

Our Reference North East and North Cumbria ICB\
FOI ICB 25–242

North East and North Cumbria ICB
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By Email

10 October 2025

Dear Applicant

Freedom of Information Act 2000 – Request for Information – NHS North East and North Cumbria Integrated Care Board (NENC ICB)

Thank you for your request received on 22 September 2025 for information held by NHS North East and North Cumbria Integrated Care Board (the ICB) under the provisions of the Freedom of Information Act 2000. The ICB covers the areas of County Durham, Newcastle Gateshead, North Cumbria, North Tyneside, Northumberland, South Tyneside, Sunderland, and Tees Valley.

Please find the information you requested on behalf of the ICB as follows.

Your Request

I am writing to make a formal request for information under the provisions of the Freedom of Information Act 2000 regarding collaborative working and joint working arrangements entered into by your organisation and companies in the pharmaceutical industry.

For clarity, I'm talking about formal arrangements between an NHS organisation and one or more pharmaceutical companies, governed by the Department of Health and Social Care's definition: "Situations where, for the benefit of patients, one or more pharmaceutical companies, the NHS and others (e.g. Patient Groups) pool skills, experience and/or resources for the joint development and implementation of patient-centred projects and share a commitment to successful delivery."

Transparency is a must for these projects, according to both the government and the Association of British Pharmaceutical Industry.

ABPI oversees the implementation of its code of practice, which contains specific instructions for industry when participating in joint working projects. It says: "All Joint Working projects must be underpinned by a formal Joint Working Agreement, an executive summary of which must be made publicly available before the project begins."

I would therefore like to request the following records from you:

www.northeastnorthcumbria.nhs.uk 

NorthEastandNorthCumbriaNHS 

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1. A copy of the executive summary of each joint working agreement your ICB entered into with a pharmaceutical industry company from 1 April 2019 to 31 August 2025. Please include any records that were held by the predecessor organisations, the clinical commissioning groups, that are now held by your ICB.
2. A copy of the ICB's policy on joint working with the pharmaceutical industry.

Please send these in an electronic format, either PDF or one compatible with Microsoft Word.

I appreciate this may include searching for many multiple documents held by the ICB. I do not believe they should be any need to redact them as these documents are intended to be made public.

However, I would respectfully point out that in *Chief Constable of South Yorkshire v Information Commissioner* (2011) the High Court ruled that a public body cannot include the time it would spend redacting exempt information in its estimates of the costs of complying with an FOI request and deciding whether complying would exceed the cost limit.

Our Response

We can confirm, as per Section 1(1) of the Freedom of Information Act 2000, the ICB holds some of the information you have requested.

1. No formal joint working arrangements or collaborative projects have been identified between the NHS North East and North Cumbria ICB (or its predecessor CCGs) and any pharmaceutical companies ([ABPI members list](#)) during the period 1 April 2019 to 31 August 2025, as defined under the Department of Health and Social Care's guidance on joint working.

To support transparency, the following key national reference documents are provided which guide the ICB's approach to managing relationships and ensuring compliance in this area:

- ABPI Code of Practice (2024): <https://www.abpi.org.uk/reputation/abpi-2024-code-of-practice/>
 - DHSC Supplier Code of Conduct: <https://www.gov.uk/government/publications/dhsc-supplier-code-of-conduct/dhsc-supplier-code-of-conduct>
 - DHSC Principles for Engaging with Industry Stakeholders: <https://www.gov.uk/government/publications/principles-for-engaging-with-industry-stakeholders/principles-for-engaging-with-industry-stakeholders>
2. The ICB's Standards of Business Conduct and Declarations of Interest Policy (ICBP039, v4.0, approved November 2024) provides the framework for managing all relationships with external organisations, including those involving the pharmaceutical industry. This policy incorporates the former "Commercial Sponsorship and Joint Working" policy and is publicly available here: <https://northeastnorthcumbria.nhs.uk/media/ygyjfe5n/standards-of-business-conduct-and-declarations-of-interest-policy.pdf>

As the policy is publicly available and in accordance with s.21 of the FOIA, we are not required to provide information in response to a request if it is reasonably accessible to you by other means.

The ICBP039 policy sets out:

- Definitions of joint working and sponsorship arrangements.
- Requirements for transparency, declarations of interests, and publication of registers.
- Governance arrangements to ensure compliance with the ABPI Code of Practice and DHSC guidance.
- The principle that sponsorship or joint working must never compromise commissioning decisions.

This response covers the North East and North Cumbria ICB area as a whole. Future joint working projects (if entered into) would be subject to the ICBP039 policy, and executive summaries would be published before project initiation, in line with ABPI requirements.

In accordance with the Information Commissioner's directive on the disclosure of information under the Freedom of Information Act 2000 your request will form part of our disclosure log. Therefore, a version of our response which will protect your anonymity will be posted on the NHS ICB website <https://northeastnorthcumbria.nhs.uk/>.

If you have any queries or wish to discuss the information supplied, please do not hesitate to contact me on the above telephone number or at the above address.

If you are unhappy with the service you have received in relation to your request and wish to request a review of our decision, you should write to the Information Governance Manager using the contact details at the top of this letter quoting the appropriate reference number.

If you are not content with the outcome your review, you do have the right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act 2000. Generally, the Information Commissioner cannot make a decision unless you have exhausted the ICB's complaints procedure.

The Information Commissioner can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or www.ico.org.uk.

Any information we provide following your request under the Freedom of Information Act will not confer an automatic right for you to re-use that information, for example to publish it. If you wish to re-use the information that we provide and you do not specify this in your initial application for information then you must make a further request for its re-use as per the Re-Use of Public Sector Information Regulations 2015 www.legislation.gov.uk. This will not affect your initial information request.

Yours faithfully

Information Governance Support Officer

**Information Governance Support Officer
North East and North Cumbria Integrated Care Board**