

# HSI21/090

## GOVERNING BODY

<b>Title of paper</b>	Policy Development Programme: Update Report		
<b>Agenda item</b>	11	<b>Date of meeting</b>	8 December 2021
<b>Exec lead</b>	Fiona Howarth, Chief of Staff	<b>Clinical sponsor</b>	N/A
<b>Author</b>	Jackie Zabiela, Governance Manager		

<b>Purpose</b>	For decision	<input type="checkbox"/>
	To ratify	<input checked="" type="checkbox"/>
	To discuss	<input type="checkbox"/>
	To note	<input checked="" type="checkbox"/>

<b>Link to strategic objective</b>	Policies and procedural documents are a key component of the Hampshire, Southampton and Isle of Wight CCG corporate governance framework and risk management system, which keep the organisation and its staff safe, protect the same from challenge, reputational damage and claim for redress. This framework supports all of the CCGs strategic objectives.
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### Executive Summary

This report outlines progress on the development of a Policy Development and Review Programme, including the establishment of a Policy Sub Group with oversight via the Audit and Risk Committee.

Since the last update report provided to Governing Body on 3 September, the Policy Sub Group met on 18 November 2021 and reviewed and approved the following documents for ratification:

- Safeguarding Adult and Children's Policy: A Think Family Approach (SFGDG/001/V1.00)
- Counter Fraud, Bribery & Corruption Policy (CORP/009/V1.00)
- Pharmaceutical Rebate Policy (CORP/010/V1.00)
- On-Call Policy (CORP/013/V1.00)
- Electronic Communications Guidance (CORP/011/V1.00)

Work is now in progress to consider how key Hampshire, Southampton and Isle of Wight CCG and Portsmouth CCG Policies can be brought into alignment in readiness for the Hampshire and Isle of Wight (HIOW) Integrated Care System (ICS) from April 2022. This will include conducting a risk assessment of policies in existence in both CCGs to consider those which need to be prioritised for review; it is likely that this will impact on the policy development and review process moving forwards.

<b>Recommendations</b>	<p><b>The Governing Body is asked to:</b></p> <ul style="list-style-type: none"> <li>• <b>Note progress with the policy development and review programme</b></li> <li>• <b>Ratify the policies / documentation as listed below which have been reviewed and approved by Policy Sub Group for use by the CCG:</b></li> </ul>
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	<ul style="list-style-type: none"> <li>○ <b>Safeguarding Adult and Children’s Policy: A Think Family Approach (SFGDG/001/V1.00)</b></li> <li>○ <b>Counter Fraud, Bribery &amp; Corruption Policy (CORP/009/V1.00)</b></li> <li>○ <b>Pharmaceutical Rebate Policy (CORP/010/V1.00)</b></li> <li>○ <b>On-Call Policy (CORP/013/V1.00)</b></li> <li>○ <b>Electronic Communications Guidance (CORP/011/V1.00)</b></li> </ul>
<b>Publication</b>	<b>Include on public website ✓</b>

<b>Please provide details on the impact of following aspects</b>	
Equality and quality impact assessment	Equality Impact Assessments are undertaken on policies which have been identified as having a medium or high impact on people with protected characteristics i.e. the Safeguarding Adult and Children’s Policy and the On-Call Policy.
Patient and stakeholder engagement	NA
Financial impact, legal implications and risk	NA

<b>Governance and Reporting- which other meeting has this paper been discussed</b>		
<b>Committee Name</b>	<b>Date discussed</b>	<b>Outcome</b>
Health Safeguarding and Looked After Children Committee	4 November 2021	Reviewed and approved the Safeguarding Adult and Children’s Policy: A Think Family Approach
Audit & Risk Committee	10 November 2021	Reviewed and approved the Counter Fraud, Bribery & Corruption Policy subject to more detail being included on fairness, equality and diversity ( <i>since added</i> )
Policy Sub Group	18 November 2021	Policies approved for ratification as listed above.

## POLICY DEVELOPMENT PROGRAMME

### Update Report (December 2021)

#### INTRODUCTION

Policies and procedural documents are a key component of the Hampshire, Southampton and Isle of Wight CCG corporate governance framework and risk management system, which keep the organisation and its staff safe, protect the same from challenge, reputational damage and claim for redress. The CCG uses policies and procedures to enable staff working for, and with us, to do so in a way that is efficient, consistent, safe and in keeping with our values, objectives and purpose. The development, approval and monitoring of the use of our policies, also ensures that we meet statutory, legal and insurance requirements as well as best practice in relation to corporate and clinical governance.

A Policy Sub Group has been established with responsibility for managing the work programme as well as the review and recommendation for approval of policies, guidelines and procedures. The Audit and Risk Committee has oversight of the Policy Sub Group's activities, and the CCG Governing Body is responsible for the final ratification of policies for use within the CCG. Approved policies / documents are published on the CCG website (corporate) or intranet (human resources).

Work is now in progress to consider how key Hampshire, Southampton and Isle of Wight CCG and Portsmouth CCG Policies can be brought into alignment in readiness for the Hampshire and Isle of Wight (HIOW) Integrated Care System (ICS) from April 2022; This will include conducting a risk assessment of policies in existence in both CCGs to consider those which need to be prioritised for review; it is likely that this will impact on the policy development and review process moving forwards. The work stream is being led by the Process Solutions Finding Group and links to the wider ICS Transition Programme; HR are already linking with colleagues in Portsmouth CCG with regard to HR related policies.

#### DOCUMENTATION FOR RATIFICATION

The Governing Body is asked to ratify the following documentation which has been reviewed and approved by the Policy Sub Group for onward ratification by the Governing Body (copies can be found in the Reading Room for information):

- **Safeguarding Adult and Children's Policy: A Think Family Approach (SFGDG/001/V1.00):** This policy details staffs' statutory responsibilities and the duties of NHS Hampshire, Southampton and Isle of Wight CCG (HSIOW CCG) as a commissioning organisation and that of its employees and GP member practices. The policy has been developed by CCG safeguarding professionals and is based on policies in place within predecessor CCGs. It was reviewed and approved by the Health Safeguarding and Looked After Children Committee of 4 November 2021.
- **Counter Fraud, Bribery and Corruption Policy (CORP/009/V1.00):** This policy provides employees with information regarding fraud, bribery and corruption and the counter fraud arrangement in place in HSIOW CCG; it is based on the versions in existence within predecessor CCGs. It was reviewed and approved by the Audit and Risk Committee on 10 November 2021 subject to more detail being included on fairness, equality and diversity; this has been added as requested.

- **Pharmaceutical Rebate Policy (CORP/010/V1.00):** Pharmaceutical companies offer schemes where CCGs can receive rebates on dispensed prescription products. This policy summarises the main points for consideration and outlines a process for assessing and managing these schemes. The CCG Audit and Risk Committee will have oversight of the process.
- **On-Call Policy (CORP/013/V1.00):** This policy describes how the CCG's on-call staff will provide the senior level local leadership of incidents and emergencies that have been delegated by NHS England South East.
- **Electronic Communications Guidance (CORP/011/V1.00):** This document provides guidance to staff on the use of electronic communications such as email, video conferencing solutions, mobile messaging etc.

## POLICY / DOCUMENTATION DEVELOPMENT SUMMARY

The following is a summary of the numbers and status of the documents currently listed on the initial draft policy / document schedule, a copy of which is available in the Reading Room for information.

Status	Number	
	Last Reported	Current
Policies / documents approved and ratified for use within the CCG	15	46
Policies / documents awaiting approval / ratification	32	5
Predecessor CCG policies / documents overdue for review (not started)	15	8
Predecessor CCG policies / documents overdue for review (started)	13	13
Predecessor CCG policies / documents not yet due for review (not started)	12	11
Predecessor CCG policies / documents not yet due for review but for which work is already underway	3	5
New policies / documents in draft / in development	4	4
New policies / documents suggested for future development (by predecessor CCGs)	3	2
<b>Total</b>	<b>97</b>	<b>94</b>

Policies are categorised as follows:

- **HR** – currently there is a total of 21 HR related policies listed on the schedule. Of these eight have been approved, two new policies under development, four are overdue but work currently in progress, three not yet due for review but work in progress, one not yet due for review (needs to be re-written with Finance team). The three listed as overdue for review with no action currently underway remain the same as previously reported i.e.:
  - Salary Over and Under Payments Policy: this is a SCW CSU HR Policy which will need to be reviewed
  - Agency and Interim Use Policy: this will now be in the form of an appendix to the Recruitment and Selection Policy
  - Travel and Expenses Policy: whilst the policy itself is overdue, the electronic claims process is available on the internal StayConnected Portal.
- **Information Governance** – the full suite of 13 policies / documents has been approved or awaiting final ratification.
- **IT Security** – there is a suite of 18 IT security related policies, one of which is overdue for review; scheduled for completion by South Central & West Commissioning Support Unit by the end of December 2021; likely to come through for the CCG for adoption early 2022.

- **Corporate / Health and Safety** – there are a total of 26 corporate policies, five currently overdue for review, 13 that have been approved / or are awaiting ratification, seven overdue but with work underway, one not yet due but in progress.
- **Continuing Healthcare (CHC)** – there are eight CHC related policies for which review dates have been deferred in order that they can be reviewed with a view to alignment across the HIOW ICS; it is likely this will not be completed for several months as arrangements across several local authority areas will need to be considered.
- **Safeguarding** – there are eight safeguarding related policies listed on the schedule, one of which has approved / awaiting ratification, two which are not yet due for review, one not yet due for review but in progress and two new policies currently under development. There were two policies which had been listed for development by predecessor CCGs; work currently on hold pending the work to review / align policies.

The number of potential policies has reduced from an initial total of 108 to 94. The majority related to policies which were in existence within individual predecessor CCGs which are no longer required as arrangements have either been superseded, contents have been absorbed into other policies or policies have been put on hold for future consideration post April 2022.

## **SUMMARY OF RECOMMENDATIONS**

The Governing Body is asked to:

- **Note progress with the policy development and review programme**
- **Ratify the policies / documentation as listed below which have been reviewed and approved by Policy Sub Group for use by the CCG:**
  - **Safeguarding Adult and Children’s Policy: A Think Family Approach (SFGDG/001/V1.00)**
  - **Counter Fraud, Bribery & Corruption Policy (CORP/009/V1.00)**
  - **Pharmaceutical Rebate Policy (CORP/010/V1.00)**
  - **On-Call Policy (CORP/013/V1.00)**
  - **Electronic Communications Guidance (CORP/011/V1.00)**

**Jackie Zabiela**  
**Governance Manager**  
**23 November 2021**