NHS Blood and Transplant

Board Meeting in Public

Tuesday, 21 July 2026

Title of Paper	Conflicts of Interest Policy and Annual Assurance Report	**Agenda No.**	4.1
Nature of Paper	☒ Official	☐ Official Sensitive	
Author	Louise Espley, Corporate Governance Manager		
Lead Executive	Helen Gillan, Director of Quality and Governance		
Non-Executive Director Sponsor	Ian Murphy		
Presenter(s) at Meeting	Silena Dominy, Company Secretary		
Presented for	☒ Approval ☒ Assurance	☐ Information ☐ Update	
Is there a plan to communicate this to the organisation?	☐ Yes ☒ No ☐ Yet to be determined		

Executive Summary

The Conflicts of Interest Policy was approved as a Board Level Policy in June 2024, a detailed review and re-write of the policy was undertaken in 2025 and approved by the Board in July 2025. The policy is subject to an annual review and addresses two areas of compliance, conflicts of interest declarations and gifts/hospitality declarations.

This paper details progress with the action plan approved in 2025, current rates of compliance with COI reporting, and data on gifts/hospitality reporting. The annual review of the policy has also taken place and a revised, (track changed) version of the policy is provided for approval following its endorsement by the Audit, Risk and Governance (ARGC) in April 2026.

Prior to recent Directorate focused awareness activity, compliance with the COI element of the policy stood at 28%. As of April 2026 this figure had risen to 68% and by June 2026 compliance is reported at 85%, demonstrating that the awareness activity has had a positive impact. Following improvements in reporting, this is the first year that we can confidently report an overall compliance level. This figure provides a benchmark to report against in 2026/27 and beyond.

Additionally, there has been a noticeable increase in the number of gifts and hospitality declarations made during 2025/26, with circa 11 declarations per month being received (a total of 136 for the year) versus 13 gifts/hospitality declarations for the whole of 2024/25.

Previously Considered by

Audit, Risk and Governance Committee, 30 April 2026

Recommendation

The Board is asked to **APPROVE** the proposed revisions to the policy and to confirm that the report provides assurance in terms of actions taken and proposed, to continually improve compliance.

Risk(s) identified (Link to Board Assurance Framework Risks)

P11 – Corproate Governance

Strategic Objective(s) this paper relates to:

☒ Modernise our operations ☒ Invest in people and culture

Appendices:	Appendix 1 – COI Policy (with track changes)

Conflicts of Interest Policy and Annual Assurance Report

Introduction:

1. The Conflicts of Interest (COI) Policy was approved as a Board Level Policy in June 2024, and an updated policy was approved by ARGC and the Board in July 2025.
2. Since the report to the ARGC in May 2024, which highlighted several gaps in compliance, targeted work has been taken to implement actions to improve compliance with COI reporting and the declaration of gifts and hospitality.
3. This paper describes the status of the action plan approved by the ARGC and Board in July 2025 and includes current rates of compliance with COI reporting and data on gifts/hospitality reporting. Additionally, the annual review of the policy has taken place and a revised, (track changed) version of the policy is provided for approval, following its endorsement by the ARGC in April 2026.

Policy Background and Aim:

4. The policy covers requirements in respect of conflicts of interests and gifts, hospitality, sponsorship and donations. All of which are transacted in different ways in NHSBT.
5. Public sector bodies such as the NHS, which are accountable to the public at large, must be impartial and honest in the conduct of their business. In turn, their members of staff and Board members should undertake their duties with the highest standards of probity and remain beyond suspicion. Providing best value for taxpayers and ensuring that decisions are taken transparently and clearly, are both key principles in the NHS Constitution. As an organisation and as individuals, we have a duty to ensure that all our dealings are conducted to the highest standards of integrity and that NHS monies are used wisely to ensure our finite resources are used in the best interests of patients.
6. The policy aims to ensure that NHSBT has robust procedures and processes for the effective management of conflicts of interest, supporting an organisational culture that proactively and positively addresses them. It also seeks to protect the organisation, its decision-making, reputation, and stewardship of public funds from any actual or perceived impropriety.

Assurance – June 2026:

7. In July 2025 the Board approved an action plan to progress efforts to achieve improved compliance with the policy. A summary of the action plan with progress updates is provided below.

July 2025 action plan update:

	Action	By whom	Timeline	Evidence
1	Develop a further communications plan to raise awareness of the revised COI policy.	Company Secretary	Completed March/April 2026	Annual communications to all staff rolled out in April 2025 and April 2026, ahead of deadline for annual COI declarations.
2	Update guidance on LINK to reflect 2025 policy changes.	Company Secretary	Completed March/April 2026	March 2026 LINK guidance updated, aligned with communications to all staff
3	Progress consideration of fee earning/private work outside of NHSBT to Conflicts of Interest policy or contracts of employment.	People Directorate and Company Secretary	Original timeline - December 2025. Action closed	Following review the People Directorate advised that this is not a necessary inclusion in the policy at this time. (See paragraph 11 below)
4	Implement a system to gain assurance that annual COI declarations are made by those required to by the COI policy.	People Directorate and Company Secretary	Completed April 2026	Compliance reporting on COI declarations is now available to the Company Secretary Team.
5	Implement a digital solution for registering/approving interests, gifts/hospitality.	Company Secretary and Digital, Data and Technology Services.	Original timeline, March 2026. Action closed, March 2026 following detailed scoping exercise	At an estimated cost of £28k it is not considered good value for money to progress this action at this time.

	Action	By whom	Timeline	Evidence
6	Consider drafting guidance to address overseas attendance at conferences in relation to hospitality.	Company Secretary	Completed March 2026.	Addressed at SMT meetings and via latest guidance.
7	Consider what information from the gifts and hospitality register should be available in the public domain.	Company Secretary	Original timeline, March 2026. Revised deadline of May 2026 for the Board Gifts and Hospitality Register publication.	Considering the approach of NHS England it has been determined that moving forward we will publish on our website annually, alongside the Board Interests Register, a Board Gifts and Hospitality Register and a general statement of our policy position and the activity and compliance in the year.

8. There has been a strengthened approach to promote awareness of the policy in 2025/26 building on the actions taken during 2024/25. All staff have access to step-by-step guidance on ‘LINK’ in respect of both declaring COI’s and gifts/hospitality and updated articles have appeared over several weeks in both the ‘Managers Digest’ and ‘Priorities Round-Up’.
9. Additionally, the Company Secretary and Corporate Governance Manager have attended Senior Management Team meetings across NHSBT to outline the requirements of the policy and to run through step-by-step guidance on how to make a COI declaration or gift/hospitality declaration. These meetings have been well received in terms of raising awareness and addressing queries.

Conflict of interest declarations compliance:

10. Prior to the recent awareness activity, compliance with the COI element of the policy stood at 28%. As of 23 April 2026 (reporting date to ARGC), this figure had risen to 68%, and as of June 2026 compliance is 85%, demonstrating that the awareness activity has had a positive impact.
11. Significant work has been undertaken to strengthen reporting and improve confidence in the underlying COI data, in collaboration with colleagues in the Strategy, Planning and Change team within the People Directorate. As a result, the Company Secretary team are able to run reports and interrogate the data with sufficient depth to provide meaningful assurance.

12. With the ability to run reports at Directorate level, compliance has, since May 2026 been reported on a monthly basis to the Executive Team via the Quality and Governance Performance Report.

Gifts and Hospitality declarations compliance:

13. In respect of action five in the table above, a three-phase scoping exercise was undertaken with colleagues from the Digital, Data and Technology Services (DDTS) Directorate to consider the feasibility of implementing a digital solution. The outcome of this was that it would cost circa £28k to implement a digital system at this time as internal resource was not available. The Company Secretariat determined that this would not represent good value for money, given the current volume of declarations, therefore the proposal has not been progressed and the action closed. The position may be re-visited at such time that the volume of declarations increases considerably.
14. There has been a significant increase in the number of gifts and hospitality declarations made during 2025/26, with circa 11 declarations per month being received (a total of 136 for the year) versus 13 gifts/hospitality declarations for the whole of 2024/25 (circa one per month). This provides assurance that the guidance and publicity around when and how to declare is having some impact.
15. Following the decision not to proceed with implementing a digital system for gifts and hospitality declarations (action five above), due to cost pressures and value for money considerations, the team will focus in 2026/27 on enhancing the existing declaration form and producing further guidance for managers who approve/reject requests to give/receive gifts and hospitality. This work will include adding clearer completion guidance and introducing mandatory fields so that forms cannot be submitted unless fully completed. These improvements are expected to increase the quality of information provided and reduce the time the team currently spends seeking clarifications.

Policy update – June 2026:

1. In July 2025 the Board approved substantial amendments to the COI policy (BLP1). As a result of that comprehensive review, only minor changes are proposed at this review. A track changed version of the policy is provided at Appendix 1.

Conclusion:

2. This report demonstrates improved adherence to the COI Policy during 2025/26 and the first quarter of 2026/27. A stand-alone action plan is not proposed for 2026/27, as a structured schedule of monthly performance reporting to the Executive Team is in place. Annual guidance updates and targeted communications to non-compliant staff will be incorporated into business-as-usual processes, with compliance continuing to be reported to ARGC and the Board on an annual basis, alongside the annual policy review.

Recommendation:

3. The Board is asked to approve the proposed revisions to the policy. Additionally, the Board is asked to confirm that the report provides assurance in terms of actions taken and proposed, to improve compliance with the policy.