

TIAN News

January 2024



Introduction

I am delighted to welcome you to our seventh edition of TIAN News. This edition spans another wide range of articles on important risk and governance issues, including:

- Results of a recent TIAN comparison of 88 NHS Board Assurance Frameworks which identified several areas requiring further focus.
- Enforcement action taken by the ICO against a hospital in Scotland due to inadequate security arrangements over patients' records.
- Some key questions to ask when considering the results of feedback from the Friends & Family Test.
- Details of recent and upcoming events provided to help support Board members at our NHS clients to keep abreast of new developments.

On behalf of all TIAN members, Happy New Year and best wishes for a happy and healthy 2024!

Mike Townsend, Managing Director of Barts Assurance

Benchmarking of NHS Board Assurance Frameworks (BAF)

TIAN recently undertook a benchmarking exercise comparing the BAFs and Head of Internal Audit Opinions of 75 Provider Trusts (52 Foundation Trusts and 23 NHS Trusts) and 13 Integrated Care Boards (ICBs). The result of this were published in a briefing for clients issued at the end of October.

Key Findings:

Based on our sample of 88 NHS organisations from across the country, the key findings are:

- 7% of NHS organisations got a "Limited" overall Head of Internal Audit (HoIA) Annual Opinion for 2022/23 – although this was a lot more common for the new ICBs (23%) than Provider Trusts (4%). Nearly 56% of organisations were given a Significant, Substantial or High Annual Opinion.
- Where a separate assurance opinion was assigned specifically in respect of the organisation's BAF arrangements, 78% were assigned a Significant, Substantial or High assurance opinion.
- The average number of risk entries being monitored by NHS organisations through their BAF is 13 – with 6.1/47% of these entries being assessed as being "High/>15+" risk.

Key questions identified for Audit Committees to consider were:

1. Are you assured that actions identified through your internal audit review of your BAF are being progressed as required?
2. Is your BAF regularly reviewed at the Board and other relevant committees?
3. Does your BAF consistently and accurately identify gaps in controls and assurances?
4. Are the risks, controls and assurances documented in your BAF clear?
5. Is your BAF regularly updated to demonstrate progress made on planned actions?
6. Are you considering how shared system risks are being collectively managed?

Further Information: If you would like to discuss how internal audit can help develop your BAF, then please contact your local TIAN audit lead. For a copy of the recent TIAN BAF benchmarking report

contact: Mike Townsend, Managing Director of Barts Assurance, michael.townsend@nhs.net or visit your TIAN member website (via www.tian.org.uk)

Patient Experience - Friends and Family Test (FFT)

Audit Yorkshire recently undertook an audit specially reviewing FFT at one of its clients and found a considerable number of improvements could be made to provide better insights which are relevant to current concerns and pressures facing all NHS providers. This article summarises some of the key issues and challenges posed in this area.

Background:

While NHSE states “listening to the views of patients and staff helps identify what is working well, what can be improved and how”, key performance indicators indicate feedback numbers are not being met.

While trusts see the detail of feedback from their questionnaire provider, the irony of questioning patients, service users and carers begin to bite – the more you ask, the more data you get, which means the more time, effort and expense needs to be spent on sifting through the information. Low response rates start to look like a blessing in disguise and keeping things to ‘either or’ responses (yes/ no, happy/ unhappy, satisfied/ unsatisfied) suddenly looks hugely appealing. But it is hard to adequately learn when responses are so binary.

So here are a few questions to ask when considering FFT as a feedback mechanism:

- When were the Trust’s questions last reviewed?
- Do the questions reflect current interests or concerns of the Trust? Linking these to corporate strategies or concerns and complaints data could help to focus responses to specific areas such as staff attitude, or appointment times or choices.
- Are key areas asked of all patients? Such as, did patients feel like they were treated with dignity and respect, was their pain managed well, or whether they left their appointment understanding their condition and treatment plan? If it is only asked of a select few departments, can this be appropriately justified?
- Are the easy questions being asked first? There is nothing worse than agreeing to fill out a questionnaire and then realising that there is an endless number of questions all requiring heavy thinking and written responses to each. Participants need to warm up and to start with, the easier the question and the simpler the choices of response the better.

And then comes the question of how the results and actions raised will be dealt with? Publicising changes, where the ideas have come from, and why a change has been made, should help make patients feel more involved in the running of the hospital and show that the Trust is interested to learn and improve. Taking on changes which aim to reduce complaints, may also decrease staff stress thereby supporting positive effect on wellbeing and team culture.

For further information about this review, please contact Caroline Mooney, Senior Auditor, Audit Yorkshire at caroline.mooney1@nhs.net.

Update on New Technology Risks

MIAA recently issued an [Audit Committee Insight briefing](#) giving an update on some key technology risks for Audit Committees to consider. Areas highlighted within the briefing covered the new and emerging risks associated with the following rapidly developing areas:

- Artificial Intelligence (AI) Chatbots and Large Language Models (LLMs);
- Deepfakes and Shallowfakes; and
- Messaging Solutions.

The eight key questions for Audit Committee members to consider in these areas are:

1. Which Large Language Models does the organisation permit in its corporate environment?
2. Which platforms / messaging solutions should the organisation permit in the corporate environment?
3. Are these solutions being corporately managed? For instance, are appropriate policies in place to risk assess, configure, manage, maintain and assure these solutions?
4. Is 2-step verification enabled to protect social media accounts?
5. How is video content corporately managed?
6. Are staff being briefed about potential deep and shallow fake video content?
7. Is the organisation continuing to brief staff on the use social media, and potential threats, for instance from fake accounts, phishing and cold calls, etc.?
8. How are emerging technology opportunities and threats being tracked?

If you have any queries or feedback on this briefing, then please contact: Paula Fagan, Head of Technology Risk at MIAA (M: 07825 592 866; E: paula.fagan@miaa.nhs.uk)

How securely do your staff treat patient data?

What assurance do you have that basic security standards are being observed across your organisation? The Information Commissioner's Office (ICO) recently urged hospitals to improve data protection standards following an incident at NHS Fife. The organisation was issued with a [reprimand](#) in November after an unauthorised person was able to enter a ward and access the personal information of 14 patients.

In February 2023, an unauthorised person gained access to a ward. Due to a lack of identification checks and formal processes, the non-staff member was handed a document containing personal information of 14 people and assisted with administering care to one patient.

The data was taken off site by the person and has not been recovered. While the hospital had CCTV installed, the wall socket with the CCTV had been accidentally turned off by a member of staff prior to the incident. The police have not been able to identify the person or recover the lost data, hindered by the lack of CCTV footage.

The ICO's investigation concluded that NHS Fife did not have appropriate security measures for personal information, as well as low staff training rates. Following this incident, NHS Fife introduced new measures such as a system for documents containing patient data to be signed in and out, as well as updated identification processes.

Natasha Longson, the ICO's Head of Investigations noted that: *"Patient data is highly sensitive information that must be handled with the appropriate security. When accessing healthcare and other vital services, people need to trust that their data is secure and only available to authorised individuals.*

"Every healthcare organisation should look at this case as a lesson learned and consider their own policies when it comes to security checks and authorised access. We are pleased to see that NHS Fife has introduced new measures to prevent similar incidents from occurring in the future."

Recommendations:

The ICO requested that NHS Fife provide an update of actions taken within six months, and recommended that NHS Fife improve its data protection compliance by:

- Improving the overall training rate, in line with current legislation. For example, refresher data protection training should be provided to all staff more frequently and underpinned by written guidance on security for employees. The ICO has helpful [resources on staff training](#).
- Developing guidance or a policy in relation to formal ID verification.

- Reviewing all policies available from their intranet, ensuring that they are all up-to-date and accurate, with archived versions clearly marked.
- Revisiting the data breach reporting process and ensure relevant personal data breaches are reported within 72 hours.

In light of this incident, all organisations should consider whether they have appropriate identification processes and training in place.

Please contact your local TIAN audit lead (via www.tian.org.uk) to discuss how internal audit can provide assurance over the actual levels of security in operation across your hospital.

Developing the Auditors of the Future

Addressing Skill Shortages:

TIAN members appreciate that capacity constraints impacting on audit providers can cause significant problems for clients – either through delays in work, reduced competition for contracts and/or increased rates. Across the public sector this problem has been most evident over recent years in the external audit market. The problems and shortages in that area mean some councils are still waiting for audit firms to sign off their 2020/21 accounts! The issues are not unique to external audit, however, with internal audit providers also experiencing pressure to attract and retain the best staff, with some specialist skills becoming increasingly difficult to recruit to.

A good example of how this challenge is being addressed is Audit Yorkshire’s (AY) flexible approach to recruiting and resourcing new auditors. Their main route to qualified status for new staff is now via the Institute of Internal Audit apprenticeship scheme. This programme provides both a structured learning and support framework for staff, as well as offering a significant cost benefit to the NHS through effective use of the apprenticeship levy.

Specialist Skills Training:

With NHS bodies ever increasing reliance on ICT, plus growing risks from emerging technology such as AI and the routine reporting of high-profile hacks, it is essential we can provide clients with robust assurance over all their Informatics and IT System risks. To support this, AY enrol their I.T. audit trainees on the Chartered Information Systems Auditor (CISA) qualification. CISA is widely recognised across the world as being the best option for Computer Auditors in all sectors to study.

AY student Sophie Penwill, Trainee Internal Auditor, describes her journey with Audit Yorkshire so far:

“I am a recent graduate from the University of York with a Mathematics degree and have always had an interest in understanding and finding efficiencies in systems, and so naturally I jumped at the opportunity to be part of the team at Audit Yorkshire.

I have really enjoyed the opportunity to get an in-depth view of the processes in place within the NHS. Currently, I am supported by my supervisor but I am working to become increasingly independent and have recently led several client meetings examining the processes in place in the Electronic Staff Record, working to share my findings with key personnel, and collaborating with them to determine the root causes of the issues found.

Recently, I have started to work on IT audits, and this has been very engaging, with much more complex systems that must be well configured. Updating IT systems in the NHS has been described to me as ‘working on an aeroplane whilst in flight’, as one of the main challenges faced is how best to implement new systems and controls whilst ensuring that the vital services keep running. This requires an element of collaboration between internal audit and the Trust’s IT personnel, that I find very rewarding.

To support my understanding of IT systems, I have enrolled to become a Certified Information Systems Auditor (CISA) and aim to complete this within the next twelve months. I enjoy putting theory into practice and I am keen to progress within Audit Yorkshire and looking forward to more challenging work as I progress through my studies.”

Similar programmes are in operation across the TIAN members. Please contact your local TIAN organisation to find out more.

Events Round Up

TIAN members organise and facilitate a number of Groups and Forums across the country to support and develop NHS governance. eg Regional Audit Committee Chair meetings. A wide range of other education, training and networking events are also run, with many of these sessions now held virtually and being accessible to all TIAN members’ NHS clients.

Watch Back: You can watch back recordings of MIAA NW Collaborative Masterclasses or read about all the previous sessions by visiting the [North West Collaborative YouTube channel](#). This includes a recording of the latest webinar on 7th of December 2023 which covered “*Transforming the delivery of public services using Human Learning Systems Approach*”. This exciting masterclass introduced the human-learning systems approach and explains what this approach means for public services and how it supports the empowerment of all those in our communities. The webinar was presented by Elizabeth Bradbury, Director and Board Member at Aqua, and featured presentations on:

- “Introduction to Human Learning Systems” by Toby Lowe, Visiting Professor of Public Management, Centre for Public Impact (CPI); and on
- “Human Learning Systems in Action” by Gary Wallace, Public Health Specialist, Plymouth County Council.

Similarly, details of past events organised by Audit Yorkshire and 360 Assurance are available at <https://www.360assurance.co.uk/events/> and <https://www.audit-yorkshire.nhs.uk/events/archive-events/>. This includes:

- A recent half-day virtual session which considered the progress made in Provider Collaboratives, and some of the key areas for consideration – such as governance, measuring success, and involvement of non-NHS organisations.

And Finally..... Public Finance Awards 2023

Members of TIAN were delighted to represent the NHS audit community at CIPFA’s 2023 Public Finance Awards in London on 28th November, having been shortlisted within the “Excellence in Public Sector Audit” category. The standard of entries was as high as ever, with stiff competition and innovation on display across all categories. It was a great evening despite the National Audit Office taking the win in the Audit category, with particular congratulations due to the London Borough of Hillingdon’s Fraud Team - who took the award for Anti-Fraud work and were also named as overall “Grand Prix” winners.



From L-R above: Louise Cobain and Angharad Kyffin Ellis from MIAA, Elaine Dower from 360 Assurance and Mike Townsend from Barts Assurance.



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