Internal Audit Report

Education & Children's Services
and
Aberdeen City Health & Social Care Partnership

CareFirst System

EXECUTIVE SUMMARY

CareFirst is a web based, multi modular Case Management system commonly used by local authorities for recording care arrangements, statutory interventions and related events pertaining to Social Care Service Users. In addition to case recording, CareFirst has functionalities which enable the Council to control payments to external care providers and the delivery of Services to meet assessed needs. It also holds financial assessment data to determine whether and to what extent Service Users contribute towards their care.

The objective of this audit was to consider whether appropriate control is being exercised over the CareFirst system, including contingency planning and disaster recovery, and its data input, and, in addition, that interfaces to and from other systems are accurate and properly controlled. In general this is the case, and minor improvements have been recommended and agreed with the Service in respect of routine maintenance activities and checks. Further enhancements to security will be added as part of a planned upgrade from the supplier.

Disaster recovery has still to be tested following a change in Data Centre provider, and Children's Social Work and the Health & Social Care Partnership Business Continuity Plans are still in development.

Annual expenditure on the system is in excess of EU tendering thresholds and the system has not been market tested to determine whether Best Value is being delivered. The Service will work with Commercial & Procurement Services to determine an appropriate action plan in respect of the system.

Whilst the charging policy was under review it was agreed that Non-Residential financial re-assessments would not be carried out, resulting in assessments not having been done since 2013. This may mean that incorrect contributions have been paid in the interim. Since the new policy was agreed in August 2016, plans have been put in place to bring all assessments up to date.

1.   INTRODUCTION

1.1   CareFirst is a web based, multi modular Case Management system commonly used by local authorities for recording care arrangements, statutory interventions and related events pertaining to Social Care Service Users.   The system has been utilised by Aberdeen City Council since 1999.

1.2   CareFirst Users are generally front line Practitioners involved in either Children's or Adult Social Work, some Housing staff and staff who provide finance and administrative support to the Social Work teams.   These users access the system from within the Council's network.   Users from external agencies, including Bon Accord Care and the NHS, can access CareFirst data via a Multi-Agency View.

1.3   In addition to case recording, CareFirst has functionalities which enable the Council to control payments to external care providers and the delivery of Services to meet the Service Users' Assessed needs.   It also holds financial assessment data to determine whether and to what extent Service Users contribute towards their care.

1.4   CareFirst has reporting functionalities which can make management information available to the CareFirst Team, Social Work Staff and Service Accountants which, amongst other things, enables them to monitor care arrangements and costs, system data quality, budget forecasting, and assists in completing statutory returns and responding to Freedom of Information and Subject Access requests.

1.5   The objective of this audit was to consider whether appropriate control is being exercised over the CareFirst system, including contingency planning and disaster recovery, and its data input, and, in addition, that interfaces to and from other systems are accurate and properly controlled.

1.6   As reported in previous Internal Audit reports the Service has not granted direct access to the live CareFirst system due to concerns over compliance with data protection legislation. Internal Audit has instead obtained assurance through examination of the processes and systems in place, discussion with key officers, redacted records provided by the CareFirst Team, and viewing data from the anonymised Test version of the system.   Although the Service has stated that the Test and Live systems are directly comparable, restrictions on access to live data could have had an effect on the findings and the level of assurance obtained through the audit process.

1.7   The factual accuracy of this report and action to be taken with regard to the recommendations made have been agreed with Euan Couperwhite - Head of Policy, Performance & Resources, Sally Wilkins - Lead Service Manager (Adult Social Work), Sandra Massey - ICT Technology Services Manager, Kate MacKay - Business Manager, and Trevor Gillespie - Team Manager (Performance Management).

2. FINDINGS AND RECOMMENDATIONS

2.1 CareFirst System Procurement

2.1.1 The system has been utilised by the Council since 1999, and although subsequent extensions and additional services have been obtained the contract with the supplier dates back to this point. Commercial and Procurement Services (C&PS) has been unable to locate a copy of the original terms and conditions of the contract.

2.1.2 Between April 2014 and June 2016 the Service paid £755,400 in respect of annual CareFirst software support fees, system enhancements and additional ad hoc support. Since the system was purchased there have been a number of upgrades and system developments and additional licence purchases, negotiated by the CareFirst Team with limited input from C&PS. Although it might be considered that purchases of enhancements are separate procurement activities, these affect the overall cost of the whole system, and typically commit the Service to additional ongoing expenditure.

2.1.3 Currently a three year support deal is in place and although the Service has no contract document which indicates the agreed costs and terms and conditions, there is a Service Level Agreement. Annual expenditure on support fees is £176,000, which is in excess of EU tender thresholds (currently £164,176 over the life of a contract) and the Council's thresholds for tendering (£50,000) as set out in the standing orders relating to contracts and procurement. Although the Service has negotiated discounts in exchange for a three year contract extension (expiring in 2017) and purchase of additional modules, it cannot demonstrate that the system provides Best Value since tendering, market testing or benchmarking have not been undertaken. There is therefore a risk of challenge from suppliers of similar systems.

2.1.4 Although there has been discussion between C&PS and the Service regarding the need to ensure that the Service is compliant with standing orders and procurement legislation, no progress has been made to date.

Recommendation
The CareFirst Team should ensure that it complies with Standing Orders and procurement regulations in terms of the Service's Case Recording System for Social Care Clients.

Service Response / Action
Agreed. The Service will work with C&PS to determine an appropriate action plan in respect of the system. This is an essential core business system which is embedded in the services' business processes, though due to changes in the way services are being delivered future systems requirements have not yet been established. Any action will need to take into account the need to minimise any potential service disruption and adverse impact on service users.

Implementation Date	Responsible Officer	Grading
April 2017	Team Manager, Performance Management	Significant within audited area

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2.1.5 Due to the incremental development of the system and addition of different modules at different times, nine different invoices are received each April in respect of support fees. The invoice detail could be clearer, as although the supported parts of the system are listed there is no breakdown of costs between them. There is currently no schedule of

anticipated payments held by the Service therefore there is a risk of overlap or duplication of payments.

Recommendation
The CareFirst Team should consider requesting the system provider to issue one invoice for annual support in order to prevent any duplicate payments.

Service Response / Action
Agreed. The Service has considered this and determined that it is not appropriate to action this at this point in time for the following reasons:
- Some invoices are paid for by other services (e.g. Communities Housing and Infrastructure) and a single invoice for that component ensures correct coding. Without this, Finance would be required to make a virement to ensure appropriate budget movement.
- Discussions are ongoing within Education and Children's Services and the H&SCP with regard to the future of the CareFirst system. At the moment, it is possible to track spend by each service on the system. It would not be proposed that we move to one invoice until the future of the CareFirst system is agreed.

Implementation Date	Responsible Officer	Grading
Implemented	Team Manager, Performance Management	Important within audited area

2.2 Software Licences

2.2.1 There are over 1,300 registered CareFirst Users, however as these users will not all require access concurrently only 310 user licences are currently required. In addition there is an 'enterprise' (or unlimited) licence for the Multi Agency View where other authorised agencies can access CareFirst when necessary. The cost of these is included in annual support fees which also cover 15 Business Objects licences for data analysis and reporting tools.

2.2.2 The CareFirst system does not prevent the number of concurrent user licences held being exceeded, and although OLM has provided scripts which can be run to determine whether actual user numbers exceed the concurrent licence holding, these are not routinely run.

2.2.3 While a sample check indicates that the Service is operating well within the current licence holding, not monitoring concurrent user numbers routinely increases the risk of breaching licence conditions.

Recommendation
The CareFirst Team should perform regular monitoring of concurrent CareFirst system usage to demonstrate compliance with software licence terms and conditions.

Service Response / Action
Agreed. IT has run the concurrent user script as requested by the CareFirst Team and will continue to do so on a quarterly basis.

Implementation Date	Responsible Officer	Grading
Implemented	Team Manager, Performance Management	Important within audited area

2.3   System Support

2.3.1   The CareFirst Team, managed by the Team Manager (Performance Management), consists of 5.7 FTE staff which includes two designated trainers who provide specific and refresher training for CareFirst Users. Staff receive training prior to being given their user name and password, and the basic Care Base training is scheduled weekly, with ad hoc and refresher training provided as needs are identified. CareFirst User manuals are accessible by front end users on the intranet and these appear to meet staff's needs. In addition to this, the CareFirst Team provides a helpdesk facility to help users with matters such as password changes and navigation through system menus and screens.

2.3.2   Technical detail and instructions relating to areas such as implementing upgrades, screen and report configurations, and database relationships are available to back office users in the CareFirst Team and can be accessed from the supplier's website.

2.3.3   In addition to the CareFirst Team, an IT Account Manager is in place to ensure smooth running of the system on the Council's network and implementation of upgrades and enhancements. Several significant developments and other system modifications are being planned. For example, the current standalone Foster Carer payment system is being replaced with the Care Pay Module and is due for implementation in October 2016. Development of Service User billing functionality is planned but is on hold pending finalisation of policy and procedure relating to Self-Directed Support.

2.4   System Access Controls

2.4.1   Adequate controls must be in place to ensure that personal and sensitive data is maintained within the CareFirst system in accordance with the Council's Data Protection responsibilities. Access to CareFirst is restricted so that only appropriate staff see Service User and provider information which is relevant to them and their job role.

2.4.2   New system users are required to complete a New User Form, with signed approval from their line manager, before they can access CareFirst. Checks on a sample of users showed that in each case forms had been completed and signed.

2.4.3   Leavers' access rights need to be amended or revoked promptly. Leavers' reports are provided by HR monthly and the CareFirst Team will update records accordingly. Although generally this was found to be operating well, the report for March 2016 had not been received as normal and was overlooked until July 2016, resulting in some leavers not having their CareFirst access withdrawn timeously. Where the leavers had left the Council, they would not have been able to access CareFirst as it requires access to the Council's network.

2.4.4   There is currently no schedule or checklist of regular tasks which need to be completed in maintaining the CareFirst system. Reliance is being placed on external processes (e.g. HR providing a list) and individual team members' knowledge and experience. In the event of staff changes or absence, there may be reduced assurance that these tasks are being completed timeously.

> **Recommendation**
> The CareFirst Team should put in place a checklist of daily, weekly, monthly, quarterly and annual tasks which are necessary to maintain control of the CareFirst System. Those responsible for these tasks should indicate that they have been performed.

<table>
<tr><td colspan="3"><u>Service Response / Action</u>
Agreed. The CareFirst Team will establish checklists of tasks which are routinely required in CareFirst.</td></tr>
<tr><td><u>Implementation Date</u>
April 2017</td><td><u>Responsible Officer</u>
Team Manager, Performance Management</td><td><u>Grading</u>
Significant within audited area</td></tr>
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2.4.5   Awareness of responsibilities and therefore accountability as a CareFirst system user is adequate. All employees logging into the Council network are reminded that they are required to comply with the Council's acceptable use policy relating to its IT facilities. Acceptance of conditions specific to the use of CareFirst is also necessary in the application's login screen, and this also applies to third parties who access the system using the Multi Agency View facility. Staff are also required to undertake the Council's routine data protection training.

2.4.6   From time to time the supplier needs access to assist in the maintenance of the system. Access is arranged via the Council's IT helpdesk, subject to authorisation from the CareFirst Team, which monitors access thereafter.

2.4.7   The Council's Information Security Good Practice Guidelines and the ICT Acceptable use policy detail the expected parameters in relation to the expiry, reuse and complexity of passwords. Passwords should be alphanumeric, at least 8 characters long, and include at least one special character. Whilst users are expected to adhere to these requirements, CareFirst does not currently enforce any password complexity standards.

2.4.8   This functionality is available as part of a recent update, and the CareFirst Team has been testing with a view to applying it in the near future. To ensure that control over password strength is increased, a recommendation has been made to track progress of this proposed system enhancement.

<table>
<tr><td colspan="3"><u>Recommendation</u>
The CareFirst Team should ensure that current password complexity requirements are enforced in the CareFirst system.

<u>Service Response / Action</u>
Agreed. The system has been reconfigured to ensure alphanumeric passwords with a minimum of 8 characters including a special character are enforced.</td></tr>
<tr><td><u>Implementation Date</u>
Implemented</td><td><u>Responsible Officer</u>
Team Manager, Performance Management</td><td><u>Grading</u>
Significant within audited area</td></tr>
</table>

2.4.9   Repeated failed access attempts could indicate attempts to gain access to a system by guessing a user's password. Typically systems are configured so that the user is referred to the system administrator after a specified number of incorrect password entries. The CareFirst system is not set to lock down a user account after a set number of failed log in attempts, and staff were unclear as to whether the system has this functionality. This increases the risk of inappropriate access to data, particularly in combination with the absence of password complexity requirements as discussed above.

> **Recommendation**
> The CareFirst Team should determine whether CareFirst has the functionality to lock down user accounts where repeated failed attempts to access the system are made, and apply this security control.
>
> **Service Response / Action**
> Agreed. A call was raised (15/09/2016) with OLM to determine if this functionality is available. OLM has agreed to include this as an enhancement in a future release.
>
> | **Implementation Date** | **Responsible Officer** | **Grading** |
> |---|---|---|
> | Implemented | Team Manager, Performance Management | Significant within audited area |

2.4.10   User access rights are set in CareFirst on the basis of the user's job title, the care area involved (e.g. Children's, Learning Disability, etc.), and the type of work to which the job relates (e.g. Administration, Worker, Invoice Processing, etc).   There are individual privileges within 'Privilege Sets' which dictate which screens a user can view and what actions they can perform in terms of the input, amendment, authorisation or deletion of information. Standard roles are set within the System which also has the flexibility to assign individual privilege sets and/or individual privileges. Testing found that access rights are being appropriately allocated.

2.4.11   The Helpdesk staff have the authority to assist users to rectify errors which they have made during input. Where information is amended or deleted, the system retains a record of this. The records are effectively hidden from view but can be extracted using CareFirst's Audit module. Although approval is requested from a Team Manager where a Practitioner requests to delete the input of another worker, there is no protocol which gives Helpdesk staff guidance on other instances where it may be prudent to seek further authorisation where amendments are requested.

> **Recommendation**
> The Service should establish a written protocol to demonstrate where amendments and deletions requested in the CareFirst system require authorisation or supporting detail.
>
> **Service Response / Action**
> Agreed. Instructions for CareFirst staff and practitioners relating to the authorisation requirements for amendments and deletions of information in client records in CareFirst will be determined and incorporated in the Social Work Case Recording Procedure which is currently being revised. In the meantime an interim instruction will be issued to the CareFirst Team and practitioners.
>
> | **Implementation Date** | **Responsible Officer** | **Grading** |
> |---|---|---|
> | April 2017 | Business Manager – Children's Services | Important within audited area |

2.5   Data Quality and Retention

2.5.1   The Council has a responsibility to ensure that the data maintained within the CareFirst system is accurate, up to date and safeguarded from loss. In order to be useful it must be recorded consistently and be retained in a manner which lends itself to review and reporting.

2.5.2   Electronic forms are in place within the CareFirst system which help to standardise input. These contain field masks, and data validation controls which prevent obvious errors or

omissions. The system is still dependent however on the consistency of the user to ensure that some fields and free text areas are completed as and when they should be.

2.5.3　The system maintains an audit trail of system activity relating to users' access to records and their input, amendment and deletion. Reports can be run by the CareFirst team to monitor this activity for individual users.

2.5.4　Update of some parts of the system are solely the responsibility of the CareFirst Team – e.g. Care Provider framework rate revisions and charging policy client contribution rates. The Non Residential Charging Policy which was revised in 2015 has not been applied to the system as yet since it is not yet clear how a Service User's 'overall budget' will be identified for Self-Directed Support. This has already been highlighted to the Service in Internal Audit Report AC1617.

2.5.5　Reassessments of the financial position of most Service Users should be performed annually by the Finance Team and input to CareFirst. This has been done for Residential Clients annually at the point at which benefit rates are revised by the Government. However, Non-Residential financial re-assessments have not been completed since 2013. Finance has stated that changes in staffing and responsibilities caused this situation to arise, meaning that non-residential clients may have been charged incorrect contribution rates.

2.5.6　The CareFirst team might have picked this up and taken further action to highlight the omission had the need been included in a checklist as recommended at paragraph 2.4.4. Going forward, Finance needs to reinstate the annual reassessment regime for Non-Residential Service Users and determine the extent to which they have been under / over charged.

Recommendation
Finance should ensure that all Service Users are subject to the financial reassessment process on an annual basis.
Finance should review the instances where service users have not been reassessed and charged correctly.
Service Response / Action
A new charging policy has been under consideration for some years and it was agreed in 2013 to stop calculating assessments until a new charging policy was in place. The new policy was authorised in August 2016 and the Finance team have plans in place to bring all assessments up to date. Members, Finance and Services established that no elderly/vulnerable people should receive large back dated bills. This decision was seen as an effective balance between ensuring appropriate charges were made and balancing the needs of vulnerable people. Since the integration of the Assessments team in November 2015 with the Social Care Finance team in Accounting there is wider resource available to share tasks and new procedures have been implemented.

Implementation Date	**Responsible Officer**	**Grading**
March 2017	Finance Controls Manager	Significant within audited area

2.5.7　System data is backed up incrementally on a daily basis. A full back up is done weekly and 30 days of backups are retained in a data centre in Aberdeen which is provided under a contract with the Council's Data Centre provider. A full backup of the data is transferred once a month to a further offsite location where it is kept for 90 days.

2.5.8   Disaster Recovery is tested annually, and was last done in 2014 with the previous Data Centre provider.   These tests established some weaknesses in relation to the reinstatement of CareFirst, the Multi Agency View and Business Objects. Revisions to the arrangements in place are being made with the new provider. Until these are completed and tested there is a risk that in the event of a major ICT incident affecting the Data Centre, that reinstatement of the CareFirst system may be incomplete or delayed.

2.5.9   The Service is currently in dialogue with IT as part of Digital Transformation activities to design a model so that assurance can be given and that system reinstatement testing is adequate to ensure continuity of the availability of CareFirst Data in the event of disaster.

Recommendation
IT should ensure that disaster recovery is tested with the new supplier.

Service Response / Action
Agreed.

Implementation Date	**Responsible Officer**	**Grading**
December 2016	IT Technology Services Manager	Significant within audited area

2.6   System Interfaces

2.6.1   The CareFirst system interfaces with e-financials, the Home Care system (CM2000) and the Child protection register, and there are designated individuals who have responsibility for monitoring the transfer of data – some of which is automatically transferred (e-financials and the Child Protection Register) and others where it is done manually (CM2000).

2.6.2   The Interface between CareFirst and e-financials was checked and found to be working satisfactorily.

2.6.3   It would be beneficial for the Service to document details of who is responsible for ensuring each interface is run and is operating correctly, and how this is checked and evidenced. This will help to preserve knowledge which could be lost or become unavailable due to staff changes or absence.

Recommendation
The CareFirst Team, in conjunction with IT, should document the interfaces to other systems from CareFirst and ensure these are available for staff as and when necessary.

Service Response / Action
Agreed.

Implementation Date	**Responsible Officer**	**Grading**
March 2017	IT Technology Services Manager; Team Manager, Performance Management.	Significant within audited area

2.7 Business Continuity Planning

2.7.1   A Business Continuity Plan (BCP) sets out how services will operate following an incident and how they expect to return to 'business as usual' afterwards. Key Services are required to have Business Continuity Plans (BCP's) to limit the impact on vital service provision.

2.7.2   Whilst there is a BCP for the CareFirst system itself, there are currently no overarching BCP's for Children's Social Work or Aberdeen City Health and Social Care Partnership. There are however 48 individual service BCP's in place, and an NHS contingency plan.

2.7.3   The BCP's for Mental Health, Children with Disabilities, and Criminal Justice Services were reviewed to ensure that there are adequate measures in place to maintain continuity of service provision in the event of a loss of key systems – specifically CareFirst. Whilst there is a section in each regarding Loss of Systems these do not all include proper definitions of 'systems', a strategy statement, or specific actions to be taken by responsible officers in the event of the loss of CareFirst access.

2.7.4   Education and Children's Services and the Health and Social Care Partnership have stated that these individual plans are currently being reviewed and updates are to be requested from Team Managers. In order to ensure that adequate Business Continuity measures are in place, a recommendation has been made to track progress with the development of the plans.

Recommendation
The Service should ensure that Business Continuity Plans adequately reference how activities will continue to operate in the event of loss of CareFirst access.

Service Response / Action
Agreed. Business Continuity Plans are being reviewed and updated.

Implementation Date	**Responsible Officer**	**Grading**
April 2017	Business Manager – Children's Services; Interim Head of Strategy & Transformation	Significant within audited area

2.8 System Reporting

2.8.1   Numerous 'Actuate' reports are available within CareFirst itself for Front End Users. In addition the CareFirst Team use, and can run, 'Business Objects' reports for managers to provide them with management information.

2.8.2   The CareFirst Team uses Business Objects for producing Statutory Returns and responding to Freedom of Information requests and in the course of this often pick up issues with data quality which need to be addressed with individual users or team managers. For example, where a care agreement has been superseded but not closed off - which results in the data available for budget forecasting being impaired. Whilst there are regular reports for commitments and other potential errors, there is no regular monitoring to highlight trends and areas where additional training or process adjustments are required.   Additional exception reporting could provide Team Managers with information with which they could encourage better input practice.

2.8.3   The CareFirst Team has also suggested that Team Managers may not be getting the full benefit of the reporting tools which are available to them. More standard reports or

dashboards which are relevant to the everyday and overall control of the Service could be created to provide Managers and their staff with a broader overview of their workload and activity. Increased engagement between the CareFirst Team and the Service may be required to ensure that they get best value from the system resources available to them.

Recommendation
In conjunction with the Services, the CareFirst Team should review the suite of reports made available for improving data quality and management information.

Service Response / Action
Agreed. Work has already commenced to provide dashboard information in both Children's (Reclaiming Social Work) and Adults (Health & Social Care Partnership) Services. Data quality and exception reporting will be progressed under the Council's Master Data Management Programme, agreed by Finance Policy & Resources Committee in December 2015. Regular reporting will be added to the checklists agreed at 2.4.4.

Implementation Date	**Responsible Officer**	**Grading**
Implemented	Team Manager, Performance Management.	Important within audited area

AUDITORS: D Hughes
C Harvey
P Smith

Appendix 1 – Grading of Recommendations

GRADE	DEFINITION
Major at a Corporate Level	The absence of, or failure to comply with, an appropriate internal control which could result in, for example, a material financial loss, or loss of reputation, to the Council.
Major at a Service Level	The absence of, or failure to comply with, an appropriate internal control which could result in, for example, a material financial loss to the Service/area audited.

Financial Regulations have been consistently breached. |
| **Significant within audited area** | Addressing this issue will enhance internal controls.

An element of control is missing or only partial in nature.

The existence of the weakness identified has an impact on a system's adequacy and effectiveness.

Financial Regulations have been breached. |
| **Important within audited area** | Although the element of internal control is satisfactory, a control weakness was identified, the existence of the weakness, taken independently or with other findings does not impair the overall system of internal control. |

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