

**Primary Care Audit Report**

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**Primary Care Commissioning Committee meeting**

18 April 2019

<b>Author(s)</b>	<b>Abby Tebbs, Deputy Director of Strategic Commissioning and Planning</b>
<b>Sponsor Director</b>	<b>Nicki Doherty, Director of Care Outside of Hospital</b>
<b>Purpose of Paper</b>	
To inform the PCCC of the opinion of the 360 Assurance, the CCGs auditors, on two audits conducted on primary medical care, together with the agreed management actions to address any recommendations identified.	
<b>Key Issues</b>	
360 Assurance undertook two audits of primary care within NHS Sheffield CCG (SCCG):	
<ul style="list-style-type: none"> <li>• Primary Medical Care Commissioning and Contracting - Review of Governance</li> <li>• Primary Care Quality Monitoring</li> </ul>	
The opinion of the auditors in both cases was substantial/significant assurance. The recommendations for action have been addressed and actions and timescales agreed for implementation.	
<b>Is your report for Approval / Consideration / Noting</b>	
Noting	
<b>Recommendations / Action Required by the Primary Care Commissioning Committee</b>	
The Primary Care Commissioning Committee is asked to note the opinion of the auditors and the actions agreed to address their recommendations.	
<b>Governing Body Assurance Framework</b>	
<b><i>Which of the CCG's objectives does this paper support?</i></b>	
<ol style="list-style-type: none"> <li>1. To improve patient experience and access to care</li> <li>2. To improve the quality and equality of healthcare in Sheffield</li> <li>4. To ensure there is a sustainable, affordable healthcare system in Sheffield</li> </ol>	
<b>Are there any Resource Implications (including Financial, Staffing etc)?</b>	
None	
<b>Have you carried out an Equality Impact Assessment and is it attached?</b>	
<b><i>Please attach if completed. Please explain if not, why not</i></b>	
Not required for this report	
<b><i>Have you involved patients, carers and the public in the preparation of the report?</i></b>	
Not required for this report	

## **Primary Care Audit Report**

### **Primary Care Commissioning Committee meeting**

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#### **1. Introduction**

360 Assurance, the CCG's Internal Auditors, have undertaken two audits of primary care within NHS Sheffield CCG:

- Primary Medical Care Commissioning and Contracting - Review of Governance
- Primary Care Quality Monitoring

Reports for both audits were published in March 2019 and the purpose of this paper is to inform the PCCC of the opinion of the auditors together with the agreed management actions to address any recommendations identified.

#### **2. Audit Objectives and Scope**

##### **2.1. Primary Medical Care Commissioning and Contracting - Review of Governance**

The audit aimed to determine whether a robust, efficient, and effective control environment is in place in relation to governance arrangements around the provision of primary medical care commissioning and contracting to test:

- arrangements for the operation and oversight of PCCC;
- arrangements within PCCC to ensure that commissioning is undertaken in accordance with delegated agreements;
- oversight of contract management functions is detailed as a responsibility of the Committee including receipt and review of financial monitoring reports;
- appropriate policies procedures and guidance have been authorised and communicated and local processes align with NHS England policy and guidance;
- decision making is exercised in accordance with NHS England statutory duties.

##### **2.2. Primary Care Quality Monitoring**

The review focussed on the following areas:

- Strategy - are the strategic aims in relation to primary care quality monitoring identified and documented, does securing quality feature in the strategies of the CCG and how is it monitored?
- Controls – are sufficient controls in place to ensure that objectives are achieved?
- Governance – do structures in place through the PCCC ensure the right groups receive information about the quality of services provided by co-commissioned

primary medical care; does Governing Body receive necessary assurance that systems are functioning as expected and actions are being taken to address any risks and ensure achievement of objectives?

### 3. Audit Opinion and Recommended Actions

The opinion of the auditors together with the number and risk assessment of any recommendations are summarised in table 1 below.

*Table 1: Audit opinions and recommendations*

Audit	Opinion	Proposed Actions
Primary Medical Care Commissioning and Contracting - Review of Governance	Substantial Assurance	Low risk - 3
Primary Care Quality Monitoring	Significant Assurance	Low risk - 2 Advisory - 1

Terminology and definitions of audit opinions differ between the two audits. This is because, as the governance review is an NHS England mandated review, auditors are required to use NHS England assurance opinion definitions. However, significant and substantial provide the same level of assurance.

SCCG have identified actions plans and timescales in response to the actions recommended in the audits. Details of these and current status are set out in Appendix 1 to this report.

### 4. Recommendations

The PCCC is asked to note the opinion of the auditors, the actions agreed to address their recommendations, timescales and progress.

### 5. Action for Primary Care Commissioning Committee

The Primary Care Commissioning Committee is asked to note the opinion of the auditors and the actions agreed to address their recommendations.

Paper prepared by: Abby Tebbs, Deputy Director of Strategic Commissioning and Planning

On behalf of: Nicki Doherty, Director of Care Outside of Hospital

Date 11 April 2019

## Agreed Actions and Progress

## Primary Medical Care Commissioning and Contracting - Review of Governance

No.	Findings	Risk and Score (Consequence x Likelihood)	Proposed Action
1.1	<p><b>Primary Care Commissioning Committee Terms of Reference</b></p> <p>We found that the following responsibility of the Primary Care Commissioning Committee outlined in the CCG's Constitution is not reflected in the Committee's terms of reference:</p> <ul style="list-style-type: none"> <li>Approval of the recommendations from the Special Cases Advisory Group.</li> </ul> <p>However, we understand that such a group does not exist within the organisation.</p>	<p>There may be a lack of clarity over the reports that the Primary Care Commissioning Committee expects from other groups in the absence of clear identification of such groups in the Committee's terms of reference.</p> <p style="text-align: center;"><b>Low 2 x 2</b></p>	<p>The CCG's Constitution to be amended to remove the reference to the responsibility of the Primary Care Commissioning Committee in relation to the approval of recommendations from the Special Cases Advisory Group.</p> <p><b>Responsible Officer:</b> Nicki Doherty, Director of Delivery Care Outside of Hospital  <b>Implementation Date:</b> 30 April 2019</p>
No.	Findings	Risk and Score (Consequence x Likelihood)	Proposed Action
2.1	<p><b>Format of PCCC Meeting Agendas</b></p> <p>Our review of a sample of agendas of meetings (public and private) of the Primary Care Commissioning Committee found that whilst pertinent</p>	<p>The Primary Care Commissioning Committee may not be fulfilling each responsibility outlined in its</p>	<p>The CCG to restructure the agenda of the Primary Care Commissioning Committee meetings in order to align it to</p>

No.	Findings	Risk and Score (Consequence x Likelihood)	Proposed Action
	<p>items are included, the format of the agenda could be improved to align it to the responsibilities outlined in the Committee's terms of reference.</p>	<p>terms of reference.</p> <p><b>Low 3 x 2</b></p>	<p>the responsibilities outlined in the Committee's terms of reference.</p> <p><b>Responsible Officer:</b> Sarah Burt, Deputy Director of Delivery – Care Outside of Hospital</p> <p><b>Implementation Date:</b> 30 April 2019</p>
No.	Findings	Risk and Score (Consequence x Likelihood)	Proposed Action
4.1	<p><b>Ensuring all NHS England Statutory Duties have been addressed in decisions taken by the PCCC</b></p> <p>We identified that the cover sheet and report template that must accompany all papers that are presented to the PCCC requires the following information to be recorded:</p> <ul style="list-style-type: none"> <li>• Author(s) and Sponsor Director;</li> <li>• Purpose of paper;</li> <li>• Key issues;</li> <li>• Whether the report is for approval/noting/consideration;</li> <li>• Recommendation/action required by the PCCC;</li> <li>• The CCG's objectives that the paper supports;</li> <li>• Whether there are any resource implications (financial, staffing etc.);</li> <li>• Whether an Equality Impact Assessment has been carried out;</li> </ul>	<p>Decisions may be made by the PCCC without complying with the statutory duties delegated to the CCG from NHS England.</p> <p><b>Low 2 x 3</b></p>	<p>The CCG should consider whether there is sufficient evidence that all statutory duties have been considered in making decisions. Where necessary the CCG should consider updating the cover sheet for the PCCC papers or ensuring that authors make it clear in the executive summary and the detail of the paper that the statutory duties have been applied where relevant.</p>

No.	Findings	Risk and Score (Consequence x Likelihood)	Proposed Action
	<ul style="list-style-type: none"> <li>• Whether patients, carers and the public have been involved in the preparation of the report;</li> <li>• Title of paper;</li> <li>• Date of PCCC meeting;</li> <li>• Introduction/background and other headings etc.; and</li> <li>• Who the paper has been prepared by and date.</li> </ul> <p>However, in the absence of each statutory duty that is assigned to NHS England (and hence delegated to the CCG) being recorded on the cover sheets, we could not confirm that all statutory requirements had been applied by the Committee in the making of its decisions.</p>		<p><b>Responsible Officers:</b> Nicki Doherty, Director of Delivery – Care Outside of Hospital Julia Newton, Director of Finance</p> <p><b>Implementation Date:</b> 31 May 2019</p>

### Primary Care Quality Monitoring

No.	Findings	Risk and Score (Consequence x Likelihood)	Proposed Action
1.1	<p><b>Review Dates for CCG Strategic Documents</b></p> <p>Our review found that whilst the CCG has produced the following strategic documents which refer to the development of primary care, the documents do not indicate when they will be subject to a formal review:</p> <ul style="list-style-type: none"> <li>• Quality Strategy;</li> <li>• General Practice Forward View Strategy (incorporating the Primary Care Strategy and Sheffield Placed Plan);</li> <li>• Framework for Managing General Practice Performance and Quality; and</li> <li>• Primary Care Development Nurse Team Strategy.</li> </ul>	<p>The CCG's strategic documents in relation to primary care and quality may become out of date in the absence of regular reviews.</p> <p style="text-align: center;"><b>Advisory</b></p>	<p>As part of its review of the following strategic documents, the CCG to formally document their next review dates:</p> <ul style="list-style-type: none"> <li>• Quality Strategy;</li> <li>• General Practice Forward View Strategy;</li> <li>• Framework for Managing General Practice Performance and Quality; and</li> </ul>

No.	Findings	Risk and Score (Consequence x Likelihood)	Proposed Action
			<ul style="list-style-type: none"> <li>Primary Care Development Nurse Team Strategy.</li> </ul>
		<b>Progress:</b> These are being amended and the action will be completed by 30 May 2019	
		<b>Management Response:</b>	
3.1	<p><b>Risk management related responsibilities of Quality Assurance Committee</b></p> <p>The terms of reference of the Quality Assurance Committee clearly state the responsibility of the Committee to ensure that significant clinical risks are identified and reported on the risk register, escalating to the Assurance Framework where necessary. However, our review of the agendas and minutes of the meetings of the Committee held during the period March to November 2018 found that items which would enable the Committee to fulfill this responsibility do not feature on its agenda.</p> <p>Our review confirmed that review of the CCG's Risk Report is a standing item on the agenda of Governance Sub Committee meetings.</p>	<p>Significant clinical risks may not be identified in a timely manner and mitigating actions may not be taken thereby increasing the likelihood of the risks materialising.</p> <p><b>Low 3 x 2</b></p>	<p>The terms of reference of the Quality Assurance Committee to be reviewed to clarify its responsibility in relation to clinical risks.</p> <p><b>Responsible Officer:</b> Jane Harriman, Head of Quality</p> <p><b>Implementation Date:</b> 30 April 2019</p>
		<b>Management Response:</b> The QAC terms of reference to say 'to ensure that clinical risks are reports on provider registers' (we do not report provider clinical risks on the CCG RR as we do not own them, unless they relate to meeting CCG targets).	
3.3	<p><b>Scheme of Reservation and Delegation (SORD)</b></p> <p>The CCG's SORD delegates the responsibility for the approval of CCG clinical policies and clinical pathways to the Quality Assurance Committee. However, the SORD does not make any reference to the</p>	<p>The CCG's Scheme of Reservation and Delegation may not be a complete and accurate reflection of the</p>	<p>As part of its next review of the Scheme of Reservation and Delegation, the CCG to incorporate the decisions / responsibilities that have</p>

	<p>Primary Care Commissioning Committee and does not delegate any decisions / responsibilities to this Committee.</p>	<p>responsibilities that the Governing Body has delegated to its Committees.</p> <p style="text-align: center;"><b>Low 2 x 3</b></p>	<p>been delegated to the Primary Care Commissioning Committee.</p> <p><b>Responsible Officer:</b> Julia Newton, Director of Finance</p> <p><b>Implementation Date:</b> 30 June 2019</p>
		<p><b>Management Response:</b> The CCG is clear that NHS England does not expect to see any delegation from a CCG's Governing Body to PCCC in relation to the responsibilities which are already delegated from NHS England direct to the the CCG because we are not allowed to 'double delegate' and that is why it would be unusual to see any delegation from a CCG's Governing Body to PCCC in the SORD. Having said that, the CCG accepts that GB can delegate matters relating to other CCG business e.g. the approval of use of other funding from within our own programme allocation.</p>	