

Reference: FOI.ICB-2627/077

Subject: Legacy CCG Access, Transition and Accountability

I can confirm that the ICB does hold some of the information requested; please see responses below:

QUESTION	RESPONSE
<p>I am requesting information about legacy CCG access, accountability, and transition arrangements following the abolition of CCGs and creation of ICBs.</p> <p>Clarification received: Please see clarification of the acronyms referenced in my request:</p> <ul style="list-style-type: none"> • PDS = Personal Demographics Service • SCR = Summary Care Record • PSIS = Personal Spine Information Service <p>For the avoidance of doubt, my request relates to any policies, governance documents, audit arrangements, access logs, accountability frameworks, or transition arrangements concerning these systems where access, queries, or records were associated with former CCG organisations and subsequently inherited or overseen by BNSSG ICB following the abolition of CCGs on 1 July 2022.</p> <p>Please provide:</p>	
<ol style="list-style-type: none"> 1. Any policy, procedure, handover document, data-sharing agreement, or governance framework explaining how legacy CCG responsibilities transferred to BNSSG ICB from 1 July 2022. 	<p>In the lead up to the establishment of ICBs on 1 July 2022, CCGs were required by NHS England to prepare for transition. This involved the transfer of responsibilities which was overseen by the completion of a Due Diligence Checklist and a Readiness to Operate</p>

	<p>Statement (ROS). Evidence of completion is found here: ICBBoard 1Jul22 item4.7.pdf</p> <p>The Due Diligence Checklist covered matters associated with Information Governance.</p>
<p>2. Any documents explaining who became responsible for historic CCG patient-data access, audit logs, complaints, unresolved concerns, and information-governance matters after the CCG-to-ICB transition.</p>	<p>BNSSG's Customer Service Team continues to have access to complaint records relating to BNSSG CCG. These are retained in line with the ICB's Records management policy.</p>
<p>3. Any records-management or retention policy covering legacy CCG records, including PDS access logs, SCR/PSIS queries, complaints, correspondence, risk-register entries, and information-governance files.</p>	<p>BNSSG ICB staff are governed by the BNSSG ICB Records management policy. The latest version is available here: Records Management Policy - BNSSG Healthier Together. From 1 July 2022, BNSSG ICB staff continued to have access to CCG records and have applied the records management policy, and the destruction and retention schedules accordingly.</p> <p>The ICB does not hold information relating to PDS access logs or SCR/PSIS queries, complaints, correspondence, risk-register entries or information-governance files. We advise you to contact the service directly via support.digitalservices@nhs.net</p>
<p>4. Any board papers, committee papers, risk-register entries, or internal reports from 2021 onwards identifying risks arising from CCG abolition, including loss of organisational memory, unclear accountability, data migration, unresolved complaints, or audit-trail continuity.</p>	<p>In the CCG's Annual Report to 30 June 2022, the following risk was flagged: <i>The impact of the transition to an ICB on the system, and on CCG staff as they transferred to a new organisation</i>. The report is available here: 15C CCG Annual Report 2022-23 FINAL.pdf</p>

<p>5. Any current guidance explaining how a member of the public should raise concerns about patient-data access or record-governance issues originating under a former CCG.</p>	<p>Any concerns relating to the ICB or the services in the local area should be raised with the Customer Services team. This page sets provides more information about the role of the team and how to contact them; Customer Services Team</p> <p>See also: Management of Compliments, General Enquiries and Complaints Policy which describes the arrangements the ICB has in place for the management of compliments, general enquiries and complaints.</p>
<p>6. Any document explaining the relationship between former CCG access logs and current ICB responsibility where PDS/SCR/PSIS access was recorded under a now-abolished CCG organisation code.</p>	<p>The ICB does not hold any information relating to PDS/SCR/PSIS. We advise you to contact the service/s directly via support.digitalservices@nhs.net</p>

The information provided in this response is accurate as of 29 May 2026 and has been approved for release by Rob Hayday, Chief of Staff for NHS Bristol, North Somerset and South Gloucestershire ICB.