

Meeting: CCG Governing Body			
Meeting Date	27 April 2022	Action	Consider
Item No.	6	Confidential	No
Title	ICS / Closedown Update		
Presented By	Clare Postlethwaite, Associate Director of Finance		
Author	Clare Postlethwaite, Associate Director of Finance		
Clinical Lead	Cathy Fines, CCG Chair		

Executive Summary

The closedown of the CCG and transition to new Integrated Care Organisational arrangements were originally planned for 1st April 2022. In December 2021, notification was received that these timescales were to be delayed by three months with a transition date of 1st July 2022 now anticipated.

This report outlines work to date in relation to CCG closedown and also outlines the key legacy items within each workstream area that will form part of the CCG exit report.

The report also outlines the likely governance and sign-off process to be adopted over the next few months in advance of the 1st July 2022 transition date.

Recommendations

The Governing Body are asked to note the content of this report and in particular;

1. Consider whether or not delegated authority for some key due diligence closedown items should be approved to allow flexibility in the approvals process in the approach to the 1st July 2022 transition date. This delegation would be to the CCG Accountable Officer plus the relevant CCG Executive Director, dependent on content and subject of a particular closedown document.
2. Note the next steps regarding formal sign-off relating to CCG closedown.

Links to CCG Strategic Objectives

SO1 - To support the Borough through a robust emergency response to the Covid-19 pandemic.	<input checked="" type="checkbox"/>
SO2 - To deliver our role in the Bury 2030 local industrial strategy priorities and recovery.	<input checked="" type="checkbox"/>
SO3 - To deliver improved outcomes through a programme of transformation to establish the capabilities required to deliver the 2030 vision.	<input checked="" type="checkbox"/>

Links to CCG Strategic Objectives	
SO4 - To secure financial sustainability through the delivery of the agreed budget strategy.	<input checked="" type="checkbox"/>
Does this report seek to address any of the risks included on the Governing Body Assurance Framework? If yes, state which risk below:	
GBAF	

Implications						
Are there any quality, safeguarding or patient experience implications?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
Has any engagement (clinical, stakeholder or public/patient) been undertaken in relation to this report?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
Have any departments/organisations who will be affected been consulted ?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
Are there any conflicts of interest arising from the proposal or decision being requested?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
Are there any financial Implications?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
Is an Equality, Privacy or Quality Impact Assessment required?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
If yes, has an Equality, Privacy or Quality Impact Assessment been completed?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
If yes, please give details below:						
If no, please detail below the reason for not completing an Equality, Privacy or Quality Impact Assessment:						
This work will happen as necessary at Greater Manchester level linked to establishment of the new Integrated Care Organisational arrangements.						
Are there any associated risks including Conflicts of Interest?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
Are the risks on the CCG's risk register?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>

Governance and Reporting		
Meeting	Date	Outcome
CCG Governing Body	27/04/2022	

--	--	--

ICS / CCG Closedown

1. Introduction

- 1.1. This report outlines the work progressed to date in relation to CCG closedown and the related transition to the new Integrated Care Organisational working arrangements.
- 1.2. Guidance is awaited at national level with regard to the formal sign-off processes and in particular the required form and content of the Accountable Officer due diligence sign-off letter. The Greater Manchester closedown team are also in the process of confirming the specific receiver handover requirements at workstream level.
- 1.3. In view of the fact that more detailed guidance is awaited at both a local and national level, this report outlines the likely requirements for review and sign-off at CCG level as we move towards the 1st July 2022 transition date.

2. Background

- 2.1. In the approach to the 1st July 2022 transition date, the CCG continues to use the nationally recognised due diligence checklist as the key guiding document to inform workstream individual workplans and the related outputs.
- 2.2. The Greater Manchester closedown team have now confirmed that the existing Greater Manchester working groups will act as receivers for the purposes of CCG closedown. For each key workstream area, the related Greater Manchester working group is now in the process of defining in exact terms the receiver information requirements in each area.
- 2.3. Recognising that direction is awaited at both local and national level, work has been progressed at CCG level to understand the likely legacy sign-off requirements as an exiting organisation.

3. CCG Closedown Due Diligence Sign-Off Requirements

- 3.1 Work continues at workstream level to ensure that all items identified on the due diligence checklist are in a form ready to be handed over to the ICB as the receiver organisation when requested.
- 3.2 At this stage it is anticipated that the following documents will need to be approved by CCGs as part of the closedown process :-
 - ICB scheme of delegation
 - ICB constitution
 - Accountable Officer due diligence sign-off letter
- 3.3 At this stage, both the ICB scheme of delegation and constitutional draft documents

remain in draft form therefore are not being tabled at this meeting. When in final form the Greater Manchester closedown team are to advise in greater detail the sign-off process required at CCG level. The potential for a Committees in Common meeting to be convened is being explored currently to avoid the need for the documents to be approved at individual CCG Governing Body meetings.

- 3.4 The Accountable Officer due diligence sign-off letter will be required as part of the legislative CCG closedown process and national direction on the content and form of this letter is awaited. It is anticipated that once agreed, this letter could be taken to a CCG Governing Body meeting in either May 2022 or June 2022 for approval.
- 3.5 Whilst there has been no requirement set for CCGs to approve legacy exit reports, a number of CCGs are considering this as part of the closedown process in order to provide additional assurance that all elements of the due diligence closedown work have been appraised and completed appropriately.
- 3.6 In view of the fact that it is likely that much of the transitional detail relating to ICB establishment and CCG closedown is likely to happen beyond the 1st July 2022, it is proposed that a formal legacy closedown document is presented to the May 2022 CCG Governing Body for completeness and to assure Governing Body members that all necessary due diligence handover work has been completed.

4 Update by Workstream Area / Key Handover Points to Consider

- 4.1 The nationally set due diligence checklist remains the basis of the key areas of closedown work within each workstream area. That said, it is recognised that in many areas the due diligence items represent core business 'work in progress' items that will transfer to the ICB at a point set in the future.
- 4.2 On this basis, and summarised here, are key areas of work completed to date within each workstream area along with the likely key summary documents and items of work that will form part of the formal due diligence legacy exit report.
- 4.3 **Human Resources**
 - 4.3.1 First cut of Electronic Staff Record (ESR) now undertaken and submitted and a date awaited for the final cut to be submitted. The final ESR submission will be required within 28 days of ICB transition, confirmation with regard to the actual submission date is awaited.
 - 4.3.2 Work is ongoing to ensure that the final ESR submission fully includes key employment data relating to any flexible working arrangements in place and also that job descriptions on file for staff are accurate and appropriately reflect current roles.
 - 4.3.3 It is recognised that the current staff consultation that commenced on 12/04/22 relates only to the move from CCG to ICB employment recognising that further consultation with staff is likely to be required once clarity on locality and Greater Manchester functions is known.
 - 4.3.4 As at 21/04/22 43 of the 110 questionnaires to staff have been returned and to date only one member of staff has requested a formal consultation meeting to be put in place.

4.3.5 Initial indications suggest that the outputs and key data in this area are likely to form a key element of the nationally defined Accountable Officer due diligence sign-off letter.

4.4 **Corporate**

4.4.1 The focus of work in this area has been the need to ensure that key records are up to date in readiness for handover to the ICB.

4.4.2 It is anticipated that the following key items will form part of the CCG closedown report (noting that there are additional items on the due diligence checklist that will be included with a nil return for Bury CCG) :-

- Listing of any open public consultations regarding service change.
- List of any open risks at point of CCG disestablishment.
- Detail of all current memorandum of understanding arrangements currently in place.
- Policy register – both clinical and non-clinical policies.
- Summary list of any areas where CCGs have differing policies in place.
- List of current Subject Access Requests (SAR.)
- List of current Freedom of Information (FOI) requests.
- Summary list of any open learning points from Emergency preparedness, resilience, and response (EPPR.)
- Documents relating to current constitutional/governance arrangements of CCG.
- List of outstanding/open complaints to transfer.
- List of any open learning points from patient surveys and feedback.
- List of outstanding/pending litigation claims to transfer.
- Summary list of any open litigation points from claims that would transfer.
- Details of CCG current insurance arrangements and related documentation.
- Mapping of all CCG statutory duties.

4.5 **Finance and Contracts**

4.5.1 Work continues to complete the 2021/22 annual accounts process however, to date no areas of risk to CCG transition have been identified in this area.

4.5.2 The delay to CCG closedown means that there will be a requirement to conduct a second financial closedown relating to the period April to June 2022.

4.5.3 Initial indications suggest that finance key data is likely to form a specific element of the nationally defined Accountable Officer due diligence sign-off letter.

4.5.4 Further clarity is awaited with regard to the likely structures and approvals processes to be put in place regarding the resourcing and development of strategic estates proposals in particular. Once this detail has been confirmed, localities will have greater clarity with regard to their role in contributing and influencing these decisions moving forward.

4.6 **Information Technology**

4.6.1 Audit work continues relating to both hardware and software infrastructure, this work is in order to ensure that all relevant detail is captured in the transition to the ICB working arrangements.

4.6.2 Work is being progressed to ensure that continuity in all key contracts has been confirmed to remove any risk over the transitional period.

- 4.6.3 It is anticipated that the following key items will form part of the CCG closedown report in this area :-
- List of software licenses in place for existing systems.
 - Summary hardware listing based on staff holder audit undertaken as part of closedown process.

4.7 Information Governance

- 4.7.1 A baseline assessment of the current position and of compliance with current regulations has been undertaken via a questionnaire to key staff. Follow-up meetings with teams have been put in place as necessary to ensure that the necessary support is in place in advance of CCG transition.
- 4.7.2 To date, one area of risk has been identified relating to Continuing Healthcare due to the complexity and volume of the data held by this team along with the imminent move to a new system. Regular meetings are being held with this team to monitor progress and to provide support as necessary.
- 4.7.3 A site visit to key CCG facilities – Knowsley Place, Townside, Town Hall, has now been undertaken to assess the existence of any legacy paper records that need to be considered as part of CCG transition. The visit did reveal some additional legacy records were in existence and actions are now in place to resolve as appropriate with a follow-up visit to site being proposed over the coming weeks.
- 4.7.4 It is anticipated that the following key items will form part of the CCG closedown report in this area :-
- Confirmation of records transition plan – including reference to any historic financial records.
 - Confirmation of CCG information governance transition plan and any related actions being taken.

4.8 Quality

- 4.8.1 Work has been undertaken locally to ensure that the transition from the CCG Quality and Performance Committee to the newly established Systems Assurance group has effectively captured all related risks.
- 4.8.2. This is a workstream area where the focus of due diligence work has been the need to ensure that key records are in place and up to date in readiness for handover to the ICB.
- 4.8.3 It is anticipated that the following key items will form part of the CCG closedown report :-
- List of current CQC inspections / warning notices / open action plans.
 - Open learning points from past System Oversight Framework assessments.
 - Register of relevant infection control records.
 - List of open serious incidents (SIs.)
 - List of open/quality improvement plans.
 - List of personal health budgets.
 - List of open individual funding requests/appeals/deferred requests.
 - List of any open investigations / open regulation 28 coroner reports.
 - List of current open learning disabilities mortality review (LeDeR.)
 - List of open learning points from patient surveys and feedback.

5 Actions Required

5.1 The Governing Body are asked to note the content of this report and in particular;

5.1.1 Consider whether or not delegated authority for some key due diligence closedown items should be approved to allow flexibility in the approvals process in the approach to the 1st July 2022 transition date. This delegation would be to the CCG Accountable Officer plus the relevant CCG Executive Director, dependent on content and subject of a particular closedown document.

5.1.2 Note the next steps regarding formal sign-off relating to CCG closedown.

Clare Postlethwaite

Associate Director of Finance