

Birmingham and Solihull CCG

Internal Audit Report 2018/19
Stakeholder Engagement and Communications
FINAL

November 2018



cw audit
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Contents

| Section | Page |
|--|-------------|
| 1. What we found in summary | 1 |
| 2. The context for our review | 2 |
| 3. What we agreed to do | 3 |
| 4. Our findings and how management has responded | 4 |
| | |
| Appendix 1: Definition of our assurance levels and risk rankings | |
| Appendix 2: Responsibility statements | |

1. What we found in summary

The review has confirmed that the Birmingham & Solihull CCG have robust processes and controls in place for Stakeholder Engagement and Communications. The Communications and Engagement Strategy for the CCG has been revised and established during the year with formal approval by the Governing Body in September 2018.

Assurance level

Significant Assurance

The key issues that management must address

We have not identified any issues for the CCG to specifically address but have noted that the Stakeholder and Communication Strategy was approved in September 2018 and monitoring of the implementation of the Delivery Plan will be commenced in January 2019. A number of forums have been established and require embedding to demonstrate the impact of engagement in decision making.

Individual control objectives

| Key control objectives | Level of assurance | | | | |
|---|--------------------|-------------|----------|---------|----|
| | Full | Significant | Moderate | Limited | No |
| 1. As part of decision making, the CCG systematically involves its patients in the process, in line with the requirements of its Strategy and national guidance. The process is embedded, with evidence that communication and engagement impacts decision making. | | ✓ | | | |
| 2. A Strategy action plan is being implemented as planned in order to deliver the intended improvements. | | ✓ | | | |
| 3. The CCG continues to build meaningful engagement with the public, patients and carers to influence the shaping of services which improves the health and wellbeing of people within Birmingham and Solihull. | ✓ | | | | |
| 4. The CCG has developed/maintained effective communication channels to ensure that the people of Birmingham and Solihull have the information they need to enable them to access the right care at the right time, helping them to both look after themselves and manage their health and wellbeing. | ✓ | | | | |
| 5. The CCG promotes open engagement and communication within and outside the organisation. | ✓ | | | | |

Our assurance level and risk rankings are defined in Appendix 1.

2. The context for our review

General background

An internal audit review of the CCG's arrangements for Stakeholder Engagement and Communications has recently been completed. This review was carried out as part of the 2018/19 internal audit plan agreed by the Audit & Risk Committee. This area was last reviewed for Birmingham Cross City CCG during 2014/15, as a review of Patient and Public Involvement, when we provided a significant assurance.

The system

Effective engagement with stakeholders is critical to the successful delivery of the CCGs objectives. The ever-changing landscape of the NHS means that communication and engagement is now even more critical to ensure that all stakeholders (including clinical, administrative, patient, carers and the public) are aware of, and understand how CCGs commission clinically led and patient centred services.

The CCG has developed a new Communication and Engagement Strategy for the new organisation, which was approved by the Governing Body on 18th September 2018. This sets out the CCGs commitment that communication and public engagement are fundamental to its performance and ability to deliver excellent health services.

In delivering the NHS England Five Year Forward View, the CCG recognises the importance and value of patient and public engagement to develop and deliver whole scale system change through new models of service provision. The success of these models will be dependent on changes in the way the CCG interacts with and empowers patients and the public to be involved in their own health care.

Core principles in support of patient communication and engagement include:

- Be open, honest, timely and transparent when communicating and engaging with all stakeholders.
- Ensure communication and engagement is meaningful, targeted and integral to the business planning and commissioning decision making processes.
- Embrace an ethos of: "No decision about me, without me" or "you said, we did. "
- Be accountable, act on feedback received and communicate the outcomes of engagement work.
- Ensure communication and engagement is everyone's responsibility within the CCG.
- Communications are open and accountable, ensuring that feedback and two-way communication processes underpin the work the CCG do.

3. What we agreed to do

The overall objective in undertaking this review was to ensure, through a process of systems evaluation and compliance testing, that there is an appropriate control framework in place to manage the following key risks and to deliver key system control objectives:

The key risks

- Poor quality, inadequate patient, public and stakeholder engagement could result in failing to meet statutory duties and poor assurance rating. There may be reputational damage to the CCG. (Risk reference: BSAF008 / BSAF011).
- Non adherence to strategy / national guidance.
- Ineffective process.
- Decisions not made in patients' best interest.
- Impact on delivery of strategic objectives.

System control objectives

- As part of decision making, the CCG systematically involves its patients in the process, in line with the requirements of its Strategy and national guidance. The process is embedded, with evidence that communication and engagement impacts decision making.
- A Strategy action plan is being implemented as planned in order to deliver the intended improvements.
- The CCG continues to build meaningful engagement with the public, patients and carers to influence the shaping of services which improves the health and wellbeing of people within Birmingham and Solihull.
- The CCG has developed / maintained effective communication channels to ensure that the people of Birmingham and Solihull have the information they need to enable them to access the right care at the right time, helping them to both look after themselves and manage their health and wellbeing.
- The CCG promotes open engagement and communication within and outside the organisation.

The results of this review have been shared with the BSOL Head of Communications. Actions to resolve control weaknesses has been agreed where necessary and detailed in Section 4.

We have delivered this review in accordance with the statements made in Appendix 2.

4. Our findings and how management has responded

System Control Objective 1: As part of decision making, the CCG systematically involves its patients in the process, in line with the requirements of its Strategy and national guidance. The process is embedded, with evidence that communication and engagement impacts decision making.

There are various forums that have been established and are documented in the Communications and Engagement Strategy, which are operated to involve patients as part of the decision making process for providing services to patients and the population of the CCG. These forums need to be embedded within the CCG and demonstrate the impact of engagement in the decision making processes.

System Control Objective 2: A Strategy action plan is being implemented as planned in order to deliver the intended improvements.

A Delivery Plan identifying activities to be completed for September 2018 to August 2019, has been produced as part of the newly revised and developed Communications and Engagement Strategy for the CCG, which was approved by the Governing Body on 18th September 2018. Monitoring against the implementation of the Delivery Plan will be via quarterly reports to the Governing Body and the first of these reports is expected in January 2019.

System Control Objective 3: The CCG continues to build meaningful engagement with the public, patients and carers to influence the shaping of services which improves the health and wellbeing of people within Birmingham and Solihull.

System Control Objective 4: The CCG has developed / maintained effective communication channels to ensure that the people of Birmingham and Solihull have the information they need to enable them to access the right care at the right time, helping them to both look after themselves and manage their health and wellbeing.

System Control Objective 5: The CCG promotes open engagement and communication within and outside the organisation.

We were able to confirm and obtain evidence that there are a variety of forums and activities that are being undertaken to build meaningful engagement with the CCGs population. A few examples of these forums and activities included the Peoples Health Panel, Patient Participation Groups,

Strategic Patient Partners and the Patient Health Forum. The CCG's website and social media forums are used to provide all required service information for the population. Birmingham and Solihul Updates is a form of social media being employed, alongside targeted campaigns, blogs, and patient stories are used to promote the services of the CCG. The CCG also utilises communication channels such as Practice News, Locality Meeting Minutes, Education Events, Annual 360 Stakeholder Survey, Team Brief, Staff Council and Staff Newsletter.

We have not highlighted any issues to report in relation to the above control objectives but are mindful that the Stakeholder and Communication Strategy has been approved in recent months and monitoring of the implementation of the Delivery Plan will commence in January 2019. A number of forums have been established and will require embedding to demonstrate the impact of engagement in decision making.

Appendix 1: Definition of our assurance levels and our risk rankings

| Opinion | Assessment rationale |
|--------------------|---|
| No | The audit highlighted weaknesses in the design or operation of controls that have not only had a significant impact on the delivery of key system objectives, they have also impacted on the delivery of the organisation's strategic objectives. As a result, no assurance can be given on the operation of the system's internal controls to prevent risks from impacting on achievement of both system and strategic objectives. |
| Limited | The audit highlighted some weaknesses in the design or operation of control that have had a serious impact on the delivery of key system objectives, and could also impact on the delivery of some or all of the organisation's strategic objectives. As a result, only limited assurance can be given on the operation of the system's internal controls to prevent risks from impacting on achievement of the system's objectives. |
| Moderate | The audit did not highlight any weaknesses that would in overall terms impact on the achievement of the system's key objectives. However, the audit did identify some control weaknesses that have impacted on the delivery of certain system objectives. As a result, only moderate assurance can be given on the design and operation of the system's internal controls to prevent risks from impacting on achievement of the system's objectives. |
| Significant | The audit did not highlight any weaknesses that would materially impact on the achievement of the system's key objectives. The audit did find some low impact control weaknesses detailed in section four of this report which, if addressed, would improve the overall performance of the system. However these weaknesses do not affect key controls and are unlikely to impair the achievement of the system's objectives. As a result, significant assurance can be given on the design and operation of the system's internal controls to prevent risks from impacting on achievement of the system's objectives. |
| Full | The audit did not highlight any weaknesses that would impact on the achievement of the system's key objectives. It has therefore been concluded that key controls have been adequately designed and are operating effectively to deliver the key objectives of the system. As a result, full assurance can be given on the operation of the system's internal controls to prevent risks from impacting on achievement of the system's objectives. |

| Risk ranking | Assessment rationale |
|--------------|---|
| 1 | The system has been subject to high levels of risk that have, prevented the system from meeting its objectives and also impacted on the delivery of the organisation's strategic objectives. |
| 2 | The system has been subject to high levels of risk that has, or could, prevent the system from meeting its objectives, and which may also impact on the delivery of some or all of the organisation's strategic objectives. |
| 3 | The system has been subject to medium levels of risk that have, or could, impair the system from meeting its objectives. |
| 4 | The system has been subject to low levels of risk that has, or could, reduce its operational effectiveness. |

Appendix 2: Responsibility statements

Disclosure statement

We have prepared this document solely for your use and, therefore, we believe that it would not be appropriate for it to be made available to third parties. If such a third party were to obtain a copy, without our prior written consent, we would not accept any responsibility for any reliance that they might place upon it. In the event that, pursuant to a request which you have received under the Freedom of Information Act 2000 you are required to disclose any information contained in this report, then you will notify CW Audit Services promptly and consult with us prior to disclosing such report. You agree to pay due regard to any representations which we may make in connection with such disclosure and apply any relevant exemptions which may exist under the Act. If, following consultation with us, you disclose this report or any part thereof, it shall ensure that any disclaimer which we have included, or may subsequently wish to include in the information, is reproduced in full in any copies disclosed.

Compliance with applicable standards

Our review of compliance against the applicable audit standards has confirmed that this engagement has been conducted in accordance with the International Standards for the Professional Practice of Internal Auditing. In conducting this assignment we can confirm that there have been no impairments to our independence or objectivity, either as an organisation or as individual auditors involved in delivering this service.

General statement

This report highlights findings on an exception basis and does not therefore include detail of controls that the audit found to be operating satisfactorily. Our opinion provides an overall assessment regarding the level of assurance we can provide regarding the controls operating in the system. The review will feed into the Head of Internal Audit Opinion which in turn forms part of the assurance for the Annual Governance Statement. Implementation of recommendations will be monitored by the Audit & Risk Committee.