



## RISK AUDIT AND PERFORMANCE COMMITTEE

<b>Date of Meeting</b>	19 November 2025
<b>Report Title</b>	Directions and Data Protection Impact Assessments Update Report
<b>Report Number</b>	HSCP25.091
<b>Lead Officer</b>	Alison MacLeod, Strategy and Transformation Lead
<b>Report Author Details</b>	Name: Alison MacLeod Job Title: Strategy and Transformation Lead Email Address: <a href="mailto:alimacleod@aberdeencity.gov.uk">alimacleod@aberdeencity.gov.uk</a>
<b>Consultation Checklist Completed</b>	Yes
<b>Directions Required</b>	No
<b>Exempt</b>	No
<b>Appendices</b>	A. Directions Tracker B. Record of Data Protection Impact Assessments (DPIAs)
<b>Terms of Reference</b>	6. Instruct Performance Reviews and related processes.

### 1. Purpose of the Report

- 1.1. This report presents the six-monthly update on the status of Directions and Data Protection Impact Assessments (DPIAs) made by the Integration Joint Board (IJB) to Aberdeen City Council (ACC) and NHS Grampian (NHSG).

### 2. Recommendations

- 2.1. It is recommended that the Risk, Audit and Performance Committee:

- a) Notes the detail and updates contained within the report and the two appendices.



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### 3. Strategic Plan Context

- 3.1. Under Section 26 of the Public Bodies (Joint Working) (Scotland) Act 2014, in order to carry out the functions delegated, the IJB must give Directions to a constituent authority. For Aberdeen City IJB the constituent authorities are ACC and NHSG. Monitoring the effectiveness of the Direction process provides assurance that activity is being undertaken to help further the delivery of the Strategic Plan. Many of the Directions made are linked directly to specific programmes or projects as set out in the Delivery Plan.
- 3.2. A Data Protection Impact Assessment (DPIA) is a process designed to help the systematic analysis of the data protection risks of a project or plan and the identification of mitigating actions. It is a key part of accountability obligations under the UK General Data Protection Regulation (GDPR). Recording DPIAs helps to assess and demonstrate compliance of the Strategic Plan with GDPR regulation.

### 4. Summary of Key Information

- 4.1. 'Health and Social Care Integration Statutory Guidance - Directions from Integration Authorities to Health Boards and Local Authorities', published in January 2020, states that there should be a log kept of all Directions made. At its meeting on 23 September 2020, the Risk Audit and Performance Committee (RAPC) agreed that a report on Directions would be presented every 6 months to review this log and provide assurance that the Directions were being issued and actioned in accordance with the 2014 Act.
- 4.2. Members agreed at the RAPC on 23rd June 2022 to a new 'traffic lights' system with four classifications to indicate the status of Directions. The classifications are as follows;

**GREEN** (Ongoing) indicating where the current direction is still valid, in place and not due for renewal or completion.

**AMBER** (Due) indicating Directions which are due for renewal or completion within the 6 months following the date of the Committee where the report is presented, including those which are at risk of not being completed within the timescale and / or within the allocated budget. In the case of the latter, an update to RAPC is required.

**RED** (Concern) indicating Directions which have either:



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- a) Not been implemented due to issues with implementation e.g. no service available to deliver on the direction; or
- b) Directions which have expired and have not been reported as renewed or completed.

**GREY** (Complete) – indicating Directions where the date has expired, and the direction is either no longer required or has been superseded by a new direction. It also includes Directions which have been completed within a set timescale and will not be required to continue beyond that.

**4.3.** Appendix A shows all 'open' Directions and those Directions which were reported previously to the RAPC meeting in June 2025 but have since had a change in status. Those that are now complete will be archived for future reports. Six Directions have been added to the spreadsheet since the last report – two from the IJB meeting on 18<sup>th</sup> March 2025, three from the IJB meeting on 1<sup>st</sup> July 2025 and one from the IJB meeting on 30<sup>th</sup> September 2025. There were no Directions made at the IJB meeting on 13<sup>th</sup> May 2025.

**4.4.** Please note the two Directions from the 18<sup>th</sup> March meeting in relation to the Annual Budget should have been recorded in the last report to Committee but were inadvertently omitted. Two from the 1<sup>st</sup> July meeting are in relation to Shifting the Balance of Care and the remaining one is in relation to commissioning the Discharge to Assess Service which is linked to the Shifting the Balance of Care report. The direction from the 30<sup>th</sup> September meeting is to utilise the grant funding provided by the Scottish Government, Invest to Save Fund, to design, develop and implement the Practitioner Application, Practitioner Search functionality, Initial Point of Contact and Single Point of Contact. The funding is to be utilised by 31<sup>st</sup> March 2026.

**4.5.** Five Directions have been closed since the last report to committee. Two in relation to the Medium Term Financial Framework have been superseded by the Directions linked to the Annual Budget Report approved on 18<sup>th</sup> March 2025. Two in relation to Rosewell House have been superseded by two linked to the Shifting the Balance of Care report approved on 1<sup>st</sup> July 2025. The final Direction which has been closed is in relation to the First Contact Mental Health and Wellbeing Service. This Direction was actually superseded by a Direction relating to report 23.056 MH Community Intervention Services, approved by the IJB meeting on 22<sup>nd</sup> August 2023 and should have been updated in previous reports. Again this had been inadvertently omitted but was picked up during an audit of the Directions Register.



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- 4.6.** The Directions in Appendix A are sorted in chronological order of the 'Effective To' date, starting with the oldest date. The total number of 'open' Directions reported is 31. It should be noted that some IJB decisions require a Direction to be made to both ACC and NHSG. Five (16.1%) are now complete (Grey category) and will be removed from the report for the next iteration. 19 (61.3%) are classified as Green (still live within their timescale), and seven (22.6%) are Amber (timescale expiring within 6 months of the date of this meeting). Three of the services that these relate to are due to be the subject of a report to the IJB meeting on 2<sup>nd</sup> December, one is subject to a report due at IJB on 3<sup>rd</sup> February 2026, and two are scheduled to be discussed at the IJB meeting on 17<sup>th</sup> March 2026. The final Amber Direction is due to expire once the digital innovations are complete. There are no Directions in the Red (expired) category.
- 4.7.** As part of the 2022/23 Internal Audit Programme an audit was undertaken on Data Sharing. One of the recommendations was to ensure assurance is obtained that Data Protection Impact Assessments (DPIAs) are completed where appropriate and that a register of these is held by each Data Controller. It was agreed to add this assurance to the process of capturing and monitoring Directions. The record of Data Protection Impact Assessments (DPIAs) is attached at Appendix B. The committee should note that an audit of the DPIAs reported to RAPC is due to be undertaken in advance of the next scheduled report in conjunction with the Data Protection Officers (DPOs) from both ACC and NHSG.

### **5. Implications for Risk Audit and Performance Committee**

#### **5.1. Equalities, Fairer Scotland and Health Inequality**

As this is a report on performance and no changes to service delivery are proposed, there is no requirement for an impact assessment to be undertaken and there are no direct implications in respect of Equality, Fairer Scotland or Health Inequality. The individual reports which prompted the Directions referred to within this report would have been subject to impact assessments where relevant.

#### **5.2. Financial**

There are no direct financial implications as a result of the recommendations in this report. The individual reports which prompted the Directions referred to within this report would have noted the financial implications and the budget would have been identified within the Direction.



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### **5.3. Workforce**

There are no direct workforce implications as a result of the recommendations in this report. The individual reports which prompted the Directions referred to within this report would have noted the workforce implications and links to the Workforce Plan.

### **5.4. Legal**

The monitoring of the Directions Log ensures that the IJB is discharging the requirement under the Health and Social Care Integration Statutory Guidance- Directions from Integration Authorities to Health Boards and Local Authorities (Jan 2020).

The recording and monitoring of DPIAs ensures compliance with GDPR legislation.

### **5.5. Unpaid Carers**

There are no direct implications for Unpaid Carers as a result of the recommendations in this report.

### **5.6. Information Governance**

This report seeks to provide assurance on Information Governance Arrangements relevant to decisions and Directions made by the IJB as part of the delivery of the Strategic Plan.

### **5.7. Environmental Impacts**

There are no direct environmental implications arising from the recommendations in this report.

### **5.8. Sustainability**

There are no direct sustainability implications arising from the recommendations in this report.

### **5.9. Other**

None.



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### 6. Management of Risk

#### 6.1. Identified risks(s)

There is a risk that if the Directions Log is not reviewed on a regular basis there would be no assurance that the IJB is discharging the requirement under the Health and Social Care Integration Statutory Guidance- Directions from Integration Authorities to Health Boards and Local Authorities (Jan 2020).

There is a risk that if DPIAs are not reviewed on a regular basis there would be no assurance on compliance with GDPR.

#### 6.2. Link to risks on strategic or operational risk register:

This report links to Risk 4 on the Strategic Risk Register,

Cause: Performance standards/outcomes are set by national and regulatory bodies and those locally determined performance standards are set by the board itself.

Event: There is a risk that the IJB, and the services that it directs and has operational oversight of, fails to meet the national, regulatory and local standards.

Consequence: This may result in harm or risk of harm to people.

#### 6.3. How might the content of this report impact or mitigate the known risks:

The 6 monthly Directions and DPIA Update Report provides the necessary regular review and assurance.



## APPENDIX A

Direction in relation to	Total Budget	Report No. (HSCP)	Lead Officer	ACC/ NHSG	Date Approved	Effective To	Status	Narrative
Medium Term Financial Framework (MTFF)	£131,067,000	24.012	Chief Finance Officer	ACC	01/04/24	31/03/25		Direction closed. Superseded by Direction relating to report reference 25.019, Annual Budget Report , IJB meeting 18/03/25
Medium Term Financial Framework (MTFF)	£266,000,000 (of which approximately £30M relates to Hosted Services and £53M is set aside for large hospital services)	24.012	Chief Finance Officer	NHSG	01/04/24	31/03/25		Direction closed. Superseded by Direction relating to report reference 25.019, Annual Budget Report , IJB meeting 18/03/25
First Contact Mental Health and Wellbeing	£1,462,733.00	21.045	Lead Commissioner	ACC	25/05/21	31/08/25		Direction closed. Superseded by Direction relating to report 23.056 MH community Intervention Services, IJB meeting 22 <sup>nd</sup> August 2023.
Rosewell House	Existing Budget	23.054	Chief Officer	NHSG	22/08/23	31/12/25		Direction closed. Superseded by Direction relating to report 25.054 shifting the Balance of Care, IJB meeting 1 <sup>st</sup> July 2025
Rosewell House	Existing Budget	23.054	Chief Officer	ACC	22/08/23	31/12/25		Direction closed. Superseded by Direction relating to report 25.054 shifting the Balance of Care, IJB meeting 1 <sup>st</sup> July 2025





Direction in relation to	Total Budget	Report No. (HSCP)	Lead Officer	ACC/ NHSG	Date Approved	Effective To	Status	Narrative
Grants Funding	£438,141	25.021	Lead Commissioner	ACC	18/03/25	31/03/26		Direct Award of grant funding to 8 organisations for 12 months. Report on future funding scheduled to come to IJB 2 <sup>nd</sup> December 2025.
Annual Budget Report	£137.729m	25.019	Chief Finance Officer	ACC	18/03/25	31/03/26		All adult social care services covered by the Aberdeen City Integration Scheme. Report on future years budget due to come to IJB 17 March 2026.
Annual Budget Report	£235.066m of which approx. £32m relates to Hosted Services and £55.55m is set aside for large hospital services.	25.019	Chief Finance Officer	NHSG	18/03/25	31/03/26		All community health services covered by the Aberdeen city Integration Scheme. Report on future years budget due to come to IJB 17 March 2026.
Shifting the Balance of Care	£6.4m	25.054	Chief Nurse	ACC	01/07/25	31/03/26		Commission the supply of appropriate social care service for the Discharge to Assess Service. Update on progress and mitigation plans due to come to IJB 2 <sup>nd</sup> December 2025
Shifting the Balance of Care		25.054	Chief Nurse	NHSG	01/07/25	31/03/26		Provision of nursing, specialist geriatric and allied health profession services. Update on progress and mitigation plans due to come to IJB 2 <sup>nd</sup> December 2025





Direction in relation to	Total Budget	Report No. (HSCP)	Lead Officer	ACC/ NHSG	Date Approved	Effective To	Status	Narrative
Digital Innovation Programme and Technology Enabled Care,	£1,238, 627	25.057	Chief Officer Adult Social Work	ACC	30/09/25	31/03/26		To utilise the grant funding provided by the Scottish Government, Invest to Save Fund, to design, develop and implement the Practitioner Application, Practitioner Search functionality, Initial Point of Contact and Single Point of Contact digital innovations.
Annual Procurement Workplan 2025/26	£42,554,350	25.007	Strategic Procurement Manager (Social Care)	ACC	04/02/25	05/04/26		One year contract extension of 23 residential services for older people under the National Care Home Contract. Annual Procurement workplan due to be considered at IJB on 3 <sup>rd</sup> February 2026 will propose future arrangements.
Supplementary Workplan	£3,616,748.00	20.001	Strategic Procurement Manager (Social Care)	ACC	09/06/20	30/06/26		Training and Skills commissioned services listed on contracts register which is reviewed at least annually. Review scheduled for January 2026.
Annual Procurement Plan	£56,205,827.00	21.008	Lead Commissioner	ACC	23/02/21	30/09/26		Various commissioned services only two of which remain open. One of these is reviewed annually and the other is due to end Sept 2026. A review of the service is currently underway as part of the overall contract review of commissioned contracts as part of the budget savings work.



Direction in relation to	Total Budget	Report No. (HSCP)	Lead Officer	ACC/ NHSG	Date Approved	Effective To	Status	Narrative
Alcohol and Drugs Partnership (ADP) Investment Programme	ADP Budget	22.037	Lead for Community MHL	NHSG	07/06/22	30/06/27		Scheduled for review a minimum of 12 months in advance of the end date.
Alcohol and Drugs Partnership (ADP) Investment Programme	ADP Budget	22.037	Lead for Community MHL	ACC	07/06/22	30/06/27		Scheduled for review a minimum of 12 months in advance of the end date.
Morse Community Electronic Patient Record Evaluation and Contract Renewal	£913,042.00	24.030	Lead for Strategy and Transformation	NHSG	07/05/24	01/10/27		Approved at IJB May 2024. Budget is maximum required, could be less if Shire and Moray come on board. Contract review will be undertaken a minimum of 12 months prior to contract end date.
Supplementary Workplan	£42,391,380.00	22.098	Strategic Procurement Manager (Social Care)	ACC	29/11/22	31/03/28		Various commissioned services all listed on Contracts Register which is reviewed at least annually. Review date will be noted on 2027/28 Annual Procurement Workplan.
Supplementary Procurement Workplan 2024/25	£146,096,300	24.007	Chief Officer	ACC	01/04/24	31/03/28		Bon Accord Support Services including variation to detail (not timescale) of original Direction in relation to Rosewell House
Aberdeen City Vaccination and Wellbeing Hub	c £300,000	24.047	Lead for People and Organisation	NHSG	09/07/24	09/05/28		Extension of provision of Wellbeing Hub at current location. Budget in relation to additional rental, maintenance, cleaning, utilities etc. only.



Direction in relation to	Total Budget	Report No. (HSCP)	Lead Officer	ACC/ NHSG	Date Approved	Effective To	Status	Narrative
Supplementary Workplan	£12,887,689.00	22.066	Strategic Procurement Manager (Social Care)	ACC	30/08/22	30/11/28		ADP and MH commissioned services all listed on Contracts Register which is reviewed at least annually. Review date will be noted on 2028/29 Annual Procurement Workplan.
Annual Procurement Workplan	£110,536,534.00	23.002	Strategic Procurement Manager (Social Care)	ACC	31/01/23	31/03/29		Various commissioned services all listed on Contracts Register which is reviewed at least annually. Review date will be noted on 2028/29 Annual Procurement Workplan.
Independent Advocacy	£2,059,612.00	23.018	Strategic Procurement Manager (Social Care)	ACC	25/04/23	30/09/29		On Grants Register which is reviewed at least annually. Review date will be noted on 2029/30 Annual Procurement Workplan.
Procurement Workplan (MH Community Intervention Services)	£4,824,046.00	23.056	Strategic Procurement Manager (Social Care)	ACC	22/08/23	31/10/29		Listed on Contracts Register which is reviewed at least annually. Review date will be noted on 2029/30 Annual Procurement Workplan.
Link Practitioner Service	£6,129,974.00	22.062	Lead for Strategy and Transformation	NHSG	30/08/22	31/03/30		Funded by PCIP – on Programme for review prior to end of contract.
Annual Procurement Workplan 2025/26	£18,356,085	25.007	Strategic Procurement Manager (Social Care)	ACC	04/02/25	31/03/30		Direct award of six contracts to Care Homes for adults with learning disabilities for a period of five years



Direction in relation to	Total Budget	Report No. (HSCP)	Lead Officer	ACC/ NHSG	Date Approved	Effective To	Status	Narrative
Annual Procurement Workplan 2025/26	£5,650,518	25.007	Strategic Procurement Manager (Social Care)	ACC	04/02/25	30/06/30		5 year extension for a residential service supporting people with substance use issues
Discharge to Assess Service	£7,263,704	25.062	Chief Officer	ACC	01/07/25	20/08/30		Undertake a Discharge to Assess service – linked to Shifting the Balance report 25.054, IJB Meeting 1 <sup>st</sup> July 2025
Annual Procurement Workplan 2024/25	£220,737,528	24.004	Chief Officer	ACC	01/04/24	31/03/31		Various commissioned services including NCHC, Housing Support, Complex Care Support Services which are listed on the Contracts Register and Grant Funded Services which are listed on the Grants Register. Both registers are reviewed at least annually.
Supplementary Procurement Workplan 2024/25	£117,716,381	24.026	Chief Officer	ACC	07/05/24	31/10/31		Care and Support at Home Services. Listed on the contracts Register which is reviewed at least annually. Review date will be noted on 2031/32 Annual Procurement Workplan. – contract will be reviewed a minimum of one year prior to contract expiry date.
Supplementary Procurement Workplan 2024/25	£200,250 (extension) + £7,103,102 (re-tender)	24.066	Chief Officer	ACC	24/09/24	31/03/32		Carers Support Services – 4 month extension to Adult Carers Support Service and retendering of both Adult and young Carers Support Services.



## APPENDIX B

### Record of DPIAs

Topic	Service	Partner	Date Submitted	Date Approved	Comments
MORSE Integration with TrakCare	Nursing, AHPs	NHSG	June 2023	April 2024	Approved
Transitions Survey	MHLD	ACC	06/06/23	06/06/23	
Community Mental Health Interventions Commissioning	MHLD	ACC	Oct 2023	Oct 2023	
Adult Mental Health Mapping	MHLD	NHSG	09/02/24	12/02/24	
CNOT (Community Nursing Outreach Team) at Middlefield Hub	Primary Care	NHSG	20.03.24	22.03.24	
Complex Care	MHLD	ACC	06/06/2024	-	
GIRFE Pathfinder (Older People)	ASW	ACC	01/06/23		
GIRFE Pathfinder (Transitions)	MHLD	ACC	01/06/23		
Assisted Care Robots	ASW	ACC	14/03/24	19/03/24	On Hold
MORSE Document Upload	Nursing AHPs	NHSG	Nov 2024	-	
Shared Federated Vision	Primary Care	NHSG	26/08/24		Approval Pending
eMAR	LD	ACC	04/12/24	04/12/24	
Stoneywood TEC	LD	ACC	03/03/25	03/03/25	
Eventbrite for Community Appointment Day (CAD) bookings	Vaccinations	NHSG	29/04/25	-	Currently with DPO for Review.