

Collation of Regional Moderation Panel Feedback for SWL CCGs: Kingston, Merton, Richmond, Sutton & Wandsworth

Comment	Action Required	Who	Status	Update
<p>1. Due to increased risk and scrutiny on Conflicts of Interest, all CCGs are asked to consider policies & processes to ensure robust.</p>	<ul style="list-style-type: none"> Please confirm that this has been undertaken, and include a commitment to adopt recommendations of Project Sunlight (the National review) 	<p>All SWL CCGs</p>	<p>In progress</p>	<p>CCGs have reviewed their policies and processes and when the new national guidance and Project Sunlight findings are reported, they will further review and update to reflect these recommendations as required and appropriate.</p> <p>Wandsworth CCG was one of the sites audited in the National review programme and has just received its report and is reviewing the recommendations and will action as appropriate.</p>
<p>2. It is requested that the output of the due diligence exercise is shared with NHS England for an opportunity to comment and discuss before a decision is made</p>	<ul style="list-style-type: none"> Please set up a meeting with Matthew Trainer, William Cunningham-Davis, Richard Jeffery and Christina Windle to discuss output when the report is expected 	<p>All SWL CCGs</p>	<p>In progress</p>	<p>Locally the outcomes of the due diligence work is being considered by the GBs and the primary care commissioning committees in the month of January 2016.</p> <p>Financial and legal due diligence reports have been shared with NHS England. A meeting took place on 18th January between NHS England and SWL SPG to discuss the reports and an action plan and Task & Finish group are proposed to work through agreeing the recommendations and actions from these reports.</p> <p>A follow up meeting with Simon Weldon and SWL SPG also is being scheduled for 11th February which will also discuss the due diligence reports.</p>
<p>3. It is expected that the due diligence process and other financial and operational discussions will identify outstanding and legacy liabilities related to Primary Care.</p>	<ul style="list-style-type: none"> It is important that the ownership for these is agreed before the end of March 2016 	<p>All SWL CCGs</p>	<p>In progress</p>	<p>Under discussion.</p> <p>This has been informed by the due diligence meeting on 18th January between NHSE and SWL SPG and an action plan is being developed between NHSE London team and SWL CCGs. Areas of responsibilities will be agreed during February 2016.</p>

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<p>4. It is important that the QIPP challenge (both the delegated allocation and the impact from the use of non-recurrent funds in 2015/16) is explicitly owned</p>	<ul style="list-style-type: none"> The Regional Moderation Panel asks for positive & explicit confirmation that the CCG accepts the requirement to deliver the full QIPP requirement as delegated commissioners, and the business rules as may be required by NHS England. 	<p>All SWL CCGs</p>	<p>In progress</p>	<p>Under discussion. As part of the action a plan being developed between NHSE and SWL CCGs. QIPP requirements will be identified and agreed.</p>
<p>5. The Regional Moderation Panel noted the strategic importance of cross SPG working, and noted that completion of an operating model which outlines the activities & responsibilities of the way CCGs in SWL and NHS England (London) work together in co-commissioning before the end of the financial year was key. In particular, further discussion on a shadow committee (proposed to operate from February) is required.</p>	<ul style="list-style-type: none"> Please provide detail of the activities and governance forums expected to be conducted across the SPG. In addition SWL are asked to support the option selected for configuration of the Primary Care Commissioning team once the OD piece is concluded. The work will be conducted collaboratively, with opportunity for SWL to provide input and have sight of the development of the options. 	<p>All SWL CCGs</p>	<p>In progress</p>	<p>Under discussion. Led by the SWL Collaborative team with the involvement of CCGs.</p> <p>SWL Primary Care SRO has drafted paper regarding Operational Model which will be tabled at the JCG meeting on 4th February.</p>
<p>6. Risk assessment was lacking in detail.</p>	<ul style="list-style-type: none"> Please provide further detail on the risks, ratings and mitigations. 	<p>Kingston CCG</p>	<p>On track</p>	<p>To be updated post the due diligence discussions at GB and PCQDG.</p>
<p>7. Little detail provided on patient and Health & Wellbeing Board engagement.</p>	<ul style="list-style-type: none"> Please provide detail of how this has/ is planned to be undertaken to ensure done collaboratively. 	<p>Kingston CCG</p>		<p>Engagement log will be provided by Kingston CCG.</p>
<p>8. Enhanced ability to deliver the Strategic Commissioning Framework should be referenced as a benefit.</p>	<ul style="list-style-type: none"> Please update as an aim and benefit of delegated commissioning. 	<p>Kingston CCG Merton CCG Richmond CCG</p>	<p>Complete for Merton and Richmond CCGs</p>	<p>Now referenced as a benefit in Richmond.</p> <p>Section on delivering the SCF included in the redrafted Primary Care Strategy for Kingston.</p> <p>Benefit added for Merton: The ability to</p>

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				redesign local schemes to review QOF and LES contracts based on local knowledge. Further, it can drive outcomes based commissioning in primary care by aligning outcome measures and incentives. This includes an enhanced ability to deliver London's Strategic Commissioning Framework for Primary Care.
9. ToR aligned with joint rather than delegated structural requirements.	<ul style="list-style-type: none"> As this was done quickly it is noted there was limited time for engagement, please ensure this is subsequently undertaken. 	Merton CCG	Complete	All members of Merton's Joint Committee have had the opportunity to comment on the Terms of Reference and they were finalised in December 2015.
10. Unclear how much patient engagement had been undertaken.	<ul style="list-style-type: none"> Please provide detail of how this has/ is planned to be undertaken to ensure done collaboratively. 	Merton CCG Richmond CCG	In progress	<p>The issues around Merton's application for full delegation were discussed at our 'Engage Merton' event on 4th November 2015. Attendance included representation from our patients, members of the public, carers, stakeholders, partners and representatives from across the borough and the communities that make up Merton's population. It is also due to be discussed at Merton's next Patient Engagement Event on 26th January 2016.</p> <p>Richmond CCG – engagement is taking place via the CCG's PPI network. Healthwatch is a member of the Richmond Shadow Primary Care Committee.</p>
11. In order to reduce risk and perception of conflicts of interest, and for good governance, it is requested that the independent GP is always a voting member of the committee.	<ul style="list-style-type: none"> Please update the Terms of Reference appropriately. 	Richmond CCG Wandsworth CCG	Complete	Wording of the TORs has been changed to reflect that the independent GP is a voting member of the Committees in Richmond and Wandsworth.

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12. Further detail on the risk assessment would be beneficial.	<ul style="list-style-type: none"> Please provide further clarity on risks, ratings and mitigations associated with delegated primary care commissioning. 	Richmond CCG Sutton CCG	Richmond CCG – ongoing Sutton CCG - complete	The financial due diligence report has highlighted risks that Richmond CCG has requested further information from NHSE about Risks have been identified and added to the Sutton CCG's corporate risk register.
13. More detail on patient engagement undertaken in preparing for delegated Primary Care commissioning.	<ul style="list-style-type: none"> Please provide detail of how this has/ is planned to be undertaken to ensure done collaboratively. 	Sutton CCG	In progress	Discussed with Patient Reference Group in July 2015. Healthwatch Sutton attend both the NHS Sutton Governing Body and SWL Primary Care Joint Committee so have been involved in numerous discussions re delegation.
14. A review is currently being conducted of the CCGs wider responsibilities.	<ul style="list-style-type: none"> Approval is pending this review, and the CCG is required to adopt these recommendations. 	Wandsworth CCG	Overdue	A review of the wider commissioning responsibilities of the CCG was proposed in September 2015 but has not to date been actioned by NHSE. In the meantime, WCCG has strengthened leadership capacity to enhance our lead commissioning responsibilities for St George's FT.
15. The application suggests a shadow committee is set up in February.	<ul style="list-style-type: none"> Please provide detail on the format and intention of this. 	Wandsworth CCG	On track	We are intending to establish our Primary Care Committee in February 2016. This will enable us to test the structure and function of the Committee in advance of formally taking on delegated responsibility for Primary Care on the 1st April 2016
16. There are some non-voting members of the committee listed (Head of Finance etc), however it is unclear what organisation these resources are from.	<ul style="list-style-type: none"> It is assumed these are NHS England representatives, please could you confirm? 	Wandsworth CCG	Complete	Wording of the TORs has been changed to reflect that these members are CCG representatives not NHS England.
17. It was noted that due to potential conflicts of interest and good governance, it is asked that an independent (out of SWL) clinician is added as a voting member of the committee	<ul style="list-style-type: none"> Please update the ToR and provide back 	Kingston CCG	On track	TOR updated. Recruitment is currently underway.