

31/03/2026

NN-ICB/26-1518

Dear Requestor

Re: Freedom of Information Request

Thank you for your request for information, received on 20 February 2026, regarding the contract with the Liaison Group and continuing healthcare funding. We have processed your request in accordance with the Freedom of Information Act 2000 (FOIA).

Under the FOIA, public authorities like ours are required to respond to requests for information within 20 working days. In response to your request, I can confirm that we do hold the information requested. However, please note that some of the information you requested has been withheld.

Please find below our response to your request:

1. Please disclose what this “gain share-based arrangement” comprised and please disclose the section of Nottingham and Nottinghamshire ICB’s contract with the Liaison Group which pertains to this “gain share-based arrangement”.

[Please see response for question 3 below.](#)

2. Please disclose if Nottingham and Nottinghamshire ICB’s contract(s) with the Liaison Group featured any commission or payment of a percentage of savings made by the ICB whenever continuing healthcare funding was “axed or reduced”.

[Nottingham and Nottinghamshire Integrated Care Board can confirm that its contract with the Liaison Group did not include any commission arrangements or payment of a percentage of savings linked to continuing healthcare \(CHC\) funding being withdrawn or reduced.](#)

[The work undertaken by the Liaison Group related to the review of jointly funded care packages to ensure that the proportion of funding attributed to NHS continuing healthcare and Local Authority social care responsibilities was appropriately applied in line with national guidance.](#)

[This work was focused on ensuring the correct attribution of costs between health and social care within jointly funded packages, rather than withdrawing or reducing overall funding for individuals’ care.](#)

3. Please disclose a copy of the ICB’s contract with the Liaison Group with any commercially sensitive content redacted as appropriate.

[NHS Nottingham and Nottinghamshire ICB holds the information you have requested \(for questions 1, 2 and 3\) regarding its contractual arrangements with the Liaison Group. However, the ICB is withholding the information in full for the reasons outlined below.](#)

Section 41 – Information Provided in Confidence (absolute exemption)

The contract contains extensive information provided by Liaison Care under a clear expectation of confidentiality. This includes proprietary operational models, financial methodologies, workflows, thresholds, clinical and delivery processes, and business practices. Disclosure would constitute an actionable breach of confidence as the information:

- is not in the public domain;
- has the necessary quality of confidence; and
- was provided in circumstances imposing an obligation of confidence.

Section 43(2) – Commercial Interests (qualified exemption)

The contract also contains detailed commercial and financial information, including but not limited to:

- cost models and benefit-share mechanisms;
- activity volumes, staffing assumptions, and financial validation arrangements;
- internal delivery and operational models;
- invoicing arrangements, risk-sharing, and mitigation structures.

Disclosure of this information would be likely to prejudice the commercial interests of both the ICB and Liaison Care, as it could undermine future procurement and negotiation activity and deter providers from sharing detailed operational information with the NHS.

Public Interest Test (Section 43)

While there is a general public interest in transparency and accountability in the use of public funds, this is outweighed by the strong public interest in:

protecting fair and effective commercial competition;

ensuring the ICB can secure best value for money in future procurements; and

maintaining the willingness of providers to engage openly and collaboratively with the NHS.

Section 40 (2) – Personal Data (absolute exemption)

The contract includes personal data relating to identifiable individuals, including names, signatures, job roles, and contact details of staff from both the ICB and Liaison Care. Disclosure would contravene the UK General Data Protection Regulation and the Data Protection Act 2018.

Section 31 – Law Enforcement / Security (qualified exemption)

Certain elements of the contract and associated data-processing documentation contain sensitive information regarding system access, data flows, security controls, and business continuity arrangements. Disclosure of this information could increase the risk of harm to the security and resilience of NHS systems and services.

Public Interest Test (Section 31)

We have considered the public interest in transparency and accountability. While there is a public interest in openness, this is outweighed by the strong public interest in:

- protecting the security and resilience of NHS information systems;
- ensuring the safe and uninterrupted operation of NHS services; and
- preventing information that could be exploited to compromise health service delivery from being publicly released.

For these reasons, the public interest favours withholding this information.

Why a redacted version cannot be provided

Due to the pervasive nature of the exemptions above, meaningful redaction would require removing:

- the entire commercial and financial model;
- all operational and delivery schedules;
- all information security and data-processing content; and
- all personal data.

Redacting these elements would render the document devoid of substantive content and of no practical value or public benefit. For this reason, the ICB is withholding the contract in full.

For the reasons set out above, the ICB considers the full contract and associated information exempt from disclosure under Sections 41, 43(2), 40(2), and 31 of the Freedom of Information Act 2000.

4. Please disclose who was the most senior ICB officer who ratified the contract(s) with the Liaison Group.

NHS Nottingham and Nottingham ICB's Chief Nurse (Rosa Waddingham).

5. Please disclose the total number of new referrals for continuing healthcare funding by year, for each of the years 2020/21, 2021/2022, 2022/2023, 2023/24, 2024 and 2025/26 YTD.

The information requested is publicly available. Within the spreadsheets within this link - [Statistics ? Continuing Healthcare and NHS-funded Nursing Care](#) - please refer to tab '1.3 In Quarter' which contains the number of CHC referrals received for each ICB.

If you are unhappy with the way in which your request has been handled, NHS Nottingham and Nottinghamshire Integrated Care Board (ICB) has 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, Director of Corporate Governance and Assurance via lucy.branson@nhs.net or by writing to FOI Team at NHS Nottingham and Nottinghamshire ICB, Sir John Robinson House, Sir John Robinson Way, Arnold, Daybrook, Nottingham NG5 6DA.

If you remain dissatisfied with the outcome of the internal review, you can apply to the Information Commissioner's Office (ICO), 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 ICB. 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 via <https://ico.org.uk/concerns/>.

Yours sincerely

Freedom of Information (FOI) Officer on behalf of NHS Nottingham and Nottinghamshire Integrated Care Board nnicb-nn.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 NHS Nottingham and Nottinghamshire Integrated Care Board. 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 nnicb-nn.foi@nhs.net. All requests for re-use will be responded to within 20 working days of receipt.