

Accountable Officer Report

1. 360° Stakeholder Survey Results

The CCG's ability to successfully develop and maintain positive relationships with key partners and stakeholders is central to the effective commissioning of services that improve quality and outcomes for local people.

The annual CCG 360° stakeholder survey, commissioned by NHS England, provides a snapshot of how local stakeholders and partners view their working relationship with the CCG and their level of engagement in local commissioning. The survey aims to provide CCGs with data to inform ongoing organisational development and decision-making, evaluate progress and continue to build strong and productive relationships with stakeholders.

Stakeholders invited to complete the survey included our member GP practices, the Health and Wellbeing Board, Local Authority colleagues, Local HealthWatch and patient groups, NHS providers and neighbouring CCGs. As the Greater Nottingham CCGs are part of a developing Integrated Care System (ICS), common stakeholders have been approached as a collective, rather than on an individual CCG basis. This means that certain stakeholders (e.g. providers and local authorities) have provided an ICS-level view, rather than their perceptions of individual CCGs. Other stakeholders who are specific to individual CCGs (e.g. member practices and patients groups) have responded to the survey questions thinking about the specific CCG with whom they have a relationship.

As in previous years, Ipsos MORI was commissioned to co-ordinate the survey and their report, which is attached for information at **Appendix A**, provides a summary of the results along with detailed responses to each question.

The CCG's survey results are being analysed alongside those of the other three Greater Nottingham CCGs in order to identify any themes and required actions emerging from the survey results. The results of this work will be presented back to the Governing Body and Greater Nottingham Joint commissioning Committee (as appropriate) in July 2018.

2. General Data Protection Regulation (GDPR) Preparedness

On 25 May 2018 new legislation known as EU General Data Protection Regulation (GDPR) will replace the Data Protection Act 1998. The changes will affect all organisations processing personal data. Although in general the principles of data protection remain similar, the GDPR brings a greater emphasis on accountability and transparency, increased data subject rights and increased financial penalties for non-compliance. There is also a move from passive to active compliance and the CCG will not only be obliged to comply with the new law, but also to demonstrate compliance.

Information Commissioner's Office guidance on the requirements of the GDPR can be accessed here: <https://ico.org.uk/media/1624219/preparing-for-the-gdpr-12-steps.pdf>.

The CCG performs well against all Information Governance Toolkit criteria, which means that many of the GDPR requirements are already established as good practice. This has provided a good baseline to work from in order to demonstrate GDPR compliance. However, an action plan has been established and work has been progressing for some months to achieve compliance in a number of key areas, including:

- Identification of an appropriate lawful basis for all personal data processing
- Updating and publication of the CCG's Subject Access Request procedure
- Updating and publication of the CCG's Privacy Notice
- Inclusion of a new specific data protection clause within contracts involving the use of data processors.

The CCG is also required to appoint a Data Protection Officer (DPO) – see **Appendix B** for a detailed description of this role. It has been agreed that the Greater Nottingham CCGs' Head of Information Governance will fulfil the DPO role requirements for an initial 3-6 month period while further work is completed to fully assess workload requirements and to complete a benchmarking exercise to determine approaches being taken by CCGs in relation to this role across the country.

The Information Commissioner's Office has stated there will be no 'big bang' on 25 May. Whilst some aspects of compliance will continue to progress past the legislative enforcement date, there is confidence that the areas of biggest risk and for absolute implementation will be in place within this timeframe. Further work towards robust compliance form part of a wider 2018/19 Information Governance Development Plan, which also incorporates the requirements of the new Data Security Protection Toolkit (which replaces the former Information Governance Toolkit for 2018) as well as other national programmes of work including National Data Opt out and cyber security, all of which contribute to an increasingly robust approach to data protection requirements.

3. Proposed geographical footprints for NHS regional geographies

NHS England and NHS Improvement are working together to:

- Integrate and align national programmes and activities, operating through single teams where appropriate
- Integrate NHS England and NHS Improvement regional teams, to be led in each case by one Regional Director, working for both organisations, and move to seven regional teams to underpin this new approach.

Attached for information at **Appendix C** is a letter from NHS England and NHS Improvement regarding proposed regional geographies for the Midlands and East. NHS England and NHS Improvement will be taking a formal proposal for the new geographical footprints to its respective Boards, which will meet in common, on 24 May 2018.

4. Mandatory Conflicts of Interest Training

Members of the Governing Body will have been contacted about the requirement to complete NHS England's online training on conflicts of interest. The training package contains three modules:

- Module 1 covers what conflicts of interest are; how to declare and manage conflicts of interest, including individuals' responsibilities; and how to report any concerns.
- Module 2 provides further information on managing conflicts of interest throughout the whole commissioning cycle and in recruitment processes.
- Module 3 provides advice on how chairs should manage conflicts of interest; an overview of the safeguards that should be applied in Primary Care Commissioning Committees; and how to identify and manage breaches of conflicts of interest rules, through a series of practical scenarios.

Module 1 is mandatory and must be completed by all individuals employed or appointed by the CCG and anyone else who may be involved in the organisation's decision-making arrangements. The deadline for completing the mandatory element of the training is 31 May 2018 and the uptake will need to be reported to NHS England as part of the CCG's 2018/19 Quarter 1 Conflicts of Interest Self-Assessment. NHS England is expecting that at least 90% of the organisation will have completed the training by this date.

Governing Body members, particularly those that have formal chairing responsibilities are encouraged to also complete Module 3.

Previous communications to Governing Body members provided details about how the training modules can be accessed. If you are experiencing any problems in accessing or completing the training, please contact Joanne Simmonds, Head of Governance and Assurance at Joanne.Simmonds1@nhs.net.

Samantha Walters
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