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# Report to the Meeting of the

# Oxford Health NHS Foundation Trust

**BOD 83/2021**

(Agenda item: 16

# Board of Directors

**30th November, 2021**

**Legal and Regulatory Update**

**For: Awareness and Assurance**

**Executive Summary**

The Reading Room contains the detail of the regular report to inform the Board of Directors on recent legislation, regulation and compliance guidance issued by bodies such as NHSE/I, the Care Quality Commission, and other relevant bodies where their action/publications have a consequential impact on the Trust or an awareness of the change/impending change is relevant to the Board of Directors and its committee’ business. This report covers the period since the last report to Board and includes any noteworthy contributions covered by health think tanks and a section in the Addendum to this report on learning / ‘True for Us’ considerations.

The Update Report is designed to reflect changes in legislation, guidance, the structure of the NHS, and government policy and direction on health and social care. A summation of the change is provided for each item and where relevant, a sense of the Trust’s position with regard to the change. **The Board of Directors is asked to consider and note the content of the report and where relevant, members should each be satisfied of their individual and collective assurances that the internal controls in place to deliver compliance against any Trust’s obligations are effective. The Appendix should prompt consideration of the need to commission any deep dive (or ‘true for us’ reviews) in order to enhance the level of assurance or to improve the control environment, and/or decisions about the focus of any relevant Board Committee.**

Early consideration of certain items supports a prospective understanding of risk and opportunity. Chairs of Board Committees should consider whether more detailed assurances relevant to their committees, are necessary, utilising this report as a constructive stimulant to inform the composition of meeting agendas and reporting focus as necessary or appropriate.

The Executive team meeting’ focus will where relevant ensure Executive Directors are aware of the changes related to their portfolios and will take forward any key actions arising from the Legal, Regulatory and Policy Updates. Progress updates on any relevant actions will be reported to the Board of Directors, as pertinent and appropriate either through the report itself or via the relevant Board reports of individual Executives.

The Director of Corporate Affairs will continue to develop or enhance internal control mechanisms to support the Trust in complying and being able to evidence compliance with relevant mandatory frameworks/obligations.

**In this meeting’s Legal and Regulatory Update**, Board members will note the ongoing surge of documentation and guidance with regard to the development of the Integrated Care Systems to align with their statutory status from April 2022 and the passage of the Health and Care Bill, but also some significant publications with regard to regulation that looks to support system integration and oversee its implementation. The state of care report from the CQC and the System Oversight Framework are two examples, further amplified in NHSP’s briefing on Evolving Regulation and Oversight, as is the widening scope of the CQC to include a duty to assess the performance of local authorities in relation to the discharge of their adult social care functions. Of interest too is their powers to police **new hospital food standards**.

The Board will need to comprehend the implications following the outcome of the consultation on NHSE/I’s Transaction Guidance which has not been reviewed since 2017. This will most definitely impact ongoing submissions and the Full Business Case for the Warneford Park Development although the consultation promises to deliver a regime that promotes the success of transactions and tests Board’s on their understanding of risk.

Under the proposed new risk assessment framework as part of this Guidance, the Regulator will continue to differentiate between material (requiring self-certification) and significant (requiring an assurance review) transactions but will consider more qualitative measures to do this. Currently they are not proposing any changes to the reporting thresholds for transactions, with the exception that statutory transactions can no longer be classified as ‘small’; that is they will always be either material or significant due to the level of risk involved. Transactions that represent more than 40% of gross assets or income will no longer automatically be determined as significant. For significant transactions, into which the Warneford Development will fall, they propose to iterate the risk assessment over time and particularly following review of the strategic case, at which point they will use it to scope the work required for the full business case. This scoping will be based on a more detailed assessment of risk than currently, such that each transaction review scope will be bespoke, reflecting the characteristics of each individual case. The Finance and Investment Committee will need to appreciate the impact of the guidance on its ongoing review of the transaction as will the Quality Committee.

The Systems Oversight Framework segmentation publication places all Providers and ICS’s in a segment that dictates the level of support / intervention. For ease of reference this is reproduced below. Any Trust or ICS falling into segment 4 will be subject to mandated intensive support that replaces the previously separate quality and finance ‘special measures’ regimes. The oversight arrangements included in a previous update report to the Board, reflect an expectation for evidence of effective provider collaboration and the failure of individual trusts to collaborate in a system context may be treated as a breach of governance conditions and be subject to enforcement actions. The segmentation determines the level and nature of support required across systems, informs oversight arrangements and is how NHSE/I will target support capacity as effectively as possible. They will adopt a phased implementation to segmentation during 2021/22 with an initial focus on ICSs and trusts that meet the criteria for segments 3 and 4 as these Trusts are deemed to have long standing significant support needs against oversight themes and very serious, complex issues manifesting as critical quality and/or finance concerns respectively. The **Trust has been given a segment** 2 rating with a number of local Trusts finding themselves in segment 3**. It is important the Board focuses equally on quality and financial performance** in order to avoid slippage into segment 3 and mandated interventions.

A number of leadership reviews have taken place over the years, the most recent Rose, and Kerr reviews, but the latest Messenger review will be watched with interest across NHS Leadership with recommendations expected in as little as four months.

On page 12 of the report, the Good Governance Institute has undertaken some thematic work which is a useful read in terms of our own quality improvement journey and translating the theoretical application of quality improvement principles to help Boards which will be of particular interest to the Quality Committee.

With the ambitions for the Oxford Health Charity ramping up given the work on implementing its first three year strategy and concentrating on governance and ‘local’ awareness, the recognition in NHSP’s blog on the power of NHS charities in improving experiences of staff and service users is timely in advance of our Corporate Trustee charity session in the New Year.

Also, with the theme of learning and the encouraged ‘True for Us’ curiosity, I invite Board and Committee members to consider the Addendum to the Report in the Reading Room. Notable is a growing importance with regard to defensible procurement practice when undertaking large scale tendering for services with a number of Legal Updates reports to Board now showing the appetite for suing the NHS and Local Authorities. This will be of significance when we consider the procurement process for the development of the new hospital. Equally, this and previous reports have shown a trend of CQC fines and penalties – this report highlighting fines for the failure to comply with the duty of candour and failure to make improvements highlighted previously in CQC inspections, later causing harm. Furthermore, the importance of listening to, and acting on staff concerns is highlighted.

Finally, set out below are some of the considerations coming out of impending legislative and regulatory change:-

* Health and Care Bill -published on 6 July has just finished the committee stage – back end of November and is on track to reach the Lords before Christmas: in–depth scrutiny expected;
* Secretary of state powers of direction, including intervention in local service configurations;
* Statutory ICSs –functions, duties, governance, accountability –and CQC assessment of systems;
* Foundation trusts’ capital spending limits;
* Opportunities for mental health providers i.e. tackling health inequalities and improving care across pathways;
* Concerns about the involvement of mental health providers in ICS design and decision making, operation over a multi-ICS footprint, and relationships with non-NHS partners;
* Outstanding questions on development of ICBs and the funding and responsibilities delegated to provider collaboratives and place-based partnerships;
* Key upcoming mental health national policy developments;
* New mental health access standards (imminent) NHSE/I response to consultation due imminently. Implementation expected in shadow form from Q4 2021/22;
* CQC restrictive practices stock take (before end of the year) report assessing progress made one year on from thematic review being published;
* Reforming the Mental Health Act (timings TBC) engagement ahead of draft bill publication Spring 2022;
* Mental Capacity Act (timings TBC) consultation on code of practice and regulations. Liberty Protection Safeguards due to ‘go live’ April 2022;
* New long term mental health strategy (winter 2021/22) scoping over the winter with a public consultation launch due end of January/early February;
* Social Care Reform – Integration White paper - promoting integrated health and social care and making the most of benefits of collaboration between health and social care partners;
* There is also the conundrum of whether places within an ICS should be able to adopt differing governance arrangements. Adopting different arrangements could result in:
  + Overly complex arrangements
  + Disparities in administrative burden and overheads between places
  + Different representation from stakeholders

**Governance Route/Approval Process**

This is a routine report with direct relevance to the Board.

**Recommendation**

The Board of Directors is invited to consider and be aware of the content of the report and where relevant, members should each be satisfied of their individual and collective assurances that the internal plans and controls in place to deliver compliance against any Trust’s obligations are appropriate and effective. Chairs of Board Committees should consider whether more detailed assurances relevant to their committees, are necessary, utilising this report as a constructive stimulant to inform the composition of meeting agendas and reporting focus as necessary or appropriate.

**Author and Title: Kerry Rogers, Director of Corporate Affairs & Company Secretary**

**Lead Executive Director: Kerry Rogers, Director of Corporate Affairs & Company Secretary**

1. *A risk assessment has been undertaken around the legal issues that this report presents and there are no issues that need to be referred to the Trust Solicitors*
2. ***Strategic Objectives/Priorities*** *– this report relates to or provides assurance and evidence against aspects of each of the Strategic Objectives/Priorities of the Trust*

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| ***NHS Provider Segmentation*** |  |  |
| ***Trust*** | ***SOF Segmentation*** |  |
| *Airedale NHS Foundation Trust* | ***2*** |  |
| *Alder Hey Children’s NHS Foundation Trust* | ***2*** |  |
| *Ashford and St. Peter’s Hospitals NHS Foundation Trust* | ***2*** |  |
| *Avon and Wiltshire Mental Health Partnership NHS Trust* | ***3*** |  |
| *Barking, Havering And Redbridge University Hospitals NHS Trust* | ***4*** |  |
| *Barnet, Enfield and Haringey Mental Health NHS Trust* | ***2*** |  |
| *Barnsley Hospital NHS Foundation Trust* | ***2*** |  |
| *Barts Health NHS Trust* | ***2*** |  |
| *Bedfordshire Hospitals NHS Foundation Trust* | ***2*** |  |
| *Berkshire Healthcare NHS Foundation Trust* | ***1*** |  |
| *Birmingham and Solihull Mental Health NHS Foundation Trust* | ***3*** |  |
| *Birmingham Community Health Care NHS Foundation Trust* | ***3*** |  |
| *Birmingham Women’s and Children’s Hospitals NHS Foundation Trust* | ***2*** |  |
| *Black Country Healthcare NHS Foundation Trust* | ***2*** |  |
| *Blackpool Teaching Hospitals NHS Foundation Trust* | ***3*** |  |
| *Bolton NHS Foundation Trust* | ***2*** |  |
| *Bradford District Care Foundation Trust* | ***2*** |  |
| *Bradford Teaching Hospitals Foundation Trust* | ***2*** |  |
| *Bridgewater Community Healthcare NHS Foundation Trust* | ***2*** |  |
| *Buckinghamshire Healthcare NHS Trust* | ***3*** |  |
| *Calderdale and Huddersfield Foundation Trust* | ***3*** |  |
| *Cambridge University Hospitals NHS Foundation Trust* | ***2*** |  |
| *Cambridgeshire & Peterborough NHS Foundation Trust* | ***2*** |  |
| *Cambridgeshire Community Services NHS Trust* | ***1*** |  |
| *Camden and Islington NHS Foundation Trust* | ***2*** |  |
| *Central and North West London NHS Foundation Trust* | ***1*** |  |
| *Central London Community Healthcare NHS Trust* | ***1*** |  |
| *Chelsea and Westminster Hospital NHS Foundation Trust* | ***1*** |  |
| *Cheshire and Wirral Partnership NHS Foundation Trust* | ***1*** |  |
| *Chesterfield Royal Hospital NHS Foundation Trust* | ***2*** |  |
| *Clatterbridge Cancer Centre NHS Foundation Trust* | ***2*** |  |
| *Cornwall Partnership NHS Foundation Trust* | ***3*** |  |
| *Countess of Chester NHS Foundation Trust* | ***3*** |  |
| *County Durham and Darlington NHS Foundation Trust* | ***2*** |  |
| *Coventry and Warwickshire Partnership NHS Trust* | ***3*** |  |
| *Croydon Health Services NHS Trust* | ***2*** |  |
| *Cumbria, Northumberland, Tyne and Wear NHS Foundation Trust* | ***1*** |  |
| *Dartford and Gravesham NHS Trust* | ***2*** |  |
| *Derbyshire Community Health Services NHS Foundation Trust* | ***1*** |  |
| *Derbyshire Healthcare NHS Foundation Trust* | ***2*** |  |
| *Devon Partnership NHS Trust* | ***2*** |  |
| *Doncaster and Bassetlaw Teaching Hospitals NHS Foundation Trust* | ***2*** |  |
| *Dorset County Hospital NHS Foundation Trust* | ***3*** |  |
| *Dorset HealthCare University NHS Foundation Trust* | ***2*** |  |
| *Dudley Integrated Health and Care NHS Trust* | ***3*** |  |
| *East & North Hertfordshire NHS Trust* | ***3*** |  |
| *East Cheshire NHS Trust* | ***3*** |  |
| *East of England Ambulance Service NHS Foundation Trust* | ***4*** |  |
| *East Kent Hospitals University NHS Foundation Trust* | ***4*** |  |
| *East Lancashire Hospitals NHS Trust* | ***2*** |  |
| *East London NHS Foundation Trust* | ***1*** |  |
| *East Midlands Ambulance Service NHS Trust* | ***2*** |  |
| *East Suffolk & North East Essex NHS Foundation Trust* | ***2*** |  |
| *East Sussex Healthcare NHS Trust* | ***2*** |  |
| *Epsom and St Helier University Hospitals NHS Trust* | ***2*** |  |
| *Essex Partnership University NHS Foundation Trust* | ***2*** |  |
| *Frimley Health NHS Foundation Trust* | ***2*** |  |
| *Gateshead Health NHS Foundation Trust* | ***2*** |  |
| *George Eliot Hospital NHS Trust* | ***3*** |  |
| *Gloucestershire Health and Care NHS Foundation Trust* | ***2*** |  |
| *Gloucestershire Hospitals NHS Foundation Trust* | ***2*** |  |
| *Great Ormond Street Hospital for Children NHS Foundation Trust* | ***2*** |  |
| *Great Western Hospitals NHS Foundation Trust* | ***2*** |  |
| *Greater Manchester Mental Health NHS Foundation Trust* | ***2*** |  |
| *Guy’s and St Thomas’ NHS Foundation Trust* | ***2*** |  |
| *Hampshire Hospitals NHS Foundation Trust* | ***3*** |  |
| *Harrogate and District NHS Foundation Trust* | ***2*** |  |
| *Hertfordshire Community NHS Trust* | ***2*** |  |
| *Hertfordshire Partnership University NHS Foundation Trust* | ***1*** |  |
| *Homerton University Hospital NHS Foundation Trust* | ***1*** |  |
| *Hounslow and Richmond Community Healthcare NHS Trust* | ***1*** |  |
| *Hull University Teaching Hospitals NHS Trust* | ***3*** |  |
| *Humber NHS Foundation Trust* | ***2*** |  |
| *Imperial College Healthcare NHS Trust* | ***2*** |  |
| *Isle of Wight NHS Trust* | ***4*** |  |
| *James Paget University Hospitals NHS Foundation Trust* | ***2*** |  |
| *Kent and Medway NHS and Social Care Partnership Trust* | ***2*** |  |
| *Kent Community Health NHS Foundation Trust* | ***1*** |  |
| *Kettering General Hospital NHS Foundation Trust* | ***3*** |  |
| *King’s College Hospital NHS Foundation Trust* | ***4*** |  |
| *Kingston Hospital NHS Foundation Trust* | ***1*** |  |
| *Lancashire and South Cumbria NHS Foundation Trust* | ***3*** |  |
| *Lancashire Teaching Hospitals NHS Foundation Trust* | ***3*** |  |
| *Leeds and York Partnership Foundation Trust* | ***2*** |  |
| *Leeds Community Healthcare NHS Trust* | ***2*** |  |
| *Leeds Teaching Hospitals NHS Trust* | ***2*** |  |
| *Leicestershire Partnership NHS Trust* | ***3*** |  |
| *Lewisham and Greenwich NHS Trust* | ***3*** |  |
| *Lincolnshire Community Health Services NHS Trust* | ***1*** |  |
| *Lincolnshire Partnership NHS Foundation Trust* | ***1*** |  |
| *Liverpool Heart and Chest Hospital NHS Foundation Trust* | ***1*** |  |
| *Liverpool University Hospitals NHS Foundation Trust* | ***4*** |  |
| *Liverpool Women’s Hospital NHS Foundation Trust* | ***3*** |  |
| *London Ambulance Service NHS Trust* | ***2*** |  |
| *London North West University Healthcare NHS Trust* | ***3*** |  |
| *Maidstone and Tunbridge Wells NHS Trust* | ***2*** |  |
| *Manchester University NHS Foundation Trust* | ***2*** |  |
| *Medway NHS Foundation Trust* | ***4*** |  |
| *Mersey Care NHS Foundation Trust* | ***2*** |  |
| *Mid and South Essex NHS Foundation Trust* | ***3*** |  |
| *Mid-Cheshire Hospital NHS Foundation Trust* | ***2*** |  |
| *Midlands Partnership NHS Foundation Trust* | ***2*** |  |
| *Milton Keynes University Hospital NHS Foundation Trust* | ***2*** |  |
| *Moorfields Eye Hospital NHS Foundation Trust* | ***1*** |  |
| *Newcastle upon Tyne Hospitals NHS Foundation Trust* | ***1*** |  |
| *Norfolk & Norwich University Hospitals NHS Foundation Trust* | ***3*** |  |
| *Norfolk & Suffolk NHS Foundation Trust* | ***4*** |  |
| *Norfolk Community Health & Care NHS Trust* | ***1*** |  |
| *North Bristol NHS Trust* | ***3*** |  |
| *North Cumbria Integrated Care NHS Foundation Trust* | ***3*** |  |
| *North East Ambulance Service NHS Foundation Trust* | ***2*** |  |
| *North East London NHS Foundation Trust* | ***2*** |  |
| *Northern Care Alliance NHS Foundation Trust* | ***2*** |  |
| *North Middlesex University Hospital NHS Trust* | ***3*** |  |
| *North Staffordshire Combined Healthcare NHS Trust* | ***2*** |  |
| *North Tees and Hartlepool NHS Foundation Trust* | ***2*** |  |
| *North West Ambulance Service NHS Trust* | ***2*** |  |
| *North West Anglia NHS Foundation Trust* | ***3*** |  |
| *Northampton General Hospital NHS Trust* | ***3*** |  |
| *Northamptonshire Healthcare NHS Foundation Trust* | ***2*** |  |
| *Northern Devon Healthcare NHS Trust* | ***3*** |  |
| *Northern Lincolnshire and Goole NHS Foundation Trust* | ***4*** |  |
| *Northumbria Healthcare NHS Foundation Trust* | ***1*** |  |
| *Nottingham University Hospitals NHS Trust* | ***4*** |  |
| *Nottinghamshire Healthcare NHS Foundation Trust* | ***3*** |  |
| *Oxford Health NHS Foundation Trust* | ***2*** |  |
| *Oxford University Hospitals NHS Foundation Trust* | ***3*** |  |
| *Oxleas NHS Foundation Trust* | ***1*** |  |
| *Pennine Care NHS Foundation Trust* | ***2*** |  |
| *Portsmouth Hospitals University NHS Trust* | ***3*** |  |
| *Princess Alexandra Hospital NHS Trust* | ***3*** |  |
| *Queen Elizabeth Hospital Kings Lynn NHS Foundation Trust* | ***4*** |  |
| *Queen Victoria Hospital NHS Foundation Trust* | ***3*** |  |
| *Robert Jones and Agnes Hunt Orthopaedic Hospital NHS Foundation Trust* | ***2*** |  |
| *Rotherham, Doncaster and South Humber NHS Foundation Trust* | ***2*** |  |
| *Royal Berkshire NHS Foundation Trust* | ***2*** |  |
| *Royal Cornwall Hospitals NHS Trust* | ***3*** |  |
| *Royal Devon and Exeter NHS Foundation Trust* | ***3*** |  |
| *Royal Free London NHS Foundation Trust* | ***3*** |  |
| *Royal National Orthopaedic Hospital NHS Trust* | ***2*** |  |
| *Royal Papworth Hospital NHS Foundation Trust* | ***1*** |  |
| *Royal Surrey NHS Foundation Trust* | ***2*** |  |
| *Royal United Hospitals Bath NHS Foundation Trust* | ***2*** |  |
| *Salisbury NHS Foundation Trust* | ***3*** |  |
| *Sandwell and West Birmingham Hospitals NHS Trust* | ***3*** |  |
| *Sheffield Children’s Hospital NHS Foundation Trust* | ***3*** |  |
| *Sheffield Health and Social Care NHS Foundation Trust* | ***4*** |  |
| *Sheffield Teaching Hospitals NHS Foundation Trust* | ***2*** |  |
| *Sherwood Forest Hospitals NHS Foundation Trust* | ***2*** |  |
| *Shrewsbury and Telford Hospital NHS Trust* | ***4*** |  |
| *Shropshire Community Health NHS Trust* | ***2*** |  |
| *Solent NHS Trust* | ***2*** |  |
| *Somerset NHS Foundation Trust* | ***2*** |  |
| *South Central Ambulance Service NHS Foundation Trust* | ***2*** |  |
| *South East Coast Ambulance Service NHS Foundation Trust* | ***2*** |  |
| *South London And Maudsley NHS Foundation Trust* | ***2*** |  |
| *South Tees Hospitals NHS Foundation Trust* | ***3*** |  |
| *South Tyneside and Sunderland NHS Foundation Trust* | ***2*** |  |
| *South Warwickshire NHS Foundation Trust* | ***1*** |  |
| *South Western Ambulance Service NHS Foundation Trust* | ***2*** |  |
| *South West London and St George’s Mental Health NHS Trust* | ***1*** |  |
| *South West Yorkshire Partnership Foundation Trust* | ***2*** |  |
| *Southern Health NHS Foundation Trust* | ***3*** |  |
| *Southport and Ormskirk Hospital NHS Trust* | ***2*** |  |
| *St George’s University Hospitals NHS Foundation Trust* | ***2*** |  |
| *St Helens and Knowsley Teaching Hospitals NHS Trust* | ***2*** |  |
| *Stockport NHS Foundation Trust* | ***3*** |  |
| *Surrey and Borders Partnership NHS Foundation Trust* | ***2*** |  |
| *Surrey and Sussex Hospital NHS Trust* | ***2*** |  |
| *Sussex Community NHS Foundation Trust* | ***1*** |  |
| *Sussex Partnership NHS FT* | ***2*** |  |
| *Tameside and Glossop Integrated Care NHS Foundation Trust* | ***2*** |  |
| *Tavistock and Portman NHS Foundation Trust* | ***1*** |  |
| *Tees, Esk and Wear Valleys NHS Foundation Trust* | ***3*** |  |
| *The Christie NHS Foundation Trust* | ***1*** |  |
| *The Dudley Group NHS Foundation Trust* | ***3*** |  |
| *The Hillingdon Hospitals NHS Foundation Trust* | ***4*** |  |
| *The Mid Yorkshire Hospitals NHS Trust* | ***3*** |  |
| *The Rotherham NHS Foundation Trust* | ***3*** |  |
| *The Royal Marsden NHS Foundation Trust* | ***1*** |  |
| *The Royal Orthopaedic Hospital NHS Foundation Trust* | ***2*** |  |
| *The Royal Wolverhampton NHS Trust* | ***3*** |  |
| *The Walton Centre NHS Foundation Trust* | ***1*** |  |
| *Torbay and South Devon NHS Foundation Trust* | ***3*** |  |
| *United Lincolnshire Hospitals NHS Trust* | ***4*** |  |
| *University College London Hospitals NHS Foundation Trust* | ***2*** |  |
| *University Hospital Southampton NHS Foundation Trust* | ***2*** |  |
| *University Hospitals Birmingham NHS Foundation Trust* | ***3*** |  |
| *University Hospitals Bristol and Weston NHS Foundation Trust* | ***3*** |  |
| *University Hospitals Coventry and Warwickshire NHS Trust* | ***3*** |  |
| *University Hospitals Dorset NHS Foundation Trust* | ***2*** |  |
| *University Hospitals of Derby and Burton NHS Foundation Trust* | ***3*** |  |
| *University Hospitals of Leicester NHS Trust* | ***4*** |  |
| *University Hospitals of Morecambe Bay NHS Foundation Trust* | ***4*** |  |
| *University Hospitals of North Midlands NHS Trust* | ***3*** |  |
| *University Hospitals Plymouth NHS Trust* | ***4*** |  |
| *University Hospitals Sussex NHS Foundation Trust* | ***2*** |  |
| *Walsall Healthcare NHS Trust* | ***3*** |  |
| *Warrington and Halton Hospitals NHS Foundation Trust* | ***2*** |  |
| *West Hertfordshire Hospitals NHS Trust* | ***2*** |  |
| *West London NHS Trust* | ***1*** |  |
| *West Midlands Ambulance Service NHS Foundation Trust* | ***2*** |  |
| *West Suffolk NHS Foundation Trust* | ***3*** |  |
| *Whittington Health NHS Trust* | ***2*** |  |
| *Wirral Community Health and Care NHS Foundation Trust* | ***2*** |  |
| *Wirral University Teaching Hospital NHS Foundation Trust* | ***3*** |  |
| *Worcestershire Acute Hospitals NHS Trust* | ***3*** |  |
| *Worcestershire Health and Care NHS Trust* | ***1*** |  |
| *Wrightington, Wigan and Leigh NHS Foundation Trust* | ***2*** |  |
| *Wye Valley NHS Trust* | ***3*** |  |
| *Yeovil District Hospital NHS Foundation Trust* | ***3*** |  |
| *York and Scarborough Teaching Hospitals NHS Foundation Trust* | ***2*** |  |
| *Yorkshire Ambulance Service NHS Trust* | ***2*** |  |

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| ***NHS ICS Segmentation*** |  |
| ***ICS*** | ***SOF Segmentation*** |
| *Bath and North East Somerset, Swindon and Wiltshire* | ***2*** |
| *Bedfordshire, Luton and Milton Keynes* | ***2*** |
| *Birmingham and Solihull* | ***3*** |
| *Bristol, North Somerset and South Gloucestershire* | ***3*** |
| *Buckinghamshire, Oxfordshire and Berkshire West (BOB)* | ***3*** |
| *Cambridgeshire and Peterborough* | ***4*** |
| *Cheshire and Merseyside Health and Care Partnership* | ***3*** |
| *Cornwall and the Isles of Scilly* | ***3*** |
| *Coventry and Warwickshire* | ***3*** |
| *Derbyshire* | ***2*** |
| *Devon* | ***4*** |
| *Dorset* | ***2*** |
| *Frimley Health and Care* | ***1*** |
| *Gloucestershire* | ***2*** |
| *Greater Manchester Health and Social Care Partnership* | ***2*** |
| *Hampshire and the Isle of Wight* | ***3*** |
| *Herefordshire and Worcestershire* | ***3*** |
| *Hertfordshire and West Essex* | ***3*** |
| *Humber, Coast & Vale* | ***2*** |
| *Kent and Medway* | ***3*** |
| *Lancashire and South Cumbria* | ***3*** |
| *Leicester, Leicestershire and Rutland* | ***3*** |
| *Lincolnshire* | ***4*** |
| *Mid and South Essex* | ***3*** |
| *Norfolk and Waveney* | ***4*** |
| *North Central London* | ***2*** |
| *North East & North Cumbria* | ***2*** |
| *North East London* | ***3*** |
| *North West London* | ***2*** |
| *Northamptonshire* | ***2*** |
| *Nottinghamshire* | ***2*** |
| *Shropshire, Telford & Wrekin* | ***4*** |
| *Somerset* | ***2*** |
| *South East London* | ***3*** |
| *South West London* | ***2*** |
| *South Yorkshire and Bassetlaw* | ***2*** |
| *Staffordshire and Stoke on Trent* | ***3*** |
| *Suffolk and North East Essex* | ***2*** |
| *Surrey Heartlands Health and Care Partnership* | ***2*** |
| *Sussex* | ***2*** |
| *The Black Country and West Birmingham* | ***3*** |
| *West Yorkshire and Harrogate* | ***2*** |