

FINAL INTERNAL AUDIT REPORT
EDUCATION, CARE & HEALTH SERVICES

REVIEW OF CONTRIBUTIONS POLICY & ITS APPLICATION IN PRACTICE
AUDIT FOR 2017-18

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REVIEW OF CONTRIBUTIONS POLICY AUDIT FOR 2017-18

INTRODUCTION

1. This report sets out the results of our systems based audit of Contributions Policy 2017-18. The audit was carried out in quarter 3 as part of the programmed work specified in the 2017-18 Internal Audit Plan agreed by the Section 151 Officer and Audit Sub-Committee.
2. The controls we expect to see in place are designed to minimise the department's exposure to a range of risks. Weaknesses in controls that have been highlighted will increase the associated risks and should therefore be corrected to assist overall effective operations.
3. The original scope of the audit was outlined in the Terms of Reference issued on 31/10/2017 and commenced on 07/11/17. The period covered by this report is from **01/01/2016 to 30/10/2017**.

AUDIT SCOPE

4. The scope of the audit is detailed in the Terms of Reference. The audit included a review of non-residential services which in respect of this audit included the following services:-
 - Day Centres
 - Transport
 - Direct Payments
 - Respite
5. This review also included determining the costs for attendance at day centres and transport at other London Boroughs through benchmarking. Charges for these services were found to be higher at the London Borough of Bromley than Havering, Bexley and Enfield, which were the three authorities that were benchmarked against, as part of this review.

REVIEW OF CONTRIBUTIONS POLICY AUDIT FOR 2017-18

6. The audit also included a review in relation to the application of the contribution policy for the Transport Service and the contract with Contractor A. The contract commenced on 1/12/2015 until 31/8/19, with an option to extend until 31/8/21. The value for the lifetime of the contract is £10,122,000.
7. The contract sits with Care Services but the contract monitoring is undertaken by Environmental Services. It was found that the contract was to be problematic from the outset as the data taken from the Transys system, when the service was in house, was not data cleansed and quality checked. The unit rate was £24.60 at this time. As a result there was a large disparity in the numbers of service users utilising the service which led to an increase in the unit rate to £28.29. The contractor highlighted that the contract was no longer financially viable for them to continue. The contract has a provision for an increase in unit rate should the estimated passenger journey volume outlined within the tender drop by 25%. This has led to a contract variation being made with effect from 1/12/17 with a further increase to the unit rate to £32.67.
8. However, if the passenger number rise to levels indicated within the tender then the rate will revert to the original sum.
9. As part of this Internal Audit, the following areas were covered:-
 - Contribution Policy review and how charges compare with other local authorities.
 - Assessment and Reviews
 - Changes in circumstances
 - Contractual arrangements and charges in respect of the contract for the provision of the transport service to day centres.
 - Service agreements within Carefirst and any supporting documentation held within Carefirst and Carestore
 - Financial Assessments and the associated client contributions and the statements issued to the service user/representative.
 - Account balances on Oracle Financials
 - Recovery of costs from another Local Authority
 - Stages of debt recovery action for a sample of outstanding debts.

REVIEW OF CONTRIBUTIONS POLICY AUDIT FOR 2017-18

AUDIT OPINION

10. Overall, the conclusion of this audit was that Limited Assurance can be placed on the effectiveness of the overall controls. Definitions of the audit opinions can be found in Appendix C.

MANAGEMENT SUMMARY

11. Internal Audit wish to bring the following to management's attention:-
- Reablement cancellation fees have yet to be levied, resulting in a loss of income.
 - The minimum threshold level applied for the purposes of contribution levels was not formally documented.
 - Departments are not being proactive in investigating debts in dispute or where there are financial concerns, preventing efficient debt recovery.
 - Statement of needs had not been completed for 2 cases. One sample had a draft support plan dated 19/9/16 as well as a current support plan dated 6/2/14. Reviews had not been undertaken in a timely manner in two cases.
 - A client accessing transport service ceased utilising the service in July 2017 and the service agreement was closed off on 2/11/17. As a result unnecessary charges have been incurred due to a lack of process to advise where a service user continues not to access services.
 - A service user received direct payments for the period 28/1/16 to 2/9/18. The incorrect rate of payment has been applied for the direct payment personal assistant as this crosses over three financial years.
 - A user of the Transport service was found to be a client from another Borough and a recoupment has not been completed since June 2017.
 - Data that was transferred over to the contractor in respect of the number of service users utilising the service had not been data cleansed or checked for accuracy. The number of journeys was thought to be 1189 but from the commencement of the contract with Contractor A is currently circa 600. (Actual service users 269 at the time of the audit).

REVIEW OF CONTRIBUTIONS POLICY AUDIT FOR 2017-18

SIGNIFICANT FINDINGS (PRIORITY 1)

12. Reablement is intensive short- term support so people can re-learn daily skills and regain confidence to live independently. The service usually lasts between three and six weeks and is a free service. During audit testing in a separate area of Adult Social Care, the auditor was advised by the Head of Direct Care that the cancellation fees for Reablement have not been levied to date. A report to the Executive 10/1/17 details the proposal to levy a cancellation charge if Reablement appointments are not kept and 24 hours prior notice is required.
13. Data was requested in respect of the cancelled and abortive visits for the 2017/18 financial year. The data provided is from 01/04/17 to 18/12/17. However, data is not readily available from 18/12/17 to date It was found that there were 534 cancelled calls and 149 aborted visits between the period 1/4/17-18/12/17. The service stopped collecting this data due to the proposed transfer to Contractor D and over the Christmas and New Year period a large number of cancelled and abortive calls are normally expected. The service is now recommenced collecting this data from week starting 5/2/18. The reasons for all the cancellations and abortive calls have not been fully provided. Procedural guidance which details when a cancellation fee should or should not be levied is not available.
14. Based on this data, in total 683 cancelled and abortive visits @ £14.95 equates to = £10,109 of lost income. (The total calculation includes both cancelled and aborted call in the absence of the agreed procedural guidance).

DETAILED FINDINGS / MANAGEMENT ACTION PLAN

15. The findings of this report, together with an assessment of the risk associated with any control weaknesses identified, are detailed in Appendix A. Any recommendations to management are raised and prioritised at Appendix B.

ACKNOWLEDGEMENT

16. Internal Audit would like to thank all staff contacted during this review for their help and co-operation.

DETAILED FINDINGS

No.	Findings	Risk	Recommendation
1	<p><u>Service User Contributions</u></p> <p>It was found that for Sample 2 that the contribution level was as at 10/4/17 £1.72 and Sample 3 £1.95. There is a minimum charge of £2.50 below which clients are not expected to contribute due to the charges outweighing the cost of collection. However, this is not documented.</p>	<p>Staff may operate different working practices.</p>	<p>The minimum threshold should be formalised and documented.</p> <p>[Priority 3]</p>
2	<p><u>Outstanding Balances</u></p> <p>Three of the cases that were included within the original sample had outstanding balances on their debtor accounts at the time of testing (Sample 7, 8 and 25). In addition to the above a further 5 cases were selected from the domiciliary care reconciliation spreadsheet which details the balances outstanding as at 24/9/17 and the current stage of recovery action undertaken, as relevant. Balances were reconfirmed as at 22/1/18.</p> <ul style="list-style-type: none"> • Sample 7- 93006061 outstanding amount of • £8, 809.26. Contractor B made a financial concerns referral on 22/3/17 and this was passed by the Adult 		

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Required to address major weaknesses and should be implemented as soon as possible

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Identification of suggested areas for improvement

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	<p>Early Inventions Team (AEI) to the Learning Disability Team. Contractor B requested an update from AEI on 23/11/17.No further progress.</p> <ul style="list-style-type: none"> • Sample 8 – 93011104 outstanding amount of £1319.14 due to backdated charges to the account between May and October 2017 and insufficient level of payments made for care charges. Contractor B chased for an update on 23/11/17. No further progress. • Sample 25 – 93011133 outstanding amount £2388.09. • Sample 26 92540190. Outstanding debt of £762.96. Contractor B made a financial concerns referral on 15/9/17 referred to care services. No further progress. • Sample 27 – 92600456 outstanding debt of £13,090.37. Insufficient payments to meet care charges. OPG search undertaken 28/11/17 which confirmed two power of attorneys. Financial concerns form sent on 8/2/18 • Sample 28 – 93006172 outstanding debt £20,041.41. Granddaughter was waiting for power of attorney to be activated which has now been done in December 2017. Debt to be cleared. • Sample 29 – 93012060 outstanding debt of £30,595.26. 		

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	<p>Client died on 13/11/17. Debt remains outstanding.</p> <ul style="list-style-type: none"> Sample 30 – 93014234 outstanding debt £6087.14 Contractor B sent a financial concerns form to the Adult Intervention Team. Documents not provided to enable the FA to be undertaken. Email dated 13/11/17 from Contractor B chasing care management. 	<p>Recovery action not being undertaken effectively as delay in investigations by departments are not being passed back to the contractor promptly.</p>	<p>Departments are reminded of their responsibilities in investigating debts that are in dispute or where there are financial concerns. The contractor should be advised of the outcome of the investigations without delay in order that the recovery process, where applicable, may be undertaken in a more efficient way.</p> <p>[Priority 2]</p>

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No.	Findings	Risk	Recommendation
3	<p><u>Statement Of Needs & Support Plans & Reviews</u></p> <p>It was found that for Sample 10 and 25 there was no record of a statement of needs being held within Carefirst. For Sample 7 there was a Draft Support Plan dated 19/9/16 as well as a current Support Plan dated 06/2/14 held for this client.</p> <p>It was found that reviews had not taken place in a timely manner in respect of Samples 4 and 12.</p>	<p>Assessments may not be up to date and match care currently being provided.</p> <p>Identifying any changes in the client's needs may not be possible</p>	<p>The statement of needs should be recorded for all service users. For the two cases identified this should be investigated and rectified. Current support plans should be in place for all service users receiving services.</p> <p>Ensure that reviews are carried out on an annual basis.</p> <p>[Priority 2]</p>

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4	<p><u>Service User Monitoring/Review of Change in Circumstances</u></p> <p>The client in Sample 7 was receiving the transport service from 10/10/16 in order to attend a day centre. An observation on Carefirst detailed that the day centre advised on 1/11/17 that the service user had stopped using the transport service on 11/7/17 and had been using public transport instead. The service agreement was closed on 2/11/17.</p> <p>The Auditor contacted the transport team and was advised that ‘ The contractor alerted LBB on the 10th Oct that service user was not accessing their transport, but appeared to be using public transport’.</p> <p>It is unclear why it took until 10/10/17 for enquiries to be made as the service user stopped utilising the service from 18/7/17. The reason for the service user not using the service is unknown.</p> <p>A review of the attendance schedule for this service user from the Omni check report showed that charges had been made for</p>	<p>Service users do not receive services that they have been assessed to require.</p>	

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	<p>the period 18/7/17 to 24/10/17 totalling £369.00. Contractor A requires 24 hours' notice if the service user is unable to attend or the charge will be made. This is detailed within the Contribution Policy also. However; no charges have been made to the client in respect of this period to date. This service user has a balance of £8,863.37 on their account on 03/01/18. (See recommendation 3).</p>	<p>Inaccurate information held within the main social care system.</p> <p>Unnecessary costs incurred by the Authority due to a lack of communication. Loss of income to the Authority.</p>	<p>A process should be put in place to ensure that where current service users do not access this service for an agreed period (to be decided), care management should be advised at the earliest opportunity and investigate the reasons to prevent any unnecessary costs being incurred. Carefirst should provide a detailed trail of events.</p> <p>[Priority 2]</p>
5	<p><u>Direct Payment Service Agreement & Rate</u></p> <p>For Sample 20 this service user was receiving a few services which included a direct payment to cover respite services and also a personal assistant.</p>		

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	<p>The service agreement commenced on 28/1/16 and has been closed off on 2/9/18. This has been queried with care management. As the service agreement has an end date the rate of £11.78 per hour has been applied for the whole of this period. The direct payment personal assistant rate, as detailed within the Contribution Policy for 2017-18 is £12.59 per hour.</p> <p>Internal Audit have queried this with care management.</p>	<p>Errors will occur when service agreements are put in place and closed off over different financial years due to rate changes.</p>	<p>This case should be investigated and amended without delay. The rate in payment should be reviewed and corrected. Internal Audit should be advised of the outcome.</p> <p>[Priority 2]</p>
6	<p><u>Recovery of Costs</u></p> <p>It was found that for Sample 21, this client had an open and authorised service agreement on Carefirst and services commenced on 01/12/2015. This client was under another Borough but receiving our transport service. The service user attends Astley Day Centre by the transport service and twice a week.</p> <p>Enquiries were made to ensure that the costs for both the day centre and transport are reimbursed back from the other Borough. The Auditor was advised that the day care cost is</p>		

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	<p>£39.00 (as detailed within the Contractor C contract for Day Care) and the transport rate is £24.60 and for this client would amount to a weekly cost of £229.80. However, this has not incorporated the premium rate of £28.29 or the £32.67 rate with effect from 1/12/17 due to the variation.</p> <p>Invoices generated previously included VAT but this has now been rectified and previous invoices cancelled and reissued.</p> <p>Under the account number 96094682 the last period that was invoiced was October 2016-June 2017. The period July 2017 to date still has still to be invoiced.</p>	<p>Failure to recover costs for services provided to a non Bromley service user.</p>	<p>Costs must be fully recovered in respect of this client. If the costs cannot be fully recovered then it should be determined whether this arrangement should be continued, as invoices have to be generated manually twice a year or annually.</p> <p>[Priority 2]</p>
7	<p><u>Contract with Contractor A</u></p> <p>The Transys system held all data relating to transport services previously. The service was transferred from Care Services to Contractor A with effect from 1/12/2015. The delivery and contract monitoring function sits with Environment & Community Services.</p>		

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	<p>Data was transferred to Contractor A and including the number of service users due to the transport services to and from various locations across the Borough. The journeys detailed within the schedules to the tender documentation was 1189 in total.</p> <p>It was confirmed by the Transport Operational Manager at a meeting on 29/11/17 that the journey numbers 1189 were incorrect from the outset. Additionally, it should be noted that the charging for the transport service commenced from April 2016 which has had a further impact on numbers.</p> <p>The clients are entered from a drop down menu and Contractor A crew retain a card for each service user that includes a bar code for each client. The Omni check system is used to confirm each service user on each journey. The fleet are all GPS tracked and we can confirm that the bus has arrived at the day centre and at what time.</p> <p>If the client is unwell or unable to attend and therefore will not be utilising the service, then Contractor A require 24 hours' notice or Bromley will still be charged as well as the client for a late cancellation.</p>	<p>If data is incorrect and misleading service data, budget monitoring and government returns may also be incorrect.</p>	<p>Care services data should have been robust and accurate in order to provide useful management information, prior to any transfer to a contractor. Lessons should be learnt as the contract variation was required as a direct result of the quality of the data transfer.</p>

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	<p>The Transys system is utilised by Contractor A and they will produce a report and this is reconciled against the Omni check records. There may be double scanning in error for example. As a result there may be queries that have to be resolved. Queries are flagged up by the PTS Contract Officer on a weekly basis in order to resolve any queries in advance. This is then checked again by Commissioning and then Contractor B. A certificate is then approved by the Director of Adult Social Care and the Commissioning team prior to the invoice being generated and approved for payment.</p> <p>In addition, to this the report will also be reviewed by a member of the Commissioning Team who will undertake checks on Carefirst as well as a member staff from Contractor B.</p> <p>Due to the disparity between the 1189 journeys and the actual number of journeys which is circa 600 (actual service users being currently 269 at the time of the audit), Contractor A have found that this contract is not financially viable. As a result the contract was varied with effect from 1/12/17. The original rate for a return journey was £24.60.</p> <p>The current contract has a provision for an increase in unit rate</p>		<p>The process in which the weekly checking of data is undertaken should be reviewed due to the time taken by different officers and contractors to confirm that the data is correct prior to approval for payment of the invoice.</p>

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	<p>should the estimated passenger journey volume outlined in the tender drops by 25%. As a result the premium rate of £28.29 is currently in place.</p> <p>The actual passenger journey volume has dropped significantly below 25% and the contractor has notified LBB that the contract is no longer viable under the proposed unit rates. Therefore, under the contract variation a rate of £32.67 will be applicable from 1/12/17.</p> <p>It was noted that the original rates of £24.60 appear in Carefirst within the service agreements.</p> <p>It is important to note the detail within the contract variation form that 'the revised rate would remain set for the remaining duration of the contract; however the increase/decrease mechanism employed in the contract would remain in place, on the basis that should the passenger numbers rise to the levels indicated in the original tender and pricing schedule after 1 December 2017, the rate would revert to that originally agreed in the tender'.</p> <p>It should be noted that regular contract monitoring meetings take place with Contractor A and copies of the meetings both monthly and 6 monthly have been provided.</p>	<p>Carefirst data may be inaccurate and misleading.</p>	<p>Rates should be reflected correctly within Carefirst.</p> <p>[Priority 2]</p>

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8	<p>During audit testing in a separate area of Adult Social Care, the auditor was advised by the Head of Direct Care that the cancellation fees for Reablement have not been levied to date. Reablement is intensive short- term support so people can re-learn daily skills and regain confidence to live independently. The service usually lasts between three and six weeks and is a free service. A report to the Executive 10/1/17 details the proposal to levy a cancellation charge if Reablement appointments are not kept and 24 hours prior notice is required.</p> <p>Data was requested in respect of the cancelled and abortive visits for the 2017/18 financial year. The data provided is from 01/4/17 to 18/12/17. Data is not readily available from 18/12/17 to date.</p> <p>It was found that there were 534 cancelled calls and 149 aborted calls between the period 1/4/17-18/12/17. The service stopped collecting this data due to the proposed transfer to Contractor D and over the Christmas and new year period a large number of cancelled and abortive calls are normally expected. The service is now recommenced collecting this data</p>		

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	<p>from week starting 5/2/18. The reasons for all the cancellations and abortive calls have not been fully provided and a copy of the guidance of circumstances when a cancellation fee should be levied has been requested. Based on this data, a total 683 cancelled and abortive visits @ £14.95 equates to = £10,109 of lost income. (The total calculations include both cancelled and aborted call in the absence of the agreed procedural guidance).</p> <p>Procedural guidance which details when a cancellation fee should or should not be levied is not available.</p>	<p>Loss of income to the Authority.</p>	<p>Reablement Cancellation Fees should be chargeable immediately and without delay as detailed within the Contributions Policy 2017-18.</p> <p>Procedural guidance should be made available detailing in which circumstances a charge should be levied.</p> <p>[Priority 1]</p>

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MANAGEMENT ACTION PLAN

Finding No.	Recommendation	Priority *Raised in Previous Audit	Management Comment	Responsibility	Agreed Timescale
1	<u>Service User Contributions</u> The minimum threshold should be formalised and documented.	3	The Head of Finance ECHS has provided written confirmation that the minimum charge is £2.50 as a weekly charge below this amount would be uneconomical to collect. The financial assessment procedures will be updated to include this information to ensure working practices are consistent.	Head of Exchequer Services	01/04/18
2	<u>Outstanding Balances</u> Departments are reminded of their responsibilities in investigating debts that are in dispute or where there are financial concerns. The contractor should be advised of the outcome of the investigations without delay in	2	ASC will review current processes and set standard practice	Director ASC	1/4/18

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	order that the recovery process, where applicable, may be undertaken in a more efficient way.				
3	<p><u>Statement Of Needs & Support Plans & Reviews</u></p> <p>The statement of needs should be recorded for all service users. For the two cases identified this should be investigated and rectified. Current support plans should be in place for all service users receiving services.</p> <p>Ensure that reviews are carried out on an annual basis.</p>	2	Annual reviews are carried out on the majority of cases we hold, these are on occasion delayed by other demands placed on the service such as safeguarding investigations. All users should have a stamen of need/support plan in place	Head of Service	1/4/18

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Finding No.	Recommendation	Priority *Raised in Previous Audit	Management Comment	Responsibility	Agreed Timescale
4	<p><u>Service User Monitoring/Review of Change in Circumstances</u></p> <p>A process should be put in place to ensure that where current service users do not access this service for an agreed period (to be decided), care management should be advised at the earliest opportunity and investigate the reasons to prevent any unnecessary costs being incurred. Carefirst should provide a detailed trail of events.</p>	2	The service to review current procedures so that timely and accurate data can be sought and used appropriately	Head of ACM/LD	1/4/18

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5	<p><u>Direct Payment Service Agreement & Rate</u></p> <p>This case should be investigated and amended without delay. The rate in payment should be reviewed and corrected. Internal Audit should be advised of the outcome.</p>	2	Being investigated	Head of LD	1 week

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6	<u>Recovery of Costs</u> Costs must be fully recovered in respect of this client. If the costs cannot be fully recovered then it should be determined whether this arrangement should be continued, as invoices have to be generated manually twice a year or annually.	2	Debt recovery for the other Borough's resident being pursued. User no longer accessing the service.	Head of LD	1Week
7	<u>Contract with Contractor A</u> Care services data should have been robust and accurate in order to provide useful management information, prior to any transfer to a contractor. Lessons should be learnt as the contract variation was required	2	The RFW for a change in the cost rate of journeys was created as soon as CPT were advised of the change. Carefirst support team amended the <i>rate</i> in the system within 5 days. The invoicing for the period from	Head of Placements & Brokerage.	N/A

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	<p>as a direct result of the quality of the data transfer.</p> <p>The process in which the weekly checking of data is undertaken should be reviewed due to the time taken by different officers and contractors to confirm that the data is correct prior to approval for payment of the invoice.</p> <p>Rates should be reflected correctly within Carefirst.</p>		<p>the date of the change (01/12/17) has not yet commenced and no payments are yet being made against the service lines for the period from 01/12/17.</p> <p>In respect of the rate of £28.29 this has been created only as a % surcharge for each pay period and payment was determined by the number of journeys in the month. The base rate of £24.60 has remained throughout the contract until the recent uplift to £32.67 which applies as of 01/12/17.</p> <p>There has been considerable effort made by all involved since the start of the contract, to speed up the data matching process and as the</p>	<p>Transport Operations Manager/ Director of Environment.</p>	<p>N/A</p>

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			<p>information held by the Council has been tidied up, this has helped to reduce queries right across the service.</p> <p>At depot level, the matching of travel data (circa 600 – 700 weekly transactions) has steadily improved to a 94% success level in December 2017. Crew errors using the scanning application on the bus are captured and the monitoring officer has worked closely with the bus crews, providing hands-on training to any user who may be having difficulties and this has helped to contributed to the reduction in time spent verifying the data.</p>		

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Finding No.	Recommendation	Priority *Raised in Previous Audit	Management Comment	Responsibility	Agreed Timescale
			<p>In December 2017 Contractor A. changed the contract supervisor based at Bromley and a fresh approach to detail in the data and the time taken to submit to LBB, has reduced from 3 days to 1.</p> <p>The LBB contract monitoring officer has again made time to train the supervisory staff to ensure that the Council is presented with the data to the standard and quality expected.</p> <p>Generally, there has been a 2 day notable improvement in the turnaround from releasing the matched data to the Civic Centre through to producing and signing the payment certificate.</p>		

Priority 1
Required to address major weaknesses and should be implemented as soon as possible

Priority 2
Required to address issues which do not represent good practice

Priority 3
Identification of suggested areas for improvement

MANAGEMENT ACTION PLAN

Finding No.	Recommendation	Priority *Raised in Previous Audit	Management Comment	Responsibility	Agreed Timescale
8	<p>Reablement Cancellation Fees should be chargeable immediately and without delay as detailed within the Contributions Policy 2017-18.</p> <p>Procedural guidance should be made available detailing in which circumstances a charge should be levied.</p>	1	<p>Investigation into why charging has not taken place underway.</p> <p>Charges being implemented.</p> <p>Processes and procedures being developed to implement and where possible recoup any loss.</p>	<p>Service Lead</p> <p>Service Lead</p> <p>As above</p>	<p>1/4/18</p> <p>Immediate</p> <p>As above</p>

Priority 1
Required to address major weaknesses and should be implemented as soon as possible

Priority 2
Required to address issues which do not represent good practice

Priority 3
Identification of suggested areas for improvement

OPINION DEFINITIONS

APPENDIX C

As a result of their audit work auditors should form an overall opinion on the extent that actual controls in existence provide assurance that significant risks are being managed. They grade the control system accordingly. Absolute assurance cannot be given as internal control systems, no matter how sophisticated, cannot prevent or detect all errors or irregularities.

Assurance Level

Definition

Full Assurance

There is a sound system of control designed to achieve all the objectives tested.

Substantial Assurance

While there is a basically sound systems and procedures in place, there are weaknesses, which put some of these objectives at risk. It is possible to give substantial assurance even in circumstances where there may be a priority one recommendation that is not considered to be a fundamental control system weakness. Fundamental control systems are considered to be crucial to the overall integrity of the system under review. Examples would include no regular bank reconciliation, non-compliance with legislation, substantial lack of documentation to support expenditure, inaccurate and untimely reporting to management, material income losses and material inaccurate data collection or recording.

Limited Assurance

Weaknesses in the system of controls and procedures are such as to put the objectives at risk. This opinion is given in circumstances where there are priority one recommendations considered to be fundamental control system weaknesses and/or several priority two recommendations relating to control and procedural weaknesses.

No Assurance

Control is generally weak leaving the systems and procedures open to significant error or abuse. There will be a number of fundamental control weaknesses highlighted.