

Integrated Care Board

Date of meeting	22 January 2026
Title of paper	Annual Review and publication of the ICB's Registers of Interests including Gifts and Hospitality.
Presented by	Debra Atkinson, Company Secretary/Director of Corporate Governance
Author	Debra Atkinson, Company Secretary/Director of Corporate Governance Claire Moore, Head of Risk, Assurance and Delivery
Agenda item	18
Confidential	No

Executive summary

The purpose of this report is to present the Board with the annual review of the ICB's registers of interests including gifts and hospitality and commercial sponsorship which are published on the ICB's website.

[LSC Integrated Care Board :: Lists and registers \(icb.nhs.uk\)](https://icb.nhs.uk).

The report provides an overview of the activity undertaken during the reporting period to provide assurance that the ICB's systems and processes are effective and the statutory requirements for managing conflicts of interest are met.

Also provided is an update on compliance against the ICB's mandatory training requirements further to the release of two additional role-specific training modules provided by NHS England (NHSE).

Public and Stakeholder Engagement

Not required.

Recommendations

The Board is requested to:

- **Note** the contents of the report.
- **Note** the work undertaken to ensure that the ICB's systems and processes for declaring conflicts of interests effective and the statutory requirements for managing conflicts of interest are met.
- **Approve** the annual review and publication of the ICB's registers of interests.
- **Note** the compliance rates against mandatory training to support staff in the management of conflicts of interests.

Which Strategic Objective/s does the report contribute to		Tick
1	Improve quality, including safety, clinical outcomes, and patient experience	✓
2	To equalise opportunities and clinical outcomes across the area	✓

3	Make working in Lancashire and South Cumbria an attractive and desirable option for existing and potential employees	✓
4	Meet financial targets and deliver improved productivity	✓
5	Meet national and locally determined performance standards and targets	✓
6	To develop and implement ambitious, deliverable strategies	✓

Implications

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

Where paper has been discussed (list other committees/forums that have discussed this paper)

Meeting	Date	Outcomes
Audit Committee	September 2025	Noted the contents of the reports and received assurance on the systems and processes for the management of conflicts of interests.

Conflicts of interest associated with this report

N/A

Impact assessments

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

Report authorised by:	Debra Atkinson Director of Corporate Governance/Company Secretary
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Integrated Care Board – 22 January 2026

Annual Review and publication of the ICB's Registers of Interests including Gifts and Hospitality

1. Introduction

- 1.1 The purpose of this report is to present the Board with the annual review of the Lancashire and South Cumbria (LSC) Integrated Care Board's (ICB) registers of interest including gifts and hospitality, and commercial sponsorship which are published on the ICB's website.
- 1.2 The report provides assurance that the ICB's systems and processes are effective and that the statutory requirements for managing conflicts of interest are met.
- 1.3 Also provided is an update on compliance against the ICB's mandatory training requirements to support staff in the management conflicts of interests, further to the release of two additional role-specific training modules provided by NHS England (NHSE).

2. Background

- 2.1 The following ICB policies and procedures provide the guiding principles and frameworks for the management of conflicts of interests within the ICB:
 - Managing Conflicts of Interest Policy and Procedures (incorporating gifts and hospitality)
 - Standards of Business Conduct Policy
 - Policy on Joint Working with the Pharmaceutical Industry
- 2.2 In accordance with the above policies and procedures, the ICB is required to maintain registers of interests for all staff, including those individuals who are employed by other organisations and undertake work for or on behalf of the ICB. In addition, the ICB must publish registers of interests for those who are determined as decision makers within the ICB.
- 2.3 The registers of interests are made available and published via the ICB's website:
 - Registers of interests for members of the board and its committees and those defined in the policy as "decision makers".
 - Registers of Gifts, Hospitality and Commercial Sponsorship.

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

- 3.1 Registers of interests for members of the board and its committees are circulated as part all board and committee meeting agendas and papers with the full combined register published on the ICB website.

[LSC Integrated Care Board Register of Interests Decision Makers \(combined\)](#)

- 3.2 The ICB's Audit Committee has received bi-annual assurance reports that the systems and processes for the management of conflicts of interests (including gifts and hospitality) are in place and operating effectively.

4. Register of Gifts, Hospitality and Commercial Sponsorship

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

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

5. Managing Conflicts of Interest in Procurement

- 5.1 Following the introduction of the Provider Selection Regime in January 2024, the ICB developed a new Contracting and Procurement policy which is published on the ICB's website.

[LSCICB FIN11 Procurement Contracting Policy v1.1.pdf](#)

- 5.2 The policy provides the principles and framework for ensuring robust procurement procedures in place to ensure that conflicts of interest are managed in accordance with relevant procurement legislation, NHSE guidance and the ICB's Managing Conflicts of Interest Policy.
- 5.3 The ICB's Audit Committee has maintained oversight of decisions made in relation to procurement with assurance that the requirements of the policy have been met, including the management of conflicts of interests in the procurement process.

6. Assurance of systems and processes for providing declarations of interests

- 6.1 The ICB's corporate team has continued to maintain oversight for the systems and processes for declaring conflicts of interests and maintaining accurate registers. In August 2025 a revised process for submitting declarations of interests (including gifts and hospitality) was introduced through MS Forms.

- 6.2 To support staff and raise awareness of the requirements, a dedicated staff intranet page is maintained which provides “step-by-step” guidance for staff on when/how to report any changes to declarations as well as other information in relation to gifts and hospitality.

7. Annual Review and compliance against requirements

- 7.1 There are a total of 150 staff whose interests are required to be held on the published registers. These include members of the ICB board, its committees and others defined as “decision makers” as described in the ICB’s policy which are:

- Members of advisory groups which contribute to direct or delegated decision making on the commissioning or provision of taxpayer funded services such as working groups involved in service redesign or stakeholder engagement that will affect future provision of services;
- Members of procurement (sub-) committees or panels;
- Those at Agenda for Change Band 8D and above;
- Individuals who have the power to enter into contracts on behalf of the ICB; and
- Individuals involved in decision making concerning the commissioning of services, purchasing of goods, medicines, medical devices or equipment and formulary decisions.

- 7.2 These staff are required to review and update their declarations of interests at least annually as required within the policy. At the time of writing 129 staff (86%), have met this requirement and the corporate team will continue to support all remaining staff to review and update their declarations.

8. NHS England Conflicts of Interest Training

- 8.1 NHSE have made available three online training modules to support staff in the management of conflicts of interests. The first module (Level 1) is aimed at all staff and became mandatory training for all ICB staff on 1 April 2024.

- 8.2 Using information drawn from the ICB’s ESR system, at the time of reporting the compliance rates for Level 1 is 80%, which is comparable with last update provided to the Audit Committee in September 2025, where the compliance was 81%.

- 8.3 Staff are reminded of the requirement to complete all relevant mandatory training via automated reminders issued via the ESR system when mandatory training becomes due. Additional communications are provided through the staff newsletters, staff briefings and information provided via the dedicated intranet page.

- 8.4 In March 2025 NHSE released a further two e-learning modules:

- **Module 2:** is designed to guide and support staff managing conflicts of interest throughout the commissioning cycle. The ICB has determined this module as mandatory for those defined under section 7.2. The module went live in August 2025, and compliance rates have improved since the position reported to the Audit Committee in September 2025 and will be reported on an annual basis to the board going forward.
- **Module 3:** is aimed at ICB chairs to support chairs deliver their responsibilities across their broader system leadership role and discharge their duties in ensuring effective ICB corporate governance.

8.7 It has been agreed locally that the ICB Chair and deputy chair will undertake Module 3 in addition to the modules described above.

9. Recommendations

9.1 The Board is requested to:

- **Note** the contents of the report
- **Note** the work undertaken to ensure that the ICB's systems and processes for declaring conflicts of interests effective, and the statutory requirements for managing conflicts of interest are met.
- **Approve** the annual review and publication of the ICB's registers of interests.
- **Note** the compliance rates against mandatory training to support staff in the management of conflicts of interests.