



FINAL INTERNAL AUDIT REPORT
QUALITY OF PLACEMENTS (EXTERNAL) –
CHILDREN'S SOCIAL CARE

PEO/12/2022

13th June 2023

Auditor	Principal Auditor
Reviewer	Head of Audit and Assurance

Distribution list

Job title
Director of Children's Services
Assistant Director, Children's Social Care
Head of Service (Care and Care Leavers)
Team Leader, Children's Commissioning Team
Assistant Director of Integrated Commissioning
Integrated Strategic Commissioner
Assistant Director Strategy, Performance and Corporate Transformation
Head of Finance, Children, Education and Families

Executive Summary

Audit Objective	The objective of this audit was to review how the Council receives assurance on the quality of Children’s Social Care external placements. Our testing focussed on Semi-Independent and Residential Care placements (including those coded as Children’s Homes placements).
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Assurance Level		Findings by Priority Rating		
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.	Priority 1	Priority 2	Priority 3
		0	2	0

Key Findings
<ol style="list-style-type: none"> 1. The service is often required to find placements at speed (e.g. emergency placements) and parameters such as geographical exclusions mean that options are limited. 2. Placement Commissioning Checklists and Trackers were available for all cases sampled and the process for ensuring ratification of the placement at Panel is effective. 3. Reporting on Quality Assurance site visits undertaken as part of the Contract Compliance function is comprehensive. Action Plans are agreed with the provider and a follow up process in place. This relatively new role continues to develop and the long-term vision of a database of Quality Assurance documentation will streamline the process at the point of placement. 4. Governance and Quality Assurance (Priority 2) – See Recommendation 1. The Quality Assurance Framework comprises three distinct functions:- Contractor A’s accreditation scheme (for unregulated placements), quality assurance undertaken in house at the point of placement and, ongoing contract compliance. We could not evidence the ‘Golden Thread’ through the functions to ensure the adequacy of the Framework as a whole and that there is no duplication or gaps in the checks required. Sample testing identified some gaps where we could not evidence that checks had either been completed or deemed as not relevant.

5. **Policy and Procedures** (Priority 2) –. **See Recommendation 2.**

The Procedure notes for the function were last updated on 5th June 2019 and do not include the more recent Contract Compliance function. We acknowledge that the department has identified this as a weakness however, without up-to-date detailed procedures, consistency, and the ability of staff to perform their tasks efficiently and effectively will be impacted. The risk of placing a child in an unsuitable placement will also be heightened.

Management has agreed actions for all findings raised in this report. **Please see Appendix A.**

*Definitions of our assurance opinions and priority ratings are in **Appendix B.***

*The scope of our audit is set out in **Appendix C.***

Appendix A - Management Action Plan

1. Governance and Quality Assurance

Finding

We found that the Quality Assurance process comprises three distinct functions being:-

- Contractor A's accreditation scheme for unregulated establishments
- Quality Assurance undertaken by the Placement Officers at the time of placement
- Ongoing Contract Compliance undertaken primarily post placement.

Whilst there is tacit understanding and acknowledgement of the links between the functions, we could not evidence the 'Golden Thread' to ensure that there are no gaps or duplication in the quality assurance checks undertaken and the evidence retained of these for each placement. Opportunities exist to both streamline and enhance the effectiveness of QA by reviewing the above functions as a whole, to ensure that there are no gaps and/or overlaps that do not add further value.

We could not evidence that all checks had been undertaken for each placement in our sample, and we saw examples of out of date documentation e.g. Electrical Certificates, and missing documentation e.g. Portable Appliance Testing (PAT) certificates. Some providers are frequently used and consequently relevant checks may be held/evidenced with a previous placement or have been obtained as part of a Contract Compliance visit. Similarly, in some instances checks such as references may have been deemed not applicable, as the provider is known. However, we could not evidence from the notes on file whether these checks had been considered and a conscious decision had been made not to obtain them.

The purpose, parameters of the information required and criteria for some checks was not fully clear. For example, Buildings and Public Liability insurance certificates are requested, but once received, there is no further guide as to the level of cover deemed adequate for placement purposes. Similarly, evidence of PAT testing is required, but one provider in our sample had declared that 'We don't need PAT testing as we replace yearly' and this explanation had been accepted without further clarification. A further provider had submitted details of all DBS results for their staff including historic convictions but it was not clear whether these were appropriate or necessary to share.

We noted that where providers are registered (e.g. Children's Homes/Residential provision), consideration is given only to the overall Ofsted judgement and not the three sub categories. Conditions of Registration are also not considered (e.g. the requirement to provide Ofsted with 8 weeks' notice prior to the admission of a child to the home), although we acknowledge that it will be the responsibility of the provider to ensure that these are fulfilled.

Contractor A has established an accreditation scheme for unregulated provision. Members of the scheme providing such services will, therefore, be subject to a level of checks in line with the level of accreditation awarded. These may duplicate some checks that the Placement Officers undertake. We are aware that the Children’s Placement service moved reporting lines on 1st February 2023 and recommend that the service leads review the Agreement as a whole and consider how the accreditation scheme fits with the Quality Assurance work conducted by the Placement Officers, to identify any gaps or duplication.

Risk

Inadequacies in the quality of accommodation may not be identified and placement breakdowns may occur. Inefficient use of resources if duplications exist.

Recommendation

We recommend that:-

- i) A Strategic review of the Quality Assurance process is undertaken to map the end-to-end process identifying any duplication and potential gaps. This should evidence the Golden Thread back to Legislation, National Guidance and internal policies and procedures. As part of this process, each quality control check should be reviewed to ensure that both the purpose and the criteria of the check is clear. The service could seek advice from specialist areas of the council, such as health, safety, and insurance, when considering the criteria for each check.
- ii) Ofsted ‘Sub Category’ judgements of below Good should be considered as part of the placement quality assurance process, as should any Conditions of Registration.
- iii) A review of the deliverables under the Agreement with Contractor A should be undertaken as a whole, to establish whether reliance can be placed on quality assurance work undertaken as part of this agreement.

Rating

Priority 2

Management Response and Accountable Manager

- i) All quality assurance and compliance checks will be reviewed with the relevant sections of the council to update the policy and ensure they remain relevant, for example checking outcomes of PAT testing expected compliance within council accommodation to ensure we are applying the same standards to commissioned placements.

Agreed timescale

End of July 23

(Team Leader, Children’s Commissioning Team)

<p>ii) Sub category judgements that are below good will be highlighted to the placing SW team and the provider will be asked to provide evidence of work undertaken to mitigate potential risk in this area.</p> <p>(Team Leader, Children's Commissioning Team)</p>	<p>End of July 23</p>
<p>iii) Contractor A has recently published new KPI data. The Children's Commissioning team lead and Commissioning lead will set up quarterly contract compliance meetings with Contractor A to evaluate the effectiveness of the service.</p> <p>(Team Leader, Children's Commissioning Team)</p>	<p>End of August 23</p>

2. Policy and Procedures	
<p><u>Finding</u></p> <p>We found that the Procedure notes for the function were last updated on 5th June 2019 and were at high level, consisting primarily of flow charts. The documentation is silent on how Trackers and Checklists should be completed and does not guide the Placement Officer to consider each piece of documentation in the checklist, annotate when this is not required and the rationale.</p> <p>We noted that the document referred to the previous Social Care Information System and did not refer to either Contract A or the ongoing Contract Compliance function, both of which have links, in terms of process and Quality Assurance documentation, to the placement function.</p> <p>We acknowledge that the department had identified this as a weakness, however, without up-to-date detailed procedures, consistency, and the ability of staff to perform their tasks efficiently and effectively will be impacted. This is particularly pertinent in supporting the new member of staff.</p> <p><u>Risk</u></p> <p>Without comprehensive procedure notes providing a standardised guide to completion of the process, there is a risk that assumptions may be made when completing the process and forms, leading to inconsistencies and oversights. The risk of placing a child in an unsuitable placement may also be heightened.</p>	
<p><u>Recommendation</u></p> <p>The Procedure notes should be reviewed and updated ensuring that the end-to-end process undertaken by the Placement Officer and the Contract Compliance function are comprehensively documented.</p>	<p><u>Rating</u></p> <div style="border: 1px solid black; background-color: #ffc000; padding: 2px; display: inline-block;">Priority 2</div>
<p><u>Management Response and Accountable Manager</u></p> <p>The Children’s Commissioning team leader will update the processes to create an end to end guide for all placement and contract compliance staff to ensure consistency of approach for all staff.</p> <p>(Team Leader, Children’s Commissioning Team)</p>	<p><u>Agreed timescale</u></p> <p>End of August 23</p>

Appendix B - Assurance and Priority Ratings

Assurance Levels

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.

Action Priority 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.

Appendix C – Audit Scope

Audit Scope

We reviewed the adequacy and effectiveness of controls over the following risks:

- If the quality of support and accommodation is inadequate, placement breakdowns may occur, leading to instability and a negative effect on education, physical and mental health.
- If placements are not safe, secure and consistent in meeting the needs of children, life chances and the shaping of adult lives may be detrimentally impacted.
- An increase in demand and complexity of placements, together with the cost of provision rising above budgeted inflation rates in a provider led market, results in budget pressures and overspends will occur.

Our scope included the following:-

- Governance, including organisational management, roles and responsibilities
- Reviewing policies and procedures and guidance to ensure these are robust
- Quality assurance undertaken prior to placement for individual cases, both those solely procured through Contract A and those concluded outside of the Framework
- Arrangements for ongoing quality assurance
- The completeness and accuracy of individual placement information recorded on the Social Care Information system

We did not include a specific review of Contract A however did consider the level of work undertaken outside of the Framework and the impact on the service achieving its objectives.

Our testing focused on the placement of Children into Semi-Independent and Residential Care Placements (including those coded as Children's Homes placements) since April 2022.