

NHS Norwich CCG Primary Care Risk Register - Primary Care Commissioning Committee 28th February 2019

NHS Norwich CCG aims to improve health outcomes and quality of services year on year for all the people of greater Norwich, with patients at the heart of its decision making process

The Primary Care Risk Register forms part of the CCG Assurance Framework and is reviewed at each Primary Care Commissioning Committee meeting.

Risk Ref	Risk Description (and Implication)	Unmitigated Risk Rating (LxC)	Existing Controls (measures in place to reduce likelihood)	Assurances on controls	Gaps in controls/assurance	Current Risk Rate LxC	Movement Since Last assessed	Target Risk Rating	Action plan and progress report	Date for Action	Lead
P2	<p>Risk added on 27th April 2017 Risk to having a resilient workforce to enable workforce transformation for New Model of Care. Key Challenges - Escalating volume and complexity of workload within Primary Care. - Experienced workforce moving towards retirement age. - Failure to attract the new clinical workforce of the future into Primary Care. - lack of a cohesive approach to support Practices to "grow their own" talent. This includes having an infrastructure required to empower small Practices to be "educationally ready".</p>	4 x 4 = 16	<p>STP footprint: NHS Great Yarmouth and Waveney CCG are leading on Primary Care across the STP footprint. They host and Chair the STP Workforce Assurance Group (WAG) that monitors progress against a set of delivery plans; - Norfolk and Waveney Training Hub. - GP Recruitment & Retention Schemes. - International GP Recruitment (IGPR). - GPN 10 Point Action Plan. - Wider Workforce. - Leadership. - Data Quality. - National Funding Streams. - Pastoral Support. STP Director of Workforce and STP Head of Workforce are hosted by NCH&C. Additional Strategic support and funding is accessed through the Local Workforce Advisory Board. Local footprint: NHS Norwich CCG lead on the GPN 10 Point Action Plan delivery plan and link in to the other plans. CCG has a director representation at the WAG and has good representation alongside OneNorwich colleagues at Norfolk & Waveney Training Hub. CCG and OneNorwich continue to explore and implement local workforce development initiatives and meet bi monthly.</p>	<p>Internally: - Quality Committee. - Delegated Primary Care Commissioning Committee. - Local Workforce meeting. - OneNorwich Executive. Externally: - LWAB. - STP WAG. - Norfolk & Waveney Training Hub. - Regional GPFV Delivery Boards. - NHSE STP Checkpoint.</p>	<p>Detailed analysis of individual practice activity and demand. Consistently reliable practice workforce data. Assurance around recruitment and retention activities to meet the current challenge of attrition. Review of the GMS 5-year contract framework, to ensure the requirements of workforce are captured within our STP plans and trajectories. National delay to IGPR programme.</p>	3 x 4 = 12	→	2 x 3 = 6	<p>1. STP scoping a new CSU service to support workforce data collection, verification and future modelling for Primary Care. 2. Recruitment, retention and "grow your own" opportunities are being delivered at an STP economy of scale, with local sensitivities, through the local delivery plans that are monitored by the WAG. 3. In January 2019 the STP received additional funding from NHSE for the development of extra schemes including Careers + for nurses. 4. Norfolk & Waveney Training Hub continues to commission and co-ordinate education and training opportunities for Primary Care staff. 5. OneNorwich working closely with NCH&C regarding potential for joint development of clinical teams and training.</p>	<p>1. 01/09/2019 2. Ongoing 3. 01/04/2019 4. Ongoing 5. Ongoing</p>	KW
P3	Inadequate premises for the provision of primary care services	4 x 4 = 16	<p>Central Norfolk CEPN Estates Strategy identifies future development needs. NPL stocktake identifies current condition of premises and ownership/landlord arrangements. Estates & Technology Transformation Fund (ETTF) bids successful in principle for more urgent development needs. Joint CCG / OneNorwich Estates work stream established to oversee Norwich premises issues; also linking with NCH&C Estates lead. Liaison with planning authorities to identify future development needs.</p>	<p>CQC reports identify significant issues with premises.</p>	<p>Lack of Norwich-wide estates strategy. Issues with practices being able to part-fund ETTF developments.</p>	3 x 3 = 9	→	2 x 2 = 4	<p>1. Norwich-wide Primary Care Estates strategy completed to support the emerging new models of care. 2. Discussions with individual practices to progress existing ETTF applications.</p>	<p>28/02/19 On-going</p>	JM/EB

P4	<p>Risk added 27th April 2017 Risk that individual practices become unable to provide general practice services due to workforce or financial resilience issues</p>	4 x 4 = 16	<p>NHS England holds a GP Resilience Fund to support practices in crisis. Practices are able to apply for support from this fund.</p> <p>Contract management support provided to practices to investigate longer-term solutions.</p> <p>OneNorwich are progressing a number of initiatives to support general practice working at scale and to relieve some of the daily pressure on practice staff eg Home Visiting service.</p>	<p>Reports to Primary Care Committee</p>	<p>See P2 for workforce issues.</p> <p>Reactive process relying on practices to report issues.</p>	4 x 3 = 12	→	3 x 2 = 6	<p>1. OneNorwich reviewing models of primary care at scale to provide resilience to individual practices.</p>	28/02/19	EB
P5	<p>Risk added 27th April 2017 Risk that poorly performing practices are not identified on a proactive basis such that remedial action can be supported</p>	4 x 3 = 12	<p>CQC inspections are carried out periodically and reported to the CCG and NHS England. Schedule of Practice Variation visits in place to monitor clinical performance of practices</p>	<p>Reports to Primary Care Committee.</p> <p>CQC reports.</p>	<p>Lack of proactive performance monitoring of measures such as patient access, satisfaction.</p>	3 x 3 = 9	→	2 x 2 = 4	<p>1. CCG to establish performance monitoring process to identify early warning signals. Format of GP Practice dashboard approved at the NHS Norwich PCCC meeting held on the 19/12/2018. Further work to be carried out to provide front sheet to GP dashboard to identify practices that are at risk and highlight resilience issues.</p>	28/02/19	Jl
P6	<p>Risk added 22nd February 2018 GP Business Continuity Management - Ensuring that General Practice Business Continuity management processes are aligned to ISO 22301</p>	4x4 = 16	<p>Establish that 23 GP Practices Business Continuity Plans are aligned to ISO 22301</p> <p>Ensure each practice will meet the 2017/18 Data Security and Protection Requirements as part of the NHS Data Security and Protection Toolkit</p> <p>Provide a general practice briefing in relation to the Data Security Protection Requirements</p>	<p>1. Progress reports to PCCC</p> <p>2. NHS IG Toolkit V14.1</p> <p>3. NHS Data Security and Protection Toolkit (2018/19)</p>		4 x 3 = 12	→	1 x 4 = 4	<p>1. Monitor completion of NHS IG Toolkit V14.1</p> <p>2. Monitor completion of NHS data security and protection toolkit 2018/19</p>	31/03/19	Jl

P7	Risk added 22nd February 2018 Risk of failure to agree enhanced GP services with the Local Medical Committee (LMC)	4x4 = 16	Weekly task and finish groups across Norfolk and Waveney CCGs established Monitor monthly through each Norfolk and Waveney CCG's STP Primary Care Commissioning Committee Regular communication to all GP Practices on contract arrangements and further developments with the LMC All GP services mapped and benchmarked for locally commissioned services across STP footprint to inform the plan Commenced development of a "shared care framework" with STP GPs Continue to seek partnership approach with the LMC to agree arrangement across STP Attain have been employed as consultants to review the locally enhanced services basket across all 5 N&W CCGs to provide a consistent picture across the patch. Procurement plan to roll out LCSs has been drafted awaiting approval by all 5 individual PCCCs	1. Progress reports to PCCC 2. Progress reports to Governing Body through the GBAF Assurance Framework 3. Progress reports to STP accountable officers		4 x 3 = 12	→	1 x 4 = 4	1. Ensure all Norfolk and Waveney CCGs place this risk onto their Risk Registers 2. Monthly Heads of Primary Care Meetings held to discuss progress and monitor action plan to ensure progress and timescales met. 3. Progress Update report and action plan to be presented to PCCC to update committee on a regular basis. 4. Regular Chief Officer briefing and cooperation across STP	28/02/19	JI
P8	Risk added 23rd August 2018 Risks around GPIT infrastructure and the impact of GDPR	4x4 = 16	NHS Norwich CCG IG manager working with practices to roll out training so that they are well prepared. New national GPIT model – which includes the role of Data Protection officer. AGem CSU have been commissioned to provide an IG support function to Practices	1. Progress reports to PCCC 2. Progress reports to NHS Norwich IG working group.		3 x 3 = 9	→	1 x 4 = 4	There is a need for individual GP practices to each appoint a DPO, which some have done.	28/02/19	JI

P9	<p>Risk added 25th October 2018 Risk to the delivery of aTIV (Trivalent) Flu vaccines to the aged 65+ population, including those residing in care/residential homes and the Housebound due to the increase in Global Demand and resultant phased delivery of vaccines. Also two Practices in Norwich were awaiting stocks, due to ordering issues with Seqirus, the only UK manufacturer.</p>	4x4 = 16	<p>National Directed Enhanced Service (DES) in place between NHS Public Health England and GP Practices. All Practices in Norwich received guidance from NHSE on 24/08/2018 advising on early seasonal prioritisation of patients aged 75+ and those aged 65 - 74 years with an underlying clinical risk factor. As of beginning of October 2018, every practice in Norwich has confirmed they have ordered sufficient vaccine for the 2018/119 flu season. Ordering issues have been followed up with 2 practices and these were before the end of October. Norfolk & Waveney Winter Resilience Group met fortnightly over peak season to oversee support to providers (including Care Homes) around prevention and management of seasonal illness, including public and staff flu vaccination. Public Health Norfolk have been given access to CCG flu programme performance for additional scrutiny.</p>	<p>Internally: Primary Care Commissioning Team Norfolk & Waveney Winter resilience Group (Chaired by NCCG). Quality Committee. Externally: Public Health Norfolk STP Primary care & Prevention Board. NHSE Regional Imms & vaccs manager PHE Health Protection Team.</p>	<p>Phased delivery of vaccines to all providers meant that practice vaccination programmes were delayed. Support to practices has been provided by the CCG Primary Care Team.</p>	3 x 4 = 12	→	3 x 2 = 6	<p>1. Norwich flu vaccination for the 65+ population as of provisional Immform shared on 31/01/2019. 52.1% practices at equal or better than national average, 30.4% at less than 5% below the national average. Practices who still have patients requiring vaccination can signpost to community pharmacies if required, due to stock levels. 2) Norfolk & Waveney Winter resilience Group will undertake an evaluation of Winter 2019 and this will include learning around vaccination uptake. 3. Proposal to close risk as of february 2019 meeting and review with a view to re opening in August or October 2019 in readiness for the 2019/20 flu season.</p>	<p>1. Completed 2. 01/06/2019 3. N/A</p>	KW
P10	<p>Risk added 28th February 2019 Risk to the legal challenge to the LCS procurement process.</p>	4x4 = 16	<p>Attain appointed to provide support and guidance to Norfolk & Waveney CCGs through the procurement process. AGEM CSU procurement team also providing support. Parveen Mercer Associate Director of Primary Care (Contracting & Performance) NHS Great Yarmouth and Waveney Clinical Commissioning Group also supporting CCGs thru the process.</p>	<p>1) Regular reports to Heads of Primary Care. 2) regular reports to individual CCG Delegated PCCC meetings</p>	<p>lack of Guidance from NHS E</p>	4 x 3 = 12	NEW	1 x 4 = 4	<p>1) Clinical representatives from all CCGs have met to undertake a review of all LCS currently provided by Norfolk & Waveney CCGs an consider which are In scope and /out of scope for the purposes of the procurement. 2) Bidder/Provider open day held to advise all parties of the procurement process and the timescales involved.</p>	31/03/19	JI