

Integrated Care Board

Date of meeting	15 May 2024
Title of paper	Lancashire and South Cumbria ICB Policies
Presented by	Debra Atkinson, Company Secretary and Director of Corporate Governance
Author	Danielle McMillan, Corporate Business and Risk Manager
Agenda item	15
Confidential	No

Executive summary

The ICB has an extensive suite of policies which it maintains to support Board members and its employees to conduct their work within appropriate frameworks and delegations.

This report presents 5 policies for the ICB Board to consider and approve in line with the agreed Scheme of Reservation and Delegation (SORD). All the policies have been thoroughly reviewed by subject matter experts prior to being presented to the Board; the policies recommended for approval are:

- Emergency Preparedness, Resilience and Response Policy (appendix A),
- Business Continuity Policy (Appendix B),
- Complaints Policy (appendix C),
- Section 106 Monies & Community Infrastructure Levy Funding Policy and Procedure for Health Facilities (appendix D),
- Standards of Business Conduct Policy (appendix E).

Recommendations

The Board is requested to:

- **Approve** the Emergency Preparedness, Resilience and Response policy,
- **Approve** the Business Continuity Policy,
- **Approve** the ICB Complaints Policy,
- **Approve** the Section 106 Monies and Community Infrastructure Levy Funding Policy and Procedure for Health Facilities,
- **Approve** the Standards of Business Conduct Policy.

Which Strategic Objective/s does the report relate to:

		Tick
SO1	Improve quality, including safety, clinical outcomes, and patient experience	x
SO2	To equalise opportunities and clinical outcomes across the area	x
SO3	Make working in Lancashire and South Cumbria an attractive and desirable option for existing and potential employees	x
SO4	Meet financial targets and deliver improved productivity	x

SO5	Meet national and locally determined performance standards and targets				x
SO6	To develop and implement ambitious, deliverable strategies				x
Implications					
		Yes	No	N/A	Comments
Associated risks			X		
Are associated risks detailed on the ICB Risk Register?			X		
Financial Implications			X		
Where paper has been discussed (list other committees/forums that have discussed this paper)					
Meeting		Date		Outcomes	
Quality Committee		20 th March 2024		Ratified the Complaints Policy.	
Conflicts of interest associated with this report					
Not applicable					
Impact assessments					
		Yes	No	N/A	Comments
Quality impact assessment completed			X		
Equality impact assessment completed	X				Updated EIA undertaken for the Complaints Policy.
Data privacy impact assessment completed			X		
Report authorised by:		Debra Atkinson, Company Secretary and Director of Corporate Governance.			

Integrated Care Board – 15 May 2024

Lancashire and South Cumbria ICB Policies

1. Introduction

- 1.1 As a publicly funded organisation, the ICB has a duty to maintain the highest standards of conduct and integrity. Expecting only the highest standards of professional behaviour and responsibility from Board members and all staff in undertaking work on behalf of the ICB.
- 1.2 The ICB has an extensive suite of policies which it maintains to support Board members and its employees to conduct their work within appropriate frameworks and delegations.
- 1.3 This report presents 5 policies for the ICB Board to consider and approve in line with the agreed Scheme of Reservation and Delegation (SORD).

2. Emergency Preparedness, Resilience and Response Policy (Appendix A)

- 2.1 The Emergency Preparedness, Resilience and Response (EPRR) Policy was initially drafted in 2022 to outline L&SC ICBs commitment to EPRR, including the preparation for, testing, and response to business continuity and major incidents, as a Category 1 responder.
- 2.2 The policy was due for a full formal review in 2023, but this was delayed due to EPRR resources being diverted to support L&SC ICBs co-ordination of, and response to, significant periods of disruption due to industrial action within the NHS.
- 2.3 A comprehensive review of the policy in line with the requirements stipulated in the NHS EPRR core standards (to improve compliance) have resulted in the following key changes:
 - i. Clarity around duties, roles and responsibilities of the ICB, the executive team and the wider ICB staff groups, and
 - ii. Enhanced detail around:
 - a. the on-call arrangements and training and exercising requirements,
 - b. the debrief process and the continuous improvement cycle to improve EPRR systems and processes going forward,
 - c. collaborative working, including local and regional health resilience partnerships to provide strategic leadership on EPRR matters,
 - d. information sharing and document retention in line with national guidance,
 - e. monitoring and review to ensure compliance with the policy requirements,
 - f. the EPRR definitions section.
- 2.4 It is recommended the Board approve this policy with a review date of May 2027 subject to any national guidance or policy changes.

3. Business Continuity Policy (Appendix B)

- 3.1 The Business Continuity Policy was initially drafted in 2022 to outline LSC ICB's commitment to business continuity management as a Category 1 responder under the Civil Contingencies Act 2004 and as required within the NHS EPRR framework.
- 3.2 The Policy was due for a full formal review in 2023, but this was delayed due to EPRR resources being diverted to support LSC ICB's co-ordination of, and response to, significant periods of disruption due to industrial action within the NHS.
- 3.3 A comprehensive review of the Policy in line with the requirements stipulated in the NHS EPRR core standards (to improve compliance) have resulted in the following key changes:
- i. Clarity around the purpose and scope of the policy, including further detail on the objectives of the policy,
 - ii. Enhanced detail around:
 - a. Governance arrangements,
 - b. Business continuity processes within directorates,
 - c. The use of loggists during incident response,
 - d. Risk management in line with LSC ICB risk management policy,
 - e. Plan, Do, Check, Act cycle and continuous improvement process,
 - f. The new business impact analysis template,
 - g. Business continuity definitions section.
- 3.4 It is recommended the Board approve this policy with a review date of May 2027 subject to any national guidance or policy changes.

4. Complaints Policy (Appendix C)

- 4.1 This policy describes how NHS Lancashire and South Cumbria (LSC) Integrated Care Board (ICB) handles complaints. It replaces the previous policy adopted by the ICB on 1 July 2022.
- 4.2 This policy outlines the ICB's approach to receiving, handling, investigating, and resolving complaints. It explains how this will be implemented locally and must be followed by all staff employed or hosted by the ICB. Furthermore, it identifies that the ICB is committed to high quality patient care for all our residents, and we encourage a culture that seeks and uses people's experiences of care to improve local services.
- 4.3 The key amendments are:
- i. To clarify how we will approach handling complaints about NHS providers including those involving more than one organisation,
 - ii. Amend the scope of the policy to include those complaints about primary care made to the commissioner of services,
 - iii. Set out the roles and responsibilities within the ICB,

- iv. Update references to other legislation and guidance linked to complaints management,
 - v. To commit our Patient Experience to provide training in complaint investigation and resolution to appropriate ICB staff.
- 4.4 The ICB Board are advised there is a robust policy and supporting procedures in place to manage and respond to Complaints and Quality Committee ratified this policy in March 2024.
- 4.5 It is recommended the Board approve this policy with a review date of May 2027 subject to any national guidance or policy changes.
- 5. Section 106 Monies & Community Infrastructure Levy Funding Policy and Procedure for Health Facilities (Appendix D)**
- 5.1 This policy confirms the role held by the NHS Lancashire and South Cumbria (LSC) Integrated Care Board (ICB) as a statutory consultee on behalf of the NHS, with regards to Section 106 (S106) of the Town and Country Planning Act 1990 and, the Community Infrastructure Levy (CIL) introduced by The Planning Act 2008.
- 5.2 It sets out how the ICB will engage with local authorities when planning applications will impact on local health infrastructure, and the principles upon which the ICB will exercise its responsibilities for making recommendations on the allocation of health related S106 and CIL allocations.
- 5.3 The procedure outlines the actions that will be taken by the ICB's Strategic Estates Team in responding and reviewing planning applications, identifying when S106 contributions should be sought, and how these contributions will be allocated.
- 5.4 This document has been fully reviewed and the only changes to highlight are references to former Local Authorities being replaced with the incumbent arrangements detailed below:
- i. References to Craven Council replace with North Yorkshire Council
 - ii. References to Copeland Council removed,
 - iii. References to Barrow and South Lakeland Councils replaced with Westmorland and Furness Council.
- 5.5 It is recommended the Board approve this policy with a review date of May 2027 subject to any national guidance or policy changes.
- 6. Standards of Business Conduct Policy (Appendix E)**
- 6.1 The Standards of Business Conduct policy describes the standards and public service values which underpin the work of NHS Lancashire and South Cumbria Integrated Care Board (ICB) and reflects current guidance and best practice which all ICB staff must follow. The updated policy will replace the previous version adopted by the ICB in July 2022.

6.2 This policy has been thoroughly reviewed and updated to reflect:

- i. Fit and Proper Person's Test Policy and Framework,
- ii. Freedom to Speak Up Policy,
- iii. Updated guidance for Anti-Fraud Bribery and Corruption,
- iv. Updated and approved Joint Working with Pharmaceutical Industry policy (which also relates to commercial sponsorship),
- v. Reference to the approved Information Governance Handbook,
- vi. The updated Seven Principles of Public Life (NOLAN principles).

6.3 It is recommended the Board approve this policy with a review date of May 2027 subject to any national guidance or policy changes.

7. Recommendations

7.1 The Board is requested to:

- i. **Approve** the EPRR policy,
- ii. **Approve** the Business Continuity Policy,
- iii. **Approve** the ICB Complaints Policy,
- iv. **Approve** the Section 106 Monies & Community Infrastructure Levy Funding Policy and Procedure for Health Facilities,
- v. **Approve** the Standards of Business Conduct Policy.

Danielle McMillan
25th April 2024