

Board Meeting in Public

Thursday, 06 June 2024

Title of Paper	Conflicts of Interest Policy	Agenda No.	4.5																
Nature of Paper	<input checked="" type="checkbox"/> Official <input type="checkbox"/> Official Sensitive																		
Author(s)	Silena Dominy, Company Secretary																		
Lead Executive	Helen Gillan, Director of Quality																		
Non-Executive Director Sponsor	Piers White, Chair of Audit, Risk and Governance Committee																		
Presented for (tick all that applies)	<input checked="" type="checkbox"/> Approval <input type="checkbox"/> Information* <input type="checkbox"/> Assurance <input type="checkbox"/> Update																		
Executive Summary (max 300 word count)																			
<p>The Conflicts of Interest Policy was first approved by the Board on the recommendation of the Audit, Risk and Governance Committee (ARGC) in 2023. The policy has been converted to the new proposed format for Board Level Policies. This sees elements of the policy which were procedural in nature removed as these will now be incorporated into procedure guidelines for Board members and staff. The content of the policy otherwise remains in line with the previous version, although content may have moved sections. Some minor wording changes have been made to make the document more readable and practical.</p> <p>A report was presented to ARGC at their meeting in May 2024 in relation to the effectiveness of conflicts of interest management in accordance with the Policy. Whilst there is clear evidence that decision making staff are following the Policy, a number of gaps in compliance with the Policy have been identified. The Company Secretary and the Governance Team will be reviewing the processes in place to ensure full compliance with the Policy, the key milestones of which are as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Action</th> <th style="text-align: left;">Target date</th> </tr> </thead> <tbody> <tr> <td>Establish method for identifying staff designated 'decision making staff'</td> <td>07/11/2024</td> </tr> <tr> <td>Establish how line managers review and approve interests, gifts/hospitality</td> <td>07/11/2024</td> </tr> <tr> <td>Review of procedural guidance utilising current systems and manual processes</td> <td>07/11/2024</td> </tr> <tr> <td>Communication and awareness to all directors, staff and line managers</td> <td>07/11/2024</td> </tr> <tr> <td>Introduction of bi-annual prompts to 'decision making staff'</td> <td>07/11/2024</td> </tr> <tr> <td>Consideration of addition of cap on fee earning outside of NHSBT to Conflicts of Interest policy, and registration process of such</td> <td>30/04/2025</td> </tr> <tr> <td>Investigation into digital solution for registering/approving interests, gifts/hospitality</td> <td>31/12/2025</td> </tr> </tbody> </table>				Action	Target date	Establish method for identifying staff designated 'decision making staff'	07/11/2024	Establish how line managers review and approve interests, gifts/hospitality	07/11/2024	Review of procedural guidance utilising current systems and manual processes	07/11/2024	Communication and awareness to all directors, staff and line managers	07/11/2024	Introduction of bi-annual prompts to 'decision making staff'	07/11/2024	Consideration of addition of cap on fee earning outside of NHSBT to Conflicts of Interest policy, and registration process of such	30/04/2025	Investigation into digital solution for registering/approving interests, gifts/hospitality	31/12/2025
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Previously Considered by																			
The policy and a report on the effectiveness of current Conflicts of Interest management were reviewed by ARGC on 16 May 2024.																			
Recommendation <i>Complying with Notes i and ii</i>	The Board is asked to approve the new format of the Conflicts of Interest Policy, as presented and note the planned action to ensure compliance with the policy can be evidenced.																		

Risk(s) identified (Link to Board Assurance Framework Risks)	
BAF P-11 Corporate Governance risk – <i>addition to BAF pending Board approval</i>	
Strategic Objective(s) this paper relates to: [Click on all that apply]	
<input type="checkbox"/> Collaborate with partners <input type="checkbox"/> Invest in people and culture <input type="checkbox"/> Drive innovation <input checked="" type="checkbox"/> Modernise our operations <input type="checkbox"/> Grow and diversify our donor base	
Appendices:	N/A