

Date of Meeting: Friday 28 November 2025

Report Author: Vineeta Manchanda, Non-Executive Member, Committee Chair

Report to the: Board in Public

Item 12.4.1 Appendix D: Committee Chair's Alert, Advise and Assure Report

Committee: Audit & Risk Committee (A&RC) – Meetings in Common

Relevant ICB: NHS Cambridge & Peterborough ICB

Recommendation: The Board is asked to **consider** the recommended amendments to the Terms of Reference for **approval**.

Agenda items covered:
• C&P ICB A&RC Terms of Reference • Governance Update • Board Assurance Framework (BAF) • Information Governance • ISFE2 Implementation • Procurement of External Audit, Internal Audit and Counter Fraud Services • Internal Audit, External Audit and Counter Fraud
ALERT: Matters that need the Board's attention or action, e.g. an area of non-compliance, safety or a threat to the ICS strategy
C&P ICB A&RC Terms of Reference – The ToR (previously approved by the Board on 17 October 2025, which mirror those for BLMK ICB) were noted and discussed. The recommended amendments shown in Appendix A as tracked changes are presented to the Board for approval.
ADVISE: The Board of areas subject to on-going monitoring or development or where there is insufficient assurance
Integrated Single Finance Environment (ISFE2) - The new national ISFE2 finance system went live on 1 October 2025. Prior to the go live various concerns were raised nationally particularly with the planned go live date, access to training and training systems. The implementation has been a very challenging time for finance teams. Following go live various issues have been identified nationally which have been or are in the process of being resolved. These issues have had a direct impact on payments to providers and could impact on all three ICBs compliance with the Better Payment Practice Code. This will be monitored closely.
ASSURE: Inform the Board where positive assurance has been received
Governance Transition: The Committee was informed that a detailed timeline of actions supported by a due diligence checklist has been issued providing the steps that need to be taken at ICB, regional and national level in order to achieve the proposed ICB boundary mergers on 1 April 2026. For H&WE ICB, there are workstreams that are taking place in relation to Central East area and those falling within the Greater Essex area. To mitigate against duplication, the checklists mirror each other with entries being entered in both. Each ICB's A&RC will be used as a point of assurance with this work with a meeting scheduled for March 2026 to provide an appropriate formal closure report and for approval to submit draft and final accounts.
Use of Seal: The ICB's "Use of Seal Register" is maintained by the Governance Team. Three documents have been sealed by the ICB since August 2025. A copy of the latest register is available from the ICB's Corporate Governance Team. cpicb.icsgovernanceteam@nhs.net

Conflicts of interest: As part of the Annual Refresh the total declaration forms received to date is 818 = 97% compliance across the ICB.

Risk Management (Transition): The Committee was assured that the Risk and Governance teams across the three ICBs have commenced collaborative work to align the BAFs in preparation for the integrated operating model planned for April 2026. Current activity includes:

- a) Thematic Overlap of risks and harmonisation of existing BAF structures, scoring matrices, and assurance categories.
- b) Testing standardised templates and reporting formats to support consistent Board-level assurance.
- c) Exploring digital interoperability between DatixWeb, 4Risk, and InPhase systems.

The Committee agreed that there needs to be focus on identifying overarching strategic risks that are then aligned through a single BAF underpinned by consistent risk assessments and agreed risk appetite.

Board Assurance Framework: The Committee was assured that work is underway to align Senior Risk Owners to the new Executive Management Team and that work is also underway to implement a new risk management tool – InPhase. The Risk Management Policy had been revised to reflect the implementation of InPhase; ahead of bringing this to the Committee there would be a review of the alignment of policies needed during transition.

Information Governance (Transition): The Committee was assured that the three ICBs have commenced collaborative working and are currently looking to align each ICB's IG Groups ToR so they can hold 'Meetings in Common.' NHS England (NHSE) have advised that current ICBs need to submit their Data Security and Protection Toolkits (DSPT) by 31 March 2026 or submit under the full scope of the new ICB on 30 June 26. ICBs are strongly encouraged to proceed with the 31 March submission (see link to background reading below) – this will be discussed with the Senior Information Risk Owner (SIRO) for the three ICBs. The importance of Data Sharing Agreements was recognised by the Committee as a key requirement of the transition period.

Information Governance: The Committee was provided with an update on progress with the Data Security & Protection (DSPT). A "standards not met" submission was entered on 30 June 2025 with an Improvement Plan attached to the submission. NHSE acknowledged the Improvement Plan and set the ICBs status to "approaching standards". The Plan also combined the recommendations from the Internal Audit review earlier this year. An updated Improvement Plan was submitted at the end of September 2025, with NHSE requiring some clarification as to achievement date changes which is in process of being provided. The next submission is due by 31 December 2025.

Internal Audit Plan: The Committee was provided with assurance that the 2025/26 plan is on track. A proposal to reduce the number of audits by removing the commissioning and contracting part 2 for the finance system and procurement and conflicts of interest and replace them with reviews on the cyber assessment framework and an audit 'in common' on transition governance (scoped and mirrored across the three ICBs) was made. The Committee approved the proposal and recommended that the cyber assessment framework audit is paused until a decision has been made regarding the agreed date for submission of the DSPT.

Local Counter Fraud Plan: A local proactive exercise focusing on the Fit and Proper Person Test framework resulted in one low and six medium priority management actions agreed to assist in strengthening processes. Fieldwork was underway for a medicines management exercise focussing on special order prescription items from pharmacies. An exercise focusing on Recruitment had been scoped and would commence in November 2025. Three NHS Counter Fraud Authority Intelligence Reports were received relating to patient prescription misuse and continuing health care funding. All investigations have been closed with no further action required.

External Audit Plan: The Committee was provided with a brief verbal update. The proposed timeline for the 2025/26 audit was noted. New audit risks due to transition had been identified and

include recharging due to shared management teams, potential provisions around exit packages and the new financial system.
Procurement of External Audit (EA), Internal Audit (IA) and Counter Fraud (CF) Services: The Committee was presented with a report which set out the proposed process to procure statutory EA, IA and CF services for Central East Integrated Care Board (ICB), with services expected to commence in April 2026. There will be there separate procurement exercises for IA, EZ and CF. The Committee: noted the current position and risks endorsed the proposed procurement approach and the appointment of Arden & Gem (AGEM) Commissioning Support Unit (CSU) as procurement advisors approved the recommendation to sequence the procurement of audit activities to appoint an EA supplier first agreed who will support the Procurement Evaluation Process approved the draft summary evaluation criteria and weighting approved the proposed maximum financial envelopes to be used in procurement discussed the Draft specification of services.
RISK: Advise the Board which risks were discussed and any new risks identified
As detailed above.
CELEBRATING SUCCESS: Share any practice, innovation or action that the Committee considers to be outstanding
This was the first A&RC – Meetings in Common for BLMK, C&P and H&WE ICB. As a result of the three ICBs working in collaboration the meeting was effective and productive with good governance practices applied throughout. The Committee noted their thanks to all three finance teams for their hard work to keep each organisation safe during the implementation of ISFE2 and ongoing challenges.
Forward plan issues:
A Forward Plan populated with items from the Annual Cycle of Business and Forward Plans for BLMK, C&P and H&WE ICBs for A&RC meetings in December 25, February 26 and March 26 was presented and discussed. Members agreed to the addition of several items which align with the ToR and the transition period including review of Single Tender Waivers and Contracts Awarded to enable the Committee to have a sense check of Value For Money (VFM) throughout the year. It was highlighted that for H&WE ICB EPR Emergency Preparedness Resilience & Response (EPRR) is reported through a different Committee and the scheduled Fit and Proper Person Test item will come to A&RC as previously requested by H&WE A&RC Chair.
Date and time of next meeting:
Friday 19 December 2025

List of appendices

Appendix A – C&P ICB A&RC Terms of Reference

Background reading

Annex A – On the 23 September 2025 NHS England issued guidance regarding changes to ICB mergers and boundaries. [NHS England » Implementing integrated care board mergers and boundary changes to take effect in April 2026 and 2027.](#)