

Appendix B

Internal Audit Report 2424 – Social Care Commissioning – Support at Home

Overall opinion

Net Risk Rating	Description	Assurance Assessment
Moderate	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified, which may put at risk the achievement of objectives in the area audited.	Reasonable

The organisational risk level at which this risk assessment applies is:

Risk Level	Definition
Service	This issue / risk level impacts at the Business Plan level (i.e. individual services or departments as a whole). Mitigating actions should be implemented by the responsible Head of Service.

Assurance assessment

The level of net risk is assessed as **MODERATE**, with control framework deemed to provide **REASONABLE** assurance over the Council's Social Care Commissioning of Support at Home.

Social Care services are delivered to people in need of support in order to lead safe, independent, healthy lives. The vision and priorities for Health and Social Care Services are set out in Aberdeenshire Health and Social Care Partnership (AHSCP) Strategic Plan 2020-25.

The commissioned Support at Home service works alongside the Council's in-house Care at Home service to promote independent living at home for vulnerable adults. A related multi-supplier framework agreement is in place to provide this care to people aged 16 years and over, including personal care, personal support and / or housing support. The contract aims to support the commissioning objectives of the Complex Care Programme Board, the Coming Home agenda, and aims to reduce inappropriate out of authority placements and delayed discharge from hospital settings.

Over 20,000 hours of care and support per week are commissioned across the Council area for vulnerable adults, with the primary care group being older people. The framework agreement has been in place since 1 April 2022, with a value of £177.9m recorded in the Council's Contracts Register.

There is a dedicated Commercial and Procurement Shared Service Team for procurement and contract management within Social Care. The Commissioning, Procurement and Contracts Team are responsible for the following areas: strategic commissioning (assisting with the development and implementation of strategic commissioning plans), procurement (including tenders, direct awards, contract maintenance) and contract monitoring (compliance and non-compliance).

The following governance, risk management and control measures were generally fit for purpose:

- **Governance (IJB and Senior Management)** – The Professional Oversight for Care at Home Group (POCAHG) meet weekly and maintain oversight of Care at Home delivery. A red-amber-green (RAG) based system is in place to monitor performance at a supplier level for the commissioned supported at home providers (approx. 85% care) and the internal Care at Home service teams (approx. 15% care). Recruitment issues and absences are monitored for the internal service, as well as delayed discharges and unmet needs as recorded in the Care Needs System. The POCAHG monitor the impact of any risks on the Grampian Operational Pressure Escalation System (G-OPES) score for the Health and Social Care Partnership (HSCP). Care at home matters are escalated from the POCAHG as appropriate to the Chief Officer – IJB at daily situation update meetings, the Clinical and Adult Social Work Governance Group, the Clinical and Adult Social Work Governance Committee and ultimately the IJB (most recently October 2023).
- **C&PSS Support** – The Commissioning, Procurement and Contracts (CPC) Social Care team, coordinates social care strategic commissioning, procurement compliance, and contract monitoring. Spend by supplier reports are supplied annually to C&PSS by Finance for monitoring contract spend and procurement planning purposes. In addition, an annual ‘Social Care Contract Routine Annual Monitoring’ report is presented by C&PSS to the Health and Social Care Partnership senior management and the Chair of the IJB, highlighting any contractual exceptions requiring consideration. The 2022/23 report considered performance of providers delivering Support at Home care. In addition, the relevant Category Manager has access to reports from the CareFirst Care Management System for monitoring care package commitments.
- **Online Resources** – The online Health, and Social Care Partnership (HSCP) Hub available to staff is well structured and contains a dedicated page on Self-Directed Support with relevant practitioner guidance and links. In addition, the dedicated HSCP Procurement website available to staff covers guidance on the support at home framework, including ordering procedures, as well as the proforma framework call-off form and details of current provider rates.
- **Budget Monitoring** – A suite of Power BI reports are available to HSCP managers to monitor Support at Home spend against budget and the SCRAG monitors the Learning Disabilities forecast as compared to budget at monthly meetings.
- **Commissioning and Procurement** – The framework agreement for support at home care has been created and approved in accordance with the Council’s Scheme of Governance.

However, the review identified some areas of weakness where enhancements could be made to strengthen the framework of control, specifically:

- **Delegated Authority and Care Package Approval** – The Strategic Commissioning and Resource Allocation Group (SCRAG) considers care packages projected to cost £1,100 per week or £60k per year or over for approval. Whilst a list of delegated powers to HSCP officers is in place covering various procurement matters including authority to call-off services under a framework agreement such as the Support at Home framework agreement, this

does not delegate authority from the Chief Officer - IJB to raise a call off for more than £50k, meaning authority has not been formally delegated to the SCRAG to approve care packages exceeding £50k. In addition, approval was insufficient for 12 (80%) of 15 cases reviewed based on powers delegated to officers, including seven (46%) packages exceeding £50k, four of which had been considered by SCRAG and approved by Partnership Managers, when Chief Officer – IJB approval was required. These issues risk a breach of the Scheme of Governance and insufficient scrutiny of procurements, risking Best Value. A recommendation has already been made in Internal Audit report Self-Directed Support 2420 to introduce a workflow system of approval.

- **Call Off Arrangements** – Suppliers on the Support at Home framework agreement are prioritised based on the assessment of their bids to be included on the framework, with hourly rates varying by supplier. To ensure Best Value care needs are advertised or standalone invitations to tender are raised where possible. However, two (13%) of 15 call offs were not advertised on the care needs system and justification for a direct award was absent. Since neither are top ranking providers (rank 10 and 28) such direct awards risk Best Value.
- **Training** – Not all H&SCP officers involved in procurements had completed mandatory Delegated Procurement Authority (DPA) training to the level required. This risks staff being ill informed when carrying out their procurement duties.

It is acknowledged that this review covers some of the same processes reviewed in Internal Audit report 2420 Self-Directed Support, with some of the same related findings highlighted as a result, as they relate to SDS Option 3 commissioned care packages. Therefore, Internal Audit will work with management to consolidate recommendations and related actions, where it is felt this is beneficial.

Recommendations have been made to address the above risks including reviewing authority delegated to officers and either formalising if appropriate or requiring Chief Officer – IJB approval of high-cost care packages. In addition, it is recommended that DPA training is completed as required; and that a system of control is introduced to ensure Support at Home call offs comply with framework requirements.

Severe or major issues/risks

No severe or major issues/risks were identified as part of this review.

Management response

Aberdeenshire Health and Social Care Partnership Senior Management Team welcome the assurance provided from the audit regarding the areas identified as fit for purpose. The Professional Care at Home Oversight Group has recently been reviewed and improvements made to strength the remit of this Group and we acknowledge the assurance from this audit that the governance of the delivery of the support at home framework and the in-house care at home service, through this Group and the process for escalation and reporting is fit for purpose.

The Health and Social Care Partnership have a close working relationship with the Commissioning, Procurements and Contracts (CPC) Social Care Team and this collaboration and guidance from this team has ensured compliance with the Council Scheme of Governance for the commission and procurement of this framework. The

ongoing input from the Category Manager is instrumental in ensuring compliance with the framework, monitoring the quality of the services, and maintaining guidance resources for practitioners, along with input from HSCP managers. The Management Team welcome the acknowledgement of these area being fit for purpose in the audit.

The Management Team accept the recommendations and will implement actions to strengthen the system of control and make improvements in the areas identified above to minimise risks:

- *Delegated Authority and Care Package Approval – ‘The List of Delegated Powers to Partnership Managers’ has been updated and once input has been received from all relevant officers, approval will be sought from the Chief Officer to delegate authorising packages over £50,000 to Partnership Managers following scrutiny by the relevant panel. The SCRAG panel for Mental Health and Learning Disability adult services has been in place for several years and was implemented prior to the creation of the HSCP in 2016. Historically, this delegation was in place from the Director to the Head of Service, however a gap in this governance arose following the establishment of the HSCP, which has now been addressed. For the Older Adult and Physical Disabilities Services work is ongoing to create a high-cost scrutiny panel to improve budget management and as a recommendation from the Self-Directed Support audit to improve the system of control.*
- *Call-off Arrangements – There was a small percentage of non-compliance of call-offs from the framework in the sample where a direct award was given with no evidence of justification. This evidences that generally practitioners are complying with the ‘Care Needs System – Guidance for Practitioners’ document. The HSCP does require exceptions to the process, where a direct award can be given to minimise risk to service users and these exceptions are detailed in the guidance. However, to ensure compliance with the system of control the Management Team will implement the recommended actions.*
- *Training – The Management Team accept the recommendation and acknowledge the risk of staff procuring without the relevant knowledge. Actions to implement a system of control will be taken, including a requirement for training to be completed prior to officers being granted access to the Care Needs System and the initiation of regular notifications of DPA training completion to line managers for the purposes of identifying and addressing outstanding training.*

The Senior Management Team welcome the recommendations from Audit, with many actions taken to address these since the draft report was received.