



Dear Requestor

RE: Freedom of Information Request

With reference to your request for information I can confirm in accordance with Section 1 (1) of the Freedom of Information Act 2000 that we do hold the information that you have requested. A response to each part of your request is below.

In the request you asked:

I am writing to request information under the Freedom of Information Act 2000.

On the 29th April, the Chief Executive and the Chief Operating Officer of NHS England, Sir Simon Steven and Amanda Pritchard wrote in a letter addressing the second phase of the NHS response to COVID19; a recommendation to 'risk-assess staff at potentially greater risk and make appropriate arrangements accordingly'.

I would therefore like to make a FOI about the Clinical Commissioning Group's (CCGs) action in this regard, to date. This is to help assess the differences and or similarities in CCGs practices and to help inform best practices in primary care nationwide.

Please provide communications addressing:

- recommendations made to your local primary care providers

All information and guidance in relation to "risk assessments for staff at potentially greater risk" has been shared with all General Practices in Nottingham & Nottinghamshire.

A communication was circulated to all General Practices asking for them to provide the CCG with a confirmation email that risk assessments have been undertaken by them as employers for all staff they employ or engage – as at 9 June 2020 we have received confirmation back from all but a few practices with the delays relating to annual leave/absences where not 100% complete. The communication shared with practices requesting confirmation that risk assessments had been undertaken is provided an **Appendix A**.

- *recommendations received from primary care providers or*

The majority of General Practices in Nottingham & Nottinghamshire have now confirmed that they have undertaken risk assessments with their staff – feedback from practices to date has been in relation to additional PPE requirements – additional supplies to meet the requirements of IPC/SOP requirements for the wider staff groups or advance PPE in places for those considered as being in those vulnerable categories where needed. Adjustments have been made to ensure that staff are able to work remotely or safely. Practices have also identified where they are impacted by having multiple staff that are potentially at greater risk.

- *any monitoring process that is currently in place concerning this risk assessments/ appropriate arrangements.*

Once the CCG has a complete record of practice impacts; a review will be undertaken in relation to where pressure/issues have been flagged to ensure practices are supported. Practices will be reviewing their individual Business Continuity Plans to ensure buddying arrangements are in place for when/if services are impacted. We encourage practices to keep us informed of changes to this daily via our OPEL monitoring process introduced for to monitor General Practice resilience as part of the response to COVID.

If you are unhappy with the way in which your request has been handled, NHS Nottingham and Nottinghamshire Clinical Commissioning Group have an internal review procedure through which you can raise any concerns you might have. Further details of this procedure can be obtained by contacting Lucy Branson, Associate Director of Governance via lucy.branson@nhs.net or by writing to NHS Nottingham and Nottinghamshire CCG, 1 Standard Court, Park Row, Nottingham, NG1 6GN.

If you remain dissatisfied with the outcome of the internal review, you can apply to the Information Commissioner's Office, who will consider whether the organisation has complied with its obligations under the Act, and can require the organisation to remedy any problems. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by NHS Nottingham and Nottinghamshire Clinical Commissioning Group formerly known as NHS Mansfield and Ashfield Clinical Commissioning Group, NHS Newark and Sherwood Clinical Commissioning Group, NHS Rushcliffe Clinical Commissioning Group, NHS Nottingham West Clinical Commissioning Group, NHS Nottingham City Clinical Commissioning Group and Nottingham North and East Clinical Commissioning Group. You can find out more about how to do this, and about the Act in general, on the Information Commissioner's Office website at: <https://ico.org.uk/for-the-public/>

Complaints to the Information Commissioner's Office should be sent to: FOI/EIR Complaints Resolution, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone 0303 123 1113 or report a concern: <https://ico.org.uk/concerns/>

Yours sincerely

Freedom of Information Officer on behalf of *NHS Nottingham and Nottinghamshire Clinical Commissioning Group formerly known as NHS Rushcliffe Clinical Commissioning Group, NHS Nottingham West Clinical Commissioning Group, NHS Nottingham City Clinical Commissioning Group, NHS Nottingham North and East Clinical Commissioning Group, NHS Mansfield and Ashfield Clinical Commissioning Group and NHS Newark and Sherwood Clinical Commissioning Group.*

notts.foi@nhs.net

All information we have provided is subject to the provisions of the Re-use of Public Sector Information Regulations 2015. Accordingly, if the information has been made available for re-use under the [Open Government Licence](#) (OGL) a request to re-use is not required, but the license conditions must be met. You must not re-use any previously unreleased information without having the consent of the Greater Nottingham Clinical Commissioning Partnership. Should you wish to re-use previously unreleased information then you must make your request in writing (email will suffice) to the FOI Lead via notts.foi@nhs.net. All requests for re-use will be responded to within 20 working days of receipt.



Appendix A:

Dear General Practices

As employers all General Practices have a duty of care to ensure that staff employed or engaged by them are able to work safely during the COVID-19 pandemic.

As you will all have seen the link to the latest guidance was shared on TeamNet yesterday as part of the Daily Bulletin, this linked to NHS Employers Risk assessments for staff – the link is also copied in below to aid ease of access. Within the guidance are a number of helpful links to further supporting resources.

<https://www.nhsemployers.org/covid19/health-safety-and-wellbeing/risk-assessments-for-staff>

Under the risk assessment section there are also links to useful supporting documents to consider when undertaking the risk assessments with your staff.

- *Wellbeing coaching questions - for managers*
- *121 wellbeing check-in template - for staff*

You will have seen the letter circulated by the Nottingham & Nottinghamshire LMC outlining advice to practices on extra considerations to take whilst risk assessing those individuals employed or engaged as Locums, GP Registrars via HEEM (employed via the Lead Employer arrangement with St Helens & Knowsley NHS Trust) or Temporary Staff (not working via an agency who would undertake the risk assessment – you will need to check with these individuals if a risk assessment has already been undertaken by their employer) to work in your general practices (copy attached).

We at the CCG have to undertake a similar process to ensure the safety of all staff employed by us - we have adapted the template used by the CCG for you to use in General Practice for each risk assessment for your team – please see “Vulnerable Staff Risk Assessment Form - General Practice”. This has been developed as an example to help practices undertake these risk assessments but appreciate that some of you may have already developed your own form.

What do we need you to do?

1. *Undertake a risk assessment with each member of staff employed or engaged by you – confirm to the CCG that this has been completed for all staff – employed or engaged.*
2. *Make reasonable adjustments for each staff member identified being vulnerable to reduce exposure - the suggested “Action Required” box on the “Vulnerable Staff Risk Assessment Form - General Practice” will help guide you on this, giving consideration to the following and any other adjustments needed (confirmation needed that this has been completed):-*
 - a. *PPE Requirements for safe working – have these been identified and are there enhanced PPE requirements*
 - b. *Remote working – is this possible?*
 - c. *If Clinical Consultations can be undertaken by Video/Telephone Consultation rather than Face to Face can the practice make adjustments to accommodate this?*
 - d. *Can Patient/Appointment Lists be reviewed to reduce the risk?*
 - e. *Consider non-clinical staff (Admin, Reception, Cleaners) – can adjustments be made to reduce the risk for this cohort of staff*
3. *Monitor changes for individual staff members and provide an update to the CCG if circumstances change.*
4. *Identify any risks to the resilience of your general practice – review individual Business Continuity Plans to ensure continued delivery of services to patients – inform the CCG if there are any risks to service delivery.*

Please confirm the following

1. Confirmation of all risk assessments have been completed for staff – we do not need you to forward copies of any risk assessments, these are to be treated confidentially by each practice
2. Confirmation to the CCG that adjustments have been made to reduce exposure for any individuals identified.
3. Identify any additional PPE requirements needed to support the staff members concerned – this will be shared with the CCG Logistics Cell to provide support practices
4. Notify the CCG of any identified risks to the delivery of general practice services.

Whilst the CCG are seeking assurances that risk assessments are being conducted by practices; we are also wanting to ensure where additional support is needed by individual practices we are able to respond e.g. any additional PPE requirements. The CCG also need to understand any risks to the delivery of general practice services; this will enable us to work together with you to address and help mitigate the impact.

Thank you for your help in providing this information

