situations where, for the benefit of the patients, pharmaceutical companies and the NHS pool skills, experience and/or resources for the joint development and implementation of patient-centred projects and share a commitment to successful delivery; and

- b) **Collaborative Working** – this is a new and broader category of cross-sector working and is wider than joint working, in that project outcomes can be for patient and/or healthcare centred projects.

18.2 Whilst the ICBs are generally supportive of working with the pharmaceutical industry, it has a duty to ensure any involvement is transparent and ethical. In summary, Individuals are responsible for ensuring that:

- a) The interests and integrity of the ICBs are safeguarded at all times and pharmaceutical companies should not use any aspect of the ICBs to infer its endorsement of products. Explicit agreement from the ICBs' Executive Team should be sought if use of the ICBs' name and/or branding is deemed necessary.
- b) Where individuals are approached by pharmaceutical industry representatives with requests for meetings to promote products or services, the decision to meet with a representative is in line with the ICBs' priorities.
- c) Engagement with any pharmaceutical company (or its representatives) does not occur without approval from an individual's line manager.
- d) Any conflicts of interest are identified at the project outset, and management actions agreed in line with the requirements of this policy.
- e) Ensuring engagement with the appropriate ICB team takes place at the earliest stage of any discussions with pharmaceutical companies. This team will be able to provide the correct guidance and advice, and ensure the ICBs are working in line with The Association of the British Pharmaceutical Industry's [Guidance on Cross-Sector Working](#) (2024).

18.3 Agreement to proceed with cross-sector working must be authorised by the relevant ICB Executive Director.

18.4 The ICBs' Confidentiality and Data Protection Policy must be always followed during any joint working or collaborative working projects.

19. Corporate Responsibilities

Charitable Collections

19.1 Whilst the ICBs wish to support individuals who want to undertake charitable collections amongst immediate colleagues, no reference or implication should be drawn to suggest that the ICBs are supporting the charity. Permission is not required for informal collections amongst immediate colleagues on an occasion like retirement, marriage, birthday or a new job.

19.2 Charitable collections which reference the ICBs must be authorised by a member of the Executive Management Team and reported to the Corporate Governance Teams.

Political Activities

19.3 Any political activity should not identify an individual as an officer of the ICBs. Conferences or functions run by a party-political organisation should not be attended in an official capacity, except with prior written permission from a member of the ICBs' Executive Management Team.

Personal Conduct

19.4 All individuals have a responsibility to respect and promote the corporate or collective decision of the ICBs, even though this may conflict with their personal views. This applies particularly if we are yet to decide on an issue or has decided in a way with which they personally disagree. Individuals may comment as they wish; however, if they decide to do so, they should make it clear that they are expressing their personal view and not the view of the ICBs.

19.5 When speaking as a member of the ICBs, whether to the media, in a public forum or in a private or informal discussion, individuals should ensure that they reflect the current policies or view of the organisations. For any public forum or media interview, approval should be sought in advance:

- a) In the case of the Boards, from the Chair and/or Chief Executive or their nominated deputies. Advice should also be sought from the ICBs' Communications Teams.
- b) In the case of all other individuals, advice should be sought from the ICBs' Communications Teams.

19.6 When this is not practicable, they should report their action to the Chair or Chief Executive or their nominated deputies, as soon as possible.

19.7 Individuals must ensure their comments are well considered, sensible, well informed, made in good faith, in the public interest and without malice and that they enhance the reputation and status of the ICBs.

19.8 Individuals must follow the guidance for communication with the media; disciplinary action may be taken if this is not followed.

Use of Social Media

19.9 Individuals should be aware that social networking websites are public forums and should not assume that their entries will remain private.

Individuals communicating via social media must comply with the ICBs' Internet and Email Policy.

19.10 Individuals must not:

- Conduct themselves in a way that brings the ICBs into disrepute.
- Disclose any ICB information that is or may be sensitive, confidential and person-identifiable, or subject to a non-disclosure contract or agreement.
- Divulge details of their NHS employer on their personal profile pages. If this information is divulged staff must state that they are communication in a personal capacity.

Confidentiality

19.11 Individuals must, at all times, operate in accordance with the UK General Data Protection Regulation and Data Protection Act 2018, and maintain the confidentiality of information of any type, including but not restricted to patient information; personal information relating to individuals; commercial information.

19.12 This duty of confidence remains after individuals (however employed) leave the ICBs.

19.13 For the avoidance of doubt, this does not prevent the disclosure or information where there is a lawful basis for doing so (e.g. consent). Staff should refer to the ICBs' Confidentiality and Data Protection Policy for more detailed information.

Gambling

19.14 No officer may bet or gamble when on duty or on ICBs' premises. The exception is small lottery syndicates or sweepstakes related to national events such as the World Cup or Grand National, where no profits are made, or the lottery is wholly for purposes that are not for private or commercial gain (e.g. to raise funds to support a charity).

Lending and Borrowing

19.15 The lending or borrowing of money between individuals should be avoided, whether informally or as a business, particularly where the amounts are significant.

19.16 It is a particularly serious breach of discipline for any officer 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.

Individual Voluntary Arrangements, County Court Judgment (CCJ), Bankruptcy or Insolvency

19.17 Any individual who becomes bankrupt, insolvent, has active CCJs, or made individual voluntary arrangements with organisations must inform their line manager and the ICBs' HR Team 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

19.18 An individual who is arrested, subject to continuing criminal proceedings, or convicted of any criminal offence must inform their line manager and the ICBs' HR Team as soon as is practicably possible. Further information can be found within the ICBs' Disciplinary Policy.

20. Breaches of this Policy

20.1 Failure by an individual to comply with the requirements set out in this policy may result in action being taken in accordance with the relevant organisational disciplinary procedure. Such disciplinary action may include termination of employment (where applicable).

20.2 Where the failure to comply relates to an individual that is not a direct employee of the ICBs, this may result in action being taken in accordance with the relevant engagement procedures (e.g. termination of a secondment agreement).

20.3 Any financial or other irregularities or impropriety which involve evidence or suspicion of fraud, bribery or corruption by any officer, will be reported to the ICBs' Counter Fraud Specialist, with a view to an appropriate investigation being conducted and potential prosecution being sought.

20.4 Individuals who are aware about actual breaches of this policy, or who are concerned that there has been, or may be, a breach, should report these concerns to the ICBs' Governance Leads or ICBs' Conflicts of Interest Guardian.

20.5 Each ICB will investigate breaches relating to its own staff, decision-making groups and activities, according to its own specific facts and merits and give

relevant parties the opportunity to explain and clarify any relevant circumstances.

20.6 Following investigation the relevant organisation will:

- a) Decide if there has been or is potential for a breach and if so, what the severity of the breach is.
- b) Assess whether further action is required in response – this is likely to involve any individual involved and their line manager, as a minimum.
- c) Consider who else inside and outside the organisation should be made aware.
- d) Take appropriate action (as set out in the next section).

20.7 Breaches could require action in one or more of the following ways:

- a) Clarification or strengthening of existing policy, process and procedures.
- b) Consideration as to whether HR/employment law/contractual action should be taken against staff or others.
- c) Consideration being given to escalation to external parties. This might include referral of matters to external auditors, NHS Protect, the Police, statutory health bodies (such as NHS England, NHS Improvement or the CQC), and/or health professional regulatory bodies.
- d) Contractual action, such as exercise of remedies or sanctions against the body or staff which caused the breach.
- e) Legal action, such as investigation and prosecution under fraud, bribery and corruption legislation.

20.8 These actions will not be considered until the circumstances surrounding breaches have been properly investigated. However, if such investigations establish wrong-doing or fault then the organisations can and will consider the range of possible sanctions that are available, in a manner which is proportionate to the breach.

20.9 Inappropriate or ineffective management of interests can have serious implications for the organisation and staff. In extreme cases, individuals could face personal civil liability.

20.10 To aid transparency, the ICBs will consider whether anonymised information on the breach and the actions taken should be published on the ICBs' website.

21. Equality and Diversity Statement

- 21.1 The ICBs pay due regard to the requirements of the Public Sector Equality Duty (PSED) of the Equality Act (2010) in policy development and implementation, as a commissioner and provider of services, as well as an employer.
- 21.2 The ICBs are committed to ensuring that the way they provide services to the public and the experiences of their staff does not discriminate against any individuals or groups on the basis of their age, disability, gender identity (trans, non-binary) marriage or civil partnership status, pregnancy or maternity, race, religion or belief, gender or sexual orientation.
- 21.3 The ICBs are committed to ensuring that their activities also consider the disadvantages that some people in the ICBs' diverse population experience when accessing health services. Such disadvantaged groups include people experiencing economic and social deprivation, carers, refugees and asylum seekers, people who are homeless, workers in stigmatised occupations, people who are geographically isolated, gypsies, Roma and travellers.
- 21.4 To help ensure that these commitments are embedded in our day-to-day working practices, an Equality Impact Assessment has been completed, and is included within this policy at Appendix 4.

22. Communication, Monitoring and Review

- 22.1 The ICBs will establish effective arrangements for communicating the requirements of this policy, to include:
 - a) Communicating the publication of this policy at the time of issue.
 - b) Ensuring that the existence of this policy, and the requirements, are highlighted to new starters as part of the local induction process.
 - c) As a minimum, bi-annual reminders of the existence and importance of this policy will be sent out via established staff communication methods.
- 22.2 The implementation of this policy, and the effectiveness of the arrangements detailed within it, will be monitored by the ICBs' Audit Committees on a bi-annual basis.
- 22.3 This policy will be reviewed by the ICBs' Boards every three years or in light of any legislative changes or best practice guidance.
- 22.4 Any individual who has queries regarding the content of this policy or has difficulty understanding how this policy relates to their role, should contact the ICBs' Governance Leads.

23. Training

- 23.1 Individuals will be made aware of this policy at induction and through regular reminders via the ICBs' staff communication channels.
- 23.2 Advice, training and support for staff on how interests should be managed will be available to individuals via the ICBs Governance Leads.

24. Interaction with other policies

- 24.1 This policy should be read in conjunction with the following ICB policies:
 - Fraud, Corruption and Bribery Policy
 - Procurement Policy
 - Raising Concerns at Work (Freedom to Speak Up) Policy
 - Secondary Employment Policy
 - Disciplinary Policy
 - Confidentiality and Data Protection Policy

Appendix 1: The Seven Principles of Public Life set out by the Committee on Standards in Public Life (The Nolan Principles)

Selflessness	Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other 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 seek to 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 rewards and 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 that 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.

Appendix 2: Categories of Interests

Type of Interest	Description
Financial	<p>Where an individual may get direct financial benefits* from the consequences of a decision their organisation makes. This could include:</p> <ul style="list-style-type: none"> • A director (including a non-executive director) or senior employee in another organisation which is doing or is likely to do business with an organisation in receipt of NHS funding. • A shareholder, partner or owner of an organisation which is doing, or is likely to do business with an organisation in receipt of NHS funding. • Someone in outside employment. • Someone in receipt of secondary income. • Someone in receipt of a grant. • Someone in receipt of other payments (e.g. honoraria, day allowances, travel or subsistence). • Someone in receipt of sponsored research.
Non-financial professional interests	<p>Where an individual may obtain a non-financial professional benefit* from the consequences of a decision their organisation makes, such as increasing their professional reputation or status or promoting their professional career. This could include situations where the individual is:</p> <ul style="list-style-type: none"> • An advocate for a particular group of patients. • A clinician with a special interest. • An active member of a particular specialist body. • An advisor for the Care Quality Commission or National Institute of Health and Care Excellence. • A research role.
Non-financial personal interests	<p>This is where an individual may benefit* personally from a decision their organisation makes 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 member of a voluntary sector board or has a position of authority within a voluntary sector organisation. • A member of a lobbying or pressure group with an interest in health and care.

Type of Interest	Description
Indirect interests	<p>This is where an individual has a close association with another individual who has a financial interest, a non-financial professional interest or a non-financial personal interest who would stand to benefit* from a decision they are involved in making. This would include**:</p> <ul style="list-style-type: none"> • Close family members and relatives. • Close friends and associates. • Business partners.
Loyalty interests	<p>This is where decision making is influenced subjectively through association with colleagues or organisations out of loyalty to the relationship they have, rather than through an objective process. This would include:</p> <ul style="list-style-type: none"> • Hold a position of authority in another NHS organisation or commercial, charity, voluntary, professional, statutory or other body which could be seen to influence decisions they take in their NHS role: • Sit on advisory groups or other paid or unpaid decision making forums that can influence how their organisation spends taxpayers' money. • Are, or could be, involved in the recruitment or management of close family members and relatives, close friends and associates, and business partners. • Are aware that their organisation does business with an organisation with whom close family members and relatives, close friends and associates, and business partners have decision making responsibilities.

Appendix 3: Declaration of Interest Form

Declaration of Interest Form

This declaration form is used across NHS Derby and Derbyshire, NHS Lincolnshire and NHS Nottingham and Nottinghamshire Integrated Care Boards (ICBs). Each ICB remains a separate statutory body and must individually demonstrate compliance with NHS England's 'Managing Conflicts of Interest in the NHS' guidance.

A conflict of interest can be described as: *"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 delivering, commissioning, or assuring taxpayer funded health and care services is, or could be, impaired or influenced by another interest they hold."*

Declarations of interest should be made as soon as reasonably practicable and by law; within 28 days after the interest arises (this could include an interest an individual is pursuing).

Further details on conflicts of interest management can be found in the ICB's Standards of Business Conduct Policy or [NHS England's Managing Conflicts of Interest in the NHS: Guidance for Staff and Organisations](#).

Please complete the following:

Full Name:		Role:	
Start Date of current post:		Directorate:	

Please complete:

Section A and **Section C** if you have interests to declare.

Section B and **Section C** if you have no interests to declare.

Section A

Description of Interest - please include all relevant details, e.g.: <ul style="list-style-type: none">- Nature of interest- Name of the organisation and the nature of business- Details of relationship for indirect interests	Type of Interest (See section D)				Date of Interest		How is the interest relevant to your ICB role and which ICB does it relate to? Please explain how this interest could affect (or appear to affect) your ICB responsibilities and tick which ICB(s) it applies to.
	Financial Interests	Non-Financial Professional Interests	Non-Financial Personal Interests	Indirect Interest	Date From:	Date To: (leave blank if end date is unknown)	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click or tap to enter a date.	Click or tap to enter a date.	Relevant ICB area(s):

Description of Interest - please include all relevant details, e.g.: - Nature of interest - Name of the organisation and the nature of business - Details of relationship for indirect interests	Type of Interest (See section D)				Date of Interest		How is the interest relevant to your ICB role and which ICB does it relate to? Please explain how this interest could affect (or appear to affect) your ICB responsibilities and tick which ICB(s) it applies to.
	Financial Interests	Non-Financial Professional Interests	Non-Financial Personal Interests	Indirect Interest	Date From:	Date To: <i>(leave blank if end date is unknown)</i>	
							D&D <input type="checkbox"/> Lincs <input type="checkbox"/> N&N <input type="checkbox"/> All <input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click or tap to enter a date.	Click or tap to enter a date.	Relevant ICB area(s): D&D <input type="checkbox"/> Lincs <input type="checkbox"/> N&N <input type="checkbox"/> All <input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click or tap to enter a date.	Click or tap to enter a date.	

Description of Interest - please include all relevant details, e.g.: - Nature of interest - Name of the organisation and the nature of business - Details of relationship for indirect interests	Type of Interest (See section D)				Date of Interest		How is the interest relevant to your ICB role and which ICB does it relate to? Please explain how this interest could affect (or appear to affect) your ICB responsibilities and tick which ICB(s) it applies to.
	Financial Interests	Non-Financial Professional Interests	Non-Financial Personal Interests	Indirect Interest	Date From:	Date To: <i>(leave blank if end date is unknown)</i>	
							Relevant ICB area(s): D&D <input type="checkbox"/> Lincs <input type="checkbox"/> N&N <input type="checkbox"/> All <input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click or tap to enter a date.	Click or tap to enter a date.	Relevant ICB area(s): D&D <input type="checkbox"/> Lincs <input type="checkbox"/> N&N <input type="checkbox"/> All <input type="checkbox"/>

Section B

Please tick the box to confirm that you have **no relevant interests** to declare.

Section C

Please tick the box to confirm the following statement: The information I have provided above is complete and correct. I acknowledge that any changes to my 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, professional regulatory or internal disciplinary action may result.

The information submitted will be held by the ICBs for personnel or other reasons specified in this email and to comply with the ICB's policies. This information will be held in electronic form in accordance with the Data Protection Act 2018 and may be disclosed to third parties in accordance with the Freedom of Information Act 2000.

The ICB is obliged to publish the interests of decision making staff on its website. If you have any concerns about this, please raise these in your response and explain why you consider that the information you supply should not be made publicly available.

Signed:

Date: Click or tap to enter a date.

Appendix 4: Equality Impact Assessment

Name of Policy	Standards of Business Conduct Policy
Date of Completion	7 October 2025
EIA Responsible Person	ICB Governance Leads

For the policy, please answer the following questions against each of the protected characteristics, human rights and health groups:	What are the actual, expected or potential positive impacts of the policy, process, strategy or service change?	What are the actual, expected or potential negative impacts of the policy, process, strategy or service change?	What actions have been taken to address the actual or potential positive and negative impacts of the policy, process, strategy or service change?
Age	There are no actual or expected positive impacts on the characteristic of Age.	There are no actual or expected positive impacts on the characteristic of Age.	None.
Disability¹ (including: mental, physical, learning, intellectual and neurodivergent)	There are no actual or expected positive impacts on the characteristic of Disability.	There are no actual or expected positive impacts on the characteristic of Disability.	Mechanisms are in place via the Communications and Engagement Teams to receive the policy in a range of large print, Braille, audio, electronic and other accessible formats.
Gender² (Including: trans, non-binary and gender reassignment)	There are no actual or expected positive impacts on the characteristic of Gender.	There are no actual or expected positive impacts on the characteristic of Gender.	None.

For the policy, please answer the following questions against each of the protected characteristics, human rights and health groups:	What are the actual, expected or potential positive impacts of the policy, process, strategy or service change?	What are the actual, expected or potential negative impacts of the policy, process, strategy or service change?	What actions have been taken to address the actual or potential positive and negative impacts of the policy, process, strategy or service change?
Marriage and Civil Partnership	There are no actual or expected positive impacts on the characteristic of Marriage or Civil Partnership.	There are no actual or expected positive impacts on the characteristic of Marriage or Civil Partnership.	None.
Pregnancy and Maternity	There are no actual or expected positive impacts on the characteristic of Pregnancy and Maternity.	There are no actual or expected positive impacts on the characteristic of Pregnancy and Maternity.	None.
Race³	There are no actual or expected positive impacts on the characteristic of Race.	There are no actual or expected positive impacts on the characteristic of Race.	Mechanisms are in place via the Communications and Engagement Team to receive the policy in a range of languages.
Religion and Belief⁴	There are no actual or expected positive impacts on the characteristic of Religion and Belief.	There are no actual or expected positive impacts on the characteristic of Religion and Belief.	None.
Sex⁵	There are no actual or expected positive impacts on the characteristic of Sex.	There are no actual or expected positive impacts on the characteristic of Sex.	None.

For the policy, please answer the following questions against each of the protected characteristics, human rights and health groups:	What are the actual, expected or potential positive impacts of the policy, process, strategy or service change?	What are the actual, expected or potential negative impacts of the policy, process, strategy or service change?	What actions have been taken to address the actual or potential positive and negative impacts of the policy, process, strategy or service change?
Sexual Orientation⁶	There are no actual or expected positive impacts on the characteristic of Sexual Orientation.	There are no actual or expected positive impacts on the characteristic of Sexual Orientation.	None.
Human Rights⁷	There are no actual or expected positive impacts on the characteristic of Human Rights.	There are no actual or expected positive impacts on the characteristic of Human Rights.	None.
Community Cohesion and Social Inclusion⁸	There are no actual or expected positive impacts on the characteristic of Community Cohesion and Social Inclusion.	There are no actual or expected positive impacts on the characteristic of Community Cohesion and Social Inclusion.	None.
Safeguarding⁹	There are no actual or expected positive impacts on the characteristic of Safeguarding.	There are no actual or expected positive impacts on the characteristic of Safeguarding.	None.

For the policy, please answer the following questions against each of the protected characteristics, human rights and health groups:	What are the actual, expected or potential positive impacts of the policy, process, strategy or service change?	What are the actual, expected or potential negative impacts of the policy, process, strategy or service change?	What actions have been taken to address the actual or potential positive and negative impacts of the policy, process, strategy or service change?
Socioeconomic and other 'at risk' groups¹⁰ (Including carers, homeless, Looked After Children, living in poverty, asylum seekers, rural communities, victims of abuse, ex-offenders)	There are no actual or expected positive impacts on the characteristic of other 'at risk' groups.	There are no actual or expected positive impacts on the characteristic of other 'at risk' groups.	None.

¹**Disability** refers to anyone who has: "...a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities..." (Equality Act 2010 definition). This includes, but is not limited to: mental health conditions, learning disabilities, intellectual disabilities, neurodivergent conditions (such as dyslexia, dyspraxia and dyscalculia), autism, many physical conditions (including HIV, AIDS and cancer), and communication difficulties (including d/Deaf and blind people).

²**Gender**, in terms of a Protected Characteristic within the Equality Act 2010, refers to: "A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex."

³**Race**, in terms of a Protected Characteristic within the Equality Act 2010, refers to: A person's colour, nationality, or ethnic or national origins. This also includes people whose first spoken language is not English, and/or those who have a limited understanding of written and spoken English due to English not being their first language.

⁴**Religion and Belief**, in terms of a Protected Characteristic within the Equality Act 2010, refers to: Religion means any religion and a reference to religion includes a reference to a lack of religion. Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief.

⁵**Sex**, in terms of a Protected Characteristic within the Equality Act 2010, refers to: A reference to a person who has a particular protected characteristic and is a reference to a man or to a woman.

⁶**Sexual Orientation**, in terms of a Protected Characteristic within the Equality Act 2010, refers to: Sexual orientation means a person's sexual orientation towards persons of the same sex, persons of the opposite sex or persons of either sex.

⁷**The Human Rights Act 1998** sets out the fundamental areas that everyone and every organisation must adhere to. In relation to health and care, the most commonly applicable of the Articles within the Human Rights Act 1998 include: Article 2 Right to Life, Article 5 Right to Liberty and Security, Article 8 Right to Respect of Private and Family Life, and Article 9 Freedom of Thought, Conscience and Religion.

⁸**Community Cohesion** is having a shared sense of belonging for all groups in society. It relies on criteria such as: the presence of a shared vision, inclusion of those with diverse backgrounds, equal opportunity, and supportive relationships between individuals. **Social Inclusion** is defined as the process of improving the terms of participation in society, particularly for people who are disadvantaged, through enhancing opportunities, access to resources, voice and respect for rights (United Nations definition). For the EQIA process, we should note any positive or negative impacts on certain groups being excluded or not included within a community or societal area. For example, people who are homeless, those from different socioeconomic groups, people of colour or those from certain age groups.

⁹**Safeguarding** means: "...protecting a citizen's health, wellbeing and human rights; enabling them to live free from harm, abuse and neglect. It is an integral part of providing high-quality health care. Safeguarding children, young people and adults is a collective responsibility" (NHS England definition). Those most in need of protection are children, looked after children, and adults at risk (such as those receiving care, those under a DoLS or LPS Order, and those with a mental, intellectual or physical disability). In addition to the ten types of abuse set out in the Health and Care Act 2022, this section of the EQIA should also consider PREVENT, radicalisation and counterterrorism.

¹⁰**Other Groups** refers to anyone else that could be positively or negatively impacted by the policy, process, strategy or service change. This could include, but is not limited to: carers, refugees and asylum seekers, people who are homeless, gypsy, Roma and traveller communities, people living with an addiction (e.g., alcohol, drugs or gambling), people experiencing social or economic deprivation, and people in stigmatised occupations (e.g., sex workers).