



Annual Summary (SWL ICB)

1st January 2024 – 31st March 2025

Prepared for NHS SWL ICB by NHS London Commercial Hub
Version 1.0

Annual Summary and Compliance Report

Period: 1st January 2024 - 31st March 2025

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1. Scope and Introduction

The Provider Selection Regime requires each Relevant Authority to publish a summary of their application of the regulations. This paper outlines NHS South West London Integrated Care Board's (SWL ICB) summary of all contracts/framework agreements awarded using the Provider Selection Regime (PSR) between 1st January 2024 and 31st March 2025. This is the first report of its kind since the inception of the PSR Regulations.

In line with Regulation 25; the report will outline a summary of:

Scope of Regulation 25	
Number of contracts Awarded via:	• Direct Award A-C • Most Suitable Provider • Competitive Process
Frameworks	• Number of frameworks concluded • Number of contracts awarded based on a framework agreement
Urgent Awards / Modifications	• Number of urgent contracts awarded and urgent modifications
Number of contracts held by the Relevant Authority	• Number of new providers awarded contracts • Number of providers who ceased to hold any contracts with the RA – SWLICB.
Representations	• Details of representations received (number of representations received during the standstill period and a summary of the outcome of all representations received and the nature and impact of those representations. • Details of any reviews conducted by the Independent Patient Choice and Procurement Panel including (total requests made to the Panel, the number of requests accepted and rejected as well as the number of times where the Panel advised the RA to re-run or go back to an earlier step in the process and the number of times the advice was followed).

In line with Regulation 26; relevant authorities must monitor their compliance with the PSR regulations. The results of this must be published online annually and must outline their compliance with processes, decisions made under PSR, contract modifications and declaration and management of conflicts of interest.

SWL ICBs compliance report is outlined below. This report is grouped thematically with appraisal with the tenets of PSR Regulation with a summary of identified actions as appropriate.

Contract Awards as per Regulation 25:

Provider Selection Regime Period: 1st January 2024 - 31st March 2025	
Contracts awarded via Direct Award A	6
Contracts awarded via Direct Award B	2
Contracts awarded via Direct Award C	35
Contracts awarded via Most Suitable Provider process	0
Contracts awarded via Competitive Process	4
Number of frameworks concluded	1
Number of contracts awarded based on a framework agreement	1
Number of urgent awards made	3
Number of urgent contract modifications	0
Number of new providers awarded the contracts	4
Number of providers who ceased to hold any contracts with the RA	2
Number of representations received during the standstill	1

Overall Summary and Compliance in line with Regulation 26:

Theme	Narrative
Overview on Process / compliance with internal processes	SWL ICB has a strong governance structure for procurement under PSR regulations, supported by two key groups. The Contracting and Procurement Group (CPG) provides first-stage approval for procurement decisions and is accountable to the Audit & Risk Committee, meeting monthly in line with constitutional and financial governance requirements. The Procurement Oversight Group (POG) ensures compliance and good practice, overseeing PSR procurements, modifications, representations, urgent awards, and conflict-of-interest management, while also addressing equality and information governance standards. Membership includes finance, quality, safeguarding, governance, and procurement leads, ensuring comprehensive oversight and assurance.
Compliance with PSR process (timeliness in award, route to award, compliance with internal process)	SWL ICB has established governance structures that provide regular oversight of PSR proposals and support timely contract awards. While these processes are robust, compliance has been affected by variations across SWL places, legacy arrangements, and workforce capacity challenges driven by national and local NHS changes. Despite these constraints, performance shows a positive improvement trajectory, supported by the introduction of a revised procurement policy to strengthen consistency and understanding across the ICB. Looking ahead, compliance is expected to improve further as national change management initiatives and the commissioning strategy are fully implemented.
Contract Modifications process (process, timeline, notices)	SWL ICB has a robust process for contract modifications, fully aligned with Regulation 13. Each modification undergoes scrutiny to ensure changes do not materially alter the contract scope, and financial thresholds are assessed against lifetime contract value before approval by CPG or POG. Additional assurance is provided through specialist advice and toolkits from the NHS London Commercial Hub, including decision trees and transparency notice guidance for modifications over £500,000. While compliance processes are strong, transparency notices were published outside the required timeframes, highlighting an area for improvement.

Utilisation of urgent awards / non-compliant processes	SWL ICB experienced several non-compliant contract awards due to time and capacity constraints, though all urgent awards were made in line with PSR regulations and justified to maintain patient care. Each non-compliant case is reported to the Audit & Risk Committee, and approvals are granted only in exceptional circumstances where no compliant alternatives exist. While governance oversight remains strong, reliance on non-compliant awards is a key risk. Action is being undertaken to align strategic commissioning decisions with required procurement timelines.
Decisions made under PSR (route to market)	SWL ICB applies rigorous review of service specifications to ensure the correct route to market for all procurements. This process is supported by the NHS London Commercial Hub, which provides specialist advice, best practice guidance, and lessons learned from national panel decisions. Regular advice sessions with senior procurement, finance, and contracting teams strengthen decision-making before proposals enter formal governance. Additionally, participation in the Pan-London Procurement Forum enables collaboration with partner ICBs, helping to address PSR challenges and maintain consistency across the system.
Declaration and management of conflict of interests (COI)	SWL ICB maintains a robust conflict-of-interest process, requiring all staff to complete declarations online. Conflicts are reviewed at every stage of procurement, and appropriate actions are taken in line with the ICB's COI policy to ensure transparency and compliance.
Representations / Independent Panel Hearings	SWL ICB received one representation relating to the procurement of Primary Medical Services at New Addington and Thornton Road Valley Park. A representation panel was convened in line with regulations, and after due diligence, the outcome of the PSR process remained unchanged. A post-review wash-up session captured lessons learned, which were integrated into ICB processes. No procurements were escalated to the national Independent Panel.