



**Governance and Human Resources
Town Hall, Upper Street, London, N1 2UD**

AGENDA FOR THE AUDIT COMMITTEE AND AUDIT COMMITTEE (ADVISORY)

Members of the Audit Committee and Audit Committee (Advisory) are summoned to a meeting, which will be held in Committee Room 4, Town Hall, Upper Street, N1 2UD on, **6 June 2016 at 7.30 pm.**

**John Lynch
Head of Democratic Services**

Enquiries to : Jackie Tunstall
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Despatched : 26 May 2016

Membership

Councillor Satnam Gill OBE (Chair)
Councillor Olly Parker (Vice-Chair)
Councillor Richard Greening
Councillor Flora Williamson
David Bennett (Co-Optee)

Substitute Members

Councillor Clare Jeapes
Councillor Alice Perry
Councillor Angela Picknell
Councillor David Poyser

Quorum: is 3 Councillors



A. Formal Matters	Page
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1. Apologies for Absence
2. Declaration of substitute members
3. Declarations of interest

If you have a **Disclosable Pecuniary Interest*** in an item of business:

- if it is not yet on the council's register, you **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent;
- you may **choose** to declare a Disclosable Pecuniary Interest that is already in the register in the interests of openness and transparency.

In both the above cases, you **must** leave the room without participating in discussion of the item.

If you have a **personal** interest in an item of business **and** you intend to speak or vote on the item you **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent but you **may** participate in the discussion and vote on the item.

***(a)Employment, etc** - Any employment, office, trade, profession or vocation carried on for profit or gain.

(b) Sponsorship - Any payment or other financial benefit in respect of your expenses in carrying out duties as a member, or of your election; including from a trade union.

(c) Contracts - Any current contract for goods, services or works, between you or your partner (or a body in which one of you has a beneficial interest) and the council.

(d) Land - Any beneficial interest in land which is within the council's area.

(e) Licences- Any licence to occupy land in the council's area for a month or longer.

(f) Corporate tenancies - Any tenancy between the council and a body in which you or your partner have a beneficial interest.

(g) Securities - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

This applies to **all** members present at the meeting.

4. Minutes of previous meeting - To be circulated

B. Items for Decision - Audit Committee	Page
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| 1. Annual Governance Statement 2015/16 | 1 - 28 |
| 2. The TicketViewer Breach and Cybersecurity | 29 - 34 |

3.	Review of Voluntary Redundancy Scheme	35 - 46
4.	Principal Risks and Uncertainties Report - June 2016	47 - 62
5.	Whistleblowing Report - April 2016 - March 2016	63 - 70

C. Items for Decision - Audit (Advisory) Committee

D. Urgent non-exempt items

Any non-exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.

E. Exclusion of press and public

To consider whether, in view of the nature of the remaining item on the agenda, it is likely to involve the disclosure of exempt or confidential information within the terms of the Access to Information procedure rules in the Constitution and, if so, whether to exclude the press and public during discussion thereof.

F. Confidential/exempt items

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G. Urgent exempt items (if any)

Any exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.

The next meeting of the Audit Committee and Audit Committee (Advisory) will be on 20 September 2016

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Report of: **Executive Member for Finance and Resources**

Meeting of	Date	Agenda Item	Ward(s)
Audit Committee	6 th June 2016		

Delete as appropriate		Non-exempt
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SUBJECT: Annual Governance Statement 2015/16

1.Synopsis

- 1.1.An annual report on the Council's governance arrangements is published with the Statement of Accounts as the Annual Governance Statement (AGS).
- 1.2.This report sets out the AGS for 2015/16 as Appendix A.

2. Recommendations

- 2.1.The Audit Committee is asked to note the contents of the Annual Governance Statement. Due to a change in process for 2015/16, and the requirement for a signed version of the AGS to accompany the draft Statement of Accounts to Audit Committee in June 2016, External Audit, KPMG, reviewed the AGS during April 2016. They reported back that they had no comments or suggested changes from an external point of view. Should any significant issue(s) arise during their external audit, they may wish to revisit the AGS to ensure it accurately reflects the situation.

3. Background

- 3.1 In discharging this overall responsibility, the Council is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the effective exercise of its functions, which includes arrangements for the management of risk. The Council has approved and adopted a code of corporate governance which is consistent with the principles of the CIPFA/SOLACE framework Delivering Good Governance in Local Government.
- 3.2 The Annual Governance Statement explains how the Council has complied with the code and also meets the requirements of Regulation 6 (Part 2) of the Accounts and Audit Regulations 2015 in relation to the publication of an Annual Governance Statement. In line with the CIPFA/SOLACE framework, this statement is “an open and honest self-assessment” of the Council’s performance across all of its activities and:
- Describes the key elements of the Council's governance arrangements, covering all corporate systems and the range of activities for which the Council is responsible;
 - Describes processes applied in reviewing their effectiveness; and
 - Lists actions proposed to deal with significant governance issues identified

4. Implications

Financial implications:

A sound system of internal controls forms a significant part of the framework and is essential to underpin the effective use of resources.

Legal Implications:

Regulation 6 (Part 2) of the Accounts and Audit Regulations 2015 requires the Council to conduct an annual review of its system of internal control and following the review, the Council must approve an annual governance statement, prepared in accordance with proper practices in relation to internal control.

Environmental Implications:

There are no environmental implications.

Resident Impact Assessments

There are no direct Resident Impact Assessment implications arising from the recommendations in this report

5. Conclusion and reasons for recommendations

- 5.1. The Annual Governance Statement, attached as Appendix A, reports on the Council’s governance arrangements and control environment and once approved will form part of the Statement of Accounts.

Appendices

Appendix A: Draft Annual Governance Statement 2015/16

Final Report Clearance

Signed by



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Corporate Director of Finance

Date

Received by

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Head of Democratic Services

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Date

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E-mail: michael.bradley@islington.gov.uk

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1. Scope of responsibility

- 1.1. Islington Council is responsible for ensuring that its business is conducted in accordance with the law and that public money is safeguarded and properly accounted for and used economically, efficiently and effectively. Additionally, the Council has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 1.2. In discharging this overall responsibility, the Council is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the effective exercise of its functions, which includes arrangements for the management of risk. The Council has approved and adopted a code of corporate governance which is consistent with the principles of the CIPFA/SOLACE framework Delivering Good Governance in Local Government. A copy of the code is on our website and included in the Council's Constitution.
- 1.3. This statement explains how the Council has complied with the code and also meets the requirements of Regulation 6 (Part 2) of the Accounts and Audit Regulations 2015 in relation to the publication of an Annual Governance Statement. In line with the CIPFA/SOLACE framework, this statement is "an open and honest self-assessment" of the Council's performance across all of its activities and:
- Describes the key elements of the Council's governance arrangements, covering all corporate systems and the range of activities for which the Council is responsible;
 - Describes processes applied in reviewing their effectiveness, and
 - Lists actions proposed to deal with significant governance issues identified.

2. The purpose of the governance framework

- 2.1. The governance framework comprises the systems, processes, culture and values by which the authority is directed and controlled and its activities through which it accounts to, engages with and leads the community. It enables the Authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost effective services.
- 2.2. The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an on-going process designed to identify and prioritise the risks to the achievement of the Council's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the

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impact should they be realised, and to manage them efficiently, effectively and economically.

2.3. The governance framework described in this document has been in place at Islington Council for the year ended 31 March 2016 and up to the date of approval of the Statement of Accounts.

3. The governance framework

This section describes the key elements of Islington Council's governance arrangements.

3.1. Identifying and communicating the Authority's vision of its purpose and intended outcomes for citizens and service users

3.1.1. The central aim of the Council's Administration is to make Islington a fairer place. In 2010 the Council set up a Fairness Commission which explored inequalities for residents and set out recommendations for a fairer Islington. This was followed in 2013 by a second commission – the Employment Commission – looking at how to tackle unemployment, a key driver in the poverty and inequality in Islington.

3.1.2. The Council's priorities to achieve 'A Fairer Islington' are set out in the 'Islington Commitment', our Corporate Plan for 2015-19. The five key priorities are:

- Providing more council housing and support private renters
- Helping residents who are out of work to find the right job
- Helping residents cope with the rising cost of living
- Providing residents with good services on a tight budget
- Making Islington a place where our residents have a good quality of life

3.1.3. These priorities and the intended outcomes have been communicated to staff, residents and service users in newsletters, on the Council's website (www.islington.gov.uk) and through a variety of other media. The Council also uses large print and translated documents to make the information accessible.

3.2. Monitoring and driving progress in delivering the Islington Commitment

3.2.1. The Council has in place a robust Performance Management Framework to ensure effective delivery of services and priorities. elements are:

- Corporate Performance Indicator Suite – performance measures covering key services, priorities and equalities objectives;

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- Monthly Performance Panel – an internal mechanism for senior scrutiny of corporate priorities and of council services;
- Performance reporting to scrutiny committees, including more in depth scrutiny of specific topics, and
- Overall monitoring of corporate performance through the Policy and Performance Scrutiny Committee.

3.2.2. The Islington Commitment, Corporate Performance Indicator Suite, and Performance Management Framework are set out on the Performance page of the Council's website.

3.3. Measuring the quality of services for users, to ensure they are delivered in accordance with the authority's objectives and that they represent best use of resources and value for money

3.3.1. The Council's robust management processes enable it to measure the quality of services provided to Islington's residents and service users:

- Service, financial and corporate planning processes ensure that the Council's objectives are based on service commitments and strategic priorities;
- Directorates report monthly on their key financial, risk and service delivery indicators. Performance slippages are highlighted and remedial action taken;
- The Monthly Performance Panel, and the external reporting through scrutiny, both include a focus on the quality of services and on user feedback.

3.4. Defining and documenting the roles and responsibilities of the Executive, Non-Executive, Scrutiny and officer functions, with clear delegation arrangements and protocols for effective communication in respect of authority and partnership arrangements

3.4.1. Islington Council's Constitution sets out how the Council operates, how decisions are made, how decisions remain efficient and transparent, and how the Council demonstrates its accountability to residents and local businesses.

3.4.2. The Constitution also sets out the roles and responsibilities of the Executive, Non- Executive, Scrutiny and officer functions. A Publicity Protocol governing Members' and Committees' communication is laid out in part 6 of the Constitution; compliance with this is supported by a specialist Communications Team.

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- 3.4.3. The Constitution is updated at least annually. Key amendments coming into effect in 2015/16 included changes to enable the electronic service of meeting summons and related documents, changes to delegations in respect of personal budgets to prepare for the implementation of the Care Act 2014, changes to the scrutiny committee structure to more closely match departmental responsibilities, changes to implement the Openness of Local Authority Bodies Regulations 2014 and changes to increase public participation in council meetings.

3.5. Developing, communicating and embedding codes of conduct; defining the standards of behaviour for Members and staff

- 3.5.1. The Council expects the highest conduct and behaviour from all its Members and officers. Responsibility for promoting, developing and maintaining these high standards lies with the Audit Committee, supported by the Standards Committee which is responsible for considering complaints of breach of the Members Code of Conduct. The Audit Committee received an annual report on Member conduct matters on 22nd September 2015. In accordance with the Localism Act 2012, the Council has appointed Independent Persons who have statutory functions in relation to the process for dealing with complaints of breach of the Code.
- 3.5.2. Part 6 of the Constitution contains the revised Members Code of Conduct which sets out the rules for registering and declaring interests; it also includes protocols on Member/Officer Relations, Financial Regulations and Procurement Rules, and the Members Call for Action.
- 3.5.3. Part 7 of the Constitution contains the Members' Allowance Scheme which includes details on Members' eligible expenses. The scheme is reviewed annually taking into account advice and recommendations of the London Council's Independent Remuneration Panel.
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- 3.5.4. An Officer Code of Conduct is reviewed, revised and publicised to staff.

3.6. Reviewing the effectiveness of the authority's decision making framework, including delegation arrangements, decision making in partnerships and robustness of data quality

- 3.6.1. Decision making arrangements are set out in the Constitution. The Council operates a Leader and Cabinet (Executive) model of decision making. Although some decisions are reserved for full Council, most are made by the Executive or by Committees, Sub-Committees or officers. The limited powers delegated to individual portfolio holders are set out in the Constitution as is the process should the Leader decide to exercise any executive powers personally. In accordance with the Local Government Act 2000 the Council has mechanisms in place to allow the effective, independent and rigorous examination of the proposals

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and decisions by the Executive. These mechanisms involve the overview and scrutiny process, call-in and question time. The conduct of the Council's business is governed by the Constitution.

3.6.2. The Constitution includes formal delegation of responsibility and accountability, procurement rules and the Council's Financial Regulations. The Monitoring Officer and Section 151 Officer have overall responsibility for ensuring standing orders, standing financial instructions, the scheme of delegation and supporting material are up to date and clearly communicated.

3.6.3. Forthcoming Executive decisions are published on the Forward Plan which sets out all key decisions at least 28 days in advance of when it is anticipated they will be made, subject to urgency procedures. The Executive is responsible for the implementation of policy and ensuring the effectiveness of service delivery. The scrutiny function supports effective decision making and policy development by the Executive. The Policy and Performance Scrutiny Committee and Review Committees are responsible for overseeing a targeted work programme that can help support service improvement through an in-depth investigation of poor performance and the development of an effective strategy/policy framework for the Council and its partners. This includes consideration of the corporate plan and the medium term financial strategy. The Policy and Performance Scrutiny Committee and Review Committees are the scrutiny bodies responsible for monitoring the performance of the Council and its partners in relation to their stated policy and priorities.

3.6.4. All formal meetings are clerked by well trained and experienced Democratic Services Officers and lawyers are present when appropriate to provide advice on law and constitutional procedure. Members are required to make sound decisions based on written reports which are prepared in accordance with the Council's report writing guidelines and have to be cleared by relevant officers including Finance and Legal Services and by portfolio holders. Reports must pay due regard to equalities and environmental issues, together with financial and legal implications and risks. Joint Board (an officer and Executive member group) meets about a month before each Executive and has included on its agenda all items planned for the next Executive meeting. Not all items are proactively briefed on but they are available for members to ask questions about.

3.7. Reviewing the effectiveness of the framework for identifying and managing risks and demonstrating clear accountability

3.7.1. Following the implementation of a refreshed council wide approach to risk management in 2014/15, which resulted in a new framework capturing key strategic, operational and programme/ project risks resulting in a more enterprise-wide and dynamic approach, further

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refinements to the framework have been made during 2015/16 to define materiality and provide guidelines for risk escalation. Key aspects of the new approach have included the development of a top-down (CMB-owned risks) and bottom-up approach (service-owned risks) to risk management including the identification of key principal risks facing the Council as identified by CMB and senior management across each Department. Going forward, risk workshops will take place to embed refinements to the framework. Risk reviews will take place for each divisional management team every six months to help integrate and embed effective risk management within the culture of the Council.

3.8. Ensuring effective counter-fraud and anti-corruption arrangements are developed and maintained

- 3.8.1. Islington Council's Anti-Fraud Strategy was refreshed during 2015/16. The revised strategy has been agreed through Corporate Management Board and Audit Committee. The strategy reflects current legislation and policy. A revised Corporate Prosecution and Enforcement policy has been written and agreed through Legal Services. Current work surrounding the Fraud Response and Risk Plan and an effective Communications and Training plan is continuing.
- 3.8.2. The Council's Fraud Forum has been established as part of the Governance arrangements within the Anti-Fraud Strategy. The Forum is chaired by a Corporate Director and is attended by relevant officers involved in fraud. The purpose of the forum is: to monitor the Anti-Fraud framework to ensure that it remains relevant; to consider any new or increased exposures to fraud and corruption; to escalate serious concerns as appropriate and; to ensure that the action taken to address fraud and corruption risks in Council activities is adequate and effective.
- 3.8.3. The Council investigates reported or suspected fraud, and participates in the National Fraud Initiative. The Council's whistle blowing policy provides a mechanism for suspected breaches of law, procedure or policy to be confidentially reported.
- 3.8.4. Completed anti-fraud work in 2015/16, produced reports in a number of areas. Investigation reports with recommendations to strengthen controls and mitigate fraud risk were issued to service management on completion of these investigations.

3.9. Ensuring effective management of change and transformation

- 3.9.1. At a strategic level the Corporate Management Board (CMB) owns the change management process for the Council. Key initiatives are identified in the "Transforming Islington" Programme, reflecting the council's key strategic priorities.

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- 3.9.2. Project and programme governance is established proportionate to the complexity, impact and risk profile of the initiative. CMB signs off all the key outcomes to be delivered by each of the "Transforming Islington" projects, and assigns ownership to a Project Sponsor at Service Director level or higher. Each has a project board which reports to CMB on progress, issues and risks. Departmental Management Teams review projects falling within their service area to ensure delivery.
- 3.9.3. The Corporate Transformation Team provide direct project support to most of these change initiatives and maintains an overview of other areas of change to ensure that appropriate progress is made and linkages and dependencies between projects are picked up. A wider support network, including financial, ICT, HR and risk management advice is coordinated by the Transformation team to ensure that barriers to success are identified and addressed.
- 3.9.4. The project planning process has a strong emphasis on return on investment and service managers are asked to sign off on the level of savings potentially achievable before committing them into spending plans. These are then monitored following project completion to ensure they are delivered.
- 3.10. ***Ensuring the authority's financial management arrangements conform with the governance requirements of the CIPFA Statement on the Role of the Chief Financial Officer in Local Government (2010) and CIPFA Statement on the Role of the Head of Internal Audit (2010)***
- 3.10.1. The Corporate Director of Finance and Resources (Chief Finance Officer in accordance with Section 151 of the Local Government Act 1972) was the Council's most senior executive role charged with leading and directing financial strategy and operations for 2015-16. In his role as Chief Finance Officer, he is responsible for:
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- Ensuring lawfulness and financial prudence of decision-making;
 - Reporting to full Council (or to the Executive if the matter to which the report relates is an executive responsibility) and the Council's external auditor if he considers that any proposal, decision or course of action will involve incurring unlawful expenditure; or is unlawful and is likely to cause a loss or deficiency; or if the Council is about to enter an item of account unlawfully, and
 - Providing advice on the scope of powers and authority to take decisions, maladministration, financial impropriety, probity and budget and policy framework issues to Councillors
- 3.10.2. The Head of Internal Audit gives an objective and evidence based opinion on all aspects of governance, risk management and internal

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control, and reports quarterly to the Audit and Governance Committee.

3.10.3. A Corporate Governance Group also meets every two months to discuss and monitor compliance with corporate systems of internal control, data security and governance issues. The group includes the Corporate Director of Finance and Resources, (the Section 151 Officer) the Assistant Chief Executive (Governance and HR) (the Council's Monitoring Officer), and the Head of Internal Audit.

3.11. *Ensuring effective arrangements are in place for the discharge of the monitoring officer function*

3.11.1. The roles and responsibilities in respect of the democratic process are set out in detail in the Constitution. The Assistant Chief Executive (Governance and HR) is responsible, in her role as monitoring officer, for:

- Maintaining and keeping under review an up-to-date version of the Constitution (setting out in particular the bodies and post holders able to exercise, the Council's functions, and codes of behaviour for members and officers) and making this widely available to Councillors, officers and the public.
- Holding an up-to-date list of authorisations issued by the Directors to other officers under Part 3, paragraph 8.7 and Appendix 3 of the Constitution, permitting other officers to exercise powers delegated to them under the Constitution.
- Reporting to full Council (or to the Executive if the matter to which the report relates is an executive responsibility) if she considers that any proposal, decision or omission has given, may or would give rise to unlawfulness or has given rise to any maladministration which has been investigated by the Ombudsman.
- Contributing to the promotion and maintenance of high standards of conduct through provision of support to the Standards Committee and by maintaining a Register of Interests of Councillors and voting co-opted members of the Council
- Receiving and acting on complaints that a member has breached the Islington Members' Code of Conduct
- Advising whether decisions of the Executive are in accordance with the Policy Framework and the Budget.

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- Advising Councillors on the scope of powers and authority to take decisions, maladministration, financial impropriety, probity and budget and policy framework issues.

3.12. *Ensuring effective arrangements are in place for the discharge of the head of paid service function*

3.12.1. As head of the paid service, the Chief Executive works closely with elected members to deliver the following:

- Leadership: working with elected members to ensure strong and visible leadership and direction, encouraging and enabling managers to motivate and inspire their teams
- Strategic direction: ensuring all staff understand and adhere to the strategic aims of the organisation and follow the direction set by the elected members
- Policy advice: acting as the principal policy adviser to the elected members of the Council to lead the development of workable strategies which will deliver the political objectives set by the Councillors
- Partnerships: leading and developing strong partnerships across the local community to achieve improved outcomes and better public services for local people
- Operational management: overseeing financial and performance management, risk management, people management and change management within the Council

3.13. *Undertaking the core functions of an audit committee, as identified in CIPFA's Audit Committees: Practical Guidance for Local Authorities*

3.13.1. The Audit Committee and its associated Sub-Committees exist to deal with a range of matters including Council accounts and audit functions and personnel and electoral registration functions.

3.13.2. The regular training of the Audit Committee's members helps ensure the Committee is able to effectively discharge its responsibilities.

3.13.3. The Audit Committee has independent members suitably qualified to support the committee in an advisory capacity.

3.14. *Ensuring compliance with relevant laws and regulations, internal policies and procedures, and that expenditure is lawful*

3.14.1. Chief Officers are responsible for ensuring that their staff operate lawfully and that human resources policies and the Code of Employee Conduct promote high standards of behaviour and are reinforced by appropriate training. As well as providing support on request on specific projects and issues, the Council's Legal Service provides proactive updates, training and advice to all Chief Officers and Members on new legislation and case law developments and changes to existing legislation and regulations. Legal Services explain the legal implications in all reports to the Council, its Committees and the Executive. The service also provides legal implication comments for reports to Chief Officers and to meetings of the Corporate Management Board. A representative of the Service attends all Council, Executive, Policy and Performance Scrutiny Committee, Planning and Licensing meetings and other meetings when appropriate.

3.14.2. The Internal Audit function produces an annual plan which identifies key strategic and operational risks facing the Council and sets out a programme of work designed to provide assurance to the Section 151 Officer, Management and Members that the Council complies with relevant laws, regulations, internal policies and procedures. All internal and external audit reports are available to the Audit Committee.

3.15. *Whistleblowing and for receiving and investigating complaints from the public*

3.15.1. The Council has established a whistle blowing policy in accordance with the requirements of the 1998 Public Interest Disclosure Act. This forms part of the Council's Anti-Fraud Policy. The Audit Committee is responsible for reviewing and updating the whistle blowing policy and receives a report concerning it annually. The policy was updated in March 2014.

3.15.2. The whistle blowing policy is publicised to staff via the corporate induction process, internal newsletters and on the Council's intranet and internet sites. The policy encourages officers to report inappropriate action by fellow employees or Members, also by external contractors, without fear of victimisation or retribution. Whistle blowing referrals are promptly investigated by Internal Audit, where appropriate, after initial referral to the Head of Internal Audit. Whistle blowing referrals have increased year on year and have more than doubled in 2015/16, where 23 whistle blowing referrals have been made.

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- 3.15.3. Islington Council has a formal process for managing complaints which has been reviewed and streamlined, with a view to "getting it right first time". The process is set out on the Council website and is available from Council offices and libraries.
- 3.15.4. The Council has a corporate complaints officer responsible for ensuring that the Council learns from complaints and improves its performance as a result. Departmental complaints officers record and report on all complaints, and the service response is monitored.
- 3.15.5. Complainants who are dissatisfied with how the Council has dealt with a complaint can contact the Local Government Ombudsman; an independent, impartial and free service. The Ombudsman has powers to independently investigate complaints about how the Council has acted.

3.16. Identifying the development needs of members and senior officers in relation to their strategic roles, supported by appropriate training

- 3.16.1. Islington Council is committed to the on-going professional development of Members and officers. Upon election, all Members are given a corporate induction and offered access to an on-going training and mentoring programme. All training provided to Members is reported to Committee annually.
- 3.16.2. Since the local elections in June 2014, training and development has been provided to councillors both on a group and individual basis. This has included personal development skills based work as well as specific knowledge. Councillors have also attended various conferences and away days as well as specific events put on by the LGA and London Councils.
- 3.16.3. There is an annual performance appraisal scheme for officers, which links targets to service objectives, underpinning the Council's vision. Through these processes, officers are able to identify their development needs, which are logged on individual development plans that they are encouraged to maintain.
- 3.16.4. Newly employed officers attend the Council's corporate induction programme, in addition to which directorate and role specific training is provided where needed. Information on staff training and development programmes and courses available are regularly publicised on the Council's intranet website, IC Bulletin and News Roundup, which includes an induction training course for all new Islington staff and Managers. An extensive induction programme was developed to support staff transferring to the Council as part of insourcing council services such as waste and repairs services. There is compulsory training for staff on key issues such as equality, data security and health and safety.

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3.16.5. The Executive and the Corporate Management Board have a number of 'away days' each year that help them to improve their performance collectively through ideas sharing and looking at improved ways of working.

3.17. Establishing clear channels of communication with all sections of the community and other stakeholders, ensuring accountability and encouraging open consultation

3.17.1. The Council regularly engages and consults with residents and the wider community on a diverse range of issues. Various communication channels are used, including council-mapped websites, social media channels, public meetings and the quarterly magazine delivered to residents. In 2014, and again in 2015, a survey of 1,000 residents was undertaken to test perceptions of the Council, its services, and the priorities for residents. The findings are used to shape policy and communications.

3.17.2. An annual Voluntary and Community Sector Conference, hosted each year, provides an opportunity for engagement with a wide number of local organisations who work closely with some of the most vulnerable residents.

3.17.3. In 2015/16 the council spent £1.65 million on core grants to the borough's main voluntary sector advice agencies (Law Centre, Citizens Advice Bureau, Islington People's Rights) and the Help on Your Doorstep advocacy service. A further £241,000 is given for specialist projects advice and advocacy. All organisations serve the poorest and most vulnerable residents. Over half of users are women, 65% from BAME communities and (depending on the organisation) the number of disabled residents served ranges from 32% to 70%. Around 70% of all users live in social housing, while 20% rent privately.

3.17.4. The Council is in the process of reviewing and agreeing grants for the next four years, with refreshed criteria to ensure that funding is targeted at those organisations best able to support residents and communities who need it most.

3.17.5. Council meetings are open to the public; however exceptions are made for matters that require confidentiality. The time, date and location of public meetings are displayed on the Islington website.

3.17.6. Ward partnerships provide a means for councillors to engage with residents and organisations in their ward to discuss local issues. . Meetings are open to the public.

3.18. *Enhancing the accountability for service delivery and effectiveness of other public service providers*

- 3.18.1. Each Executive Member is required to report annually to the relevant scrutiny committee on delivery of services and priorities within their portfolio. The Executive Member is accompanied by the relevant Corporate Director. Details are set out in the performance management framework.
- 3.18.2. Accountability and effectiveness of other service providers is addressed through relevant partnership arrangements, including the Safer Islington Partnership, Children and Families Board and the Health and Wellbeing Board.
- 3.18.3. The Council's scrutiny committees can undertake more in depth research into particular challenges or concerns, and request evidence from other service providers.
- 3.18.4. The Health and Wellbeing Board, which includes membership from the Council, Islington Clinical Commissioning Group and Healthwatch Islington provides the mechanism for leadership of the local health and wellbeing system, maintaining an overview of account for improvement in health and wellbeing outcomes, and ensuring effective coordination and integration of commissioning plans to secure best use of resources and population health outcomes.

3.19. *Incorporating good governance arrangements in respect of partnerships and other joint working as identified by the Audit Commission's report on the governance of partnerships, and reflecting these in the authority's overall governance arrangements*

- 3.19.1. The Council works in partnership with a wide range of organisations from the statutory sector, third sector and business to deliver services for local people and drive forward improvements in Islington. Partnership working includes different types of relationships – from contractual arrangements between the Council and other organisations to deliver services or projects through to strategic forums (some of which are required by statute, others voluntary) which bring partners together around the table to agree how best to tackle key challenges and shared priorities. Some have funding to allocate and targets to meet, others provide a steer to inform individual partners' priorities and commissioning.
- 3.19.2. The governance arrangements vary depending on the nature of partnership working but are designed to ensure that the partnership remains appropriate, effective and fit for purpose. In addition, the Council's Financial Regulations provide guidance on best practice in managing partnership arrangements.

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- 3.19.3. Where the relationship is a contractual one i.e. funding to deliver an agreed service, the contract or service level agreement will set out requirements around use of funding, what is to be delivered, targets, measurable outputs and how the contract is to be monitored, reviewed and evaluated. Contracts and budgets are managed by the relevant department with the Corporate Director or Assistant Chief Executive having overall responsibility.
- 3.19.4. Where the relationship is a strategic one, for instance membership of a partnership such as the Safer Islington Partnership, the Terms of Reference will set out governance and accountability.
- 3.19.5. Generally speaking, most partnerships and forums are not legal entities - partners are there on a voluntary basis and the Council is the formal accountable body in terms of any targets or funding that falls within the remit of the partnership.
- 3.19.6. Where a partnership is a mandatory requirement, e.g. the Safer Islington Partnership and Children's Trust Boards, there will be an expectation set out in legislation on named partners to attend. Even in the case of non-mandatory partnerships such as the Children and Families Board or the Islington Partnership Board, partners may agree 'mandatory' membership from key organisations.
- 3.19.7. Over the past decade, the Council has worked closely with its partners through the Islington Partnership Board (IPB) and its precedents to allocate funding to deliver priorities and targets agreed with government. The IPB agrees the overall priorities for the borough, shares information about key issues affecting individual organisations and agrees joint working arrangement for cross cutting challenges such as youth unemployment and welfare benefit reforms.

4. Review of Effectiveness

- 4.1. The Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the executive managers within the authority who have responsibility for the development and maintenance of the governance environment, the head of internal audit's annual report, and also by comments made by the external auditors and other review agencies and inspectorates.
- 4.2. The Annual Governance Statement has adopted the six core principles of good governance as recommended by CIPFA/SOLACE. The Council has a number of mechanisms in place to ensure that its partnership governance arrangements are appropriate, fit for purpose and effective.

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4.3. The process and activities that have been applied in maintaining and reviewing the effectiveness of the governance framework are set out below.

4.3.1. The Authority

Part three of the Council's Constitution sets out which bodies or officers are responsible for which functions, whether Executive or Non-Executive. The terms of reference of bodies referred to in this Constitution are set out in part 5 of the Constitution. These include specific responsibilities for ensuring the Council has effective governance arrangements in place.

The Authority's functions may lawfully be exercised by:

- Council;
- The Executive;
- The Leader;
- Individual members of the Executive;
- Individual Ward Members (although not currently in Islington as the Council has not decided to delegate any such powers);
- Committees and Sub-Committees of the Council or the Executive;
- Joint Committees;
- Officers, and
- Other persons properly authorised under specific legislation.

4.3.2. The Executive

The Executive is made up of the Leader of the Council and seven Executive members. The Executive is responsible for the Council's most significant decisions, which are made in line with Council policy and budget. Its terms of reference are clearly defined in Parts 3 and 5 of the Constitution.

The Executive also has an important role in the risk management process, reviewing the corporate risk register on a quarterly basis. Executive agendas, minutes and summaries of decisions are available on the Council website.

4.3.3. Audit Committee

The Audit Committee's terms of reference are set out in Part 5 of the Constitution and are in accordance with recommendations from CIPFA. Its key responsibilities include approval of the annual Internal Audit work plan, review and approval of the annual Statement of Accounts and monitoring the effectiveness of the Council's corporate governance activities and promoting high standards of member conduct.

The Committee meets on a quarterly basis. Since its inception in November 2008, it continues to review and report on the Council's

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auditing processes, with particular regard for performance, value for money, and governance issues. The Committee includes independent members.

4.3.4. Scrutiny Committees

The Policy and Performance Scrutiny Committee and the theme based scrutiny committees enable Councillors to scrutinise the performance of the Council and its partners and decisions made by the Executive.

Scrutiny Committees have responsibility for overseeing performance of the service area within their remit. There are four Scrutiny Committees, closely aligned with Council departments as follows:

- Children's Services Scrutiny Committee;
- Health and Care Scrutiny Committee (to cover Public Health and Adult Social Care);
- Environment and Regeneration Scrutiny Committee, and
- Housing Scrutiny Committee.

Policy and Performance Scrutiny Committee will act as the Scrutiny Committee for those areas not covered above i.e. Crime, Employment, Finance and Resources and is initially responsible for all Councillor Calls for Action.

4.3.5. The Standards Committee

The Standards Committee is responsible for considering complaints of breach of the Members Code of Conduct referred by the Monitoring Officer.

The Committee has the support of Independent Persons appointed under the Localism Act 2012 in respect of its consideration of complaints.

4.3.6. Internal Audit

The Public Sector Internal Audit Standards (PSIAS) require that the Head of Internal Audit provides an annual audit opinion and report that can be used by the organisation to inform its governance statement.

Audit Approach

The Internal Audit plan is developed using a risk-based approach. Internal Audit provide reports on the control of key potential risks identified from risk registers and reports and also comments on operational risks found in services which could impact on the achievement of business objectives.

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The audit plan is delivered by the in-house team across the Cross Council Shared Audit Service (with Camden) and our internal audit contractor, PWC. Key messages arising from Internal Audit's work in the 2015/16 year regarding areas where the Council's controls and governance need to be strengthened are included in section 5 below. The full summary of the work that Internal Audit has undertaken during the financial year 2015/16 which provides detail on the high risk and priority issues which could impact on the effectiveness of the internal control environment across the Authority is provided in the Internal Audit Annual Report 2015/16 to the September 2016 Audit Committee.

All planned audits from 2015/16 will be scheduled for follow up reviews to ensure that management action plans for implementation of agreed audit recommendations have been fully implemented within agreed timescales. This will provide DMTs, Corporate Governance Group, CMB and the Audit Committee with a direction of travel in the internal control environment across the Council and areas where further improvement is required.

Audit's assurance opinion is further informed through a "Service Assurance Statement" process which involves an on-going self-assessment within the year by Corporate Directors of the extent to which their services comply with expected controls and processes operating across their Service Directorates. The outputs from the completed self-assessments are mapped against Internal Audit's independent assessment of the internal control environment as well as the departmental risk registers. This assurance process provides the Council with greater assurance to support and embed a robust governance framework.

Head of Internal Audit's Annual Opinion

The Head of Internal Audit is satisfied that the work undertaken during 2015/16 has enabled him to form a reasonable conclusion on the Council's control framework, risk and governance arrangements. For the year ended 31st March 2016, it is the Head of Internal Audit's opinion that the adequacy and effectiveness of the Council's arrangements is **Moderate Assurance** – overall the Council's systems for control, risk and governance are generally adequate with some improvement required. Weaknesses identified in individual assignments (including those rated as critical) are not significant in aggregate to the system of internal control; high/critical risk rated weaknesses identified in individual assignments are isolated to specific systems or processes. Where we have concluded "no assurance" in 2015/16, robust action plans have been agreed with services and we are expecting a high level of implementation of recommendations. Revision to assurance ratings and residual risks will be closely monitored through follow ups in early 2016/17.

Section 6 (Part 2) of The Accounts and Audit Regulations 2015 require that relevant bodies conduct, at least once in each year, a

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review of the effectiveness of the system of internal control. The findings of the review must be considered as part of the consideration of the system of internal control referred to in the regulations by the body or relevant committee of the body. We concluded that the internal audit service continues to be effective, complies with the Public Sector Internal Audit Standards (PSIAS), and provides the necessary skills and expertise to deliver a cost effective, value added, service to the Council, its partners and stakeholders.

Key Improvements and overall performance of the service in 2015/16 include:

- Key Performance Indicators showed that internal audit meets set targets for delivering the audit plan, maintaining staff productivity targets, and following up on implementation of agreed audit recommendations;
- Audit Quality Surveys received following each completed audit project revealed that surveys showed good or very good satisfaction with the audit service provided;
- External audit continue to place reliance on the work of internal audit through their review of audit work on key financial systems and other key risk areas, and
- CCAS (the Cross Council Assurance Service) provides opportunities both to enhance the value from the provider but also to work more closely with member boroughs to develop the shared service benefits even further.
- Peer review to be undertaken in May 2016 by Croydon to comprehensively review the effectiveness of the shared audit service with Camden.

5. Significant Governance Issues during 2015/16

5.1. A key element of the annual governance review process is also to identify any significant internal control issues. The Council has adopted the approach recommended by the CIPFA which has identified what may be considered generally as a significant issue. These include:

- The issue has seriously prejudiced or prevented achievement of a principal objective;
- The issue has resulted in a need to seek additional funding to allow it to be resolved;
- The issue has resulted in significant diversion of resources from another aspect of the business;
- The issue has led to a material impact on the accounts;

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- The audit committee, or equivalent, has advised that it should be considered significant for this purpose, or
- The Head of Internal Audit has reported on it as significant in the annual opinion on the internal control environment.

5.2. In 2015/16, the Council commissioned a piece of work by PWC to assist in the handling of the response to a data breach linked to the Parking Ticket Viewer application used by the Environment and Regeneration Directorate. It was found that poor overall security control design and operation resulted in a vulnerable system that exposed information to unauthorised users. Key themes from the audit related to the role of ICT in business transformation, governance and accountability for ICT provision and risk appetite. A remedial action plan has been put in place and is being monitored by Digital Services.

5.3. Our other work within Departments over the year has not identified any significant issues with the Council's overall governance framework, however, work will continue with Children's Services to further develop their control frameworks.

5.4. The following areas of governance/assurance are also noted:

Finance & Resources

5.4.1. The Council has a sound process to setting its budget that ensures that estimates are robust and in particular savings proposals are fully scrutinised to ensure political, managerial and financial deliverability. The Council's budget monitoring process during the year routinely monitors service financial performance and key risks against budget and looks to put management action in place to deliver the council's financial outturn within the overall budget.

5.4.2. Since 2010 the Council's budget has been subject to major funding cuts. Between 2010 and 2015 the Council has had to make £150m in savings. Following the recent Local Government Finance Settlement the Council is faced with making a further £72m of savings over the coming four years. Detailed planning during 2015 identified £24m of savings to balance the budget for 2016/17 and work has started on the options to find the further £58m of savings forecast to be needed through to 2019/20.

5.4.3. The Chancellor's budget 2016 announced a further £3.5bn of government departmental spending cuts required by 2020 and a further £8bn of spending cuts pencilled in from 2020/21. It is uncertain at this time how the further cuts will impact on local government and Islington in particular and how the additional £3.5bn squares with the 4-year settlement offer from the government in December 2015 to provide councils with certainty in their financial planning.

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- 5.4.4. In the context of such unprecedented cuts it is a testament to the robustness of the budget setting and monitoring processes and control framework that in each financial year since 2010, the council has delivered its overall spending within budget. Cuts to financial management resources of around 50% since 2010 has add more risk to the process, however processes and the organisation of those resources have been reviewed to mitigate the risk as much as is possible and focus the reduced resource where they are needed.
- 5.4.5. The Council's Housing Revenue Account has benefited over a number of years from a robust and funded 30-year business plan. Recent government policy has created a large degree of financial uncertainty for the Housing Revenue Account with the requirement to reduce rents by 1% per annum and the proposed forced sale of high value void properties. Robust savings plans have been put together for the immediate budget (2016/17) and medium term options developed with longer term funding options under active consideration. The conclusion for the Housing Revenue Account is that it has moved from a low financial risk for the Council to a higher risk category from both a financial and service context. However financial management processes remain robust.

Children's Services

- 5.4.6. The current structures and organisational arrangements provide a strong accountability scrutiny, leadership and management grip on Islington's statutory duties for children in need of help and protection, children in care and care leavers, including early help and benefitting from high educational standards locally.
- 5.4.7. The Corporate Director of Children's Services reports directly to the Chief Executive and the span of control allows the work to be given due priority. Assurance checks are integral to the decision making processes of the Council. The quality of work for children in need of help and protection, children looked after and care leavers is scrutinised through Islington's Quality Assurance Framework. Professional leadership is challenged by the Chief Executive and Leader of the Council who hold the Corporate Director of Children's Services, the Lead Member for Children and Families and the Director of Specialist and Targeted Services to account on a quarterly basis. Progress on themes arising from audit and performance data is reported at these meetings.
- 5.4.8. As part of this quality assurance, external and highly qualified professionals in the field carry out service reviews to benchmark against inspection expectations. There are research links with universities that inform practice, and this has led to an Innovation Grant

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from the DfE on Motivational Social Work, Doing What Counts, Measuring What Matters.

- 5.4.9. An annual self-assessment is carried out. Social worker caseloads, timeliness of interventions and outcomes for children are monitored at all levels and management oversight is good. The quality, value for money and sufficiency of placements for children is kept under review. An evaluation of Early Intervention has been undertaken, and early findings indicate good impact. Only evidence based programmes are in use.
- 5.4.10. The Islington Safeguarding Children Board (ISCB) has an independent chair who meets periodically with the Corporate Director as part of the accountability framework outlined in paragraph 5.4.7. The ISCB annual report is discussed by the Health and Wellbeing Board (HWB), Children and Families Board (CFB) and the Children and Families' Scrutiny Committee. Both the HWB and CFB reflect on the learning and build ISCB recommendations into their respective strategies. There continues to be a strong focus on Child Sexual Exploitation through the ISCB's sub group that leads the partnership on this work, complemented by the Council's elected member working group on CSE. The ISCB also oversees multi-agency audits of practice, training and compliance with safeguarding requirements set out in legislation. The Children and Families' Scrutiny Committee have looked at the impact of early help, new arrangements for children with special educational needs and the annual report on learning and education standards.
- 5.4.11. The Joint Strategic Needs Assessment includes sections on vulnerable children and those in need of help and protection, and is used to determine priorities for both the safeguarding board and for services for children and families. Educational outcomes for Children Looked After and care leavers are scrutinised at the Corporate Parenting Board.
- 5.4.12. The Corporate Parenting Board is chaired by the Lead Member for Children and Families. It has strong representation from the Children's Active Involvement Service, and the voice of the child is well evidenced in individual casework. Budget and change management proposals are scrutinised for impact on the quality of work with children in need of help and protection, children looked after and care leavers and this is included in Equality Impact Assessments.

Housing and Adult Social Care

- 5.4.13. HASS Corporate Director is the statutory DASS for Islington. DASS is responsible for providing professional leadership for all local authority staff involved in delivering the council's social services functions for adults and across local networks and partnerships involved in the

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provision of adult social care services. DASS is also accountable for ensuring that relevant professional and occupational standards and standards of conduct are maintained across adult social care services provided by, or commissioned by the local authority.

- 5.4.14. The Corporate Director of Housing and Adults Social Services reports directly to the Chief Executive and the span of control allows Adult Social Care to be given due priority. Assurance checks are integral to the decision making processes of the Council. Professional leadership is challenged by the Chief Executive and Leader of the Council who hold the Corporate Director of Housing and Adult Social Services, the Deputy Leader (who is also Lead Member for Health and Social Care) and the independent Chair of the Safeguarding Adults Partnership Board to account on a quarterly basis. Progress on themes arising from audit and performance data is reported at these meetings.
- 5.4.15. Islington has a Safeguarding Adults Partnership Board that meets the current and new requirements for its scope and inclusiveness, chaired by an independent expert in the field.
- 5.4.16. The Council has partnership agreements ("section75") with the Camden and Islington Mental Health Foundation Trust, Whittington Health and Islington NHS Clinical Commissioning Group, for the provision and commissioning of health and social care services. The purpose is to ensure cost effective, joined up services for vulnerable people. There are regular meetings between the Chairs and Chief Executives of these organisations and the Council Leader and Chief Executive, and an annual report to the respective Boards and the Council's Executive to ensure that the day to day arrangements for collaborative working are meeting the aims of the partnerships and the objectives of the Council. These arrangements have been strengthened in the light of the Better Care Fund and greater inter-dependency of health and social care funding. The partnership agreements have been reviewed, and the council and the CCG have reviewed their respective commissioning structures to ensure better integration and accountability on both sides. These arrangements have been formally agreed by the Health and Wellbeing Board in line with national guidance.
- 5.4.17. HASS is responsible for managing council tenancies and council leasehold properties in the borough, either directly or by clienting Partners for Improvement (PFI). A Homes and Estates Safety Board, with an independent chair, oversees the particular fire and property-related risks to people in these dwellings. This is part of the overall corporate health and safety arrangements.
- 5.4.18. HASS Property Services have effective arrangements in place to monitoring equipment and stock. Arrangements are in place to actively manage the risk of fraud through prevention and detection techniques.

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Stock control within the repairs service has been audited with a moderate assurance rating. Improvements are being implemented.

5.4.19. Islington also has two long term PFI contracts to manage street council housing. The contract is managed by a clienting team with governance via senior management meetings with the PFI board and scrutiny via a range of annual audits carried out by the council's Internal Audit. In the last year performance has improved and penalties have been applied where properties have not been up to standard.

5.4.20. The relationship with the 25 Tenant Management Organisations in the borough is managed by the TMO compliance team supported by internal audit who run an annual programme auditing TMO financial and governance controls.

5.4.21. Residents are involved in the prioritisation and governance of the housing service via reference groups and representation on housing scrutiny.

Information Assurance

5.4.22. The council received an on site audit from the Information Commissioner's Office in February 2015 and received an overall rating of 'Reasonable Assurance'. The council has implemented the agreed actions from this audit and completed a follow up review with the ICO in October 2015. Other work has continued to improve Information Assurance, in line with our Information Roadmap. This includes the development of a Records Management policy, the review of the retention schedule and the beginnings of work to prepare the council for the General Data Protection Regulation which is expected to become enforceable in 2018. This regulation will shape the council's approach to Information Assurance over the coming few years.

5.4.23. In 2015/16, the Council commissioned a piece of work by PWC to assist in the handling of the response to the recent data breach linked to the Parking Ticket Viewer application. This is outlined in 5.2.

5.4.24. The risk and importance of cyber security is corporately recognised, with specialist sessions undertaken at Senior Leadership Group, delivered by Cyber Security specialist. Further assurance is being sought through the 2016/17 internal audit plan.

Anti-Fraud

5.4.25. During 2015/16, the Anti-Fraud Strategy has been designed through a unified corporate approach utilising the expertise of the fraud investigative community, which has strengthened the Council's stand against fraud. As part of the delivery of the Anti-Fraud Strategy, a Corporate Prosecution and Enforcement Policy has been written. This

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sets the standards and guidelines that assists in the decision making process when prosecution or enforcement action is necessary as part of the commitment to protecting the Council's funds, assets and reputation. The addition of the Fraud Forum to the Governance arrangements ensures that Fraud and Risk in different areas of the business is reported and acted upon.

Signed by:

Richard Woot 12/5/16
Leader Date

Signed by:

L. Stann 12/5/16.
Chief Executive Date

Report of: The Corporate Director of Finance and Resources.

Meeting of	Date	Agenda Item	Ward(s)
Audit Committee	6 June 2016		

SUBJECT: The TicketViewer Breach and Cybersecurity

1. Background

- 1.1. Islington Council is a digital organisation; we exploit the benefits of digital technologies to help staff work efficiently, to collaborate with partners to support residents and to offer online services to citizens. We are now highly reliant on our ICT capabilities in almost all we do.
- 1.2. Like all digitally enabled organisations, Islington Council is under constant attack; in April 2016 Digital Services blocked 924,096 spam and phishing emails, many of which seek to compromise the Council's infrastructure and information; and of the 40 million attempts to connect to our network we check every day around 85% are blocked as unwanted.
- 1.3. The threat is sustained and growing. Our attackers come in many forms from the archetypical teenage hacker in their bedroom; through to crime syndicates and the proxies of nation states.
- 1.4. The vast majority of these attacks are untargeted – those perpetrating them have nothing specific against Islington Council – and they simply seek random victims to exploit for their own ends. A smaller number may be targeted at us.
- 1.5. Our attackers have many motivations, including financial gain, publicising their causes and malice whether they be specific to Islington Council, the wider public sector, the UK, or general western interests.
- 1.6. Whilst the threat of malicious attacks is great, as a digitally enabled organisation we also face the risk of unintentional vulnerabilities or accidental actions resulting in information security breaches. These can result in significant business disruption and reputational damage. If criminals become aware of them, they may exploit them further.

- 1.7. The council benefits from government and industry security information sharing arrangements to keep us up to date with the latest vulnerabilities and threats and has access to specialist and specific support from the PwC cybersecurity team through our internal audit contract.
- 1.8. Both malicious and accidental actions can cause information security breaches. Both must be managed as security incidents.

2. Recommendations

- 2.1. Recognise there needs to be a balance between delivering the digital transformation programme at the required pace and maintaining appropriate and proportionate information security controls, and that this an agreed approach to risk.
- 2.2. Request internal audit explore broader information security risks, focussing their work on the identification and protection of our higher risk information assets, largely those containing sensitive personal information and accessed from outside the council's network to enable self-service and information sharing with partners.

3. The changing nature of the threat and our response

- 3.1. Cybersecurity has traditionally relied on strong perimeter defences to prevent attackers from accessing our internal network and information on the assumption that the "baddies" were on the outside and the "goodies" were on the inside, and if we built a big enough walls we could keep them separate.
- 3.2. While this approach remains an essential part of our security it is no longer sufficient; for us to use and provide digital services we have to enable the flow of information to and from our partners and our citizens; and our attackers are constantly finding new ways of using these channels to get inside our network and attack us from within.
- 3.3. Common forms of cyber-attack that seek to use legitimate routes into our network for malicious purposes include attachments on emails containing malware; links to websites which automatically install malware on our computers and the exploitation of web forms.
- 3.4. Attackers who are specifically targeting us will also seek to exploit human factors, either by subverting our employees or contractors (insider threat), or by relying on poor security behaviours to gain a foothold.
- 3.5. We have responded to both implementing security-in-depth where vulnerable systems like email have multiple layers of protection so if one is compromised we still have other defences and by educating staff on how to identify and handle attacks. This is often referred to as a 'layered defence'.
- 3.6. Some of our most effective defences are mundane; such as regular checking for vulnerabilities; ensuring unused network accounts are removed promptly and updating security patches across our entire infrastructure quickly.
- 3.7. Despite these efforts, best practice across the cyber-security community is to operate on the 'assumed breached' principle. This approach starts from the premise that successful cyber-attacks are inevitable and every network has been, or will be, compromised. We are responding to this by preparing for different types of attacks to minimise the impact and restore normal services as quickly as possible.

4. Three Islington case studies

- 4.1. These case studies highlight the risks are real and relevant to Islington and illustrate the work Digital Services is doing to protect Islington's information and services.
- 4.2. In summer 2015 we were informed by government security services that we had been targeted with carefully crafted emails containing links to sites hosting malware; external advice indicated this was an advanced, persistent threat most likely from state sponsored hackers seeking particular information that Islington might hold to support their economic objectives. Extensive checking demonstrated our defences had repelled this attack and our network had not been compromised.
- 4.3. In autumn 2015 we suffered a ransomware attack similar to that which affected Lincolnshire County Council and was widely reported in the media. Prompt reporting by the first user affected combined with early detection allowed Digital Services to contain the attack to one service area, remove the ransomware and restore the encrypted files within a day, with minimal impact on Islington services.
- 4.4. On Christmas Day 2015 one of Islington Council's campaign websites was hacked and our content replaced with alternative content. Alerted by a concerned citizen the Council's out-of-hours service invoked Digital Services incident plan and the unauthorised content was promptly replaced and the campaign site further strengthened.

5. The TicketViewer Breach

Background

- 5.1. A concerned citizen legitimately using the TicketViewer system noticed they could see potentially personal and/or sensitive personal information relating to other people and alerted the council. The TicketViewer system was shutdown immediately to prevent further breaches and following an initial investigation to verify the situation we self-reported to the Information Commissioners Office and initiated an internal audit led cybersecurity review.
- 5.2. The TicketViewer breach was not the result of a malicious attack, but a combination of unintentional vulnerabilities that occurred without the Council realising. While the TicketViewer breach has many similarities with cyber-attacks, those who identified the weakness reported it to the Council rather than exploiting them.
- 5.3. If the failure had been exploited maliciously, the entire contents of the parking database could have been stolen by cyber criminals and/or placed irretrievably in the public domain causing embarrassment to citizens and exposing the impacted citizens to the risk of crime. The vulnerabilities could have enabled a malicious criminal to attack other systems.

Audit findings

- 5.4. The internal audit led review found the breach was caused by a combination of factors:
- 5.5. Firstly, the service was hosted on infrastructure managed and maintained by third parties, and was not subject to the same management controls as our core infrastructure.
- 5.6. Secondly, there was a misconception that the system did not contain any personal or sensitive personal information, so the need for additional controls was not identified.

- 5.7. Thirdly, there were design faults in the application, which was developed in-house some years ago, which allowed simple manipulation of the results of one search to access other records; and did not separate the pictures of the offences from other more sensitive information.
- 5.8. Fourthly, misconfiguration of the web server enabled any user to see other people's records on the system.
- 5.9. Fifthly, misconfiguration of the application firewall allowed unfettered access to the system, and opened up the possibility of the contents of the database being copied off our network. While this is possible, extensive forensic investigation found no evidence that this happened.
- 5.10. While the TicketViewer system was hosted separately from most other Council systems there were links to other applications and attackers could have silently secured control of the TicketViewer system and used this as a platform within our boundary defences to attempt to compromise other systems. While this is possible, extensive forensic investigation found no evidence that this happened.
- 5.11. Digital Services commissioned an external reconnaissance test to identify any other potentially vulnerable applications outside the main data centre and found no similar circumstances.

Current situation

- 5.12. The TicketViewer system remains unavailable. This is an inconvenience for citizens and is impacting on business processes. There is a strong desire to restore the ability to view information supporting parking tickets online in a way which is secure.
- 5.13. The Digital Services led review of the business processes and supporting technology is drawing to a close. The fieldwork is complete and the results are being collated to produce a detailed technical action plan to support the broader audit recommendations.
- 5.14. A Web Services Standard has been produced, and approved by the council's Technical Design Authority (TDA) which introduces specific technical controls which all new web-based systems must comply with. The standard includes guidance from Microsoft and the Open Web Application Security Project (OWASP). Systems built to this standard will mitigate many of the most common forms of external threat.

Next steps

- 5.15. While the detailed results are being collated some clear themes have emerged:
- 5.16. TicketViewer functionality is available in the new parking management system – Taranto - and utilising this, rather than the original locally developed system, will provide greater assurance that the system is robust. We estimate it will take three months to implement this module.
- 5.17. The alternative internet connection and supporting infrastructure at Old Street unnecessarily duplicates functionality available on the core network and introduces additional risk. The feasibility of channelling all internet traffic via the two main connections is under investigation.
- 5.18. Data centre consolidation plans, which are likely to reduce the number of data centres operated across Camden, Haringey and Islington, needs to consider whether the Old Street data centre is better integrated into other existing facilities.

Additional work with PwC as our internal auditors is under consideration. This will examine broader information security implications, particularly in high risk applications where sensitive personal

information is potentially exposed outside the network to support self-service functions and information sharing.

Implications

Financial implications:

- 5.21. The Information Commissioner's Office (ICO) has powers to levy a financial penalty of up to £500,000 for each data breach. The ICO is still investigating the TicketViewer breach and we are not yet aware if the Council will be fined or face other compliance action.
- 5.22. Dealing with a cybersecurity incident has significant financial implications; including the initial response, investigations, expert advice and implementing any recommendations; and also the loss of service and potential loss of income or additional expense in providing services.
- 5.23. This must be weighed against the cost of remediation and/or investment to prevent or reduce the risk and impact of information security breaches.

Legal Implications:

- 5.24. Principle 7 of the Data Protection Act states that appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. Most fines levied by the ICO have been for breaches of Principle 7.
- 5.25. The EU has just published the final text of the General Data Protection Regulation, which is due to become law on 25 May 2016, and will be enforceable from 25 May 2018. This regulation will enable fines of up to €20Million for data breaches.
- 5.26. While the Ticket Viewer breach involved an internally-developed bespoke system, care should still be taken when procuring third-party solutions or cloud services, as the data and information security risks remain with the Council. Due diligence should still be undertaken, and the Council sufficiently assured that risks are appropriately mitigated and/or liability is shared before committing to contracts with third parties.

Environmental implications

- 5.27. None

Resident Impact Assessment:

- 5.28. The loss of personal and sensitive information relating to residents clearly has an impact on them individually; and the resulting loss of service may have an impact on many residents.

Conclusion and reasons for recommendations

- 5.29. Digital technologies bring risks as well as opportunities; the Council needs adopt and maintain an appropriate balance to provide effective services while accepting appropriate risk.
- 5.30. With around 400 applications in use, increasing citizen self-service over the internet and the commodification of advanced hacking tools there remains a danger of further data breaches despite our extensive efforts to protect our applications and information.



24 May 2016

Signed by

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Corporate Director of Finance

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Date

Received by

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Head of Democratic Services

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Date

Appendices

- None.

Background papers:

- None.

Report author: Adrian Gorst, Digital Services
E-mail: adrian.gorst@islington.gov.uk



Chief Executive's Department
Town Hall, Upper Street, London N1 2UD

Report of: Assistant Chief Executive, Governance and HR

Meeting of:	Date	Ward(s)
Audit Committee	6 June 2016	All

Delete as appropriate	Exempt	Non-exempt
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SUBJECT: Review of Voluntary Redundancy Scheme

1.0 Synopsis

- 1.1 The Council has run council wide voluntary redundancy schemes in the last six financial years. The last scheme (2015/16) provided for an increased incentive payment of £5,000 in addition to the entitlement they would receive under the council's standard compulsory redundancy scheme. This report investigates the take-up and financial impact of the scheme and invites the committee to consider whether it would be appropriate to continue to offer an increased additional payment in the 2016/17 scheme.

2.0 Recommendations

- 2.1 To note the information in the report concerning the voluntary redundancy schemes run over the past six years.
- 2.2 To note the extra costs of the increased enhanced payment.
- 2.3 To agree that the scheme be offered in June/July 2016.

3.0 Background

- 3.1 The council has run a voluntary redundancy scheme in each of the last six financial years. Invitations to apply were issued to all directly employed council staff. The redundancy calculations have been based on the council's standard terms and conditions with an additional enhancement of £5,000 last year, and of £500 in the previous years. The standard redundancy payments scheme applies only to employees with two or more years' continuous service with a body listed in the Redundancy Payments (Continuity of Employment in Local Government) Modification Order.
- 3.2 Calculation of payments under the council's standard scheme is based on the statutory scheme but actual salary rather than the statutory weekly maximum is used for this calculation. The calculation is as follows:
- 0.5 week's pay for each full year of service aged under 22
 - 1 week's pay for each full year of service between the ages of 22 and 41
 - 1.5 week's pay for each full year of service worked from the age of 41 and over.

This is subject to a maximum 20 years of service (30 x a week's pay is therefore the maximum available).

- 3.3 The scheme has been agreed each year with the trade unions which support the principle of making voluntary redundancies before making any compulsory redundancies. This is also likely to impact positively on staff engagement levels. The council's Organisational Change procedure states that the council will seek to avoid compulsory redundancy by considering voluntary redundancy if this is appropriate.

4.0 How the scheme works

- 4.1 A copy of the draft scheme for 2016/17 is in Appendix 1.
- 4.2 The scheme is usually open for applications for a 4 week period either before or after the main summer break. However the 2015/16 scheme was run in the autumn due to uncertainties as to savings proposals until a later stage than normal. As general plans for savings for 2017/18 are already known, there is no need to delay this year's scheme. Applicants complete an online application form by the specified deadline and all applications completed are submitted to the relevant line manager and departmental management team for consideration. The Corporate Director or Assistant Chief Executive makes the final decision. Applications by Chief Officers are considered by CMB. There is no appeal of this decision.
- 4.3 Each individual case is assessed in the interests of the efficiency of the service and longer term financial considerations. Applications can only be accepted where it is appropriate to delete the employee's post. However, an unsuccessful employee may be placed on a central register of employees willing to take voluntary redundancy should another employee facing

compulsorily redundancy in the future be a suitable candidate for their post. This is known as a 'bumped' redundancy.

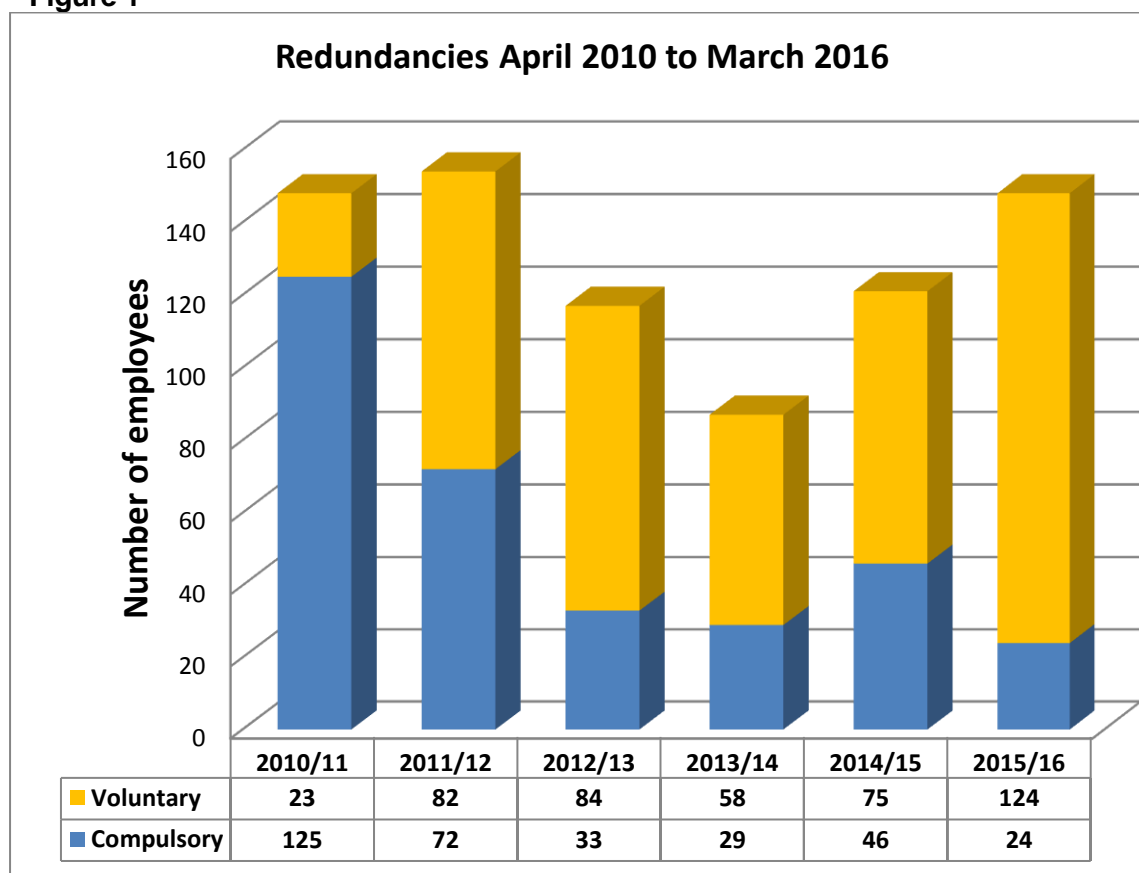
4.4 The proposed timing for this year's scheme is:

- Monday 13 June 2016 – open for applications
- Friday 8 July 2016 close
- w/c Monday 18 July 2016 – DMT's to make decisions on applications
- w/c Monday 1 August 2016 – employees advised on outcome of applications
- Employees to leave on 31 March 2017 (unless another date exceptionally agreed by the Assistant Chief Executive (Governance and HR).

5.0 Take-up of the scheme

5.1 Between April 2010 and March 2016 (inclusive) 775 staff exited the council by way of redundancy, 446 of whom were volunteers. Typically, in the region of 25% of voluntary redundancy applications are accepted. The remainder are declined or put on the central register.

Figure 1



5.2 The balance of redundancies has shifted over the last six years from a position where the majority were compulsory to the current situation where the majority

of redundancies are voluntary. In 2010/11 only 16% of redundancies were voluntary whereas in 2014/15 - 62% of redundancies were voluntary.

5.3 The distribution between departments is as follows:

April 2010 to March 2016	Chief Executive's	Children's Services	Environment & Regen	Finance & Resources	HASS	Public Health	Total
Compulsory Redundancy	50	118	68	62	28	3	329
Voluntary Redundancy	43	56	129	94	118	6	446
All Redundancies	93	174	197	156	146	9	775

6.0 Equalities Analysis

6.1 The average age of an employee leaving via voluntary redundancy is 51 compared to 46.09 for those leaving via compulsory redundancy and 44.3 for existing council employees. Older employees are usually more expensive to make redundant as the compensation calculation takes into account length of service and age. If an employee is aged 55 or over on their last day of service they are entitled to access their pension where applicable. This has additional financial implications known as a "pension strain".

The average age of an employee leaving has increased from 47.3 in 2010/11 to 51.71 in 2015/16.

Table 1

Year	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
Average age of VR leaver	47.3	49.2	52.2	52.7	50.48	51.71

Source: HR Systems 2016

51.70% of voluntary redundancy leavers are aged 55 or over compared to 24.10% of compulsory redundancy leavers and 20.33% of the existing workforce. This trend has increased markedly since 2010/11 and in the 2015/16 scheme 55.08% leavers were over 55.

Table 2

Year	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
% VR Leavers over 55	17.40%	41.50%	58.30%	58.60%	54.65%	55.08%

Source; HR Systems 2016

All the above data demonstrates that the voluntary redundancy scheme is being well used by older workers to exit the organisation.

- 6.2 White employees are more likely to leave via voluntary redundancy accounting for 66.29% of voluntary redundancies compared to 55.09% of compulsory redundancies and 52.98% of the workforce as a whole.
- 6.3 A higher proportion of employees with a disability leave via voluntary redundancy (8.8%) than compulsory redundancy (5.08%). This compares to 5.4% for the organisation as a whole.

7.0 Financial Analysis of take-up

- 7.1 As indicated in figure 1, there were 124 voluntary redundancies and 24 compulsory redundancies in 2015/16. Of these 81 were under the enhanced 2015/16 scheme. In addition, there were a further 14 voluntary redundancies agreed under the 2015/16 scheme which have had leaving dates agreed to take place by the end of June 2016. In addition, there have been 2 compulsory redundancies since then. It is anticipated that restructures to implement the 2016/17 savings which are not yet complete will generate a further 3 compulsory redundancies.
- 7.2 The additional costs incurred as a result of the increase of the incentive from £500 to £5000 in the pilot scheme is £427,500. The overall cost of the incentive payments made under the 2015/16 scheme is £475,000.
- 7.3 The council still has substantial savings to make and this will unfortunately involve further reductions in the workforce. It is therefore proposed that a further scheme be run in June /July 2016 to contribute to 2017/18 savings. Previous schemes have been run in the summer months.

8.0 The Enterprise Act 2016

- 8.1 The Enterprise Act introduced a £95,000 cap on termination payments for public sector workers, including those in local government. It also includes new and amended regulations to the Local Government Pension Scheme to enact the cap.

Payments in scope include:

- any payment on account of dismissal by reason of redundancy
- any payment on voluntary exit;
- any payment to reduce or eliminate an actuarial reduction to a pension on early retirement or in respect of the cost to a pension scheme of such a reduction not being made; (pension strain)
- any severance payment or other ex gratia payment;
- any payment in respect of an outstanding entitlement; (could include annual leave)
- any payment of compensation under the terms of a contract;
- any payment in lieu of notice;

- any payment in the form of shares or share options.

The commencement date for the introduction of this £95,000 exit cap not yet been published and it is not know if there will be any transitional arrangements regarding settlements already agreed.

- 8.2 In the 2014/15 scheme seven employees would have been affected by the introduction of this cap, mainly because of the additional cost of the pension strain. In the 2015/16 scheme there were no employees who fell within this category.
- 8.3 It is proposed that in the 2016/17 scheme employees taking voluntary redundancy continue to work until the end of the financial year (31 March 2017) as the scheme normally stipulates, as opposed to applying or allowing another earlier date of departure (unless another date is exceptionally agreed by the Assistant Chief Executive (Governance and HR). It will be made clear in the publicity for the scheme that those over 55 with pension scheme entitlements will need to bear this in mind.

9.0 Benefits to the council of a successful voluntary redundancy scheme

- 9.1 The voluntary redundancy scheme is advantageous for both management and employees. It enables employees to come forward and initiate a discussion about their future without fear of committing themselves until all the paperwork has been agreed once exit figures have been finalised. For managers, it means that they can plan reorganisations more effectively knowing in advance about who is thinking of leaving. It provides management with much more flexibility in planning aided by the “bumped” redundancy scheme.
- 9.2 Implementing compulsory redundancies is a significant drain on management time and is very disruptive for the wider workforce. Time is spent on individual consultation and in dealing with appeals which is saved if redundancy can be agreed on a voluntary basis.
- 9.3 The council has made a commitment in its Organisational Change policy to seek to avoid compulsory redundancies by using voluntary redundancy where appropriate. This commitment and its implementation is likely to have a positive effect on employee engagement and reduce the negative impact on service performance which can result from the distress and demotivation sometimes experienced by continuing staff whose colleagues have been made compulsorily redundant.
- 9.4 Use of voluntary redundancy also reduces the risk of legal claims against the council. Implementation of compulsory processes carries with it the risk of disputes and to employment tribunal claims. Even where these are successfully defended, they pose a further drain on management resource and on HR and Legal Services resources and may incur irrecoverable costs, for example in respect of the use of counsel in more complex cases.

10.0 Why continue with the £5,000 scheme?

- 10.1 The council is facing a further period of change as a result of reductions in funding from central government. This will inevitably require more redundancies to be made. The benefits of a successful voluntary redundancy scheme have been identified above and to ensure sufficient take-up and reduce the number of compulsory redundancies required and to attract a more representative cross section of the workforce it is considered that the incentive should remain at £5,000.
- 10.2 £5,000 amounts to approximately two months' pay for the average employee. It is considered that this should be a sufficient period to attract employees who are considering volunteering, but are concerned it might take them longer than their notice period to find a new job. As those with less than 2 years' continuous employment are only entitled to this additional scheme payment and not to a payment under the standard scheme, this £5,000 payment will make it more likely that employees in this category will consider applying for voluntary redundancy. It is also anticipated that this will make the scheme more attractive to lower graded staff who in the past have been under-represented amongst volunteers. This will enable fewer compulsory redundancies to be made amongst this staff group.
- 10.3 It is anticipated that with offering £5,000 interest in the scheme will be high and generate additional work within HR and for managers in administering the scheme. It is anticipated that this extra work will be offset by reduced time being spent on compulsory processes as described at section 9 above.
- 10.4 Consultation with the trades unions has taken place concerning the proposal to continue with the additional payment of £5,000 in line with last year's scheme and they have indicated their support for the proposal.
- 10.5 The scheme will revert to an additional payment of £500 for 2017/18 unless a further report is brought to the Audit Committee.

11.0 Legal implications

- 11.1 The council has power to enhance the statutory redundancy scheme and to make severance payments to staff not eligible for that scheme under the Local Government (Early Termination of Employment) (Discretionary Compensation) (England & Wales) Regulations 2006 (as amended) where dismissal is for redundancy or efficiency reasons.
- 11.2 Under the Redundancy Payments (Continuity of Employment in Local Government) Modification Order continuous service with bodies listed in the Order is included in the calculation of an employee's continuous employment for redundancy purposes.

12.0 Financial implications

- 12.1 In terms of the cost of the 2015/16 enhanced scheme. The 95 staff made voluntary redundant cost an additional £427,500 through the increased £5,000 enhancement above the previous £500. The cost alongside where relevant capital costs of early retirement were met in full from the Council Redundancy Reserve. The reserve is planned to be 'topped-up' and this should provide a sufficient resource to fund a 2016/17 VR scheme.
- 12.2 Given the scale of the continuing savings required by the council over the coming years a suitably attractive VR scheme is a useful tool in mitigating the impact of compulsory redundancies on staff and smoothing the achievement of savings.

13.0 Resident Impact Assessment

- 13.1 An equalities analysis of the operation of the scheme over the past six years is included in the body of the report.

14.0 Conclusion

- 14.1 The council's voluntary redundancy scheme has been successful over recent years. In order to maintain and extend its success, the Audit Committee is asked to agree that the additional payment available to volunteers under it remains at £5,000 for the 2016/17 scheme on a pilot basis.

Appendices

Draft Voluntary Redundancy Scheme

Background papers: (available online or on request)

None

Final report clearance:

Signed by:

Debra Norman
Assistant Chief Executive (Governance and HR)

Date 25 May 2016

Report Author: Pat Edwards (HR)
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Appendix 1

DRAFT Voluntary Redundancy Scheme 2016

BACKGROUND

1.1 CONTEXT

The council is faced for a further year with the need to make substantial savings which will inevitably entail some job losses. In order to minimise the need for compulsory redundancies, the council has decided to introduce a voluntary redundancy scheme which will operate for the 2016/17 financial year.

1.2 SCOPE OF THE PROCEDURE

This procedure applies to most non-school council employees. Those who are not eligible for a redundancy payment because they will not have completed 2 years continuous employment at the time of their departure may apply under the Scheme and will be eligible to receive a payment of £5,000 in the event that their employment is terminated pursuant to the Scheme.

- 1.3 Applications under this Scheme will not be considered unless they are received by the closing date of **Friday 8 July 2016**. It will still be possible for employees directly affected by a specific re-organisation to volunteer for redundancy during the consultation process concerning the specific reorganisation in the ordinary way but the special payment of £5,000 mentioned at 3 below will not be available.

PROCEDURE

2.0 Application for Voluntary Redundancy

- 2.1 To make a formal application for voluntary redundancy, you should complete the Voluntary redundancy application form which is available online at: <http://vr/>. Paper applications or e-mails saying you wish to apply will **not** be accepted. If you do not have access to a computer, please call HR Express on 020 7527 6070. As a courtesy, you should inform your line manager if you submit an application for voluntary redundancy.
- 2.2 Before you apply you should calculate your redundancy entitlement using the online calculator available on izzi. You can also contact the HR team on 020 7527 6070 or email hr.express@islington.gov.uk. If you require pensions figures as part of this calculation you should allow 5 working days for a response.
- 2.3 Requesting redundancy figures is not a formal application and does not commit you or the council to anything; it will simply trigger the production of a personal redundancy payment estimate for you. Your line manager is not notified of your interest in voluntary redundancy at this stage, although you may have already told them as a courtesy that you are interested in it.

2.4 Should you need formal estimate of pension entitlement, you should make this clear in your email requesting a redundancy estimate.

2.5 Once you have received the estimate of your redundancy figures, if you decide to proceed and make a formal application for redundancy you should apply as soon as possible but no later than midnight on **Friday 8 July 2016**

3.0 Voluntary Redundancy Pay

- 3.1 Under the council's current severance arrangements you will receive:
- a statutory redundancy payment based on your contractual weekly gross pay, rather than the statutory maximum of £479 per week;
 - immediate and unreduced payment of your benefits if you are a member of the Local Government Pension Scheme and provided that you:
 - have at least 2 years membership **AND**
 - are 55 years of age or over on your last day of service (assumed to be 31 March 2017 for the purpose of this exercise);

In the event that you are accepted for redundancy under this scheme, you will be entitled to a payment of £5,000 whether or not you qualify for a redundancy payment.

3.2 If you apply under this Scheme you will initially be provided with estimated figures with a last day of service of 31 March 2017. More precise figures will be supplied should your application for redundancy be successful.

- 3.3 Figures will be estimated based on:
- your age: as at the last day of service (in this case 31 March 2017)
 - length of local government service: completed years (maximum length 20 years)
 - weekly pay: based on your contractual gross weekly pay.

The amount of week's pay awarded is in accordance with the following:

- **0.5 week's pay** for each full year of service aged under 22
- **1 week's pay** for each full year of service between the ages of 22 and under 41
- **1.5 week's pay** for each full year of service worked from the age of 41 and over.

4.0 Consideration of applications

4.1 Shortly after the closing date of **Friday 8 July 2016**, Human Resources will notify all Corporate Directors, Assistant Chief Executives, Service Directors and Heads of Services of the applications that have been made within their areas. The relevant Departmental Management Team (DMT) will consider your application. Your line manager will also be formally made aware of your application at this stage.

- 4.2 The DMT may accept or reject your application and has complete discretion in this respect (other than as set out at 4.3) based on business considerations. There is no appeal of the decision.
- 4.3 Applications by Chief Officers will be considered by CMB.
- 4.4 Where your application is not accepted because it is not appropriate to delete your post, it may, if the DMT considers appropriate, be entered into a central register of employees willing to take voluntary redundancy should another employee facing compulsorily redundancy in the future be a suitable candidate for their post. This is called a “bumped” redundancy. Suitability will be assessed through the normal interview process for redeployment.
- 4.5 If your application is accepted a confirmation e-mail will be sent out.
- 4.6 You may accept or decline the offer.
- 4.7 If you wish to accept the offer, you must confirm by return e-mail that you accept the offer. Appropriate letters setting out the arrangements for leaving, including notice period and last day of service will then be issued and you will be made redundant.
- 4.8 You should be aware that if you obtain a position with this council or another body covered by the Redundancy Modification Order within a month of receiving your redundancy pay you will need to repay your redundancy payment.
- 4.9 The last day of service for employees leaving under this scheme is 31 March 2017. Employees accepted for voluntary redundancy under this scheme will be expected to continue working until this date.

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Report of: **Executive Member for Finance and Resources**

Meeting of	Date	Agenda Item	Ward(s)
Audit Committee	June 2016		

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SUBJECT: Principal Risk and Uncertainties Report June 2016

1.Synopsis

- 1.1. This report sets out the Principal Risks and Uncertainties for 2016/17 for the London Borough of Islington as Appendix A.

2. Recommendations

- The Audit Committee are asked to note and review the principal risks and be satisfied with the proposed action.

3. Background

- 3.1. The Council is responsible for putting in place proper arrangements for the governance, which includes arrangements for the management of risk. The Council's approach to risk management is line with best practice industry standards (Institute of Risk Management and the International Standard IS031000 for Risk Management).

4. Implications

4.1. Financial implications

The programme of work has been met from within the existing Internal Audit revenue budget.

4.2. Legal Implications

None specific to this report.

4.3. Environmental Implications

There are no environmental implications

4.4. Resident Impact Assessments

There are no direct equality implications arising from the recommendation in this report

5. Conclusion and reasons for recommendations

5.1 For the principal risks, both existing and new, the Audit Committee is asked to:

- Consider and confirm if the current risk distribution is acceptable and reflective of Islington's risk profile, and
- Confirm the appropriateness of the current actions.

To further embed the improved risk management process, we plan to refresh the risk management approach over the next 12-months, which will include the following actions:

- Continue to facilitate, moderate and provide an independent challenge through detailed risk discussions management teams and provide progress updates to CMB and AC biannually;
- Develop communications for staff to raise awareness of risk management and its application; and
- Develop key risk indicators for principal risks, as early warning signals and to monitor identified exposures and control effectiveness over time.

Final Report Clearance

Signed by



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Corporate Director of Finance

Date

Received by

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Head of Democratic Services

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Date

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Appendix A

London Borough of Islington

PRINCIPAL RISKS AND UNCERTAINTIES REPORT

June 2016

1. Introduction

















This report has presents the principal risks and uncertainties to Islington Council's priorities for 2016/17. It has been prepared for the London Borough of Islington Audit Committee and is based on a report that was considered by the Corporate Management Board (CMB) in April 2016.

The next section presents the executive summary of the principal risk report, thereafter the principal risk report provides an update on recent developments and key actions underway to mitigate each risk. For each risk detailed in the report there are a number of control mitigations in place. This report provides an update on key actions underway, but does not detail all of the controls (mitigations) already in place. Thereafter the report presents the Principal Risk map and tolerability criteria.


The Audit Committee is requested to:




Consider and comment on the principal risks presented.


2. Executive summary of the principal risks


		CMB Sponsor	Trend Sept 15	Trend June 16	Comment on change in trend
External	Violence against young people and youth crime (NEW)	C. Littleton	NEW	NEW	We are average In London on youth violence but highest on mobile phone theft. There is insufficient confidence amongst councillors and the community as a whole that the issue is under control.
Financial	Financial strategy	M Curtis			
Strategic	Transformation programme (NEW)	M Curtis	NEW	NEW	
	IT delivery and transformation	M Curtis			Implementation of project governance process, gating methodology
Service delivery	Safeguarding adults	S McLaughlin			
	Safeguarding children	C Littleton			
	Future of affordable housing (NEW)	S McLaughlin	NEW	NEW	
	Health and social care integration (NEW)	S McLaughlin	NEW	NEW	
Compliance and Governance	Information governance	M Curtis			Staff turnover and recruitment underway
	Fraud	M Curtis			Strategy and implementation plan approved
	Cyber security (NEW)	M Curtis	NEW	NEW	
Operational	Health and safety	M Curtis			Audits show significant rise in H&S standards across schools
	Business resilience	K O'Leary			Action plan following the recent internal audit has been implemented



3. Principal risk report

Risk	Risk score	Trend since Sep 2015	Recent developments, progress & concerns	Actions
Violence against young people and youth Crime There is a risk that the council fails to respond adequately to and prevent rising crime involving young people despite additional funding and well publicised plans	Under review	NEW	<p>In July 2015 the council developed a Youth crime strategy focussing on Interventions, Enforcement & Regeneration; Prevention & Diversion; and Community Engagement. An integrated gangs team (with council officers, police, probation, victim support and others) has been operational since January 2016 and proactively engaging gang-affected young people.</p> <p>The Safeguarding Children Board has developed a gangs protocol to ensure gang-affected young people are including in safeguarding work to protect them from harm.</p>	<p>Improve understanding of the nature and extent of the problem and update the Youth Crime Strategy to ensure that effective action is taken. L Kogbara/C.Littleton. June 2016</p> <p>The YOS improvement plan to be monitored closely and the staff supported to deliver an improved service. C. Littleton. Sept 2016</p> <p>The council to ensure additional funding is delivering additionally and communicate this to residents. C. Littleton. Sept 2016</p>
Financial Strategy The Council fails to balance the council's budget over the medium term – including making the cash savings	Impact: 4 Likelihood :2		<p>December 2015 4-year settlement led to £70m savings requirement vs £90m expectation. As such, 2015 budget process has produced c£70m of savings agreed by Labour group. The General Fund balance reduced as part of 2016/17 budget</p> <p>Frontline service overspends continued in 2015/16 and some savings delivery delayed. A high priority area, Adult Social Care has challenging targets for 16/17, with further savings to that expected but not yet agreed for 17/18 and 18/19. Some savings will be delayed from 15/16 (for a number of reasons including council decisions to delay).</p> <p>Income targets from commercial activity for 17/18 are challenging.</p>	<p>Regular budget monitoring to CMB, Mike Curtis</p> <p>Frontline spending and demand management actions include:</p> <ul style="list-style-type: none"> Redesign of the provision of all early childhood services from pregnancy to 5 to ensure all children, particularly the 35% of children who currently do not achieve the "good level of development" by the end of their reception year, are healthy and ready for school. C. Littleton Tailor the amount of care offered to people who are eligible for social services support, while maintaining adult social care for people with moderate needs. S Galcynski <p>Reviewing income targets and plan 9/16. Commercial board monitoring and careful oversight of income targets. K O'Leary</p>
Transformation Change There is a risk that the transformation programme fails to deliver the desired outcomes/service delivery for Islington residents	Under review	NEW	<p>Additional transformation programmes have been identified. There are now 12 work streams, extended to include work streams relating to: street environmental services, the best start in life, supporting our youth and housing reform. Sponsors have been identified for all work streams.</p> <p>A reporting and governance process has been agreed.</p> <p>New transformation projects are now subject to revised business case criteria emphasising clarity around delivering objectives and value add.</p>	<p>Start reporting to CMB and members 5/16, R Dunlop</p> <p>Establish a support network for the programme - 7/16 R Dunlop</p>

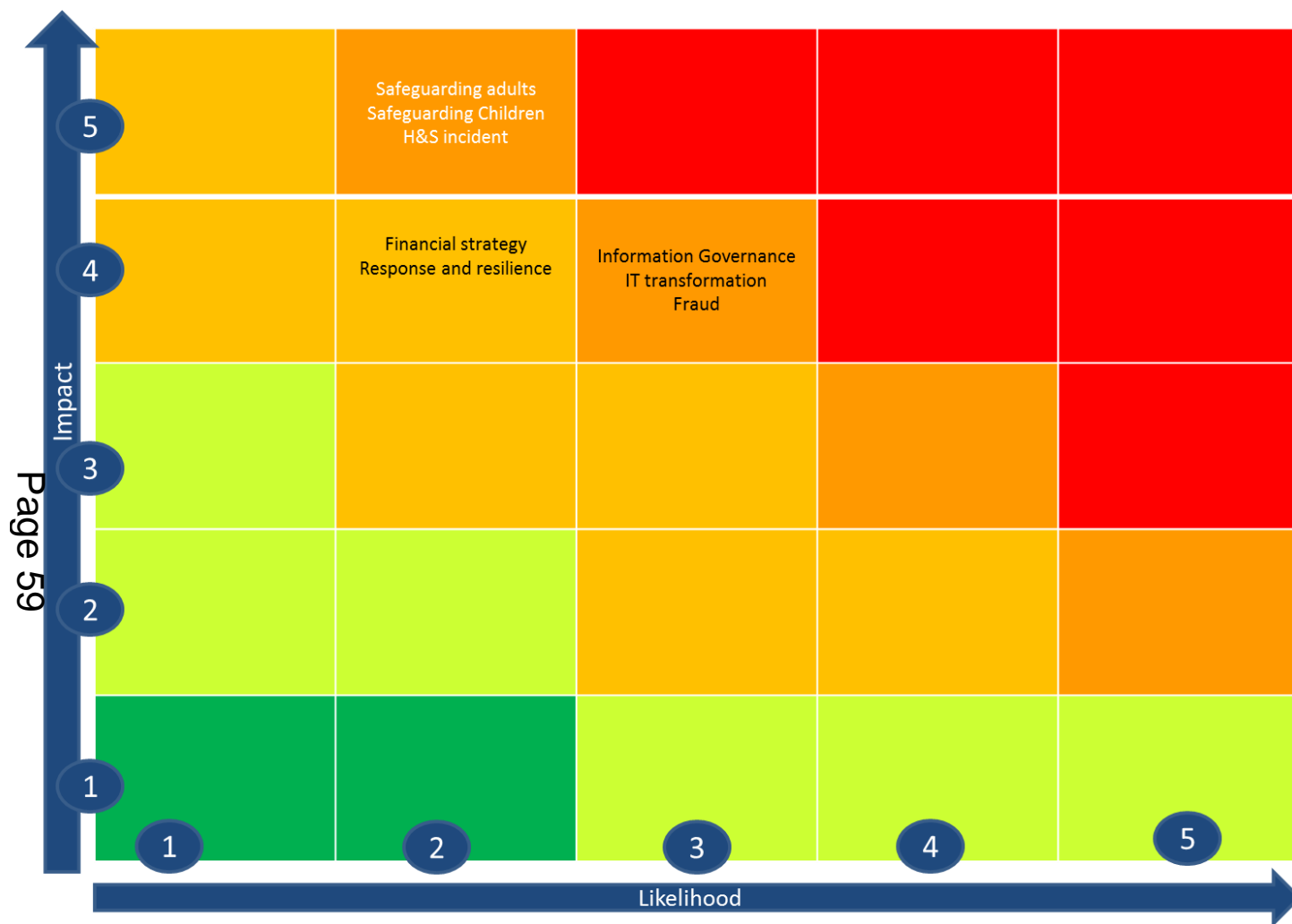
Risk	Risk score	Trend since Sep 2015	Recent developments, progress & concerns	Actions
IT delivery and transformation There is a risk we do not deliver IT projects which will enable/optimize business transformation across the Council	Impact:4 Likelihood: 3		Implementation of project governance process, gating methodology. Demand management process developed and in place - to consider and explore options prior to delivery New Corporate Digital Technology Board – executive role in prioritising demand against available capacity within digital services in place from April 2016 Developing future funding requirements across CTP/Digital is underway For the IT shared service programme, the Shared Service Board and programme manager is in place. Work streams underway include: Data Centre, IT contracts, and IT architecture.	Review of skills required for changing landscape of project complexity 2016 Q3, P Savage Prioritisation model being developed – June 2016, P Savage Work with project boards to educate and empower them, shifting focus from IT Projects to IT enabled business projects. Sept 2016, P Savage Shared service actions (A Layton): <ul style="list-style-type: none"> - Recruitment of a head of shared service 9/ 2016 - Governance agreed - July 2016 Management Board in place 9/ 2016 - Joint Committee commences – 10/ 2016
Safeguarding adults at risk of abuse The council fails to fulfil its statutory obligation to identify or respond to preventable harm to adults at risk of abuse	Impact: 5 Likelihood: 2		Last year we trained 1876 people on safeguarding adults (from both within and external to the council) which was an 18% increase on 2014 RADAR group is now functioning which provides a multi agency forum for sharing of intelligence of safeguarding concerns in commissioned services across key partners. Pan London safeguarding adults procedures have now been launched and the Safeguarding Unit has produced additional guidance to assist staff to recognise the new categories of abuse and respond in line with statutory expectations. Training is available for staff	Training and the production of additional guidance is constantly on-going and in response to policy developments and findings from audit. Elaine Oxley
Safeguarding children There is a risk we are unable to either prevent, identify and/or respond to children who may be at risk of significant harm or repeated significant harm	Impact:5 Likelihood: 2		LBI received £2.97M from central government innovations (March 2015) funding to take forward a system wide change to the delivery of social work in Children's Services. The aim is to reduce the risk of children coming into care, re-referrals, the need for care proceedings, and expedite care proceedings when they do happen. The new evidenced based model of practice, Motivational Social Work, is being developed with the University of Bedfordshire, offers more intensive (weekly sessions), purposeful, goal based interventions focussed on change. A Multi-Disciplinary service provides more intensive (min twice week) wrap around service for up to 12 weeks for complex cases. The key skills relied upon in MSW are being measured by University of Bedfordshire. Results will be incorporated into the practice report. Our January 2016 quarterly practice report indicates that relationships with families have improved, satisfaction with service has improved, and skill level has improved (Rising from an average of 2.64/5 in June 2015 to 3.22/5 January 2016) (Target of 3.5/5).	We await the outcome of the funding application to DfE to begin progressing Phase II (£1.95M). MSW has been rolled out in the CIN service and Phase II will focus on impact on high risk cases. Phase II will also see MSW rolled out in the CLA, IF and YOS Services during 2016. S Goodman Phase II also focusses on MSW Supervision & Leadership to support the more emotionally intelligent style of practice.

Risk	Risk score	Trend since Sep 2015	Recent developments, progress & concerns	Actions
Future of affordable housing There is a significant risk that sale of high value voids, reduction in rental incomes, and policies that favour starter homes reduces development opportunities and increases the cost of housing. The reduction in social housing supply and rising costs could reduce the council's ability to provide temporary accommodation (for homeless households)	Impact: 4 Likelihood: 5	NEW	<p>The high value levy in the Housing & Planning Bill could mean that the council will have to pay over £200m pa (estimate) to the Government for the foreseeable future. In order to finance the payment of the levy the Council will have to sell assets including some housing stock which will result in loss of rental income. ,</p> <p>Along with welfare reforms, expected changes will (a) restrict further the amount of rent we can collect – almost all households in TA will be affected by the new benefit cap, and (b) place further pressure on moving households out of temporary accommodation as we will see voids drop between 30-50%.</p> <p>To manage the pressure on temporary accommodation we are: scrutinising bookings going in, intensively managing move on out of temp accommodation and standardising processing times for applications. The average nightly cost has also fallen due to successful implementation of London wide caps. However, the caps have also resulted in a reduction in supply.</p>	<p>The Council will set up a programme to address reforms when the bill is finalised. To report in to CMB. S McLaughlin</p> <p>New procurement framework to attract new supply of temporary accommodation - Contract award due June 2016 (M Holdsworth)</p>
Health and social care integration Integration poses risks to Islington's current funding arrangements, as well as a service delivery and consequent reputational risks	Under review	NEW	<p>Planning around the NCL Sustainability and Transformation Plan is in place to develop integration across local health and care systems.. There is a reputational and service risk that the Sustainability Transformation Plan (STP) process doesn't sufficiently reflect Islington's needs.</p> <p>Islington Council is working with local partners - Camden and Islington Mental Health Trust, Whittington Health, Haringey Council and the Islington and Haringey Clinical Commissioning Groups – to develop a population based approach to health and social care that will comply with the STP requirements while addressing local demands collaboratively on a firm evidence base.</p>	<p>Development of the local model of care</p> <p>Sean McLaughlin, Julie Billett</p>
Information governance The Council does not keep sensitive and/or personally identifiable information secure resulting in a major breach of Data Protection legislation	Impact:4 Likelihood :3		<p>Currently team is under-resourced. Recruiting underway for Data Protection Manager, Information Compliance Manager (Maternity) and Access to Information Administrator</p> <p>European general data protection regulations, currently in discussion, increase the stringency of the DP legislation and larger fines (up to Eur 20 million) for breaching legislation. Legislation expected to be passed later this year.</p> <p>Internal audit of Data Held by Third Parties has been undertaken. High priority findings focus on contracts. Contracts will form a fundamental part of the work the council needs to undertake in preparation for the DP regulation changes.</p> <p>Annual Assurance Statements require all service directors to commit to having adequate data processing clauses in place.</p>	<p>Staff to be in post: June 2016, S Nicholson</p> <p>Working group being, S Nicholson developed: June 2016</p> <p>Approach to be presented to CMB: Sept 2016, S Nicholson</p> <p>Audit actions sit primarily with Procurement. Some actions for IG, and all directorates will need to participate; April 2017. P Horlock, S Nicholson</p> <p>2016 statements; June 2016, S Nicholson</p>

Risk	Risk score	Trend since Sep 2015	Recent developments, progress & concerns	Actions
Serious fraudulent activity There is a risk that the Council is not aware of the range of fraud risks facing it and thereby fails to design and implement effective preventive and detective controls. This could result in financial loss, disruption to service delivery and reputational damage	Impact: 4 Likelihood: 3		An Anti-Fraud Strategy and implementation plan approved by Audit committee March 2016. A Corporate Prosecution and Enforcement Policy agreed by Legal Services and. The Council's Fraud Forum has been revived as part of fraud governance arrangements. The council's Corporate fraud training needs have been identified Emerging trends identified and reported through Fraud Forum, Corporate Governance and onto CMB to affect change.	Conflicts of interest/hospitality registers are on the Audit plan for 2016/17, C Lobb Fraud Response and Risk plan to be formalised, April 2016, C Lobb Fraud awareness Training programme to be developed based on employee roles within the Council – 2016/2017, C Lobb
Cyber security Process Control Networks and/or Critical Information Assets may be compromised by computer-based unauthorized access or malicious modification of data	Under review	NEW	Ransomware will be the biggest threat in 2016: .LBI was successfully hit by a ransomware attack in 2015 but damage was controlled to one day's lost work for a single user. Attacks (which are via email) have increased from 1.5 million identified in 2014 to 4 million in 2015. We have implemented a fourth level of protection for our email systems. Email is the delivery method of choice for ransom ware and other malware. This layer of email security routinely blocks 4000 undesirable inbound email per hour. Completed March 2016 Each application requires hundreds of updates a year. Adobe released 70 in one month for one application. 'Home grown' applications require constant testing and updating to reflect new approaches in attack. LBI - Parking was hit with an application hack / attack in 2015 We have significant concern over the lack of secure development principles in our home grown development of applications. This has been highlighted by the Parking breach, a website defacement on Christmas Day and other issues that have come to light.	We are in the process of implementing log retention and enhanced network monitoring to identify attacks not picked up by other methods. This is implemented, managed and monitored by an expert external vendor. Pilot by August 2016. A Gorst We are in the process of implementing firewall management systems. This is implemented by a vendor but managed internally. Pilot June 2016. A Gorst We are in the process of completing an application landscape – a database of all applications currently in use to help us manage vulnerability testing and updating. On-going. A. Gorst.

Risk	Risk score	Trend since Sep 2015	Recent developments, progress & concerns	Actions
Significant H&S incident There is a risk of a significant H&S incident (life changing/fatality) compromising the safety and wellbeing of service users, public or the workforce	Impact: 5 Likelihood: 2		<p>A series of external audits have been undertaken in all schools and have shown significant increases in health and safety standards across all schools. A significant number of head teachers, business managers and premises manager's within schools have undergone NEBOSH accredited training.</p> <p>Increased training for all employees: 785 people trained in classroom courses, Sept 2015- Mar 2016, compared to 612, over the same period a year ago.</p> <p>We have introduced a new e-learning course from September 2015 we have trained the following individuals via the online courses: Fire Safety Plus (416), induction (196), Managing Stress for Managers (34), Safe Driving Plus (39), Workstation Safety (428)</p> <p>A recent audit of Legionella, commissioned by H&S, highlighted concerns with regard to Water management, this is being addressed via a Water management action plan</p> <p>Corporate Health and Safety team now have active involvement in contract management including Leisure contract.</p> <p>To ensure compliance with health and safety within our council housing stock two committees have been formed to monitor compliance.</p> <ul style="list-style-type: none"> - LBI/Fire Service liaison safety committee: reviews current working practices and compliance to the Fire Safety reform order, - Homes and Estate Safety Board: chaired by an independent chair from another council borough, reviews working practices and compliance with all safety critical contracts in regard to housing stock. 	<p>Water management action plan to address concerns D Lewis – April 2016</p> <p>A commissioning officer has been appointed for out-sources services in order to monitor standards of performance for waste recycling, to report to the H&S committee quarterly.</p>
Responsiveness and resilience There is a risk we are not able to recover critical internal processes or respond effectively to an emergency following a disruptive event within a suitable timeframe	Impact:4 Likelihood: 2		<p>Staff awareness briefings on counter terrorism continuing. Testing Humanitarian Assistance capability as part of Exercise Unified Responder (Feb 2016). Learning from incidents on-going.</p> <p>Internal Audit of Business Continuity conducted and action plan implemented. IT Disaster Recovery plan developed</p> <p>Testing of top 20 systems commenced in March and will shape future actions</p>	<p>Complete programme of Counter Terrorism briefings for staff – Sept 2016. Implement programme of exercising and testing – March 2017</p> <p>Incorporate lessons learnt from EUR into plans – Dec 2016. Business Recovery Team Exercise Dec 2016</p>

4. Principal risk map



Note: New risks will be assessed and presented in the next Principal Risk Report.

5. Risk management tolerability criteria

Risks presented in this report have been assessed in line with the criteria provided below, were reviewed in June 2014.

Impact Criteria

NEGATIVE IMPACT	FINANCIAL	ORGANISATIONAL PRIORITIES & STRATEGIC OBJECTIVES	SERVICE DELIVERY	SAFETY & WELLBEING	REPUTATION	LEGISLATIVE/COMPLIANCE	PEOPLE
INSIGNIFICANT (1)	Minimal financial loss which can be accommodated at Divisional level <i>Financial loss less than £50k</i>	Inability/failure to achieve team/individual targets that is not key to Camden Plan outcomes or other organisational priorities	Minimal/brief impact on a non-crucial service	No obvious harm/injury/safeguarding risk or obvious impact on safety and wellbeing	Unlikely to cause any adverse publicity, internal only	Non-compliance with industry best practice / local procedures or guidance (no regulatory impact)	Loss of staff/fail to recruit in non-key areas
MINOR (2)	Moderate financial loss which can be accommodated at Directorate Level <i>Financial loss £50k-£500k</i>	Failure to achieve a service objective that is not key to Camden Plan outcomes or other organisational priorities	Brief disruption on an important service Moderate disruption on a non-crucial service	Minimal effect on safety and wellbeing. First aid treatment/non-permanent harm up to 1 month / Some potential for safeguarding risk	Some public embarrassment, no damage to reputation	Non-compliance with contracts, standards or legislation with minor consequences	Small number of staff made redundant and/or affected - loss of staff confidence
MODERATE (3)	Significant financial loss which will have a major impact on the Council's financial plan <i>Financial loss £500k-£2.5million</i>	Failure to achieve a Camden Plan outcome	Moderate disruption on an important service Major disruption on a non-crucial service	Noticeable effect on safety and wellbeing. Medical treatment required, semi-permanent harm up to 1 year / Noticeable safeguarding risks	Some adverse publicity needs careful press relations, short term damage (<30% of opinion formers)	Non-compliance with contracts / standards or legislation with possible legal or regulatory proceedings leading to moderate reputational or cost damage. Breaches of law punishable by fines only	Loss of staff/fail to recruit in key areas
MAJOR (4)	Major financial loss which will have a major impact on the Council's financial plan <i>Financial loss £2.5m - £5million</i>	Failure to achieve a major Camden Plan outcome or organisational priority	Major disruption to an important service	Multiple casualties with recoverable injuries. Extensive injuries, major permanent harm, long term sickness / Major safeguarding concerns potentially affecting multiple people	Major adverse publicity, major loss of confidence, medium term damage (30-60% of opinion formers)	Major/widespread non-compliance with contracts / standards / legislation with possible legal proceedings leading to major reputational or cost damage. Breaches of law punishable by fines or possible imprisonment	Large number of staff made redundant and/or affected/loss of key skills
EXTREME (5)	Severe financial loss which will have a catastrophic impact on the Council's financial plan and resources are unlikely to be available <i>Financial loss > £5million</i>	Failure to deliver a number of Camden Plan outcomes or other organisational priorities	Major disruption to a number of important services	Multiple death(s) or serious/ life-changing non-recoverable injury(s) / extreme safeguarding alerts likely	Adverse national publicity, highly damaging, severe loss of public confidence, long term damage (>60% of opinion formers)	Major/widespread non-compliance with legislation with legal proceedings leading criminal proceedings and long term reputational damage (inc. loss of public confidence). Breaches of law punishable by imprisonment	Large number of staff made redundant and/or affected including Senior Leadership/ substantial loss of irreplaceable skill sets

Likelihood Criteria

SCORE	DESCRIPTION	EXAMPLES	PROBABILITY
1	Rare	Very unlikely that this will ever happen	<5%
2	Unlikely	Expected to occur in only exceptional circumstances	6-25%
3	Possible	Expect to occur in some circumstances Has happened elsewhere	26-50%
4	Likely	Expected to occur in many circumstances Has happened in the past	51-75%
5	Almost Certain	Expected to occur most frequently and in most circumstances Imminent	>75%

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**Internal Audit
Finance and Resources
Municipal Offices,
222 Upper Street, London N1 1XR**

Report of: The Corporate Director of Finance and Resources.

Audit Committee	Date: 6th June 2016	Ward(s): N/A
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If part of the report is not for publication because it contains exempt information under Schedule 12A of the Local Government Act 1972) Paragraphs 1, 2, 7 Schedule 12A of the Local Government Act 1972, namely: Information relating to an individual. Information which is likely to reveal the identity of an individual and Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime

THE APPENDIX TO THIS REPORT IS NOT FOR PUBLICATION

SUBJECT: Whistleblowing Report April 2015 to March 2016

1. Synopsis

- 1.1 The report confirms that the Whistleblowing arrangements in place are effective and that reporting fraud is an integral part of the Council's Anti-Fraud Strategy going forward.
- 1.2 The report gives detail to the types of whistleblowing referral made and the quantities of referrals between April 2015 and March 2016. This is compared against the referrals made over the previous years.

2. Recommendations

- 2.1 Consider and comment on the contents of the report

3. Background

- 3.1 Robust Whistleblowing arrangements are a key element of effective governance arrangements within the Council. It is a mechanism to "empower the honest majority" in the fight against fraud and corruption.

4. Implications

Financial implications:

- 4.1 None arising from the content of this report

Legal Implications:

- 4.2 None arising from the content of this report

Environmental Implications

- 4.3 None

Resident Impact Assessment:

- 4.4 There are no direct Resident Impact Assessment implications arising from this report.

5. Reasons for the recommendations / decision:

- 5.1 The report presents the Council's use of the Whistleblowing arrangements from April 2015 to March 2016
- 5.2 The Council is obliged under the Public Interest Disclosure Act to maintain a Whistle-blowing Policy, designed to encourage staff, elected Members, contractors and the public to raise legitimate concerns about wrong-doing within the Council without fear of reprisal.



20 May 2016

Signed by

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Corporate Director of Finance

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Date

Received by

.....
Head of Democratic Services

.....
Date

Appendices

- Appendix A Exempt

Background papers:

- None

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By virtue of paragraph(s) 1, 2, 7 of Part 1 of Schedule 12A
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