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Agenda Item: 10.

Performance and Audit Committee

Date of Meeting: 26 June 2024.

Subject: Internal Audit of External Communications and Engagement.

1. Purpose

1.1. To present the External Communications and Engagement Audit Report for members' scrutiny.

2. Recommendations

The Performance and Audit Committee is invited to scrutinise:

2.1. The findings contained in the internal audit report, attached as Appendix 1 to this report, reviewing the procedures and controls around external communications and engagement for the Integration Joint Board, in order to obtain assurance that action has been taken or agreed where necessary.

3. Background

3.1. The Orkney Integration Joint Board (IJB) was established in 2016 under the Public Bodies (Joint Working) (Scotland) Act 2014, which aimed to enhance the coordination and integration of health and social care services in order to improve outcomes for patients, service users, carers and their families.

3.2. Communication and engagement are key aspects of the organisation, helping people to better understand services and how they are delivered, and making sure that everyone feels that their voice is heard.

3.3. The objective of this audit was to review the processes and procedures around external communications, including the planning, delivery and subsequent monitoring of external communications.

4. Audit Findings

4.1. The audit provides substantial assurance over the procedures and controls relating to external communications and engagement.

4.2. The internal audit report, attached as Appendix 1 to this report, includes one medium priority recommendation regarding the prior authorisation of press releases and one low priority recommendation regarding the use of social media. There are no high priority recommendations made as a result of this audit.

5. Contribution to quality

Please indicate which of the Orkney Community Plan 2023 to 2030 values are supported in this report adding Yes or No to the relevant area(s):

Resilience: To support and promote our strong communities.	No.
Enterprise: To tackle crosscutting issues such as digital connectivity, transport, housing and fuel poverty.	No.
Equality: To encourage services to provide equal opportunities for everyone.	No.
Fairness: To make sure socio-economic and social factors are balanced.	No.
Innovation: To overcome issues more effectively through partnership working.	No.
Leadership: To involve partners such as community councils, community groups, voluntary groups and individuals in the process.	No.
Sustainability: To make sure economic and environmental factors are balanced.	No.

6. Resource and financial implications

6.1. There are no resource or financial implications associated directly with this report.

7. Risk and equality implications

7.1. There are no risk or equality implications associated directly with this report.

8. Direction required

Please indicate if this report requires a direction to be passed to:

NHS Orkney.	No.
Orkney Islands Council.	No.

9. Escalation required

Please indicate if this report requires escalated to:

NHS Orkney.	No.
Orkney Islands Council.	No.

10. Authors and contact information

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11. Supporting documents

11.1. Appendix 1: Internal Audit Report - External Communications and Engagement.



Internal Audit

Audit Report

Integration Joint Board: External Communications and Engagement

Draft issue date: 6 June 2024

Final issue date: 14 June 2024

Distribution list:	Chief Officer Integration Joint Board Chief Executive NHSO Head of Strategic Planning and Performance Orkney HSCP Communications Team Manager OIC Corporate Communications Officer NHSO
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Audit Opinion

Based on our findings in this review we have given the following audit opinion.

Substantial

The framework of governance, risk management and control were found to be comprehensive and effective.

A key to our audit opinions and level of recommendations is shown at the end of this report.

Executive Summary

The objective of this audit was to review the procedures and controls around the external communications and engagement for the Integration Joint Board.

Several areas of good practice were identified during the audit including:

- There are up to date strategy, framework and policy documents which are regularly reviewed.
- Communications are issued in line with the priorities set out in the IJB Communication and Engagement Strategy.
- Communications are accurate, relevant and generally timely and produced using a variety of sources.
- Communications are published using channels appropriate to the target audience and content of the message.
- Both the health and social care aspects of the IJB have demonstrated consultation with local communities and the reflection of those consultations within their plans.
- The NHSO communications team have engaged with a wide range of social media platforms and have delivered appropriate content to those audiences.

The report includes 2 recommendation which has arisen from the audit. The number and priority of the recommendations are set out in the table below. The priority headings assist management in assessing the significance of the issues raised.

Responsible officers will be required to update progress on the agreed actions via Pentana Risk.

Total	High	Medium	Low
2	0	1	1

The assistance provided by officers contacted during this audit is gratefully acknowledged.

Introduction

The Integration Joint Board (IJB) in Orkney was established in 2016 under the Public Bodies (Joint Working) (Scotland) Act 2014, which aimed to enhance the coordination and integration of health and social care services in order to improve outcomes for patients, service users, carers and their families. The membership reflects the equal participation by NHS Orkney (NHSO) as the Health Board and Orkney Islands Council (OIC) as the Local Authority.

Communications and engagement work is undertaken on behalf of the IJB by the relevant communication teams within NHSO and OIC. Broadly, the NHSO team deal with communications around health and the OIC team handle communications around social care. There are some joint communications issued, but these are rare, e.g. the last major one was the communication around the outbreak of COVID-19 in the Orkney care homes.

As a result, whilst subject to the overall strategy and requirements of the IJB, there are procedural differences between the two communications team. The audit of IJB external communications has effectively been an audit of the processes and procedures around external communications issued by each of the teams separately. A complementary audit on internal communications is being undertaken by Azets, the NHSO Internal Auditors.

This review was conducted in conformance with the Public Sector Internal Audit Standards

Audit Scope

The audit work focussed on the period 1 April 2023 to 31 March 2024 for OIC, and the calendar year to 31 December 2023 for NHSO.

The scope of this audit included the following:

- Reviewing various external communication channels (e.g. newsletters, press releases, social media, website etc.).
- Examination of communication materials for accuracy, clarity and appropriateness.
- Evaluation of crisis communications protocols and readiness.
- Analysis of audience engagement metrics and feedback mechanisms.
- Consideration of legal and regulatory compliance in external messaging.
- Collaboration with relevant stakeholders.

Audit Findings

1.0 Statutory and Governance Requirements

- 1.1 Statutes and regulations cover many aspects of the IJB's communications and engagement. The Public Bodies (Joint Working) (Scotland) Act 2014 requires the IJB to publish an Annual Performance Report, which is held on the OIC website. The National Health Service Reform (Scotland) Act 2004 sets out how NHS Boards must engage with local communities to shape local health services. NHSO and OIC work with an external body, the Orkney Partnership Board, to ensure that community organisations have a voice in decisions about public services in line with the Community Empowerment (Scotland) Act 2015.
- 1.2 The IJB has a specific Communications and Engagement Strategy, which sits alongside the NHS Orkney Communications framework and policy, and the OIC Communications and Engagement Strategy. These documents also refer to the Orkney Partnership Communications Strategy and the Community Consultations and Engagement Guide.
- 1.3 The IJB Communications and Engagement Strategy has a number of key principles:
- Good communication is everyone's responsibility - from the Chief Officer to their respective front-line staff.
 - This needs to be a two-way process: it is important to seek and listen to the views and opinions of the public and staff.
 - Communication and engagement activity will be focused, targeted and relevant.
 - Communication should be timely, with information quickly communicated once available.
 - Communication will be proactive, open, and transparent.
 - The language and format used to communicate and engage will be right for the target audience. In most cases this means in plain English and jargon free.
 - Written materials will be made available in formats that are accessible to all.
 - Staff have a right to be well informed and have the opportunity to provide views, ideas, and other feedback
- 1.4 Our audit testing indicated that communications from both NHSO and OIC are being issued in line with the IJB Principles listed above.
- 1.5 In addition to the principles, both NHSO and OIC have protocol and guidance documents on branding, communication and engagement planning, managing websites and social media accounts and dealing with media enquiries which reiterate and reinforce the principles.
- 1.6 Both NHSO and OIC have procedures in place for reviewing and updating relevant documents. All of the core policy documents produced by the IJB, NHSO or OIC referred to at 1.2 above have been reviewed or updated in 2022 or 2023. The Orkney Partnership documents are now six years old (2018), but responsibility for these documents sits outwith the IJB.
- 1.7 The IJB, NHSO and OIC have robust controls in place to ensure that communications are issued in line with statutory and governance requirements.

No Recommendation

2.0 Accuracy, Clarity and Relevance of Communications

- 2.1 For each outlet, NHSO and OIC, communications are mostly initiated in respect of the need to get information to the public, either as part of a planned campaign on a particular issue or as a response to the circumstances of an event. Our audit testing showed that publication of articles was generally timely. For one of the sampled communications within the OIC team there was a delay of six months between the initial work by the press officer and the final publication. Whilst this delay did coincide with a period of long term leave for the press officer, the OIC team had already finalised the materials in good time, but were waiting on authorisation from the service to release the communication, which was not given until other project elements were in place some months later.
- 2.2 Underlying information is provided by Departments for NHSO and Services for OIC, 'good news / people' stories come from staff, Scottish Government have certain campaign focuses, and as noted above, events can dictate the requirement for communications (e.g. "Snowmageddon" Jan/Feb 2024). The information gathering mechanisms appear to be working well and the communications published are a good mix of campaigns (e.g. Stop Smoking), 'good news stories', responses to concerns (e.g. RAAC in hospitals issue / assistance in blocking scam callers) and promoting necessary information (e.g. opening times of healthcare facilities around public holidays).
- 2.3 Staff have access to protocol documents which assist them in drafting articles for publication and specific social media guidance in respect of social media posts. In addition, staff request guidance from the Communications Teams if they have a potentially sensitive post.
- 2.4 For NHSO, articles brought forward by Departments to be published have already been authorised by the Departmental Head. The NHSO Communications team edits articles where required and releases the articles. For both the main social media sites and where Departments have been authorised to set up their own social media sites, the Communications team are administrators and monitor postings throughout the day.
- 2.5 For OIC, press releases and articles are drafted by the Communications team. The procedure is generally that they are then edited by the Team Manager, and authorised by the relevant Director, before being signed off for release by the Corporate Director SPBS. However, audit testing showed that two of the four communications tested (of the 18 communications within the quarter to 31 March 2024) had no evidence of quality checking or authorisation.
- 2.6 Staff should be reminded of the necessity of getting all press releases both quality checked / edited and authorised before the article is released. We recommend the development of some form of tracking spreadsheet to allow monitoring of outstanding editor sign offs and approvals.

Recommendation 1

- 2.7 Guidelines followed by the Communications Teams recognise that the most appropriate medium for any particular message will differ depending on the content and the intended audience. Both teams use newspapers, Radio Orkney, Facebook, Twitter (X), Instagram, and LinkedIn.
- 2.8 Comments and responses to articles published are monitored, and a decision made as to the appropriate response, which may include redirecting members of the public to formal channels for feedback or complaints where appropriate.

- 2.9 Our audit testing showed that for the NHSO communications, there was evidence that there was good use of audience profile to direct articles appropriately, and that communications were consistent across multiple platforms. One article of the 18 tested in the quarter to 31 December 2024 was omitted from Facebook, but included in other social media. This appears to have been an isolated incident.
- 2.10 Our audit testing showed that the OIC communications, press releases and social media have a consistent message, but the tone is varied deliberately to reflect the less formal nature of social media. The main social media used was Facebook. OIC has excellent engagement with its Facebook feed, and is a leader amongst local authorities in Scotland in this area. However, there were limited posts on either Twitter (X) or Instagram. Of the 18 press releases in the quarter to 31 March, only four were reflected on Twitter (X), and none on Instagram. Given the age profile of the users of various social media platform, there is a risk of not reaching younger populations if other channels are not as fully utilised.
- 2.11 The OIC Communications Team should aim to increase their posting of news releases to Twitter (X) and Instagram where appropriate.

Recommendation 2

3.0 Engagement

- 3.1 The IJB has previously used Orkney Opinions, OIC's public consultations group where a range of views is sought. However, at present, Orkney Opinions is on hiatus.
- 3.2 More recently, OIC has been using individual stand-alone consultations on a variety of topics, including those around care, e.g. the Carers Survey (Sept 2023). OIC have also been working with the Orkney Partnership on consultations, e.g. Net Zero Transition Consultation.
- 3.3 There is no formal process for NHSO to undertake community consultation via the Orkney Partnership. Instead NHSO have specific campaigns with the public, e.g. the Community survey in October 2021 which fed into the Clinical Strategy document released in September 2022, and the ongoing 'Engagement Sessions' on NHSO Corporate Strategy 2024-2028.
- 3.4 Our review of prior consultations and surveys showed that both NHSO and OIC are actively consulting with the local community and reflecting the results of those consultations in their future plans.
- 3.5 Social media metrics are available from the various platforms which allow both Communication Teams to monitor and evaluate public engagement. This has driven changes in the timing of posts, i.e. timed to obtain maximum engagement, and been used to show the success of 'out of hours' posts in the event of local crises.

No Recommendation

4.0 Crisis response

- 4.1 NHSO previously had a Service Level Agreement with NHS Shetland which allowed them to have a joint communications team, which operated during crises. Following the ending of that agreement in December 2023, the role of urgent communications and responding to media requests in the event of a crisis has been transferred to the on-call Executive Director. If necessary, communications can also be issued via the Orkney Local Emergency Co-ordination Group (OLECG), which utilises the OIC communications team, and can assist with

communications as required. OIC has a weekly rota for the Duty Tactical Lead, who authorises any necessary urgent communications or press releases.

- 4.2 In the event of being asked to stand-by for a major incident, or a major incident being declared, both OIC and NHSO have Major Emergency / Major Incident Plans which include communications, and lists staff and stakeholder groups that must receive agreed messages. The NHSO plan was recently updated and approved, and refresher training has taken place. Under the plan, the content of all press releases and statements is required to be agreed by the Chair of the (NHSO) Incident Management Team, together with the retention of a comprehensive record of all media releases. The OIC plan was last updated in 2022. Under this the Duty Tactical Lead may call for an OIC Incident Management Team (IMT), which must include a member of the Communication Team by default. The IMT determine the spokesperson and agree media statements.
- 4.3 There are good controls around procedures and authorisations in respect of urgent, crisis and major incident communications.

No Recommendation

Action Plan

Recommendation	Priority	Management Comments	Responsible Officer	Agreed Completion Date
<p>1. Staff should be reminded of the necessity of getting all press releases both quality checked / edited and authorised before the article is released. We recommend the development of some form of tracking spreadsheet would allow monitoring of outstanding editor sign offs and approvals.</p>	<p>Medium</p>	<p>The Council's Communications team has been taking part in a Pathfinder project which has seen a shared files area created on OneDrive. The functionality of this will allow for such tracking to take place. A guidance note will be issued to staff to advise them how to use this and of the protocols around sign off of communications materials.</p>	<p>Communications Team Manager (OIC).</p>	<p>31 December 2024.</p>
<p>2. The OIC Communications Team should aim to increase their posting of news releases to Twitter (X) and Instagram where appropriate..</p>	<p>Low</p>	<p>A review of the social platforms that are available for use will be reviewed as to their likely effectiveness and further protocols developed as a result.</p>	<p>Communications Team Manager (OIC).</p>	<p>31 December 2024.</p>

Key to Opinion and Priorities

Audit Opinion

Opinion	Definition
Substantial	The framework of governance, risk management and control were found to be comprehensive and effective.
Adequate	Some improvements are required to enhance the effectiveness of the framework of governance, risk management and control.
Limited	There are significant weaknesses in the framework of governance, risk management and control such that it could be or become inadequate and ineffective.
Unsatisfactory	There are fundamental weaknesses in the framework of governance, risk management and control such that it is inadequate and ineffective or is likely to fail.

Recommendations

Priority	Definition	Action Required
High	Significant weakness in governance, risk management and control that if unresolved exposes the organisation to an unacceptable level of residual risk.	Remedial action must be taken urgently and within an agreed timescale.
Medium	Weakness in governance, risk management and control that if unresolved exposes the organisation to a significant level of residual risk.	Remedial action should be taken at the earliest opportunity and within an agreed timescale.
Low	Scope for improvement in governance, risk management and control.	Remedial action should be prioritised and undertaken within an agreed timescale.