Gillian Morrison (Interim Chief Officer)

Orkney Health and Care

01856873535 extension: 2611 OHACfeedback@orkney.gov.uk



Agenda Item: 8

Integration Joint Board

Date of Meeting: 30 September 2020.

Subject: Directions.

1. Summary

1.1. The Public Bodies (Joint Working) (Scotland) Act 2014 requires Integration Joint Boards (IJBs) to make Directions to the Council and/or Health Board, and the Integration Joint Board should be provided with an annual report on the monitoring of Directions. Statutory Guidance on Directions introduced in January 2020 requires specific actions to be introduced to improve practice relating to Directions.

2. Purpose

2.1. To note that the current Directions have been monitored and to agree the specific actions required by the Statutory Guidance on Directions, together with the standard format for the IJB's directions to both delivery bodies.

3. Recommendations

The Integration Joint Board is invited to:

3.1. Note that the current Directions, attached as Appendix 1 to this report, have been monitored.

It is recommended:

- 3.2. That the key actions within the 2020 Statutory Guidance, listed in section 6 of this report, be approved.
- 3.3. That the proposed direction template, attached as Appendix 2 to this report, be approved.

4. Background

4.1. The Public Bodies (Joint Working) (Scotland) Act 2014 places a duty on Integration Authorities to develop a Strategic Plan for the functions and budgets under their control.

- 4.2. Integration Authorities require a mechanism to action their Strategic Plans. This mechanism takes the form of legally binding directions from the Integration Authority to one or both of the Local Authority and/or Health Board. Sections 26 to 28 of the Act lay out the legislative framework within which Directions are made.
- 4.3. The Scottish Government has published Statutory Guidance for Integration Authorities with regard to Directions which can be found at the following link: https://www.gov.scot/publications/statutory-guidance-directions-integration-authorities-health-boards-local-authorities/
- 4.4. The Act distinguishes between matters which "**must**" and which "**may**" be included within Directions. For clarity these terms are highlighted in bold throughout this report.

5. Legislative Requirements

- 5.1. Directions **must** set out how each integrated health and social care function is to be exercised, and the budget associated with that function.
- 5.2. Directions **must** be in writing. Directions **may** also vary or revoke other directions previously given to the Council and/or Health Board.
- 5.3. Section 27(4) of the Act prescribes that the Council and Health Board **must** comply with any direction from the IJB. There is no provision by which the Council or Health Board can appeal, ignore, amend or veto any direction given.
- 5.4. Where the IJB directs both the Council and Health Board to carry out a function, it **may** direct that the function is carried out:
- Wholly and jointly by the Council and Health Board.
- With specific aspects of the functions carried out by either the Council or Health Board, as specified in the direction.
- With specific direction as to what both the Council and Health Board must do in relation to carrying out the function.
- 5.5. Directions from the IJB **may** also prescribe the manner in which the function is to be carried out, to whatever level of specificity the IJB sees fit. The exercise of each function can for example be described in terms of delivery of services, achievement of outcomes, or by reference to the Strategic Plan.
- 5.6. The IJB **may** direct the Health Board to use a portion of the "set aside" budget to carry out a function delegated to the IJB for which said budget has been set aside by the Health Board. If the Health Board does not use all of the amount specified within the direction, the IJB **may** request that the Health Board pay the balance to the IJB. If the Health Board requires more resource to deliver the function than allocated in the direction, it **may** require the IJB to reimburse the difference.

6. Statutory Guidance

6.1. Key actions identified within the statutory guidance which officers will implement as consistent practice are set out as follows.

- 6.1.1. A standard covering report format will be introduced, which will include a brief section requiring the report author to decide and record if the report needs a direction to be issued to the Health Board, the Local Authority or both, or that no direction is required.
- 6.1.2. There will be detail on the required delivery of the function and financial resources.
- 6.1.3. The content of a direction should be informed by the content of a report on the function(s) approved by the IJB and should be contained in the same report, using the standard format set out at Appendix 2.
- 6.1.4. Directions should be issued as soon as practicable following approval by the IJB, usually by the IJB Chief Officer to the Chief Executive of either the Health Board or the Local Authority, or both, each in their role as accountable officers to the relevant statutory body.
- 6.1.5. A log of all directions issued, revised, revoked and completed will be maintained. This log should be periodically reviewed by the IJB and used as part of performance management processes, including audit and scrutiny.

7. Format of Directions

- 7.1. No template or model text for directions has been published by the Scottish Government, and none is in development. The format of directions is therefore a matter for local determination, subject to the legislative requirements outlined in section 3.
- 7.2. A draft template for directions from the IJB to the Council and Health Board, is attached as Appendix 2 to this report. Completion of this template will ensure that directions from the IJB comply with statutory requirements.

8. Monitoring of Current Directions

8.1 The current Directions, attached as Annexes 1 to 11, have been monitored and no changes are proposed at present. However, it is the intention of the Chief Officer to introduce more regular use of proposed Directions in keeping with the 2020 Statutory Guidance. Once the new template for Direction is approved the current Directions will be updated.

9. Contribution to quality

Please indicate which of the Orkney Community Plan 2019 to 2022 visions are supported in this report adding Yes or No to the relevant area(s):

Resilience: To support and promote our strong communities.	Yes.
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.	Yes.

Fairness : To make sure socio-economic and social factors are balanced.	Yes.
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.	Yes.
Sustainability: To make sure economic and environmental factors are balanced.	Yes.

10. Resource implications and identified source of funding

- 10.1. There are no financial implications directly arising from this report.
- 10.2. Directions must include the budget allocation made available to the Council and/or the Health Board to deliver the relevant function(s).

11. Risk and Equality assessment

- 11.1. The IJB is required to direct the Council and/or the Health Board to deliver the services to support delivery of the Strategic Plan.
- 11.2. There are no equality implications directly arising from this report.

12. Direction Required

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

NHS Orkney.	No.
Orkney Islands Council.	No.
Both NHS Orkney and Orkney Islands Council.	No.

13. Escalation Required

Please indicate if this report requires escalated to:

NHS Orkney.	No.
Orkney Islands Council.	No.
Both NHS Orkney and Orkney Islands Council.	No.

14. Author

14.1. Gillian Morrison (Interim Chief Officer), Integration Joint Board.

15. Contact details

15.1. Email: gillian.morrison@orkney.gov.uk, telephone: 01856873535 extension 2611.

16. Supporting documents

- 16.1. Appendix 1: Directions Database.
- 16.2. Annex 1: Council Direction.
- 16.3. Annex 2: NHSO Direction.
- 16.4. Annex 3: NHSO Direction.
- 16.5. Annex 4: Council Direction.
- 16.6. Annex 5: Council Direction.
- 16.7. Annex 6: Council Direction.
- 16.8. Annex 7: NHSO Direction.
- 16.9. Annex 8: Council Direction.
- 16.10. Annex 9: Council Direction.
- 16.11. Annex 10: NHSO Direction.
- 16.12. Annex 11: NHSO Direction.
- 16.13. Appendix 2: Directions Template.

Date issued	Direction	Issued to
01.04.16	As is until directed otherwise	Council
01.04.16	As is until directed otherwise	Health Board
04.11.16	Integrated Care Fund	Health Board
	Fostering and Kinship Care	
04.11.16	Integrated Care Fund	Council
17.02.17	Housing Grants - Review of Eligibility Criteria	Council

Link to saved copy

CS.MS.02 Alistair Buchan 01.04.16
CS.MS.03 Cathie Cowan 01.04.16
CS.SJ.09 Cathie Cowan 04.11.16

CS.SJ.10 Alistair Buchan - 04.11.16

CS.SJ.02 Alistair Buchan - 17.02.17

Date issued	Direction	Issued to
18.04.17	Refreshed Strategic Commissioning Plan 2017-2019.	Council
18.04.17	Refreshed Strategic Commissioning Plan 2017-2019.	Health Board
04.08.17	Home Care Pool Car Pilot	Council

Link to saved copy

CS.SJ.08 Alistair Buchan - April 2017 CS.SJ.12 Cathie Cowan - April 2017. IJB.CS.SJ.24 Alistair Buchan - 04.08.17.

Date issued

06.04.18

06.04.18

Direction

Refreshed Strategic Commissioning Plan 2018-2019 Learning Disabilities Nurse Refreshed Strategic Commissioning Plan 2018-2019 Learning Disabilities Nurse Funding Community Justice Planning Alcohol and Drug Partnership Strategy Issued to Link to saved copy

Council CS.SJ.04 Alistair Buchan - April 2018.

Health Board CS.SJ.05 G O'Brien - April 2018

Date issued Direction
PCIP Funding

Issued to Link to saved copy

Health Board PCIP Funding



Caroline Sinclair Chief Officer Orkney and Health and Care (01856) 873535 ext 2601 OHACfeedback@orkney.gov.uk

Our ref: CS/MS/02

1 April 2016

Mr A Buchan Chief Executive Orkney Island Council School Place KIRKWALL Orkney KW15 1NY

Dear Mr Buchan,

Until such time as Orkney's Integration Joint Board issues its first direction, Orkney Islands Council is requested to continue to deliver services pursuant to the functions delegated to the Integration Joint Board, in line with the Integration Joint Board's Strategic Plan and budgets. All actions should remain consistent with the existing policies of the Council and any relevant decisions of the Council in relation to its revenue budget.

Yours sincerely

Caroline Sinclair Chief Officer / Executive Director



Caroline Sinclair Chief Officer Orkney and Health and Care (01856) 873535 ext 2601 OHACfeedback@orkney.gov.uk

Our ref: CS/MS/03

1 April 2016

Mrs C Cowan Chief Executive NHS Orkney Balfour Hospital New Scapa Road KIRKWALL Orkney KW15 1BH

Dear Ms Cowan,

Until such time as Orkney's Integration Joint Board issues its first direction, NHS Orkney is requested to continue to deliver services pursuant to the functions delegated to the Integration Joint Board, in line with the Integration Joint Board's Strategic Plan and budgets. All actions should remain consistent with your existing policies and any relevant decisions in relation to your revenue budget.

Yours sincerely

Caroline Sinclair Chief Officer / Executive Director



Caroline Sinclair
Chief Officer
Orkney and Health and Care
(01856) 873535 ext. 2601
OHACfeedback@orkney.gov.uk

Our ref: CS/SJ/09

4 November 2016

Mrs C Cowan Chief Executive, NHS Orkney, Garden House, New Scapa Road, Kirkwall, Orkney KW15 1BQ

Dear Cathie,

I write on behalf of the Integration Joint Board, following its meeting of 30 September 2016.

At the meeting the Board considered a number of reports and made a number of decisions that result in the need to issue a "direction" to NHS Orkney in line with the Public Bodies (Joint Working) Scotland Act 2014.

I attached the unapproved minute of the meeting and would like to draw your attention to item 10.5 and in particular points 10.5.1 through 10.5.3.

The effect of this "direction" is that a sum of £64,500 of Integrated Care Fund money is to be transferred to Orkney Islands Council to implement the new pilot project and that this project be continued for 2017/18 from the same funding source. The full report the minute refers to is also attached for information.

As Chief Officer accountable to you for matters of service delivery, I will proceed to implement this direction on your behalf unless you advise otherwise.

Yours sincerely,

Caroline Sinclair
Chief Officer, Orkney Health and Care

Cc Hazel Robertson, Director of Finance

Cc Pat Robinson, Chief Finance Officer



4 November 2016

Caroline Sinclair
Chief Officer
Orkney and Health and Care
(01856) 873535 ext 2601
OHACfeedback@orkney.gov.uk

Mr A Buchan Chief Executive, Orkney Island Council, School Place, Kirkwall, Orkney KW15 1NY

Dear Alistair,

I write on behalf of the Integration Joint Board, following its meeting of 30 September 2016.

At the meeting the Board considered a number of reports and made a number of decisions that result in the need to issue a "direction" to Orkney Islands Council in line with the Public Bodies (Joint Working) Scotland Act 2014.

I attached the unapproved minute of the meeting and would like to draw your attention to items: 10.3 Fostering and Kinship Care – Financial Policy and Procedure 10.5 Integrated Care Fund, in particular 10.5.1 through 10.5.3.

The effect of these "directions" are to introduce a policy change in relation to payments made to Foster and Kinship Carers and to transfer a sum of £64,500 of Integrated Care Fund money from NHS Orkney to Orkney Islands Council to implement a new pilot project, which will be continued from the same funding source for 2017/18. The full reports the minutes refer to are also attached for information.

As Chief Officer accountable to you for matters of service delivery, I will proceed to implement this direction on your behalf unless you advise otherwise.

Yours sincerely,

Caroline Sinclair Chief Officer / Executive Director, Orkney Health and Care

Cc Gareth Waterson, Head of Finance Cc Pat Robinson, Chief Finance Officer



17 February 2017

Mr A Buchan Chief Executive, Orkney Island Council, School Place, Kirkwall, Orkney KW15 1NY

Dear Alistair,

I write on behalf of the Integration Joint Board, following its meeting of 7 December 2016.

At the meeting the Board considered a number of reports and made a number of decisions that result in the need to issue a "direction" to Orkney Islands Council in line with the Public Bodies (Joint Working) Scotland Act 2014.

Caroline Sinclair Chief Officer

Orkney and Health and Care (01856) 873535 ext 2601 OHACfeedback@orkney.gov.uk

I attached the unapproved minute of the meeting and would like to draw your attention to item: 13.1 Housing Grants – Review of Eligibility Criteria

The effect of this "direction" is to introduce a policy change in relation the Test of Means in awarding grants to housing adaptions in private sector housing and the establishment of a waiting list for when funds allocated are already committed. The full report the minute refered to is also attached for information.

As Chief Officer accountable to you for matters of service delivery, I will proceed to implement this direction on your behalf unless you advise otherwise.

Yours sincerely,

Caroline Sinclair
Chief Officer / Executive Director, Orkney Health and Care

Cc Gareth Waterson, Head of Finance Cc Pat Robinson, Chief Finance Officer



18 April 2017

Caroline Sinclair Chief Officer Orkney and Health and Care (01856) 873535 ext 2601 OHACfeedback@orkney.gov.uk

Mr A Buchan Chief Executive, Orkney Island Council, School Place, Kirkwall, Orkney KW15 1NY

Dear Alistair,

I write on behalf of the Integration Joint Board, following its meeting of 10 March.

At the meeting the Board considered a number of reports and made a number of decisions that result in the need to issue a "direction" to Orkney Islands Council in line with the Public Bodies (Joint Working) Scotland Act 2014.

I attached the unapproved minute of the meeting and would like to draw your attention to item 14.2 Refreshed Strategic Commissioning Plan 2017-2019.

The effect of the "direction" is to request that the Council deliver services pursuant to the functions delegated to the Integration Joint Board, in line with the Board's Strategic Plan and budgets, including the specific commissioned actions set out in section two of the Strategic Commissioning Plan. All actions should remain consistent with your existing policies and any relevant decision in relation to your revenue budget. The full report and the minute referred to is attached for information.

At the meeting the Board also considered the Change Programme's Change Review – Outsourcing and Partnership's recommendation for the IJB which related to testing the market for alternative care services providers for future developments and have accepted this recommendation.

As Chief Officer accountable to you for matters of service delivery, I will proceed to implement this direction on your behalf unless you advise otherwise.

Yours sincerely,

Caroline Sinclair
Chief Officer / Executive Director, Orkney Health and Care

cc Gareth Waterson, Head of Finance Pat Robinson, Chief Finance Officer



18 April 2017

Mrs C Cowan Chief Executive NHS Orkney Garden House New Scapa Road Kirkwall Orkney KW15 1BH

Dear Cathie,

I write on behalf of the Integration Joint Board, following its meeting of 10 March.

At the meeting the Board considered a number of reports and made a number of decisions that result in the need to issue a "direction" to Orkney Islands Council in line with the Public Bodies (Joint Working) Scotland Act 2014.

Caroline Sinclair Chief Officer

Orkney and Health and Care (01856) 873535 ext 2601 OHACfeedback@orkney.gov.uk

I attached the unapproved minute of the meeting and would like to draw your attention to item 14.2 Refreshed Strategic Commissioning Plan 2017-2019.

The effect of the "direction" is to request that the Council deliver services pursuant to the functions delegated to the Integration Joint Board, in line with the Board's Strategic Plan and budgets, including the specific commissioned actions set out in section two of the Strategic Commissioning Plan. All actions should remain consistent with your existing policies and any relevant decision in relation to your revenue budget. The full report and the minute referred to is attached for information.

As Chief Officer accountable to you for matters of service delivery, I will proceed to implement this direction on your behalf unless you advise otherwise.

Yours sincerely,

Caroline Sinclair
Chief Officer / Executive Director, Orkney Health and Care

cc Hazel Robertson, Director of Finance Pat Robinson, Chief Finance Officer



Our ref: IJB/CS/SJ/24

04 August 2017

Mr A Buchan Chief Executive, Orkney Island Council, School Place, Kirkwall, Orkney KW15 1NY

Dear Alistair,

I write on behalf of the Integration Joint Board, following its meeting of 27 June.

At the meeting the Board considered a number of reports and made a decision that results in the need to issue a "direction" to Orkney Islands Council in line with the Public Bodies (Joint Working) Scotland Act 2014.

Caroline Sinclair Chief Officer

Orkney and Health and Care (01856) 873535 ext 2601 OHACfeedback@orkney.gov.uk

I attached the unapproved minute of the meeting and would like to draw your attention to item 21 – Home Care Pool Car Pilot.

The effect of the "direction" is to request that the Council ceases to deliver the Home Care Pool Car Pilot scheme. The full report and the minute referred to is attached for information.

As Chief Officer accountable to you for matters of service delivery, I will proceed to implement this direction on your behalf unless you advise otherwise.

Yours sincerely,

Caroline Sinclair
Chief Officer / Executive Director, Orkney Health and Care

cc Gareth Waterson, Head of Finance Pat Robinson, Chief Finance Officer



Caroline Sinclair
Chief Officer
Orkney and Health and Care
(01856) 873535 ext 2601
OHACfeedback@orkney.gov.uk

Our ref: CS/SJ/04

06 April 2018

Mr A Buchan Chief Executive, Orkney Island Council, School Place, Kirkwall, Orkney KW15 1NY

Dear Alistair,

I write on behalf of the Integration Joint Board, following its meeting of 14 March 2018.

At the meeting the Board considered a number of reports and made a number of decisions that result in the need to issue a "direction" to Orkney Islands Council in line with the Public Bodies (Joint Working) Scotland Act 2014.

I attached the unapproved minute of the meeting and would like to draw your attention to item 10 Refreshed Strategic Commissioning Plan 2018-2019.

The effect of the "direction" is to request that the Council deliver services pursuant to the functions delegated to the Integration Joint Board, in line with the Board's Strategic Plan and budgets as allocated to service in appendix 1, including the specific commissioned actions set out in section two, three and four of the Strategic Commissioning Plan. All actions should remain consistent with your existing policies and any relevant decision in relation to your revenue budget. The full report and the minute referred to is attached for information.

At the meeting the Board also considered item 9 Budget for 2018 to 2019. The Board considered the budget and agreed to implement the proposed savings except for the removal of the post of Learning Disabilities Nurse, where they have directed NHS Orkney to find an alternative source of funding to retain this post. The saving to the Council relating to that post will still be delivered, just not in the detailed means described in the Council's budget plan. The full report and the minute referred to is attached for information.

Another consideration by the Board was item 12 Orkney Community Justice Partnership. The Board approved the contribution to implementation of the plan to be made by services within the strategic planning of Orkney Health and Care. The full report and the minute referred to is attached for information.

As Chief Officer accountable to you for matters of service delivery, I will proceed to implement this direction on your behalf unless you advise otherwise.

Yours sincerely,

Caroline Sinclair Chief Officer / Executive Director, Orkney Health and Care

cc Gareth Waterson, Head of Finance Pat Robinson, Chief Finance Officer



Caroline Sinclair Chief Officer Orkney and Health and Care (01856) 873535 ext 2601 OHACfeedback@orkney.gov.uk

Our ref: CS/SJ/05

06 April 2018

Mr G O'Brien Chief Executive, NHS Orkney, New Scapa Road, Kirkwall, Orkney KW15 1BH

Dear Gerry,

I write on behalf of the Integration Joint Board, following its meeting of 14 March 2018.

At the meeting the Board considered a number of reports and made a number of decisions that result in the need to issue a "direction" to NHS Orkney in line with the Public Bodies (Joint Working) Scotland Act 2014.

I attached the unapproved minute of the meeting and would like to draw your attention to item 10 Refreshed Strategic Commissioning Plan 2018-2019.

The effect of the "direction" is to request that NHS Orkney deliver services pursuant to the functions delegated to the Integration Joint Board, in line with the Board's Strategic Plan and budgets as allocated to service in appendix 1, including the specific commissioned actions set out in section two, three and four of the Strategic Commissioning Plan. All actions should remain consistent with your existing policies and any relevant decision in relation to your revenue budget. The full report and the minute referred to is attached for information.

At the meeting the Board also considered item 9 Budget for 2018 to 2019. The Board considered the budget and noted that the funding for the Learning Disabilities Nurse post was removed as a saving. The Board accepted all of the Council's proposed savings but did not wish to lose the above post for Orkney services. The Board wishes to direct NHS Orkney to find alternative baseline funding for this post by making compensatory savings in other areas to enable this to happen. The Integration Joint Board has delegated authority to the Chief Finance Officer to realign NHS OHAC budgets as appropriate in order to achieve this direction.

Another consideration by the Board was item 12 Orkney Community Justice Partnership. The Board approved the contribution to the plan to be made by NHS services within the strategic planning of Orkney Health and Care. The full report and the minute referred to is attached for information.

Finally, the Board consider item 20 Alcohol and Drug Partnership. The Board approved the Alcohol and Drugs Partnership Strategy Group's recommendation to implement a revised approach to the delivery of Alcohol Brief Interventions. The details are outlined in the covering report at section 4.8

and in appendix 2, attached for information. This approved change also constitutes a direction to NHS Orkney for implementation.

As Chief Officer accountable to you for matters of service delivery, I will proceed to implement these directions on your behalf unless you advise otherwise.

Yours sincerely,

Caroline Sinclair Chief Officer / Executive Director, Orkney Health and Care

cc Derek Lonsdale, Head of Finance Pat Robinson, Chief Finance Officer



Working together to make a real difference

SS/SJ/41

October 2019

Mr Gerry O'Brien Chief Executive NHS Orkney The Balfour Forelands Road Kirkwall Orkney KW15 1NZ

Dear Gerry

I write on behalf of the Integration Joint Board (IJB), following its meeting on 2 October 2019.

At the meeting the Board considered a report on Primary Care Improvement Plan Budget. The report recommended a spend for improvement in Primary Care in relation to:

- Musculosketal Services.
- Mental Health Services.
- Vaccine Transformational Services.

The IJB agreed with the recommendation and due to this the IJB is issuing a direction to NHS Orkney in line with the Public Bodies (Joint Working) (Scotland) Act 2014.

I attached the unapproved minute of the meeting and would like to draw your attention to item 14.

The direction will be to employ:

- 2 x MSK Physiotherapists.
- 1 x Mental Health Primary Care Worker
- 1 x Vaccine Transformation Nurse.





Resource/Practitioners.	Full Year Costs £.
2 x Band 7 MSK Physiotherapists.	121,258.
1 x Band 6 Mental Health Primary Care Worker.	51,649.
1 x 0.75 Band 5 Vaccine Transformation Nurse.	31,308.
On Costs (Travel, Telephone etc) working on 3% of cost.	6,126.
Total	210,341.

As Chief Officer accountable to you for matters of service delivery, I will proceed to implement this direction on your behalf unless you advise otherwise.

Yours Sincerely

Sally Shaw
Chief Officer / Executive Director
Orkney Health and Care







Integration Joint Board Direction Template.

Reference	Reference number e.g. 2020.01
Date direction issued	Date of Meeting.
Date direction in effect from	Date to be determined by Integration Joint Board.
Direction issued to (delete as appropriate)	Orkney Islands Council. NHS Orkney. Both Orkney Islands Council and NHS Orkney.
Does this direction supersede, amend or cancel a previous direction – If yes, include reference number(s) (delete as appropriate)	No. Yes, reference xx.
Service area covered by direction	List service areas subject to the direction, e.g. Dental Services, Primary Care.
Detail of Direction	Outline clearly what the direction entails.
Budget allocated for this direction	Detail of the financial resource allocated.
Outcome(s) to be achieved	Detail of what the direction is intended to achieve. Should link to Strategic Plan and relevant performance indicators.
How will this be measured	In line with the agreed performance framework.

Date of direction review Annual, unless required otherwise.
