

Standard Risk Register

Report Date	06 Jan 2020
Risk Status	Open
Service Line	Information Management & Technology, Primary Care Commissioning , Primary Care Improvement, BE Primary Care
Control Status	Existing
Action Status	Outstanding

Standard Risk Register

Risk Ref	Risk Title	Corporate Objective	Created Date	Cause & Effect	Inherent Risk Priority	Risk Control	Control Assurance (1st Line)	Control Assurance (2nd Line)	Control Assurance (3rd Line)	Assurance Level	Comments	Residual Risk Priority	Action Required	Progress Notes	Last Review Comments	Latest Review Date
PCC 34	ETTF Ben Lynwood Risk Owner: Alex Tilley Delegated Risk Owner: Ann Bryant Last Updated: 06 Jan 2020	N/A	18 Nov 2019	<p>Cause Kings Corner and Magnolia House Surgeries are not sustainable in the medium to long term. Neither practice is suitable for patients with poor mobility as the majority of consultation rooms are on the first floor. Neither can deal with growth in patient list sizes.</p> <p>Land is available at Ben Lynwood Care Village however, this has many complexities.</p> <p>Effect Failure to find suitable, alternative premises will result in no primary care services in the Sunninghill or Sunningdale area within the next 5-10 years.</p>	I = 4 L = 3 12	Planning Permission refused by Royal Borough of Windsor and Maidenhead	Revised planning application being submitted Autumn 2019 with updated technical reports, sequential testing and case for very special circumstances.					I = 4 L = 3 12	<p>Ensure appropriate engagement with Parish and Councillors to support the planning application. Ensure that all technical reports recommended by Planning Advisors are completed to support the planning application. Supply information as requested in a timely and accurate manner</p> <p>Person Responsible: Ann Bryant</p> <p>To be implemented by: 31 Jan 2020</p>			

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PCIM4	Adherence to the wound formulary Risk Owner: Catriona Khetyar Delegated Risk Owner: Last Updated: 04 Dec 2019	BEC Only-We will commission services that improve the outcome and experience of all our residents by consistently delivering the NHS Constitutional Standards.	24 Jan 2017	Cause If Tissue Viability expertise is limited Nursing Homes, District Nurses and Practice Nurses may inappropriately request dressings from FP10 Informed at March 2019 Berkshire Wound Care Advisory Group that 1 x TVN and Team Lead TVN is leaving the service which may impact TVN service delivery and support. This in turn may impact adherence to formulary for Woundcare; resulting in less clinical and cost effective choices and potentially driving prescribing via GP FP10 Effect Increase in Primary Care prescribing budget. Inappropriate choice of woundcare products due to potential use of less clinical and cost effective options used	I = 4 L = 4 16	Quarterly meetings with Tissue Viability nurses to discuss adherence to the formulary, cost per base. Monitoring EPACT data on Primary Care. Training with Practices who outside the norm. Tissue Viability nurses to educate DN. Pharmacist and Clinical leads can visit the practice. Report through Quality channels to decide whether contractual levers are required.						I = 3 L = 4 12	A new model of delivery and support by TVN service for Woundcare Formulary Person Responsible: Catriona Khetyar To be implemented by: 31 Jan 2020		There are still capacity issues with the team with vacancies for specialist nurses.	04 Dec 2019

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PCIM 6	Increase in EColi bacteraemias from the 2016/17 baseline Risk Owner: Joanne Greengrass Delegated Risk Owner: Last Updated: 04 Dec 2019	BEC Only- We will commission services that improve the outcome and experience of all our residents by consistently delivering the NHS Constitutional Standards.	23 Oct 2017	Cause If there is not a decrease in the number of EColi bacteraemias Effect Then this could have an impact on the CCG Quality premium targets.	I = 4 L = 4 16	ICS Ecoli bacteraemia group monitoring the action plan						I = 4 L = 3 12	Implementation across the system, hydration project and the catheter passport	catheter passport in place but patients still coming out from hospital with no passport.		04 Dec 2019
						Monitoring of action plan by the ICS Quality Group							Person Responsible: Joanne Greengrass To be implemented by: 31 Mar 2020			
													Implementation of the Gram negative infection action plan Person Responsible: Joanne Greengrass To be implemented by: 31 Mar 2020			

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PCIM9	inequitable service delivery to all residents in care homes from Primary Care Risk Owner: Joanne Greengrass Delegated Risk Owner: Last Updated: 14 Apr 2019	BEC Only- We will commission services that improve the outcome and experience of all our residents by consistently delivering the NHS Constitutional Standards.	04 Jan 2019	Cause If there is not an agreed model of service delivery for people in care homes Effect Then there will be an inequity on care provided which could result in increased hospital admissions and poor resident experience.	I = 4 L = 3 12	GMS contract						I = 3 L = 3 9	To develop a service delivery model across East Berkshire CCG and work with partners in the ICS. Phase one will be supporting care homes with knowledge and skills and how they can reduce the burden on Primary Care. Phase 2 will be the implementation of the DES 2020. Person Responsible: Joanne Greengrass To be implemented by: 31 Mar 2020	05 Jun 2019 Joanne Greengrass Task and finish group to be set up to scope the new model to support care homes in phase 1 14 Apr 2019 Joanne Greengrass Care home workshop was held in April to start to develop a future model.	Business case agreed and implementation group set up. Hosting arrangements in negotiation with BHFT.	04 Dec 2019
						PCOG to monitor individual cases										

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709	Primary Care Estates Sustainability - committed new premises	BEC Only-We will play a proactive role in the development and delivery of an innovative and united Sustainability and Transformation Plan	11 Jul 2016	<p>Cause Some Primary and community care premises are not fit for the delivery of the primary care strategy either due to standards of the premises or to changes to service and population needs. Alignment to new models of integrated care require co-location suitable for the provision of a wider range of services, therefore needs different physical and digital capacity</p> <p>Effect The commissioners will be unable to secure the primary care transformation plans if works are not put in place to refurbish, extend, rebuild or develop surgeries.</p>	I = 4 L = 4 16	<p>Outline Business Cases approved for Ben Lynwood, Britwell and Heatherwood Hospital. FBC committed for Feb 2020</p> <p>Full Business Case approved for Heatherwood Hospital - November 2019. Risk around spending ETTF monies in the current financial year.</p> <p>Summary of key milestones required for Britwell and Ben Lynwood to provide assurances to NHSE - working towards submission of FBC and dates of submission.</p>	NHS England ETTF			Adequate	<p>BEN Lynwood and Britwell Outline Business Cases for ETTF funding were approved by NHSE in January 2019, the Commissioning Support Officer is working up a programme plan for Full Business Case submission for each of the ETTF Schemes.</p> <p>Heatherwood Hospital ETTF OBC is dependent on</p>	I = 3 L = 3 9	<p>Support to primary care providers and partners to progress transformation plans in the community. Specifically; project management, vision development for non-capital schemes</p> <p>Person Responsible: Alex Tilley</p> <p>To be implemented by: 03 Feb 2020</p>	<p>12 Dec 2019 Alex Tilley ICS Estates PMO anticipated to provide expertise as schemes progress through feasibility phases</p>	reviewed	06 Jan 2020
													<p>Progress the opportunities through ETTF to identify facilities to secure and transform general practice services in east Berkshire.</p> <p>Person Responsible: Ann Bryant</p> <p>To be implemented by: 28 Feb 2020</p>			

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											confirmation of FHFT CDEL limit and confirmation of ETTFF funding route. Binfield/Blue Mountain - work progressing on revised concept design and associated build and revenue costs.						

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						<p>Needs assessment has been shared at members' meetings in Bracknell & Ascot, Windsor, Ascot and Maidenhead and Slough. Further updates required following these meetings plus input from extra housing in Bracknell Forest, the revised Local Development plan for RBWM and the imminent publication of the Slough Local Development Plan.</p> <p>The Revised Infrastructure Plan is scheduled to be presented at PCCC in January 2020 for approval.</p>										

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						Routinely survey practice premises under the 6 facet survey audit - recommended every 3/4 years. This provides the commissioners and providers with state of premises including fit for purpose, maintenance and capacity Next audit expected 2020											

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PCIM8	Workforce in Primary care Risk Owner: Joanne Greengrass Delegated Risk Owner: Hayley Edwards Last Updated: 31 Oct 2019	BEC Only- We will commission services that improve the outcome and experience of all our residents by consistently delivering the NHS Constitutional Standards.	19 Oct 2018	Cause If the rate of Practice Managers leaving Primary care continues at the current rate Effect then there is a risk practices will not be compliant with CQC, loss of organisational memory and locality expertise.	I = 4 L = 3 12	Monthly monitoring of the workforce situation reviewed at PCOG and PCQIG meetings Resilience and training plans being developed for non-clinical staff for delivery in 2019 The Primary Care Networks made aware of the risk and consider the inclusion of non clinical staff development in their Network Plans						I = 3 L = 3 9	Work with the PC Networks to include non clinical staff Person Responsible: Hayley Edwards To be implemented by: 31 Jan 2020		No change	04 Dec 2019

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													<p>Programme of resilience and management training for Practice Managers and key staff aligned to the ICS workforce development and national initiative through Training Hubs, LMC and HEE</p> <p>Person Responsible: Hayley Edwards</p> <p>To be implemented by: 31 Jan 2020</p>	<p>13 Dec 2019 Hayley Edwards</p>		

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														Work with the Training Hub manager to identify training providers for practice requirements, survey being created by PMA fir publication in Jan 20. ICS training also advertising management and leadership training available to management in practices. All being actively promoted via the newsletters, meetings and		

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														emails.		
PCC 32	Anticipated services pressures from predicted population growth from Local Borough Plans Risk Owner: Alex Tilley Delegated Risk Owner: Ann Bryant Last Updated: 19 Jul 2019	BEC Only- We will ensure that Clinical Leadership and patient engagement is at the heart of everything we do and develop a culture that brings to life 'thinking locally, working together.'	19 Jul 2019	Cause Published Local Borough Plans highlight the increased number of dwellings over the next 20 years set out increased demand on existing services which may not have the infrastructure Effect existing providers are unable to deliver effective care as commissioned and patient experience of registration and access is diminished	I = 3 L = 3 9	Revision of the PC Infrastructure Plan to ensure the commissioners are able to predict pressures and establish possible future population needs. Meeting with RBWM and local practices booked for 9th Jan 2020.						I = 3 L = 2 6	Identify with all local authorities the impact in primary care infrastructure from local borough plans, through the sharing of the infrastructure plan on sign off Person Responsible: Ann Bryant To be implemented by: 31 Jan 2020 Deliver additional capacity through ETTF in areas of pressure: Binfield/Warfield/Winkfield areas which border Wokingham Person Responsible: Ann Bryant To be implemented by: 28 Feb 2020		reviewed and progress updated	06 Jan 2020

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PCC 30	Primary Care Premises - District Valuer capacity Risk Owner: Alex Tilley Delegated Risk Owner: Ann Bryant Last Updated: 06 Jan 2020	BEC Only- We will commission services that improve the outcome and experience of all our residents by consistently delivering the NHS Constitutional Standards.	11 Apr 2019	Cause District Valuers' offer provide the re-assessment and establishment for the levels of reimbursement to practice under the Primary Care Premises Regulations, the capacity has been reduced in 2019 Effect Practices have outstanding routine assessments of their reimbursement levels and appeals to re-assessments are not being reviewed within expected timelines. New premises and extensions approvals are being delayed due to reduction in capacity at DV and increased demand through capital investment. Creates financial pressures in CCG delegated budget due to delays and delays in ETTF capital investments	I = 3 L = 3 9	SLA with CSU to facilitate and manage the rent reimbursement process - establish with delegated responsibilities						I = 2 L = 3 6	Risk assessment will be carried out on the January 2020 rent review report - working with CSU and CCG finance to identify risks and changes Person Responsible: Ann Bryant To be implemented by: 28 Feb 2020		review completed - moved audit to Feb 2020	06 Jan 2020

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PCC 35	Network DES Commissioned Services 2020/21 Risk Owner: Alex Tilley Delegated Risk Owner: Last Updated: 06 Jan 2020	BEC ONLY - Place: working in local communities, local authority area or across a bigger geography to respond to the needs of our population	06 Jan 2020	Cause Change in commissioning of enhanced services for PCNs, in partnership with the community and MH providers. Service specifications include Structured Medication reviews, enhanced health in care homes, anticipatory care, personalised care and supporting early cancer diagnosis. Effect Service delivery will be re-designed resulting in changes for providers through the contracting of the Network DES and NHS Community Services contract for 2020/21. Investment and sustainability of the providers is a challenge	I = 3 L = 3 9	Engage in the national consultation on the draft network DES contract service specifications. Continue to work with Clinical Directors of PCNs in readiness for final specification in early 2020						I = 2 L = 3 6	review current commissioning arrangements within the scope of the draft specifications Person Responsible: Ricky Chana To be implemented by: 10 Jan 2020			
													include in PCN meetings in east Berkshire and inform members of proposed service in 2020/21 network contracts Person Responsible: Alex Tilley To be implemented by: 28 Feb 2020			

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IMT 15	Cyber Security Risk Owner: Anshu Varma Delegated Risk Owner: Arif Gulzar Last Updated: 03 Sep 2019	BEC Only- We will commission services that improve the outcome and experience of all our residents by consistently delivering the NHS Constitutional Standards.	24 May 2017	<p>Cause Cyber risk is increasingly prevalent across healthcare sector as the cyber threats continue and become more sophisticated and can impact on the operational delivery. IMT Risk -Systems are compromised or ineffective due to cyber attacks that jeopardise effective patient care. Information assets are damaged.</p> <p>Effect It can impact on the delivery of safe patient care, key information assets as well as business processes. It is therefore a major risk that needs to be mitigated to an appropriate level. Controls are in place to reduce the risk of attack around the CCG IT Infrastructure and key information assets that are maintained/ managed by SCW on behalf of CCG.</p>	I = 4 L = 3 12	IMT Control- Business continuity plans and disaster recover plans have planned reviews and with additional revisions where there is a known cyber breach. All primary care support systems are assessed						I = 2 L = 3 6	<p>Person Responsible: To be implemented by:</p>		Risk is reviewed and mitigations are in place.	03 Jan 2020

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						<p>The following mitigations are in place:</p> <ul style="list-style-type: none"> •Effective SCW Information Security Management System including IT security framework and IT security assurance plan for CCG. •SCW Implementation of Cyber Security framework that is based on Department of Health '10 Steps to Cyber Security'. •Information Governance Privacy Impact Assessment process including the System Level Security policy review. •Annual Penetration Tests aligned with ISO 27001 standards. For year 2017/18, penetration test was performed by NHS Digital during March 											

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						2017 as a part of CareCERT Assure early adopters programme. <ul style="list-style-type: none"> •IT security incident handling policy. •SCW IT business continuity plans and disaster recovery plans. •CareCERT advisories/bulletins from NHS Digital (NHSD) received and actioned by SCW for CCG. •CareCERT Threat notifications by NHSD received and actioned by SCW IT services. •As a part of CareCERT React, guidance is available from NHSD CareCERT team in the event of a cyber-attack. •IT SAR (Service Audit Review) performed annually by external auditors. •CCG Annual IG toolkit return. •Mandatory IG 											

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						training for CCG staff, refreshed annually. •SCW service desk communications highlighting the CCG staff vigilance against cyber threat landscape. •Provision of Cyber Security Report which highlights key activities relating to Cyber security that have taken place within SCWCSU Central IT Services. The report provides high level summary of actions taken to clear identified risks by penetration (Pen) tests and provides threat landscape trends over the last six months and mitigations in place. It also illustrates the implementation of CESG 10 Steps to Cyber Security. •Data Flow Maps												

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						regularly updated to identify information assets and risks and training provided to Information Asset Owners (IAOs and Administrators (IAAs). •PMO office manages project lifecycle of new projects which may include implementation of/or changes to information systems which will prompt completion of Privacy Impact Assessment which are approved by IT Security and Information Governance. •PMO manage projects via PRINCE which is an approved methodology which gives a structured and logical approach to conducting projects when developing new											

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						information assets which should cover project stages such as requirements analysis, functional specification, system architecture and design, creation/selection of software, testing, acceptance and implementation and operation and management.										

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PCC 13	General Practice Sustainability Risk Owner: Alex Tilley Delegated Risk Owner: Joanne Greengrass Last Updated: 03 Sep 2019	BEC Only- We will play a proactive role in the development and delivery of an innovative and united Sustainability and Transformation Plan	18 Oct 2016	Cause General Practice is operating under considerable pressure and may not be able to deliver the ambitions set out in the GPFV, national policy and ICS plans Effect Services under pressure will be susceptible to any adverse or unforeseen occurrences resulting in continued lack of transformation and opportunity to build sustainability or ability to change	I = 4 L = 3 12	Primary Care has initiated a GP Forward View Time for Care programme to optimise the support available to practices and to be sure that the focus of is really on what is required by practices to become more sustainable and be part of transformation. Support practice through the workload reduction evidenced in the full implementation of digital initiatives such as online consultations, patient digital access, NHS App.						I = 3 L = 2 6	Report on the improvements to resilience investment in 2017/18 to learn the most effective interventions Continue to support practices that have been identified with resilience issues through knowledge and intelligence from the PC dashboard tool Work with Primary Care Networks on the investment of further resilience funds in 2017/18 Propose to PCOG in July investment of 2018/19 resilience funds from the GPFV Person Responsible: Hayley Edwards To be implemented by: 31 Dec 2019	13 Dec 2019 Hayley Edwards Continued work with the PC Clinical Lead for discussion at the December 19 PCOG meeting. Proposal includes the data captured to proactively identify practice possibly requiring support, prospects of support available to all practices, training hub options and an action plan to work with PCNs to develop further.	Continued work with the PC Clinical Lead for discussion at the December 19 PCOG meeting. Proposal includes the data captured to proactively identify practice possibly requiring support, prospects of support available to all practices, training hub options and an action plan to work with PCNs to develop further.	13 Dec 2019

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						Through the GPFV delivery the CCG has supported GP federations, established Primary Care Networks and encouraged practice clusters with some investment to support the space to delivery transformation, these are linked to direct outcomes for each initiative aimed at transforming general practice to greater resilience and integration.								General Practice sustainability 'trigger dashboard' has been created to proactively identify practices that potentially have issues regarding resilience and sustainability. Work with the PCNs will develop as they mature.		

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													Establish champions for digital initiatives to increase the update and implementation of digital workload reduction and flexible access tools Person Responsible: Katerina Nash To be implemented by: 31 Mar 2020			

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PCC 2	Workforce Development for Sustainability Risk Owner: Alex Tilley Delegated Risk Owner: Joanne Greengrass Last Updated: 06 Jan 2020	BEC Only- We will play a proactive role in the development and delivery of an innovative and united Sustainability and Transformation Plan	11 Jul 2016	Cause Workforce in General Practice requires development and future planning to attract clinicians, retain existing workforce and introduce new roles to deliver new career and workforce models. Service delivery depends on high quality and capacity in our workforce. Effect Practice sustainability is weakened without a workforce plan and the retention and development of roles in general practice. Practices may be forced to reduce service offer and risks to staff and patients may increase.	I = 4 L = 3 12	Ensure high success in the investment of the PCN Additional Role Reimbursement Fund in 2019/20. investment into new additional roles to benefit practices and patient outcomes in line with Long Term Plan. Establish a robust Training Hub across the ICS. Benefits to include: supply and up-skilling of workforce, innovate with new roles and ways of working supported through leadership development						I = 3 L = 2 6	PCCC in east Berkshire to approve the proposal to establish the Frimley Training hub Person Responsible: Joanne Greengrass To be implemented by: 31 Jan 2020 PCN Clinical Directors to be provided with workforce planning tool using capacity and demand modelling, fed through practice workforce reporting for each network. Person Responsible: Alex Tilley To be implemented by: 31 Jan 2020		closed action for establishment of the east Berkshire Training hub - Frimley Training Hub established 2020	06 Jan 2020

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IMT 24	Windows 10 Enterprise Licences	BEC Only-We will play a proactive role in the development and delivery of an innovative and united Sustainability and Transformation Plan	17 Jun 2019	<p>Cause NHS Digital have committed to providing Windows 10 Enterprise licences to all NHS organisations at zero cost. The first tranche of licences purchased by the Department of Health was insufficient to meet demand.</p> <p>Effect Failure to supply licences will leave the CCG and GP Practices with a cyber security risk as support from Microsoft for Windows 7 patches and updates will cease in January 2021. There would also be significant cost to the CCG for purchasing Windows 10 licences, and associated savings from using the cyber security elements of Windows 10 Enterprise would also need to be realised by the CCG</p>	I = 3 L = 2 6	<p>Deployment to CCG staff underway.</p> <p>Deployment to GPIT planned as part of the Capital Refresh project.</p> <p>Deployment of Windows 10 Enterprise to CCG staff. SCW have created a Work Request to scope, plan and cost the deployment of Windows 10 Enterprise.</p>	SoW sent to and approved by EB CCG					I = 2 L = 2 4	<p>Microsoft support for Windows 7 has been extended to January 2021 eliminating the immediate risk to the CCG. SCW will be deploying Windows 10 Enterprise, but using a Windows 10 Professional licence until the W10 Enterprise licences are available. Once issued by NHS Digital, SCW will then remotely upgrade the licence to enable the features of W10 Enterprise</p> <p>Person Responsible: Simon Hodge</p> <p>To be implemented by: 31 Dec 2020</p>	Project to complete Corporate migration is near completion		06 Jan 2020

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IMT 25	Use of Fax Machines Risk Owner: Anshu Varma Delegated Risk Owner: Graham Brown Last Updated: 17 Dec 2019	BEC Only- We will commission services that improve the outcome and experience of all our residents by consistently delivering the NHS Constitutional Standards.	17 Jun 2019	Cause National phasing out of the use of Fax machines across the NHS by 2020. Removal of all fax machines, physical and soft, from GP Practices. Effect Failure to remove or cease all fax services by 2020, will cause the CCG and GP Practices in East Berkshire to breach the NHS England Directive. In addition to this, fax services are not guaranteed to be secure or encrypted, therefore posing serious risk of patient identifiable information being exposed to non-authorised people.	I = 4 L = 3 12	Risk Control: Review the IG impact and recommendations prior to proceeding with cessation of fax services in GP Practices. Reviewing the clinical impact of removal of fax services from GP Practices. Understanding alternative options for transmitting information previously sent by fax, working with GP Practices, Acute hospitals, Pharmacies, Care Homes etc.				Substantial	The recommended replacement for the service will be using dedicated shared nhs mail boxes between originators and GP practices. This will remove current risks associated with the use of fax eg: whether safe haven	I = 2 L = 2 4	Person Responsible: To be implemented by:		Project plan on track, all practices have been issued with guidance and timetable for ceasing use of fax. Next phase commences 18/12/2019 from which time incoming faxes will be responded to with advice to sender that an alternative route will need to be adopted, recommending use of dedicated	29 Nov 2019

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IMT 27	Delay in migration of HSCN Risk Owner: Anshu Varma Delegated Risk Owner: Ryan Edridge Last Updated: 20 Sep 2019	BEC Only- We will commission services that improve the outcome and experience of all our residents by consistently delivering the NHS Constitutional Standards.	20 Sep 2019	Cause Delay in the implementation of the HSCN due to issues related to BT and N3. Currently all sites specifically accessing BT Point of Presence (PoP) need to be moved off by August 2020 Effect – if practices are not moved off the transition network then there could be a financial impact on the CCG with a share of the cost. The approximate cost of this to the CCG would be around £70k PCM	I = 4 L = 2 8	East Berkshire do not have any PoP sites on the transition network so this would not apply. In addition East Berkshire have now completed there pilot HSCN site successfully so will have all sites migrated by July 2020						I = 2 L = 2 4	Person Responsible: To be implemented by:		The project is on track however it may not finish till August 2020	16 Dec 2019

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IMT 29	Digital First Project Risk Owner: Graham Brown Delegated Risk Owner: Last Updated: 13 Dec 2019	BEC ONLY - Engage: engaging with staff, member practices, local people and other stakeholders so that services are informed by their needs, views and behaviours	10 Dec 2019	Cause The digital section of the Long Term Plan contained several mandates and timelines for implementation. In several instances supporting guidance and implementation procedures were not issued at the same time, and in some cases are still awaited. This has led to the need for local implementation of definitions to be adopted, interpreting the ask to the best of our ability in order to meet the timeline. A risk exists that this ultimately differ from national guidance Effect Potential for inappropriate activity to have been undertaken	I = 3 L = 3 9								identify projects which are at risk not to be delivered with in the set time line Person Responsible: Graham Brown To be implemented by: 17 Jan 2020		Mandates affected: Lloyd George Digitisation of patient records NHS app - impact of alternative apps ie: iPlato myGP 25% appointments available for on line booking	13 Dec 2019