

Policy Approval

1. Introduction

As reported to the Greater Nottingham CCG Governing Bodies at their meetings in May 2018, work has commenced to develop a suite of joint policies for implementation across the four CCGs. This work builds on policies already in existence for each CCG, so has primarily focussed on ensuring the alignment of systems and processes across the four organisations and updating roles and responsibilities following the changes to the CCGs' governance arrangements and staffing structure.

The purpose of this paper is to now present a number of policies which require Governing Body consideration and approval.

2. Integrated Risk Management Framework

A fundamental aspect of the CCGs' joint commissioning and governance structure is the establishment and implementation of sound risk management arrangements. The CCGs' Governing Bodies have overall accountability for risk management and as such, need to be satisfied that appropriate arrangements are in place and that internal control systems are functioning effectively. The CCGs' Integrated Risk Management Framework has now been developed to:

- Demonstrate the Governing Bodies' shared commitment to the risk management function and set out the desired risk culture.
- Define the CCGs' risk architecture (roles, responsibilities, communication and reporting requirements).
- Describe how risk management is the business of everyone and requires routine consideration as part of all of the CCGs' business activities.
- Set out the processes in place for the identification, evaluation and recording of risks.

2.1. Risk Appetite Statement and Risk Tolerance

The Governing Bodies are also responsible for the setting the risk appetite and risk tolerance levels of the CCGs and the proposed approach to both areas is shown on **pages 8 and 9** of the Integrated Risk Management Framework (**Appendix A**). This has been drafted following discussions with Senior Managers and utilising guidance from the [Good Governance Institute](#) and the [Institute of Risk Management](#).

The Integrated Risk Management Framework is shown for **consideration** and **approval** at **Appendix A**. In particular, members are requested to **comment** specifically on the proposed risk appetite statement and risk tolerance levels.

3. Conflicts of Interest Policy

As each CCG already had policies in place which were consistent with the [NHS England guidance on managing conflicts of interest](#), very few amendments have been made to the joint policy. Key points of the policy are highlighted for the Governing Bodies' attention as follows:

- Whilst appropriate to develop a joint policy on the CCGs' approach to managing conflicts of interest (to ensure alignment of working practices across the four CCGs), it is important to remember that the legal requirements remain the responsibility of each individual organisation. As such, the policy describes that each CCG will continue to have its own 'Conflicts of Interest Guardian' and provide separate submissions to NHS England as part of the quarterly and annual conflicts of interest assurance process.
- The guidance requires that CCGs have systems in place to assure themselves annually that Registers of Declared Interests are correct. The CCGs' policy sets out that an exercise will be performed across the CCGs bi-annually to provide the Governing Bodies with sufficient assurance that the new arrangements are working effectively and its register for employees and appointees is accurate and up-to-date. For the Register of Declared Interests for Member GP practices, the same exercise will be undertaken annually.
- The guidance states that only the register of declared interests for 'decision-making staff' requires publication, although the requirement is still that all employees (including those working in a temporary capacity) and appointees must declare any interests. As the guidance on who should be classed as a 'decision-maker' is particularly broad, the CCGs' policy stipulates that full registers will continue to be published (the policy details how individuals can request that their information be redacted).
- The policy also addresses a small number of low-risk/advisory recommendations made in each of the CCGs' 2017/18 Internal Audit Conflicts of Interest reports. These recommendations included referencing the NHS England guidance (Annexe K) on managing interests in [New Models of Care](#).

The Managing Conflicts of Interest Policy is shown for **consideration** and **approval** at **Appendix B**.

4. Gifts, Hospitality and Sponsorship Policy

As with the Managing Conflicts of Interest Policy, previous CCG policies were already compliant with national guidance; therefore, the majority of changes to the joint Gifts, Hospitality and Sponsorship Policy were to ensure consistent working practices across the four organisations and to update roles and responsibilities in line with the new arrangements. The policy also sets out:

- The requirement for each CCG to ensure its own compliance with the legal requirements (as per the Conflicts of Interest Policy); and
- Specific requirements on the acceptance of Gifts, Hospitality and Sponsorship

It is planned that a supporting protocol on joint working, sponsorship and engagement with the pharmaceutical industry will be developed in conjunction with the STP.

The Gifts, Hospitality and Sponsorship Policy is shown for **consideration** and **approval** at **Appendix C**.

5. Raising Concerns (Whistleblowing) Policy

The Raising Concerns (Whistleblowing) Policy sets out the arrangements in place to enable the CCGs' employees (including temporary staff) to raise concerns about possible improprieties. The policy has been developed in line with [NHS England guidance](#) and sets out:

- Clear definitions of what 'whistleblowing' is and is not.
- How to raise a concern internally or externally and where to go for further advice.
- The Governing Bodies' commitment to a transparent and supportive culture for its workforce and assurance that that no reprisals will be taken against individuals who raise genuine concerns, internally or externally.
- Key contacts with whom individuals can raise a concern in confidence; namely the Corporate Director (who has delegated responsibility to deal with such concerns) and the 'Freedom to Speak up Guardians' who can provide independent and impartial advice (these roles are undertaken by the CCGs' Audit and Governance Committee Chairs).
- The procedure for reporting concerns and advice for managers on how to handle the reporting of concerns.

The Raising Concerns (Whistleblowing) Policy is shown for **consideration** and **approval** at **Appendix D**.

6. Procurement Policy

The Procurement Policy has been developed in line with the CCGs' statutory obligations, including the Public Services (Social Value) Act 2012; and to ensure an aligned approach to procurement across the four organisations. The policy:

- Covers both healthcare and non-healthcare procurement.
- Encompasses narrative regarding key commissioning principles that should be considered alongside specific procurement considerations.
- References emergent Integrated Care systems plus new care models of care work.

The Procurement Policy is shown for **consideration** and **approval** at **Appendix E**.

7. Information Governance Framework

The Information Governance Framework has been updated to reflect

- The introduction of new national legislation; namely the Data Protection Act 2018 and EU General Data Protection Regulation, and how this applies to the CCGs.

- Introduction of the role of Data Protection Officer. As previously reported to the Governing Bodies at their last meeting, this role will be undertaken on an interim basis by the CCGs' Head of Information Governance.
- The new NHS Digital reporting pathway and grading system for Information Governance serious incidents.

The Information Governance Framework is shown for **consideration** and **approval** at **Appendix F**.

8. Recommendations

The Governing Body is requested to **CONSIDER** and **APPROVE** the joint policies attached at **Appendices A - F**

Lucy Branson
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