

# **Direct Payments for Children**

Follow Up Review

# Direct Payments for Children Follow-up Review

## Purpose & Background Information

Our original review of Direct Payments for Children was completed in November 2020, giving a low assurance rating due to the significant weaknesses identified.

It should be noted that the updated opinion is based on the assumption that systems and controls as previously identified during the original audit remain in operation and are being complied with in practice. The purpose of our follow up exercise is not to retest the operation of controls which have already been assessed, but to review how management has responded to the action plans following our initial work.

## Audit Opinion

The follow-up identified that progress has been made to address the issues raised, but development had been impacted by a review of service delivery, and dealing with the impact of the Covid-19 pandemic. Dates have been pushed forward to reflect this.

Progress has been made with the outstanding actions with ten actions complete, including:

- Guidance in place for when a child transitions to adulthood.
- A meeting was held confirming that direct payments are most appropriately used, but can be considered in other Children's Social Care teams.
- Updated guidance to standardise recording of direct payment information within new care and support plan.

The council is looking to procure the Welsh Community Care Information System (WCCIS) to replace both the PARIS system and the CIS system that is used to make payments. At the conclusion of our original review, it was envisaged that the PARIS system could be improved in the interim, but this is no longer a feasible option due to staff capacity.

A further follow up review will be needed to establish the progress made with the outstanding actions. Based on the results of the first follow up review, we are providing a medium assurance.

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## Assurance Rating

Audit Opinion	Rating
At Final Report	Low ●
At First Follow Up	Medium ●

## Progress with Implementing Agreed Actions

Action Risk Rating	Actions Fully Implemented	Actions Not Implemented	Actions Not Yet Due
Critical ●	0	0	0
Major ●	6	3	0
Moderate ●	4	1	0

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Ref	Agreed Action	Issue & Risk	Manager Responsible & Target Date	Follow Up Status and Comments
1.1	Community Support Services (CSS) and Education & Children's Services to co-productively develop guidance for detailing the arrangements in place for when a child transitions to adulthood.	No documented guidance on direct payments or transition arrangements  Moderate ●	<i>Team Manager (Complex Disabilities)/ Senior Social Worker/ Transition Social Worker, CSS Complex Disabilities Team</i>	<b>Complete</b>  Transition Guidance was developed in 2019 and further reviewed in 2021.
1.2	Review shared Direct Payment Guidance and Procedures with CSS (last updated April 2019) to ensure that standard recording practices are clear and reflect the new templates and incorporate guidance on transition guidance.	No documented guidance on direct payments or transition arrangements  Moderate ●	<i>Principal Manager (Intervention, Prevention, Health &amp; Wellbeing)/ Principal Manager (Operational Services)</i>  31/03/2021	<b>In Progress - Revised Date 30/09/2021</b>  All staff that are involved with direct payments have been consulted as part of an internal review of the process. The documented guidance for staff is being drafted, but progress with finalising the document has been impacted by Covid-19 and other priorities.
2.1	Complex Disability Team (Transition) to develop a system which ensures that the required list of children transitioning to CSS is accessible to the management team.	Direct payments only provided in the Children with Disabilities team  Moderate ●	<i>Team Manager (Complex Disabilities)/ Senior Social Worker</i>  Complete	<b>Complete</b>  A report can now be run to list all children transitioning to Community Support Services (CSS). The Team Manager has access to run this report and the process is included within written guidance.

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2.2	Meeting held to confirm that Direct Payments cannot be utilised in other Children's Social Care teams currently.	Direct payments only provided in the Children with Disabilities team Moderate ●	<i>Director of Social Services/Head of Children's Services</i> <i>Complete</i>	<b>Complete</b>  A discussion took place between the Acting Head of Children's Services, Corporate Director: Communities, and the Principal Manager (Intervention, Prevention, Health and Wellbeing) regarding this action. The decision taken was that direct payments are most appropriately used within the children with disabilities team, but can be considered in other Children's Social Care teams. Further work will be done to promote direct payments.
2.3	Meeting to address the business continuity arrangements for the Children with Disabilities Team Manager to ensure that appropriate cover is available for leave and sickness absence from other team managers within the service.	Direct payments only provided in the Children with Disabilities team Moderate ●	<i>Principal Manager (Intervention, Prevention, Health &amp; Wellbeing)/Interim Head of Children's Social Care</i> 31/12/2020	<b>Complete</b>  Business continuity arrangements for the Children with Disabilities Team Manager have been reviewed but no changes have been made as it was felt that there is appropriate cover in place. Having appropriate documented procedures in place would assist to strengthen the arrangements
3.2	There have been issues with recording on PARIS. As PARIS is not used for making payments there are sometimes issues with double inputting data on both	Key management information held is not robust Major ●	<i>Principal Manager (Intervention, Prevention, Health &amp; Wellbeing)/ Principal</i>	<b>No Further Action</b>  A new system is being procured when the current contract ends in 2023, so no further time is being spent redesigning the current system to suit

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	PARIS and the system used for payment (CIS or Proactis). The newest version of PARIS (6.1 build 19.39) has now been completed and ICT are currently investigating implementing changes to system to allow budget codes and tariffs to be recorded and edited.		<i>Manager (Operational Services)</i> 31/12/2020	the Service's needs due to the low number of direct payments that are made.
3.3	In the meantime, procedures and standards for recording direct payments in PARIS will be reviewed and the FAO Team will work with the Children with Disabilities Team to improve communication and data recording as much as possible considering the identified issues with PARIS.	Key management information held is not robust  Major ●	<i>Team Manager (Client Services)/ Team Manager (Children with Disabilities)</i> 31/03/2021	<b>Complete</b>  The Financial Assessment Officers (FAOs) regularly attend the Children with Disabilities Group Supervision meeting and a standing item is to review any issues to do with recording and processing of direct payments.  The FAOs have developed an Additional Information Checklist to complement the guidance for social worker staff.
3.4	Update recording guidance to standardise recording of Direct Payment information within new care and support plan and review templates.	Key management information held is not robust  Major ●	<i>Team Manager (Children with Disabilities)</i> 31/03/2021	<b>Complete</b>  The Regional Care and Support Plan templates were implemented during late 2019 and the Children with Disabilities team's current cases were all transferred across to the new templates by February 2020.

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4.1	<p>A joint working group has been set up by the Principal Managers in CSS and ECS to research and review the service specification for a Direct Payment Support Service going forward and an action plan is in place to pursue options to address the issues and commission an appropriate service to meet our requirements.</p>	<p>Non-adherence to Contract Procedure Rules (CPRs)</p> <p>Major ●</p>	<p><i>Principal Manager (Intervention, Prevention, Health &amp; Wellbeing)/ Principal Manager (Operational Services)</i></p> <p>31/03/2021</p>	<p><b>In Progress</b></p> <p>The Direct Payment Framework has been set up in partnership with Conwy County Borough Council (CCBC). Tendering has happened as part of this framework, but there are still elements of the framework that need to be tendered, e.g. advice and assistance. Therefore, the council has had to continue to spot purchase with the current provider and expenditure levels still contravene Contract Procedure Rules (CPRs) by exceeding tendering thresholds i.e. £25k and above. Contract value above £25k requires a minimum competitive process be undertaken through advertising on Sell2Wales via the Council's electronic procurement system with associated tendering documentation and sustainability assessment.</p>
4.2	<p>A prepaid card solution has been implemented by both Adults and Children's Services for Direct Payments which would reduce the need for a managed account service.</p>	<p>Non-adherence to Contract Procedure Rules (CPRs)</p> <p>Major ●</p>	<p><i>Team Manager (Client Services)</i></p> <p><i>Complete</i></p>	<p><b>Closed</b></p> <p>A similar action was raised under the Support Budgets/Direct Payments review for Community Support Services and the following progress was recently established:</p>

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				<p>The Team Manager (Client Services) confirmed that pre-payment cards have been implemented but with a pilot to identify how well the new process is working. This has identified some improvement is needed in terms of the real-time reporting to allow for robust monitoring, e.g. more detail in terms of expenditure. Staff have been trained to assist with embedding the process, but take up of new direct payments has been low during the pandemic as some lunch clubs and other support groups have been closed.</p> <p>We have closed this action to save duplication, and will continue to monitor progress as part of the CSS review.</p>
5.1	To review the support provider service in relation to employing PAs and DBS and to consider alternatives. To consider the Authority taking on a more 'hands-on' approach rather than the light touch monitoring requested by the Director of Social Services.	Personal Assistants' Process is not robust Major ●	<i>Principal Manager (Intervention, Prevention, Health &amp; Wellbeing)/ Principal Manager (Operational Services)</i> 31/03/2021	<p><b>In Progress - Review Date 31/09/2021</b></p> <p>As a result of the Covid-19 pandemic, there has been less demand for direct payments. The support service provider has been reviewed and the following actions taken:</p> <ul style="list-style-type: none"><li>• a template has been developed to prompt a provider to carry out the relevant checks on personal assistants. However, the</li></ul>

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				<p>template could be strengthened to include Disclosure Barring Service (DBS) and Right to Work in the UK checks.</p> <ul style="list-style-type: none"><li>• In conjunction with the Direct Payment framework (see action 4.1), the advice and assistance service will be tendered that will include checks of personal assistants</li><li>• Reviewing the feasibility of using a micro-provider to enable people to be self-employed as carers after having the appropriate employment checks and could help with recruitment issues</li></ul>
5.2	To contact the All Wales Direct Payment Forum to gain an understanding of other Welsh Authority's monitoring process with regard to PAs and DBS checks.	Personal Assistants' Process is not robust Major ●	<i>Team Manager (Client Services)</i> <i>Complete</i>	<b>Complete</b> The Team Manager (Financial Assessment) has contacted the All Wales Direct Payment Forum to gain a better understanding of other Welsh Authority's monitoring process, however, could not provide more insight.

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6.1	Create recording standards for social worker team to ensure that information regarding direct payment, decisions, arrangement and reviews are recorded consistently.	Reviews of outcomes are not robust Major ●	<i>Team Manager (Children with Disabilities)</i> 30/09/2020	<b>Complete</b>  A guidance document has been created to record standards for the social worker team to ensure reviews are recorded consistently. This will be shared with staff in due course.  We are satisfied that sufficient action is being taken to close this action.
6.2	Carry out quality assurance audit to ensure that social workers are using the existing template to review cases and are complying with recording standards.	Reviews of outcomes are not robust Major ●	<i>Team Manager (Children with Disabilities)</i> 31/01/2021	<b>In Progress - Revised date 31/03/2022</b>  A quality assurance casefile tool is in place, but reviews have been impacted by the Covid-19 pandemic. Therefore, none have been carried on within the Children with Disabilities team as recording standards have only been recently developed.  Aiming to build in a review of the Children with Disability cases, to include direct payment arrangements, into the Service's Practice Audit schedule.

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## Report Recipients

- Principal Manager - Intervention, Prevention, Health & Wellbeing
- Head of Children's Social Care
- Team Manager (Children with Disabilities team, ECS)
- CSS Team Managers (Complex Disabilities, and Client Services)
- Principal Managers (CSS)
- Corporate Director: Communities
- Head of Community Support Services
- Service Manager (Client Services)
- IT Business Partner
- Strategic Planning & Performance Officer
- Scrutiny Coordinator
- Chair-Performance Scrutiny Committee
- Governance & Audit Committee
- Lead Member for Finance, Performance & Strategic Assets
- Lead Member for Education, Children's Services & Public Engagement

## Internal Audit Team

Sara Webster, Auditor      01824 712033      [sara.webster@denbighshire.gov.uk](mailto:sara.webster@denbighshire.gov.uk)

## Key Dates

Review commenced	March 2021
Review completed	May 2021
Reported to Governance & Audit Committee	9 June 2021
Proposed date for next follow up review	September 2021