

Primary Care Commissioning Committee							
<b>Date of Meeting</b>		8 January 2019		<b>Paper Number (PART 1 or 2)</b>		Item 7	
<b>Title</b>				Internal Audit Review of Primary Care Commissioning (Contract Oversight and Management Functions)			
<b>Sponsoring Director</b> (name and job title)				Fiona Slevin-Brown (Director of Strategy and Operations)			
<b>Sponsoring Clinical / Lay Lead</b> (name and job title)				Clive Bowman (Lay Chair, East Berkshire Primary Care Co-commissioning Committee)			
<b>Author(s)</b>				James Earle (Internal Audit Manager)			
<b>Purpose</b>				<p>To provide the Committee with an update on the findings from the recent internal audit review of Primary Care Commissioning (Contract Oversight and Management Functions) and a copy of the draft report to enable them to discharge the requirement in paragraph 15 of the <i>Primary Medical Care Commissioning and Contracting: Internal Audit Framework for delegated Clinical Commissioning Groups</i> that:</p> <p>“The CCG Primary Care Commissioning Committee (or alternative committee with responsibility for the delegated function) should have a lead role in discussing and agreeing the report.”</p>			
<b>The Joint Operations Group is required to (please tick)</b>							
<b>Approve</b>	<input type="checkbox"/>	<b>Receive</b>	<input type="checkbox"/>	<b>Discuss</b>	<input checked="" type="checkbox"/>	<b>Note</b>	<input type="checkbox"/>
<b>Risk and Assurance</b> <i>(outline the key risks / where to find mitigation plan in the attached paper and any assurances obtained)</i>				The Associate Director of Primary Care will develop an action plan to address each of the findings in this report. Findings will be monitored by the CCG and internal audit who provide regular updates on progress to the Audit Committee.			
<b>Legal implications/regulatory requirements</b>							
<b>Public Sector Equality Duty</b>							
<b>Links to the NHS Constitution (relevant patient/staff rights)</b>							
<b>Strategic Fit</b> <i>Primary Care strategy? and Other relevant strategies</i>				This review fulfils the requirement under section 4.1 of <i>Preparing for 2019/20 Operational Planning and Contracting</i> published on 21 December 2018 for a delegated CCG to have an internal audit to assess if they are compliant and effective in discharging their responsibilities for primary care contract and performance management as well as the associated governance elements.			

<p><b>Commercial and Financial Implications</b> <i>(Identify how the proposal impacts on existing contract arrangements and have these been incorporated?</i></p> <p><i>Include date Deputy CFO has signed off the affordability and has this been incorporated within the financial plan. Include details of funding source(s)</i></p>	<p>Audit Committee will receive the draft report following PCC, on which the deputy Director of Finance is a key member.</p> <p>Date Deputy CFO sign off .....</p>
<p><b>Quality Focus</b> <i>(Identify how this proposal impacts on the quality of services received by patients and/or the achievement of key performance targets</i></p> <p><i>Include date the Director of Nursing has signed off the quality implications)</i></p>	<p>Report will be share with the Director of Nursing and Quality at PCCC. Action planning on the outcomes of the report will be share with the PCQI group.</p> <p>Date Director of Nursing sign off.....</p>
<p><b>Clinical Engagement</b> <i>Outline the clinical engagement that has been undertaken</i></p>	<p>Via Clinical members of the PCCC and PCOG in January 2019</p>
<p><b>Consultation, public engagement &amp; partnership working implications/impact</b></p>	<p>Presented at a meeting in public where questions can be submitted.</p>
<p><b>NHS Outcomes</b> <i>Please indicate (highlight) which Domain this paper sits within by highlighting or ticking below:</i></p> <p><i>Please note there may be more than one Domain.</i></p>	<p>Domain 1 Preventing people from dying prematurely;</p> <p>Domain 2 Enhancing quality of life for people with long-term conditions;</p> <p>Domain 3 Helping people to recover from episodes of ill health or following injury;</p> <p><b>Domain 4 Ensuring that people have a positive experience of care; and</b></p> <p>Domain 5 Treating and caring for people in a safe environment; and protecting them from avoidable harm.</p>
<p><b><u>Executive Summary</u></b></p> <p>In August 2018 NHS England published the <i>Primary Medical Care Commissioning and Contracting: Internal Audit Framework for delegated Clinical Commissioning Groups</i> (“the Guidance”). As part of this there is a formal requirement for an annual audit of primary care provision that must cover the following four areas over the course of a three year cycle:</p> <ul style="list-style-type: none"> <li>• Commissioning and Procurement of Services;</li> <li>• Contract Oversight and Management Functions;</li> <li>• Primary Care Finance; and</li> <li>• Governance (common to each of the above areas).</li> </ul>	

It was agreed with members of the Audit Committee and management that this year’s audit will focus on Contract Oversight and Management Functions and the Governance arrangements in this area with Commissioning and Procurement of Services and Primary Care Finance picked up in future years. Therefore, the elements of paragraph 24 of the Guidance, relating to Contract Oversight and Management Functions, were considered:

- GP Practice opening times and the appropriateness of sub-contracted arrangements;
- Managing patient lists and registration issues (for example, list closures, targeted list maintenance, out of area registration, special allocation schemes);
- Identification of practices selected for contract review to assure quality, safety and performance, and the quality of the subsequent review and implementation of outcomes;
- Decisions in relation to the management of poorly performing GP practices and including, without limitation, contractual management decisions and liaison with the CQC where the CQC has reported non-compliance with standards (but excluding any decisions in relation to the performers list);
- Overall management of practice: (1) mergers (2) closures; and
- Operation and oversight of the Primary Care Commissioning Committee (or alternative committee with responsibility for the delegated function) in regard to the points above (but not in relation to the management of Conflicts of Interest).

This review identified three medium risk findings resulting in an overall medium risk report. The findings are as follows:

- Improvements required over the development of a targeted programme of GP practice list maintenance;
- No process in place to ensure equality of access and appropriate information for patients resident in a GP practice’s outer practice boundary; and
- Ensuring up to date performance data is held to effectively monitor practice and programme performance.

Full details in relation to these findings and areas of good practice are outlined in the accompanying report.

Paragraph 28 of the Guidance requires that internal audit provide recommendations on conversion of the local risk rating to the overall assurance rating to be reported to NHS England. Internal audit recommends that a medium risk report be aligned to “Substantial Assurance”, the second highest rating.

**Recommendation(s)**

The Committee has discussed the contents of the report, including potential actions, and that it is content for the report to be issued in final and taken to the February 2018 meeting of the Audit Committee.

**Chairs Use Only**

Any known conflicted committee members from Declarations of Interest register?

**To Be Completed**