

15 April 2021

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## **Mental Health Investment Standard Statement of Compliance 2019/20**

All CCGs must plan to achieve the Mental Health Investment Standard in 2019/20 and CCGs must spend greater than or equal to the 2019/20 target spend number provided by NHS England.

As the Accountable Officer of NHS Northumberland CCG, I am responsible for the preparation of the Mental Health Investment Standard Compliance Statement (the "Statement") for the year ended 31 March 2020 and for the financial information that forms the basis of the calculation on which the Statement is derived. This includes the design, implementation and maintenance of internal control relevant to the preparation of the Statement to ensure that mental health expenditure is correctly classified and included in the calculations, and that the Statement is free from material misstatement, whether due to fraud or error.

To the best of my knowledge and belief, I have properly discharged my responsibilities with regard to reporting against the Mental Health Investment Standard.

NHS Northumberland CCG considers that it has complied with the requirements of the Mental Health Investment Standard for 2019/20. The 2019/20 target spend was £62,727k and actual spend was £62,771k.

**Mark Adams**  
**Accountable Officer NHS**  
**Northumberland CCG**

**Independent Reasonable Assurance Report  
ISAE (UK) 3000 Engagement  
For the period from 1 April 2019 to 31 March 2020**

**NHS Northumberland Clinical Commissioning Group**

The Rivergreen Centre  
St Mary's Lane  
St Mary's Park  
Morpeth NE61 6BL

**And NHS England and NHS Improvement**

15 April 2021

**Independent Reasonable Assurance Report on NHS Northumberland CCG's 2019/20 Mental Health Investment Standard Compliance Statement to the Governing Body of NHS Northumberland CCG and NHS England for the year ended 31 March 2020**

**Introduction**

This reasonable assurance report (the "Report") is made in accordance with the terms of our engagement letter dated 14 December 2020 (the "Engagement Letter") for the purpose of reporting to the Governing Body of NHS Northumberland Clinical Commissioning Group (the "CCG") and NHS England and NHS Improvement in connection with the CCG's Mental Health Investment Standard compliance statement dated 15 April 2021 for the year ended 31 March 2020 (the "Statement"), which is attached. As a result, this Report is not suitable for another purpose.

**Scope**

The objective of this engagement is to provide an opinion on whether the CCG's Mental Health Investment Standard (MHIS) Compliance Statement has been properly prepared, in all material respects, based on the criteria set out in the "Assurance Engagement of the Mental Health Investment Standard 2019/20 - Briefing for Clinical Commissioning Groups" published by NHS England.

The planning guidance for 2019/20 issued by NHS England and NHS Improvement stated that: "CCGs must continue to increase investment in mental health services, in line with the Mental Health Investment Standard (MHIS). For 2019/20 the standard requires CCGs to increase spend by at least their overall programme allocation growth plus an additional percentage increment to reflect the additional mental health funding included in CCG allocations for 2019/20..... in every case will be subject to independent auditor review."

Each CCG is required to publish a statement after the end of the financial year to state whether they consider that they have met their obligations with regard to the MHIS (the “Statement”). The format and content of the Statement should be in line with the specified wording in the Assurance Engagement of the Mental Health Investment Standard 2019/20 - Briefing for Clinical Commissions Groups (the “Guidance”) issued by NHS England and NHS Improvement.

## **Responsibilities of the CCG**

The CCG’s Accountable Officer is responsible for the preparation of the Statement for the year ended 31 March 2020 and for the completeness and accuracy of the accounting records and calculations (the “Relevant Information”) that forms the basis for the preparation of the Statement. This includes the design, implementation and maintenance of internal controls relevant to the preparation of the Statement to ensure that mental health expenditure is correctly classified and included in the calculations and that the Statement is free from material misstatement, whether due to fraud or error.

## **Relevant Information to be used in the preparation of the Statement**

The relevant information to be used in the preparation of the Statement is set out in the guidance. This includes:

- total expenditure on mental health in the year ended 31 March 2020, which is consistent with the definitions used for programme budgeting, as set out in the guidance; and
- the CCG’s target spend for the year, as confirmed by NHS England and NHS Improvement.

The guidance sets out what constitutes eligible mental health expenditure for the purpose of the MHIS and the Statement.

The CCG’s Accountable Officer was required to provide us with:

- access to all information of which management is aware that is relevant to the preparation of the Statement, including procuring any such records held by a third party so they were made available to us;
- additional information that we requested from management for the purpose of the engagement; and
- unrestricted access to persons within the CCG from whom we determined it necessary to obtain evidence.

## **Our responsibility**

Our responsibilities are to express a conclusion on the accompanying Statement. We conducted our engagement in accordance with UK Standard on Assurance Engagements (ISAE (UK) 3000)), Assurance engagements other than audits or reviews of historical financial information. ISAE (UK) 3000 requires us to form an opinion as to whether the Statement has been properly prepared, in all material respects, in accordance with the criteria set out in the guidance.

We apply International Standard on Quality Control 1 and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

For the purpose of the engagement we have been provided by the CCG with a copy of their draft MHIS compliance statement showing the CCG's eligible MHIS expenditure and its target spend for 2019/20, together with a more detailed expenditure summary. The Accountable Officer of the CCG remain solely responsible for the Statement.

We performed a reasonable assurance engagement as defined in ISAE (UK) 3000. The objective of a reasonable assurance engagement is to perform such procedures [on a sample basis] as to obtain information and explanations which we consider necessary in order to provide us with sufficient appropriate evidence to express a positive conclusion on the Statement.

A reasonable assurance engagement in accordance with ISAE (UK) 3000 involves performing procedures to obtain evidence about the fairness of the MHIS Compliance Statement. The nature, timing and extent of procedures selected depend on our judgement, including the risk of material misstatements, whether due to fraud or error, in the MHIS Statement of Compliance. In making those risk assessments, we considered:

- the CCG's method of compilation of the Mental Health Investment Standard Compliance Statement and the headline calculations on which it is based; and
- the internal controls applied by the CCG over the preparation of the statement and the headline calculations and the design of those controls relevant to the engagement to determine whether they have been implemented.

Our reasonable assurance engagement included:

- Verifying that the total 2019/20 spend is equal or above the target spend as provided by NHS England.
- Carrying out sample testing on the mental health expenditure included in the headline calculations and supporting schedules to check whether it meets the definition of mental health expenditure properly incurred as set out in the relevant Group Accounting Manual and Guidance.
- Verifying the factual accuracy of the MHIS Compliance Statement based on work undertaken.
- Obtaining and considering written representations from the CCG, including:
  - that the CCG has provided us with all the information relevant to the engagement.
  - confirmation that the CCG's measurement of the underlying subject matter against the applicable criteria and its preparation of the headline calculation on which the statement is based, including confirmation that all relevant matters are included in the Mental Health Investment Standard Compliance Statement and supporting calculations.

We have examined the records of the CCG, performing such procedures on a sample basis so as to obtain information and explanations which we considered necessary having regard to the guidance issued by NHS England and NHS Improvement and received such explanations from the management of the CCG in order to provide us with sufficient appropriate evidence to form our conclusion on the Statement.

The scope of our testing covered the total MHIS expenditure included in the Statement only and does not cover the reporting of spend against individual service lines in the expenditure summary.

Our work was directed to those matters which, in our view, materially affect the Statement and was not directed to the discovery of errors or misstatements that we consider to be immaterial. Whilst we perform our work with reasonable skill and care, it should not be relied upon to disclose all misstatements, fraud or errors that might exist.

## **Inherent limitations**

Our objectives are to obtain reasonable assurance about whether the CCG's Mental Health Investment Standard Statement of Compliance for the period ended 31 March 2020 is properly prepared, in all

material respects, based on the criteria set out in the "Assurance Engagement of the Mental Health Investment Standard 2019/20 - Briefing for Clinical Commissioning Groups" published by NHS England.

Reasonable assurance is a high level of assurance, but is not a guarantee that a review conducted in accordance with the ISAE (UK) 3000 standard will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the MHIS Statement of Compliance.

Our testing on the mental health expenditure included in the headline calculations and supporting schedules was done on a sample basis.

Our audit work on the financial statements of the CCG is carried out in accordance with our statutory obligations and is subject to separate terms and conditions. This engagement will not be treated as having any effect on our separate duties and responsibilities as the CCG's external auditors. Our audit report on the financial statements is intended for the sole benefit of the members of the Governing Body of the CCG, as a body, in accordance with Part 5 of the Local Audit and Accountability Act 2014. Our audit work has been undertaken so that we might state to the members of the Governing Body of the CCG those matters we are required to state to them in an auditor's report and for no other purpose. Our audits of the CCG's financial statements are not planned or conducted to address or reflect matters in which anyone other than such members of the Governing Body of the CCG, as a body, may be interested for such purpose. In these circumstances, to the fullest extent permitted by law, we do not accept or assume any responsibility to anyone other than the CCG and the members of the Governing Body of the CCG, as a body, for our audit work, for our audit reports, or for the opinions we have formed in respect of those audits.

To the fullest extent permitted by law we do not and will not, by virtue of our reports or otherwise, assume or accept any duty of care or liability under this engagement to the CCG and the members of the Governing Body of the CCG, as a body, or NHS England and NHS Improvement or to any other party, whether in contract, negligence or otherwise in relation to our statutory audits of the CCG's financial statements.

## **Use of the reasonable assurance report**

This report is made solely to the members of the Governing Body of the CCG and NHS England. Our work has been undertaken so that we might state to the members of the Governing Body of the CCG and NHS England those matters we are required to state to them in accordance with NHS England and NHS Improvement Guidance and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Governing Body of the CCG, as a body, for our work, for this report, or for the opinions we have formed.

## **Opinion**

### **Qualified Conclusion**

Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this report.

In our opinion, NHS Northumberland CCG's Mental Health Investment Standard compliance statement for the period ended 31 March 2020 has been properly prepared, in all material respects, in accordance with the criteria set out in the Assurance Engagement of the Mental Health Investment Standard 2019/20 -

Briefing for Clinical Commissioning Groups, guidance published by NHS England and NHS Improvement, except for the matter detailed below.

## **Basis for Qualified Conclusion**

We have undertaken our review of the CCG's Statement of Compliance having regard to the criteria set out by NHS England and NHS Improvement in its Assurance Engagement of the Mental Health Investment Standard 2019/20 - Briefing for Clinical Commissioning Groups.

We have identified the following issues that indicate the CCG's Statement of Compliance has not been properly prepared in accordance with NHS England and NHS Improvement's guidance:

- Section 117 referrals (£4.31 million 2018/19, £4.90 million 2019/20): the CCG has apportioned Section 117 referral spend according to the percentage used in the previous year to estimate the proportion attributable to Mental Health to include in the MHIS total. We note that the additional guidance issued in the frequently asked questions requires a relevant clinician to provide an estimate of the proportion of spend which relates to mental health need as opposed to learning disabilities or dementia where patients have multiple diagnoses. We note further that the CCG has adopted a consistent approach to last year.
- Continuing healthcare spend (CHC) (£8.15 million 2018/19, £7.75 million 2019/20): the CCG has apportioned the total CHC spend on the basis of Mental Health client numbers as a proportion of the total client numbers to estimate the proportion attributable to Mental Health spend. Further to this we note that an individual assigned to Mental health team could have multiple needs, including dementia, however it is not practical to separately identify such spend. We note that the CCG has adopted a consistent approach to last year.

In relation to the above 'except for' qualification, we draw attention to the margin for error in relation to the MHIS Statement of Compliance that the MHIS has been met. There is a difference between the increase that the CCG is required to make in mental health expenditure in 2019/20, based on its overall programme increase and the actual mental health expenditure included as the final position in the Enclosure to this report. This means that if there were underlying errors in the 2018/19 or 2019/20 figures for mental health expenditure arising from the uncertainties where we have been unable to obtain assurance, these errors would need to exceed this amount to impact on the overall assertion that the MHIS has been met or has not been met.



Cameron Waddell  
Partner

For and on behalf of Mazars LLP  
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15 April 2021

Enclosure

NHS Northumberland CCG's Statement of Compliance 2019/20 dated 15 April 2021