

REDACTED



INTERNAL AUDIT FINAL REPORT

PUBLIC HEALTH DIRECTORATE

PUBLIC HEALTH COVID-19 RESPONSE – LESSONS LEARNED

Issued to: Director of Public Health
Consultant in Public Health
Director of Finance (final report only)

Prepared by: Principal Auditor

Reviewed by: Head of Audit and Assurance

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Report No.: PH/01/2022

INTRODUCTION

1. This report sets out the results of our audit of the lessons learned from the Public Health Covid-19 response. The audit was carried out as part of the work specified in the 2022-23 Internal Audit Plan. The controls we expect to see in place are designed to minimise the Council's exposure to a range of risks. Weaknesses in controls that have been highlighted will increase the associated risks and should therefore be addressed by management.
2. The Covid-19 pandemic resulted in Local Authorities needing to respond immediately to challenges which they had not faced before. In Bromley a local Covid-19 Outbreak Control Plan was put in place which provided the framework for coordinating the borough multi-agency response to COVID-19 pandemic. Key areas of work which the Public Health team undertook during the pandemic were:
 - Surveillance
 - Outbreak management
 - Covid-19 clinical response service
 - Local contact tracing service
 - Community testing service
 - Vaccination
 - Prevention /Communication and engagement
3. We would like to thank everyone contacted during this review for their help and co-operation.

AUDIT SCOPE

4. The original scope of the audit was outlined in the Terms of Reference issued on 25 August 2022.
5. We identified the following key risks:
 - Lessons learned from the Council's Public Health response to the Covid-19 pandemic have not been identified

- Lessons learned have not been prioritised and assessed, including the availability of resources within the Council and services provided by external stakeholders
- Measures to improve the Council’s Public Health response have not been tested and implemented, meaning that the Council is unprepared for a future pandemic.

AUDIT OPINION

6. Our overall audit opinion, number and rating of recommendations are as follows.

AUDIT OPINION	
Reasonable Assurance	(Definitions of the audit assurance level and recommendation ratings can be found in Appendix B)

Number of recommendations by risk rating		
Priority 1	Priority 2	Priority 3
0	2	1

SUMMARY OF FINDINGS

7. Our audit identified areas of good practice and sound controls as set out below:

- Within the Public Health Directorate, initial lessons learned were identified and addressed promptly by the Directorate during the course of the Covid-19 pandemic. This resulted in it being adequately resourced and prepared to deal with the Public Health response, both as the Covid-19 pandemic progressed and in the event of a further pandemic emergency in the future.
- Care Home Managers were complimentary about the support received from Public Health, as part of the multi-disciplinary Bromley Care Settings Support group, throughout the Covid-19 pandemic. The joint working to support care settings resulted in the recognition of a National ‘Care and Health Integration Award’.
- The report written by the Director of Public Health on Public Health management of the Covid-19 pandemic identified lessons learned from management of the pandemic and prioritised three key lessons for the future for the London Borough of Bromley. The report was presented to the Health & Wellbeing Board and the Council’s Adult Care and Health Policy Development and Scrutiny Committee. From our testing of a sample of data and information contained in the report we were able to confirm its robustness and accuracy. The principle of identifying three key lessons for the future arose from a peer review process led by the Association of Directors of Public Health across London.
- Separately, as part of the Council’s preparedness for the UK Covid-19 Inquiry, interviews were arranged by Public Health officers and took place with key officers throughout the Council who were involved in providing the Council’s response during the Covid-19 pandemic. Questions included those about the Council’s level of preparedness pre-pandemic and governance and decision making. These interviews, which took place in 2022, also identified lessons learned, some of which related to individual Directorates and some which had a Council-wide focus.

8. Our audit review has, however, identified the following areas which we would like to bring to management's attention:
- We were unable to find evidence that the three key lessons learned for the future for the Council, prioritised in the Director of Public Health's report, have been actioned and tested for adequacy across the Council. Ownership and responsibility for this has not been assigned.
 - We did not see evidence that each of the lessons learned suggested in interviews by key officers had been evaluated and either accepted or rejected. Examples included creating a guide for future pandemics with key people and 'steps' to do it efficiently and efficiently, having a bank of staff for a response team incident and keeping a database on this information and consideration of a proper wellbeing programme for everyone who worked on the Covid-19 response programme.
 - Officers from Public Health interviewed key officers in the Council who were involved in providing the Council's response but one interview did not take place and so it is not known what, if any, suggestions of lessons learned were identified by that key officer.

DETAILED FINDINGS / MANAGEMENT ACTION PLAN

9. 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, together with management's responses and timescales for implementation. Appendix B details the definition of the audit assurance and priority ratings.

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1. Lessons learned not actioned or tested across the Council	
<p><u>Finding</u></p> <p>Following the Covid-19 pandemic, the Director of Public Health wrote a report on Public Health management of the Covid-19 pandemic. This was based on the Bromley Outbreak Management Plan. It was presented to the Health and Wellbeing Board and the Adult Care and Health Policy Development and Scrutiny Committee in June 2022.</p> <p>Lessons learned had already been discussed at an Association of Directors of Public Health meeting and there was a lot of commonality between the Public Health teams, but some were quite specific to individual areas. The report written by the Council’s Director of Public Health identified three key lessons or developments that should be retained as a priority for the future in Bromley. These were:</p> <ol style="list-style-type: none"> 1.Re-energise whole Council approach, including partners i.e. whole system approach to address any health protection issues. 2.Ensure flexibility of the workforce through training, development, recruitment. 3.Maintain communications and local networks established for rapid information sharing and community engagement. <p>We were unable however to find evidence that the three key lessons learned for the future for the Council, as prioritised in the Director of Public Health’s report, have been actioned and tested for adequacy across the Council. Ownership and responsibility for this has not been assigned.</p> <p><u>Risk</u></p> <p>There is a risk that the Council is not adequately prepared for a future pandemic.</p>	
<p><u>Recommendation</u></p> <p>The Council implements the three key lessons for the future highlighted in the Director of Public Health’s report on Public Health management of the Covid-19 pandemic and tests them for adequacy, to ensure that the Council is</p>	<p><u>Rating</u></p> <div style="border: 1px solid black; background-color: #ffc107; padding: 5px; display: inline-block; margin-top: 10px;"> Priority 2 </div>

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<p>prepared for a future pandemic. This should be addressed by creating a more detailed supporting action plan with responsibilities assigned and resources addressed.</p>	
<p><u>Management Response and Accountable Manager</u></p> <p>Regarding the three key lessons for the future highlighted in the Director of Public Health’s report:</p> <ol style="list-style-type: none"> 1. This has been taken forward through our joint partnership working, mainly through the Health and Well-Being Board One Bromley Executive and Borough Officers Group. 2. Further discussions and planning to take place with the Training and Development Team. 3. This has been maintained through various mechanisms as in point 1. In addition, through the South East London Integrated Care Board and the South East London Directors of Public Health group. <p>Accountable Manager : The Director of Public Health.</p>	<p><u>Agreed timescale</u></p> <p>On-going</p> <p>1 June 2023</p> <p>On-going</p>

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2. Evaluating all suggestions of lessons learned	
<p><u>Finding</u></p> <p>During their interviews for the Council’s preparations for the UK Covid-19 Inquiry, key officers including Directors, suggested lessons learned. In some instances, those suggested lessons learned e.g. creating a guide for future pandemics with key people and ‘steps’ to do it efficiently and effectively, aligned with the three overarching lessons learned and identified for the future.</p> <p>We did not however see evidence that other suggestions made by key officers in interviews in response to the ‘lessons learned’ question, been evaluated subsequently and either taken forward by the Council or individual departments as separate actions or rejected. Examples included ‘Create a guide for future pandemics with key people and ‘steps’ to do it efficiently and efficiently’, ‘to have a bank of staff for a response team incident and keep a database on this information’ and ‘a proper wellbeing programme put in place for everyone who worked on the Covid-19 response programme’.</p> <p>We are aware from a discussion with Public Health that there is a protocol, agreed at Chief Officers Executive meeting on 1 November 2022, for appropriate Directors to check the accuracy and completeness of evidence and respond to a Rule 9 request (written request for evidence) received by the Council from the UK Covid-19 Inquiry. Our finding in this report is however outside of that protocol and relates purely to the risk of lessons learned not being actioned internally.</p> <p><u>Risk</u></p> <p>Useful suggestions which could help to improve the Council’s response in future may not be taken forward, resulting in the loss of key learning opportunities and a less effective and efficient response if another pandemic occurred in the future.</p>	
<p><u>Recommendation</u></p> <p>Public Health provide COE with the strengths and areas for development, identified by individuals through the interviews conducted by Public Health for the Council’s response to the Covid-19 Inquiry. COE can then evaluate and implement them where appropriate. This is to ensure that the Council is prepared for a future pandemic.</p>	<p><u>Rating</u></p> <div style="border: 1px solid black; background-color: #ffc107; padding: 5px; display: inline-block; margin: 10px auto;"> Priority 2 </div>
<p><u>Management Response and Accountable Manager</u></p> <p>Director of Public Health will present to COE the strengths and areas for development as recommended above.</p>	<p><u>Agreed timescale</u></p> <p>1 April 2023</p>

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3. Stakeholder interviews	
<p><u>Finding</u></p> <p>As part of the Council’s preparations for the UK Covid-19 Inquiry, officers from Public Health held interviews with key officers in the Council who were involved in providing the Council’s response to the Covid-19 pandemic. We did not see transcripts of one of the interviews with key officers because, although arranged, it did not take place and so it is not known what, if any, suggestions of lessons learned were identified by that key officer.</p> <p>Interviews had not taken place with Members or external partners to identify lessons learned. We noted however that Members had welcomed the Director of Public Health’s ‘Management of Covid-19 Pandemic’ report when it was presented to the Health & Wellbeing Board and Adult Care and Health Policy Development and Scrutiny Committee in June 2022. Members had been informed about the Director of Public Health’s three key lessons for the future for the London Borough of Bromley and we are not aware of any consequent issues raised by them.</p> <p><u>Risk</u></p> <p>Lessons learned may not be identified and therefore key learning opportunities to help the Council to prepare for a future pandemic may be missed.</p>	
<p><u>Recommendation</u></p> <p>Public Health ensure that suggestions of lessons learned are obtained from:</p> <ul style="list-style-type: none"> (i) the key officer who has not yet provided them, and (ii) that any suggested lessons learned are fed into the evaluation exercise outlined in recommendation 2 above. 	<p><u>Rating</u></p> <div style="border: 1px solid black; background-color: #90EE90; padding: 5px; display: inline-block; margin: 10px auto;">Priority 3</div>
<p><u>Management Response and Accountable Manager</u></p> <p>The key officer has been asked by Public Health for suggested lessons learned but has not provided them.</p>	<p><u>Agreed timescale</u></p> <p>Risk accepted.</p>

OPINION DEFINITIONS

Assurance Level

Assurance Level	Definition
Substantial Assurance	There is a sound system of control in place to achieve the service or system objectives. Risks are being managed effectively and any issues identified are minor in nature.
Reasonable Assurance	There is generally a sound system of control in place but there are weaknesses which put some of the service or system objectives at risk. Management attention is required.
Limited Assurance	There are significant control weaknesses which put the service or system objectives at risk. If unresolved these may result in error, abuse, loss or reputational damage and therefore require urgent management attention.
No Assurance	There are major weaknesses in the control environment. The service or system is exposed to the risk of significant error, abuse, loss or reputational damage. Immediate action must be taken by management to resolve the issues identified.

Recommendation ratings

Risk rating	Definition
Priority 1	A high priority finding which indicates a fundamental weakness or failure in control which could lead to service or system objectives not being achieved. The Council is exposed to significant risk and management should address the recommendation urgently.
Priority 2	A medium priority finding which indicates a weakness in control that could lead to service or system objectives not being achieved. Timely management action is required to address the recommendation and mitigate the risk.
Priority 3	A low priority finding which has identified that the efficiency or effectiveness of the control environment could be improved. Management action is suggested to enhance existing controls.