



Internal Audit Report  
Housing and Community Care  
Adult Support & Protection  
Assignment No 14-04  
August 2014

## Final Report

Chief Executive's Service  
Finance Division  
Perth & Kinross Council  
2 High Street  
Perth PH1 5PH

## Background and Introduction

This audit was carried out as part of the audit plan for 2014/15, which was approved by the Audit Committee on 2 April 2014.

The Adult Support and Protection (Scotland) Act 2007 (the Act) introduces measures to identify and protect adults at risk of harm. The measures contained in the Act complement measures in pre-existing legislation.

Councils have responsibility under the legislation for ensuring that appropriate arrangements are in place with partner organisations to ensure that adults at risk of harm are protected in a co-ordinated manner. In addition, Perth & Kinross Council is the lead agency in ensuring that such adults are protected from harm and are appropriately supported.

This audit focussed on the Council's arrangements as part of the multi-agency approach and on the internal arrangements for ensuring the adherence to the relevant procedures. The audit did not review the work of the other agencies.

## Acknowledgements

Internal Audit acknowledges with thanks the co-operation of M Notman, Inter Agency Adult Protection Co-ordinator, Housing and Community Care during this audit.

## Control Objectives and Opinions

This section describes the purpose of the audit and summarises the results. A 'control objective' is a management objective that requires the maintenance of adequate and effective internal controls to ensure that it is achieved. Each control objective has been given a rating describing, on the basis of the audit work done, the actual strength of the internal controls found to be in place. Areas of good or poor practice are described where appropriate.

Control Objective: To ensure the adequacy of the Council's arrangements to identify, assess and support adults at risk of harm.
Auditor's Comments: The Council's arrangements to support adults at risk of harm are published on the Council website. The Multi Agency Guidelines are comprehensive and adequately set out the arrangements for identifying, assessing and supporting adults at risk of harm.
Audit testing confirmed that the Service obtains assurance that these arrangements are effectively implemented. This is provided by undertaking a number of detailed case file audits, the results of which are reported to the Community Care Management Team and the Adult Protection Committee (APC).
The Service Business Management and Improvement Plan (BMIP) includes a 2013/14 target that 77% of adult protection cases be screened within 24 hours.

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Performance is reported as part of the ongoing Service BMIP monitoring. For the period January to March 2014, 393 (65%) of such cases were screened within 24 hours.

There is scope to improve the adequacy of the arrangements as follows:

The Adult Support and Protection (Scotland) Act 2007 requires Councils to establish an APC to ensure that all policies, procedures and protocols are regularly reviewed. However, the Service was unable to provide any formal evidence of the APC review of the March 2012 guidelines.

Also, the Scheme of Administration authorises the Housing and Health Committee to exercise the Council functions in relation to the Act. However, none of the recent Adult Protection information made available to the APC had been presented to them.

There is also scope to improve the monitoring and reporting of progress with their improvement plan. Similarly, the performance and statistical reporting of Adult Support and Protection referrals would benefit from standardisation and review.

Strength of Internal Controls:	Moderate
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## Management Action and Follow-Up

Responsibility for the maintenance of adequate and effective internal controls rests with management.

Where the audit has identified areas where a response by management is required, these are listed in Appendix 1, along with an indication of the importance of each 'action point'. Appendix 2 describes these action points in more detail, and records the action plan that has been developed by management in response to each point.

It is management's responsibility to ensure that the action plan presented in this report is achievable and appropriate to the circumstances. Where a decision is taken not to act in response to this report, it is the responsibility of management to assess and accept the risks arising from non-implementation.

Achievement of the action plan is monitored through Internal Audit's 'follow up' arrangements.

Management should ensure that the relevant risk profiles are reviewed and updated where necessary to take account of the contents of Internal Audit reports. The completeness of risk profiles will be examined as part of Internal Audit's normal planned work.

## Feedback

Internal Audit welcomes feedback from management, in connection with this audit or with the Internal Audit service in general.

## Distribution

This report has been distributed to:

B Malone, Chief Executive;

J Walker, Executive Director (Housing & Community Care)

J Gilruth, Deputy Executive Director (Housing & Community Care)

C Johnston, Head of Community Care;

D Fraser, Head of Community Care;

A Taylor, Head of Finance & Support Services (Housing & Community Care)

J Symon, Head of Finance;

N Rogerson, Service Manager, Community Safety

M Notman, Adult Protection Coordinator

G Taylor, Head of Democratic Services;

P Dickson, Complaints & Governance Officer;

External Audit

## Authorisation

The auditor for this assignment was D McCreadie. The supervising auditor was M Morrison.

This report is authorised for issue:

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Jacqueline Clark

Chief Internal Auditor

Date: 20 August 2014

## Appendix 1: Summary of Action Points

No.	Action Point	Risk/Importance
1	Governance Arrangements	High
2	Housing and Health Committee	Medium
3	Business Management and Improvement Plan	Medium
4	Adult Protection Committee	Low
5	APC Improvement Plan	Medium
6	Procedural Guidance	Medium
7	Performance Measures	Medium



## Appendix 2: Action Plan

### Action Point 1 - Governance Arrangements

There is a need to clarify Perth and Kinross Council's governance arrangements in respect of Adult Support and Protection.

The 2008-2010 Adult Protection Committee (APC) Biennial Report refers to the APC reporting to the Senior Management Team. However a review of fifteen relevant minutes from 2014 revealed that this did not occur.

The 2010-12 Biennial Report states the independent convener reports directly to the Director of Housing and Community Care. This conflicts with the current APC Partnership Agreement and Constitution which states that the APC is accountable to the Council Executive Officer Team and the Community Planning Partnership.

### Management Action Plan

The Inter Agency Adult Protection Co-ordinator will liaise with the Head of Community Care to clarify the Adult Support and Protection governance structure and reporting arrangements to HCC Senior Management Team and Elected Members.

Once agreed the Adult Support and Protection governance structure and reporting lines will be tabled for approval to the appropriate Committee and published on Eric.

Importance:	High
Responsible Officer:	M Notman, Adult Protection Co-ordinator
Lead Service:	Housing and Community Care
Date for Completion (Month / Year):	January 2015
Required Evidence of Completion:	Extract from report detailing governance structure and SMT reporting arrangements

### Auditor's Comments

Satisfactory

## Action Point 2 - Housing and Health Committee

The Adult Support and Protection (Scotland) Act 2007 requires Councils to establish an Adult Protection Committee (APC). These arrangements are confirmed in a Community Planning Partnership report of 2 March 2012 which states that annual adult protection reports are brought to the Housing and Health Committee (H&HC). The role of the H&HC is further detailed in the Council's Scheme of Administration which authorises that Committee to exercise the Council functions in relation to the Adult Support and Protection (Scotland) Act 2007.

Whilst the APC biennial reports were presented to the Council, other Adult Protection information made available to the APC, such as the annual reports and improvement plan, have not been presented to the H&HC.

## Management Action Plan

The Inter Agency Adult Protection (AP) Co-ordinator will liaise with the Heads of Community Care to arrange for future reporting of Adult Support and Protection matters to the Housing and Health Committee.

Importance:	Medium
Responsible Officer:	M Notman, AP Coordinator
Lead Service:	Housing and Community Care
Date for Completion (Month / Year):	January 2015
Required Evidence of Completion:	Extract from H&HC report relating to Adult Support and Protection

## Auditor's Comments

Satisfactory



### Action Point 3 - Business Management and Improvement Plan

Key Performance Indicators relating to Adult Support and Protection are contained in the Housing and Community Care Business Management and Improvement Plan (BMIP) 2013/14 with the responsibility allocated to the Community Safety Committee.

However, the Council's Scheme of Administration doesn't authorise the Community Safety Committee to exercise the functions of the Council in respect of the Adult Support and Protection (Scotland) Act 2007.

### Management Action Plan

The Inter Agency Adult Protection (AP) Coordinator will liaise with the appropriate Heads of Service to ascertain which Committee(s) requires reporting of Adult Support and Protection Key Performance Indicators.

Importance:	Medium
Responsible Officer:	M Notman, AP Coordinator
Lead Service:	Housing and Community Care
Date for Completion (Month / Year):	January 2015
Required Evidence of Completion:	Updated BMIP or Scheme of Administration

### Auditor's Comments

Satisfactory

## Action Point 4 - Adult Protection Committee (APC)

The Perth and Kinross Adult Protection Committee Partnership Agreement and Constitution states that the Vice Convener can be appointed for 3 years. Audit testing revealed that the current post holder was appointed on the 18 February 2011 APC meeting and at the date of audit testing (June 2014) still held that position.

The agreement and constitution lists the membership of the Committee and requires core members to have a designated deputy who will attend in his/her absence. Audit testing revealed scope to improve the number of Council officers or deputies attending such meetings in line with the requirements of the agreement and constitution. The Service advised that a recent agreement to extend the membership of the APC should result in improved attendance by Council officers.

## Management Action Plan

1) The Inter Agency Adult Protection (AP) Co-ordinator will liaise with the APC Convener to review the post of Vice Convener and arrange for this matter to be discussed at a future APC meeting.

2) The Inter Agency Adult Protection (AP) Coordinator will contact Services requesting they nominate a deputy to attend when core members are unable to attend.

Importance:	Low
Responsible Officer:	M Notman, AP Co-ordinator
Lead Service:	Housing and Community Care
Date for Completion (Month / Year):	1) October 2014
Required Evidence of Completion:	1) Extract from APC minutes 2) Copy of correspondence

## Auditor's Comments

Satisfactory

## Action Point 5 - APC Improvement Plan

The Perth and Kinross APC agrees an improvement plan of which some actions relate to the Council. The 2012/13 plan is contained in the 2010/12 Biennial APC report.

Audit testing of the progress report revealed that it was difficult to identify progress with all of the improvement objectives as the report detailed the main and not all of the areas addressed, with some headings changed. Also, from June 2013 the APC had not received their quarterly updates regarding progress with the improvement plan.

A Council Report of 19 December 2012 states that the improvement plan is taken forward by sub – groups of Committees and individual agencies. No Council Committee or team reviews progress with the improvement plan or the Perth & Kinross Council elements thereof although the AP Co-ordinator undertakes this task.

The failure to ensure that regular progress reports are made to appropriate bodies that clearly demonstrate progress with improvement plans, such as date completed makes it difficult to evidence that actions have been delivered.

## Management Action Plan

1) The Inter Agency Adult Protection Co-ordinator will ensure that the improvement plan is reviewed to ensure the consistency of reporting to include a progress column.

2) The Inter Agency Adult Protection Co-ordinator will liaise with the Heads of Community Care to arrange for suitable reporting of the APC improvement plan to the Community Care Senior Management Team. The APC will receive quarterly updates regarding progress with the improvement plan.

Importance:	Medium
Responsible Officer:	M Notman, AP Co-ordinator
Lead Service:	Housing and Community Care
Date for Completion (Month / Year):	1) October 2014 2) January 2015
Required Evidence of Completion:	1) Updated APC improvement plan 2) APC improvement plan extract to SMT

## Auditor's Comments

Satisfactory

## Action Point 6 - Procedural Guidance

Section 42 of The Adult Support and Protection (Scotland) Act 2007 requires each Council to establish an APC whose responsibilities include reviewing the procedures and practices relating to the safeguarding of adults at risk. The APC constitution further details that the APC role includes ensuring that all policies, procedures and protocols are regularly reviewed.

The service was unable to provide formal evidence of the APC review of the March 2012 guidelines.. The guidelines would benefit from the inclusion of a purpose statement and a version control system that logs changes and the approval thereof.

Also, Section 4.1.1 of the APC partnership agreement and constitution requires member agencies to have in place their own adult protection procedures. The Service advised that the Multi Agency guidelines were in practice the Council's procedures. However, the Auditor could not find any formal approval of this approach.

The PKC website A-Z section includes the above guidelines. But the A-Z section on the staff intranet site (Eric) omits this information which makes the guidance less easy to find. The intranet site contains broken hyperlinks which also make it less easy for staff to find the guidance. The Service corrected this during audit testing.

## Management Action Plan

The Inter Agency Adult Protection Co-ordinator will update the adult support and protection guidance and arrange for the inclusion of a purpose statement. A system of version control that approves and logs such changes will be introduced. The guidance will also include a statement that the guidelines are the Council's operational procedures.

The above will be approved by the Heads of Community Care and submitted to the APC for approval.

Importance:	Medium
Responsible Officer:	M Notman, AP Co-ordinator
Lead Service:	Housing and Community Care
Date for Completion (Month / Year):	March 2015
Required Evidence of Completion:	Extract from APC minutes

## Auditor's Comments

Satisfactory

## Action Point 7 - Performance Measures

The Service Business Management and Improvement Plan (BMIP) include a 2013/14 target that 77% of adult protection cases be screened within 24 hours. Performance in this area is reported as part of the regular BMIP monitoring. (The Service records for the period January to March 2014 indicating that 393 (65%) of 606 such cases were screened within 24 hours.)

There is scope to standardise performance reporting, as the BMIP measures monitor timescales, and the Adult Protection Committee analyse the volume and type of referrals. The latter is not reported to any group within Perth and Kinross Council.

The lack of consistency regarding performance information may undermine the effectiveness of the scrutiny of performance.

## Management Action Plan

The Inter Agency Adult Protection (AP) Co-ordinator will liaise with the Heads of Community Care to arrange for the ASP performance statistics which are currently reported to the Adult Protection Committee to also be reported to the Council's Executive Officer Team and Community Care Senior Management Team.

Importance:	Medium
Responsible Officer:	M Notman, AP Co-ordinator
Lead Service:	Housing and Community Care
Date for Completion (Month / Year):	January 2015
Required Evidence of Completion:	Extract of APC performance reports to EOT and CCSMT.

## Auditor's Comments

Satisfactory

