

Internal Audit Report

Edinburgh Health and Social Care Partnership (EHSCP) Sensory Loss Support Services

29 June 2023

HSC2202

**Overall
Assessment**

**Limited
Assurance**

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This Internal Audit review is conducted for the City of Edinburgh Council under the auspices of the 2022/23 internal audit plan approved by the Governance, Risk and Best Value Committee in March 2022. The review is designed to help the City of Edinburgh Council assess and refine its internal control environment. It is not designed or intended to be suitable for any other purpose and should not be relied upon for any other purpose. The City of Edinburgh Council accepts no responsibility for any such reliance and disclaims all liability in relation thereto.

The internal audit work and reporting has been performed in line with the requirements of the Public Sector Internal Audit Standards (PSIAS) and as a result is not designed or intended to comply with any other auditing standards.

Although there are specific recommendations included in this report to strengthen internal control, it is management’s responsibility to design, implement and maintain an effective control framework, and for the prevention and detection of irregularities and fraud. This is an essential part of the efficient management of the City of Edinburgh Council. Communication of the issues and weaknesses arising from this audit does not absolve management of this responsibility. High and Critical risk findings will be raised with senior management and elected members as appropriate.

Overall opinion and summary of findings

Weaknesses were identified in the design and effectiveness of the control environment supporting provision of Sensory Loss Support Services including formalisation of strategic plans and associated risk management, and ongoing contract management and performance monitoring. Consequently, only limited assurance can be provided that supplier, contractor, and partnership management risks are being effectively managed and that the partnership's objectives of delivering a seamless support service achieved.

The following improvement actions were identified:

- there are capacity and key-person dependency issues within the service that should be addressed to ensure the effective management of the service.
- a formal implementation plan needs to be developed to set out the service objectives over the next strategic cycle to monitor delivery progress towards strategic outcomes, and establish the resources required to support delivery.
- standardised service provider returns should be developed which clearly set out required delivery, performance and contract information, the individual key performance indicators for each contract lot. All key supplier meetings should also be documented, and minutes circulated.







- the need for improved service quality, review, and feedback processes, such as direct user feedback, monitoring locality service provision, formal contract review meetings and development of a dispute management protocol.
- the need for service updates to be provided to management for EIJB reporting.

Areas of good practice

Our review identified:

- officers were able to clearly articulate future strategies, for example, Sensory Loss and British Sign Language (BSL) focus groups are arranged for 2023 to facilitate better collaboration and engagement, and ensure the future strategy is inclusive and person centred.
- the service are leading on proposals for future Pan-Lothian Sensory Loss Support Services, and a working group planned to develop a Pan-See Hear Strategy.
- officers attend regular cross departmental BSL Authority (Local) Plan working group meetings.
- regular meetings are held with all service providers, and update reports are received in advance of quarterly monitoring meetings for review.
- inconsistencies in contract monitoring are recognised, and standardised supplier returns are being developed.

Audit Assessment

Audit Area	Control Design	Control Operation	Findings	Priority Rating
1. Strategic commissioning			Finding 1 – Key person dependency and capacity	Medium Priority
			Finding 2 – Strategy implementation	Medium Priority
2. Contract monitoring			Finding 3 – Ongoing Contract Management and Performance monitoring	High Priority
3. Governance and oversight			Finding 4 – Service Quality, Review, and feedback	High Priority
			Finding 5 – Sensory Loss Support Services Reporting	Medium Priority

[See Appendices 1a and 1b for Control Assessment and Assurance Definitions](#)

Background and scope

People with Sensory Loss (Blindness and Sight Loss; Deafness and Hearing Loss; and Deafblindness and Dual Sensory Loss) represent a diverse and significant group within Edinburgh, with around 4,000 people on the Sight Loss register, an estimated 400-600 British Sign Language (BSL) users, although according to the Census 2011 it shows over 1,000 use BSL at home and an estimated 25,000 to 85,000 people with acquired hearing loss living in the city.

The 2014 Scottish Government / CoSLA See Hear Strategy for Sensory Loss (formerly 'Sensory Impairment' – moving away from the medical model of disability), provides a framework for meeting the needs of people with a Sensory Loss, and is supported by annual funding to Health and Social Care Partnerships for allocation citywide.

Complementary to this, the [British Sign Language \(BSL\) \(Scotland\) Act](#) was given royal assent in October 2015, and [the British Sign Language Plan for Edinburgh 2018-2024](#) was published in October 2018.

The Edinburgh Health and Social Care Partnership (EHSCP) is responsible for commissioning community and hospital based Sensory Loss Support Services for adults aged 16 and over.

The EHSCP funds or provides four (4) separate services for people with Sensory Loss:

- rehabilitation and mobility training (also Certificate of Vision Impairment Register Management) from [Sight Scotland](#).
- individual patient support, signposting to other services and technology help at Princess Alexandra Eye Pavilion (PAEP) from [Visibility Scotland](#).
- social work services, assessment, and care management from the EHSCP's locality teams. [Deaf Action](#) provides both specialist social work assessment, care management services and a specialist equipment service for deaf people on behalf of the EHSCP.

The total value of the four services over the maximum lifetime of the contract is circa £2.3M.

The [Edinburgh Integration Joint Board strategic plan for 2019-22](#) sets out the ongoing commitments for service provision. The [annual review of directions report](#) presented to the EIJB in August 2022 included an update to the direction from the EIJB to the City of Edinburgh Council to continue commissioned services contracts for Sensory Loss Support Services. For Deaf Action, contract period ends September 2023 with an optional 1 or 2-year extension; for sight loss services (Sight Scotland and Visibility Scotland), contract period ends March 2024 with an optional 1 or 2-year extension.

Scope

The objective of this review was to assess the adequacy of design and operating effectiveness of the key controls established to ensure the adequate Sensory Loss Support Services are commissioned and provided.

Risks

The review also considered adequacy of assurance in relation to the following Corporate Leadership Team (CLT) risks:

- Financial and Budget Management
- Supplier, Contractor, and Partnership Management
- Governance & Decision Making
- Service Delivery

Reporting Date

Testing was undertaken between 12 December 2022 and 23 March 2023.

Our audit work concluded on 23 March 2023, and our findings and opinion are based on the conclusion of our work as at that date.

Findings and Management Action Plan

Finding Rating

Medium
Priority

Finding 1 – Key person dependency and capacity

Officers responsible for commissioning and monitoring delivery of Sensory Loss Support Services are committed and are working hard to deliver services to citizens, however the effectiveness of this work is impacted by workload issues and uncertainty around future Scottish Government funding for key officer roles to lead on implementation of national strategies and plans.

Currently the service consists of a Strategic Planning and Commissioning Officer and a part time See Hear Implementation Officer (vacant post). The continued provision of the part time post is currently uncertain due to funding.

A business case is in progress for the creation of a second Implementation Officer post to lead on BSL Authority (Local) Plans. The service has advised they would also like to explore other resources such as apprenticeships.

Risks

- **Strategic and Service Delivery** – insufficient capacity to support delivery of strategic plans and essential services to citizens.
- **Regulatory and Legislative compliance** – the Partnership does not achieve national strategic outcomes.

Recommendations and Management Action Plan: Key person dependency and capacity

Ref.	Recommendation	Agreed Management Action	Action Owner	Contributors	Timeframe
1.1	<p>Service resourcing requirements for meeting service delivery and achieving strategic plans should be determined.</p> <p>In addition, any resourcing key dependencies should be identified, and appropriate mitigating controls put in place.</p>	<p>Service resourcing requirements will be determined, this will include consideration of the core posts and additional posts such as the additional implementation officer and apprentices where possible.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	30/06/2024

1.2	Service capacity risks should be reflected in a service risk register for discussion, action and escalation as required. See recommendation 2.5.	Service capacity and resource issues will be captured in a Sensory Loss Support Services risk register as per action 2.5.	Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB	Tony Duncan, Service Director Strategic Planning Emma Pemberton, Acting Disability Strategy Manager Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh	31/12/2023
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Finding 2 – Strategy implementation

Finding Rating

Medium
Priority

Review of the strategic commissioning arrangements for Sensory Loss Support Services highlighted:

- future plans for delivery of services were outlined by officers, however these have not yet been documented to align with commencement of the refreshed EIJB strategic plan which is due to be published by September 2023.
- the first mid-progress report for the '[British Sign Language \(BSL\) plan for Edinburgh](#)' was due in 2020/21, but was not prepared due to Covid-19. Work is progressing via a working group; however, no updates have been provided to Committees and the general public as set out in the plan. Officers noted that additional resources would be required to effectively progress actions within the plan.
- the 2019 EIJB strategic plan included a workstream to develop an implementation plan for the '[See Hear Strategy](#)' (the Scottish Government's strategic framework for meeting the needs of people with Sensory Loss support needs in Scotland), however no evidence has been provided that a plan was developed during the term of the 2019-22 plan.

- the draft 2023 EIJB strategic plan and Council website pages reference the term 'Sensory Impairment'. The Strategic Planning and Commissioning Officer observed that the term 'Impairment' should not be used, and that there is a need to move from a medical to a social model of disability in respect of appropriate language used. It is also noted that the strategic plan document is not easily accessible for Sensory Loss support needs.
- it is also noted that a risk register to identify, capture, assess and manage the risks associated with commissioning and delivery of Sensory Loss Support Services strategic objectives has not been developed.

Risks

- **Strategic and Service Delivery** – Sensory Loss support needs may not be met for people across the city.
- **Regulatory and Legislative compliance** – strategies may not reflect relevant guidance and legislation.

Recommendations and Management Action Plan: Strategy implementation

Ref.	Recommendation	Agreed Management Action	Action Owner	Contributors	Timeframe
2.1	<p>Service delivery plans which detail planned service delivery priorities should be documented and communicated.</p> <p>Plans should include links to resourcing and funding requirements with amendments communicated where these require adaptation.</p>	<p>The following key national and local strategies are due to be reviewed in 2023, 2024 and 2025.</p> <ul style="list-style-type: none"> - See Hear Strategy, planned for March 2025 (rescheduled twice). - BSL National Plan, planned for October 2023 and BSL Authority (Local) Plan for Edinburgh, planned for October 2024. <p>Service delivery plans and funding requirements will be aligned to these.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	31/03/2025

2.2	<p>A progress update on the current <u>British Sign Language (BSL) plan for Edinburgh</u> should be provided within an agreed timescale to the EIJB, the Council’s Policy and Sustainability Committee and Scottish Government.</p> <p>Progress on the plan should also be communicated to the public through the Council’s press and social media channels as well as ensuring national deaf bodies and associations are kept up to date as set out in the governance section of the BSL Authority (Local) Plan document.</p>	<p>A revised BSL Authority (Local) Plan is due to be developed for October 2024.</p> <p>As part of this a review of progress with the previous plan will be captured and reported to the EIJB, Committees, the Scottish Government, and the public.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Eleanor Cunningham, Lead Officer, Corporate Services, CEC</p> <p>Edinburgh BSL Working Group, CEC / EHSCP</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	31/12/2024
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2.3	<p>Arrangements to develop implementation plans for monitoring delivery and progress towards the See Hear Strategy and BSL Plans, including alignment to available funding, should be clearly established and resources to support this allocated.</p>	<p>As per 2.1 implementation plans will be developed in line with the revised strategies due in 2024.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	31/12/2024
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2.4	<p>The Council and EHSCP should ensure that terminology in relation to Sensory Loss support needs are appropriately referenced within strategic documents, websites, and other communications, with appropriate engagement with service representatives to support this process.</p>	<p>This will be raised with the newly established Health and Social Care Communications and Engagement team. A meeting to discuss Sensory Loss Support Services requirements has been arranged.</p> <p>Feedback has been provided directly on the EIJB strategic plan and content of the Council website.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	31/12/2024
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2.5	<p>In line with the Council's Risk Management Framework, a risk register for the Sensory Loss Support Services should be developed and maintained on a quarterly basis, ensuring that current and emerging risks are captured, documented, assessed, with mitigating action identified and implemented, and risks escalated to the EHSCP; EIJB and the Council's Corporate Leadership Team risk committees where required.</p>	<p>A risk register for the Sensory Loss Support Services will be developed and processes put in place to ensure it is reviewed regularly and risks escalated where required.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p> <p>Julie Tickle, Strategic Planning Officer</p>	31/12/2023
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Finding 3 – Ongoing Contract Management and Performance monitoring

Finding
Rating

High Priority

Several improvement areas for contract management and performance monitoring were noted during the audit.

Roles and responsibilities for the overall contract are not clearly established, with a previous officer named on the contract register as the contract manager, and no designated contract monitoring officer assigned to the contract.

The EIJB Direction for Adult Sensory Loss Support Services states that 'each commissioned service will have its own key performance indicators (KPIs) developed as part of the commissioning process'. A review of contract specifications confirmed that individual KPIs are in place for all contract lots, however the service noted that only one provider submits KPI data as required.

Quarterly monitoring reports are submitted by all service providers. Reports for the quarter to 31 December 2022 (Q3) were reviewed by audit. Some alignment with tier 2 contract requirements was noted, such as sections for contract performance, contracted service review and updates, complaints and resolution, however this was not consistent across all reports, and where such headings were in place, they were not always completed.

The format of these reports was also inconsistent; a mix of excel tabs and single / multiple word documents was returned by different providers. The reports reviewed for Q3 2022 did incorporate required KPI data for all suppliers in line with contract specifications, however the different formats and tabs made interpretation of data against targets difficult. Full year KPI data was also not included to demonstrate trends.

Provider monitoring meetings are held quarterly, and while actions are progressed and circulated via email, no formal minutes of these meetings were being taken at the time of the review. Officers advise that they have now started to minute meetings.

Risks

- **Strategic and Service Delivery** – service providers may not provide contracted and required levels of service.
- **Financial and Budget Management** – the Council/Partnership may not achieve best value from contracted services.
- **Regulatory and Legislative compliance** – limited assurance that service providers meet regulatory and legislative requirements.

Recommendations and Management Action Plan: Ongoing Contract Management and Performance monitoring

Ref.	Recommendation	Agreed Management Action	Action Owner	Contributors	Timeframe
3.1	Roles and responsibilities for contract management and contract monitoring of Sensory Loss Support Services should be clearly established, agreed and communicated with training and guidance provided to support officers assigned to these roles.	Interim arrangements have been agreed, with the Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh assuming this role on a temporary basis (as this is a temporary role). Permanent arrangements to support ongoing management of the contracts will be established.	Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB	Tony Duncan, Service Director Strategic Planning Emma Pemberton, Acting Disability Strategy Manager Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh	30/09/2023

				Emma Gunter, Contracts Manager	
3.2	<p>A review of the contract monitoring and performance monitoring arrangements for Sensory Loss Support Services should be undertaken to ensure that service providers are providing all performance data and other information required, in line with contract specifications.</p> <p>The review should determine if any changes to the specifications are required to ensure that the information requested remains fit for purpose, for example KPI data required.</p> <p>Arrangements should include alignment to the guidance set out in the Council's contract management framework including:</p> <ul style="list-style-type: none"> - the requirement for regular meetings to be held. 	<p>This is currently in progress with new templates issued to providers to establish consistent arrangements.</p> <p>KPI information is being reviewed.</p> <p>Informal discussions are held monthly, and formal monitoring review meetings are held on a quarterly basis.</p> <p>The first submission of data on the new templates is due September 2023. Following this, the data submitted will be reviewed at a review meeting with the providers and amendments required will be agreed and minuted.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	31/12/2023

	<ul style="list-style-type: none"> - communication of KPI and data reporting requirements such as full suite of KPIs, risks, incidents etc to be reported and format of reporting expected to ensure consistency and aid assessing of service delivery. - KPI data should be separated out of quarterly reports and clearly mapped to targets set. - formal record keeping and action monitoring for meetings. 	<p>Formal documentation will be issued following monitoring review meetings.</p>			
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Finding 4 – Service quality, review, and feedback

Finding
Rating

High Priority

It is noted that there are limited opportunities to enable citizens to provide direct feedback to the commissioning service on their experience of Sensory Loss Support Services, however, officers advised this is currently being considered. Direct feedback is an essential element for assessing and improving delivery of services.

In addition, there are no formal processes for review of, or provision of feedback on, the quality of services provided in localities in line with the EIJB direction which states that *'outcomes for people using the service to be delivered within the locality teams (social work assessment and care management with people with a vision impairment) will be monitored'*.

Contract specifications also require providers to regularly provide information on the views of people using the service, their family and carers. It was noted that feedback had only been included by two of the three service providers in the Q3 monitoring reports reviewed. It is noted that it is challenging for some providers to obtain service feedback due to the nature of services.

Tier 2 contracts should be formally reviewed once across the lifespan of the contract (at least 12 months prior to contract expiry), however it is noted that these contracts are now in

their final year and no contract review meeting has yet been held.

It is recognised that the above areas have not been developed to date due to budget limitations and also time spent managing challenges with one of the contracted services.

Discussion with officers noted that they were unaware of protocols to manage and escalate any potential contract breaches. Review of contracts specifications notes that they do not include clauses for provider underperformance. The contract handover report does include detailed guidance on dispute resolution and managing performance.

Risks

- **Strategic Delivery** – service providers may not provide contracted and required levels of service.
- **Financial and Budget Management** – the Council / Partnership may not achieve best value from contracted services.
- **Regulatory and Legislative compliance** – limited assurance that service providers meet regulatory and legislative requirements.

Recommendations and Management Action Plan: Service quality, review, and feedback

Ref.	Recommendation	Agreed Management Action	Action Owner	Contributors	Timeframe
4.1	Set up of engagement focus groups, and other planned direct channels of communication to receive direct service user feedback, should be progressed.	<p>The service would like to hold twice yearly face to face communication and engagement sessions to gather feedback generally and views on future Sensory Loss Support Services provision across Edinburgh.</p> <p>The service would like to hold an annual open day for the public across Edinburgh, engaging with Public, Third and Private sector organisations.</p> <p>There are resourcing and funding challenges for facilitating these sessions including costs associated with accessible venues and providing appropriate trained BSL / English Interpreters and Electronic Notetakers.</p>	Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p> <p>Communications and Engagement Team, EHSCP</p>	30/09/2023

4.2	Establishing user feedback from the provider of contract lots due to expire in September 2023 should be prioritised to ensure that any required contract improvements are identified prior to the contracts being extended or re-let.	<p>Meetings have been arranged to initiate the contract review / extension process.</p> <p>As part of this, feedback will be obtained and incorporated in to contract negotiations and tendering requirements.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	31/12/2023
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4.3	Monitoring processes should be put in place for all locality teams delivering Sensory Loss Support Services to provide the commissioning service with assurance that quality services are being provided by the Partnership.	Monitoring process to be developed and implemented in partnership with the localities.	Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB	Tony Duncan, Service Director Strategic Planning Emma Pemberton, Acting Disability Strategy Manager Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh	31/12/2023
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4.4	<p>The review of performance monitoring arrangements detailed in recommendation 3.2 should include the requirement for all service providers to provide regular information on the views of people using the service, their family and carers.</p>	<p>Obtaining feedback from Sensory Loss Support Services' users is known to be challenging.</p> <p>The service will consider ways in which effective feedback can be obtained and considered as part of contract review meetings.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	31/12/2023
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4.5	<p>Formal contract review meetings should be scheduled during 2023 with all service providers.</p> <p>Minutes should be taken and circulated with action notes to all relevant parties.</p>	<p>As per 3.2 informal discussions are held monthly, and formal monitoring review meetings are held on a quarterly basis.</p> <p>Support is currently being provided by the Contract and Grants management team to review the contracts, and formal arrangements to review these once a year will be established.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	31/12/2023
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4.6	<p>Council guidance on recording and escalating supplier underperformance and disputes should be followed, and a log of key meetings and events held, in addition to formal records of all supplier meetings.</p> <p>A protocol should be agreed with all suppliers to ensure that there is clarity around actions to be taken should service standards not be met.</p>	<p>Training is being provided to the Strategic Planning and Commissioning Officer – Sensory Loss and See Hear Lead for Edinburgh as part of their interim arrangements for managing the contracts.</p> <p>This will include consideration of recording and management underperformance in line with the Council’s framework.</p> <p>A protocol for underperformance will be agreed with suppliers as part of the contract review / negotiation process.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	30/09/2023
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Finding 5 – Sensory Loss Support Service reporting

Finding
Rating

Medium
Priority

While the Sensory Loss Support service is subject to annual review via the EIJB direction for Adult Sensory Loss Support Services in place, required service updates to provide assurance that this direction is on track are not currently provided to management, due to the inconsistent data currently submitted by service providers.

The service advised that quarterly update reports are provided to the EIJB procurement board, and that monthly updates are provided to the Acting Disability Strategy Manager.





Risks

- **Governance & Decision Making** – senior management and members may not have oversight of the delivery of the service.

Recommendations and Management Action Plan: Sensory Loss Support Services reporting

Ref.	Recommendation	Agreed Management Action	Action Owner	Contributors	Timeframe
5.1	<p>All necessary service information should be supplied to management as requested, on a timely basis.</p> <p>Where any required information cannot currently be provided, alternative means of providing assurance should be agreed until the requested data can be supplied.</p>	<p>The revised reporting template provided to suppliers for data submissions will support provision of consistent and accurate information to support reporting on EIJB directions.</p>	<p>Mike Massaro-Mallinson, Service Director Operations / Interim Chief Officer of the EIJB</p>	<p>Tony Duncan, Service Director Strategic Planning</p> <p>Emma Pemberton, Acting Disability Strategy Manager</p> <p>Derek Todd, Strategic Planning and Commissioning Officer – Sensory Loss See Hear Lead for Edinburgh</p>	31/12/2023

Appendix 1a – Control Assessment Definitions

Control Assessment Rating		Control Design Adequacy	Control Operation Effectiveness
Well managed		Well-structured design efficiently achieves fit-for purpose control objectives	Controls consistently applied and operating at optimum level of effectiveness.
Generally Satisfactory		Sound design achieves control objectives	Controls consistently applied
Some Improvement Opportunity		Design is generally sound, with some opportunity to introduce control improvements	Conformance generally sound, with some opportunity to enhance level of conformance
Major Improvement Opportunity		Design is not optimum and may put control objectives at risk	Non-conformance may put control objectives at risk
Control Not Tested	N/A	Not applicable for control design assessments	Control not tested, either due to ineffective design or due to design only audit

Appendix 1b – Assurance and finding priority definitions

Overall Assurance Ratings	
Substantial Assurance	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.
Reasonable Assurance	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.
Limited Assurance	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
No Assurance	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.

Finding Priority Ratings	
Advisory	A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.
Low Priority	An issue that results in a small impact to the achievement of objectives in the area audited.
Medium Priority	An issue that results in a moderate impact to the achievement of objectives in the area audited.
High Priority	An issue that results in a severe impact to the achievement of objectives in the area audited.
Critical Priority	An issue that results in a critical impact to the achievement of objectives in the area audited. The issue needs to be resolved as a matter of urgency.