

Meeting: CCG Governing Body			
Meeting Date	22 June 2022	Action	Receive
Item No.	6	Confidential	No
Title	CCG Closedown Update – Legacy Report		
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 the new Integrated Care Organisational (ICO) are on track to happen on 1st July 2022.

Over recent months, significant due diligence work has occurred to ensure that the CCG is in a state of readiness to transition to the Integrated Care Organisation.

This report outlines final due diligence work completed in readiness for CCG closure and summarises the key pieces of work that have underpinned this preparation.

Recommendations

That the Governing Body;

- Note the contents of the report and in particular the due diligence work completed in anticipation of CCG closure and the transition to the Integrated Care Organisation.
- Note the content of this report and in particular note the completion of the necessary due diligence work to enable CCG closure and the related transition to the ICO.
- Note the risks outlined recognising that the due diligence work that has been completed did not flag any risks or issues that would impact on the 1st July transition date.
- Note that the due diligence checklist submission has been assured by various parties prior to submission and can be shared with them for information if required.
- Note the proposed interim governance arrangements outlined.

Links to CCG Strategic Objectives

SO1 - To support the Borough through a robust emergency response to the Covid-19 pandemic.	<input checked="" type="checkbox"/>
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Links to CCG Strategic Objectives	
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"/>
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 checked="" 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	22/06/2022	

CCG Closedown Update Report – Legacy Report

1. Introduction

- 1.1. This report outlines the due diligence work progressed over recent month in readiness for the transition to the Integrated Care Organisational (ICO) working arrangements.
- 1.2. Within this report, the key areas of work completed within each work stream areas are outlined for information and note.

2. Background

- 2.1. CCG closedown and a transition to the ICO is to happen on 1st July 2022.
- 2.2. The nationally defined due diligence checklist has been the guiding document for all CCGs within work to date and has formed the basis of final due diligence checks.
- 2.3. All CCGs were required to submit their signed accountable officer letter, human resources transfer schedule and updated due diligence spreadsheet by 1st June 2022.

3. Key Work Areas Completed to Date

- 3.1 The key due diligence documents that CCGs were required to submit by 1st June 2022 were :-
 - Signed Accountable Officer letter.
 - HR staff transfer schedule.
 - Due diligence checklist.
- 3.2 It can be confirmed that all documents were submitted on time and complete in advance of the 1st June 2022 for Bury CCG.
- 3.3 It is anticipated that a refresh of the due diligence spreadsheet may be required from CCGs towards the end of June 2022 to reflect any major changes during the final weeks of CCG operations.
- 3.4 The due diligence submission that was provided has been reviewed by workstream leads, audit chair and executive directors prior to submission. Due to the size of the document, it has not been tabled at this meeting however, can be shared with any Governing Body member who would like to review the detail for their own reference.
- 3.5 Summarised here are key areas of due diligence work completed to date within each workstream area :-
- 3.6 **Human Resources**
 - 3.6.1 Electronic Staff Record (ESR) submission and related staff transfer document have both been completed. Work with managers and staff has been progressed to ensure that this transfer document includes key contractual and

- flexible working employment information.
- 3.6.2 All personal files in Bury are now held electronically to enable a transfer to the Integrated Care Organisation as required in the future.
 - 3.6.3 At a Greater Manchester level, an assessment of all employment related contracts in place has been made with individual CCG arrangements extended where necessary over the transition period.
 - 3.6.4 Consultation relating to key executive roles continues.
 - 3.6.5 All CCG members of staff will transfer to the Integrated Care Organisation on 1st July 2022.

3.7 Corporate

- 3.7.1 A full summary record has now been collated to detail where key documents are held and the process for regular update and reviews as required.
- 3.7.2 Detailed work has now been completed to ensure that all relevant clinical and non-clinical policies are held centrally to aid in the imminent transition to the ICO.
- 3.7.3 The due diligence submission has specifically outlined the number of cases/items and level of risk in a number of key corporate documents including Freedom of Information register and the corporate risk register.

3.8 Finance and Contracts

- 3.8.1 Whilst the due diligence checklist includes a significant number of items relating to finance, in the main these are covered by the normal annual accounts closedown process.
- 3.8.2 To date no material issues have been raised during closedown of the usual CCG yearend and none are anticipated for the quarter one financial accounts closure prior to CCG transition.

3.9 Information Technology

- 3.9.1 An initial audit of software packages installed across the CCG has been completed. A number of these packages are to be managed by GMSS at a Greater Manchester level but, a small number of local contracts were identified as part of this review. In all cases, the necessary arrangements have been made to extend contracts as necessary to ensure continuity during the transition period.
- 3.9.2 A hardware audit has also been completed with the necessary write-offs as a result of this assessment being progressed as appropriate.

3.10 Information Governance

- 3.10.1 Baseline assessment of current position and compliance with current regulations has been completed to identify any gaps in information that need filling before transition. In all cases, follow up meetings with managers have been progressed to recheck the position in each department.
- 3.10.2 Data Security and Protection Toolkit (DSPT) audit was undertaken in February 2022 by the MIAA internal audit team.
- 3.10.3 Where gaps have been identified in specific departments, the necessary follow up meetings and support have been put in place to resolve any issues in advance of CCG closure.
- 3.10.4 Physical reviews of key sites have been undertaken and identified a small number of paper records being stored. All of these records have now been

assessed and dealt with as appropriate by the relevant department.

3.11 Quality

3.11.1 A detailed central log of the key quality related documents is now in place to ensure ease of access to key information during the CCG closedown process.

3.12.2 For all key areas on the due diligence checklist headline numbers and risk categorizations have been included for completeness. In all cases the due diligence submission clearly states where a particular summary record is held to allow ease of access after CCG closure.

4. Assurance of Closedown Processes – Internal Audit (MIAA)

4.1 The interim assessment of CCG closure processes by internal audit (MIAA) has already been completed and had concluded that robust due diligence processes were in place. A second and final review has now been completed and has confirmed that the necessary controls and processes remain in place relating to CCG closedown processes hence, concluding that the necessary robust processes are in place to support CCG closedown.

4.2 MIAA are also in the process of conducting a statutory duty audit for all CCGs focused on the final three months prior to transition – it is anticipated that this report will be completed within the next couple of weeks.

4.3 At a Greater Manchester level, Browne Jacobsen have been commissioned to assess due diligence processes and in particular the state of readiness of the ICO – the final report has now been received and does not outline any material issues with regard to the CCG closedown and transition process in place in Bury.

5 Risks to ICB Transition

5.1 Currently within the corporate risk register, two risk relating to CCG closedown are being reported – one relating to the risk of staff losses due to the uncertainty during the ICO transition period and the second relating to the potential for lack of clarity regarding locality and ICO functions on day one.

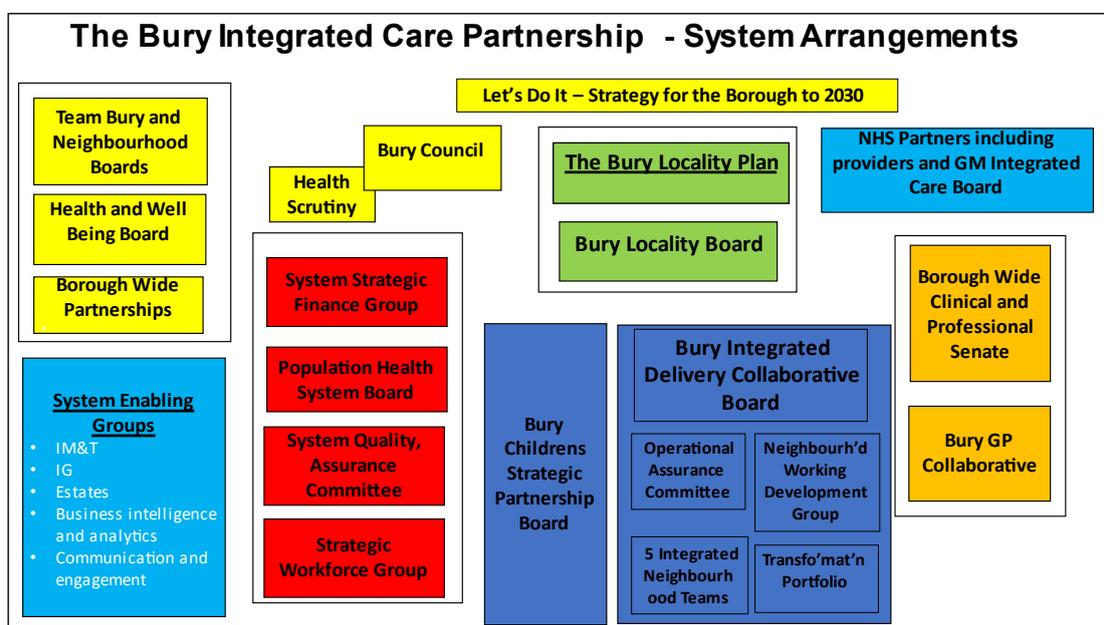
5.2 Whilst the closedown of the CCG and the related transition to ICO working arrangements has caused ongoing uncertainty with staff to date, significant staff losses have not been experienced as a direct result.

5.3 The corporate risk register also outlines a risk relating to the potential for a lack of clarity relating to the split of functions between the ICO and at a locality level on day one of ICO operations. Whilst some direction at Greater Manchester level has been provided relating to day one operations, this detail is largely at a higher level with clarity about the functional split at a locality and Greater Manchester level still being worked up. In order to manage this ongoing risk, the CCG continues to ensure processes are in place to ensure that local operational arrangements continue to work safely and effectively until the point that the ICB gives clear direction about any future focus or location of individual functions.

5.4 Over recent months, work has been ongoing with the Continuing Healthcare team recognising some pressures within this team relating to clinical assessments and also linked to the related transition to a new database. As the date of CCG closedown approaches, it has now become apparent that risks will exist in this area at the point of transfer hence, the related risk registers are to be updated to reflect this to ensure that all risks are correctly scored and identified to inform the ICO at the point of transition.

6 Locality Board Governance

6.1 Partners in the Bury Health and Care System have been working for the last six months to establish and operate in shadow form the partnership arrangements for the Bury Integrated Care Partnership. The operating model previously endorsed recognises the following diagram :-



6.2 Within this arrangement the Locality Board is recognisable as a focal point for the strategic leadership of the Bury Integrated Care Partnership – with a line of accountability to the Greater Manchester ICO and also to Bury Council.

6.3 The role of the Locality Board to date has been understood to provider strategic context, build partnerships, create the conditions for the Bury Integrated Delivery Collaborative, be assured on quality, finance, workforce, and the contribution of population health, and create the conditions for expert clinical and professional leadership, working with political and managerial leadership to be at the heart of the partnership working.

6.4 It is recognised that further work is required across Greater Manchester to understand the nature of the delegated authority to the Locality Board from the Greater Manchester ICO, other NHS providers and from the Council. These issues are not

yet resolved.

- 6.5 During the operation of the transitional partnership arrangements it has been necessary to continue other system governance – including the CCG Governing Body and the Strategic Commissioning Board (SCB.)
- 6.6 The Strategic Commissioning Board is a committee with delegated authority from the CCG and from Council Cabinet to take commissioning decisions in the context of an integrated (pooled and aligned) budget. It should be noted however that during this transitional period the number of meetings of this Board have been reduced and decisions limited to only those decisions that of necessity required a decision from the respective governance.
- 6.7 In the absence of clarity on the expectation and authority of the Locality Board, it is necessary to ensure a mechanism exists to allow the Strategic Commissioning Board to continue to discharge its obligations relating to pooled budget management in particular.
- 6.8 It remains important however, that the Locality Board is recognised as a single focal point for the strategic leadership of the Bury integrated care partnership.
- 6.9 On this basis, it is proposed that the Strategic Commissioning Board meets as required to continue the decision-making authority of those issues within its scope, but does so at the same time as the Locality Board. There will be a need to review the existing membership of the Strategic Commissioning Board given the impending changes to the CCG/ICO governance arrangements from the 1st July 2022 and along with recent changes to the Council's Cabinet.
- 6.10 The agenda for the Locality Board will clearly differentiate where there is a decision that relates to the SCB and with whom the specific voting authority lies – limited as it will be to the members identified in the terms of reference of the SCB – council and Greater Manchester ICB.
- 6.11 An alignment of the current terms of reference (including membership) for the Strategic Commissioning Board and Locality Board needs to be undertaken. Within this review it is necessary to make clear that moving forward the Strategic Commissioning Board will sit within the Locality Board.

7 Actions Required

- 7.1 The Governing Body are asked to note the content of this report and in particular note the completion of the necessary due diligence work to enable CCG closure and the related transition to the ICO.
- 7.2 The Governing Body are asked to note the risks outlined recognising that the due diligence work that has been completed did not flag any risks or issues that would impact on the 1st July transition date.
- 7.3 The Governing Body are asked to note that the due diligence checklist submission

has been assured by various parties prior to submission and can be shared with them for information if required.

- 7.4 The Governing Body are asked to note the proposed interim governance arrangements outlined.

Clare Postlethwaite

Associate Director of Finance