



**Oversight and Governance**

Chief Executive's Department  
Plymouth City Council  
Ballard House  
Plymouth PL1 3BJ

Please ask for Jamie Sheldon  
T 01752 668000  
E [jamie.sheldon@plymouth.gov.uk](mailto:jamie.sheldon@plymouth.gov.uk)  
[www.plymouth.gov.uk](http://www.plymouth.gov.uk)

Published 30 November 2020

## **CABINET**

Tuesday 8 December 2020  
2.00pm  
Microsoft Teams Meeting

**Members:**

Councillor Evans OBE, Chair

Councillor P Smith, Vice Chair

Councillors Haydon, Coker, Dann, Lowry, Penberthy, Jon Taylor, Laing and Kate Taylor.

Members are invited to attend the above meeting to consider the items of business overleaf.

This meeting will be webcast and available on-line after the meeting.

The Council is a data controller under the Data Protection Act. Data collected during this webcast will be retained in accordance with authority's published policy.

For further information on attending Council meetings and how to engage in the democratic process please follow this link - [Get Involved](#)

**Tracey Lee**

Chief Executive

# Cabinet

## Agenda

### Part I (Public Meeting)

#### 1. Apologies

To receive apologies for absence submitted by Cabinet Members.

#### 2. Declarations of Interest

Cabinet Members will be asked to make any declarations of interest in respect of items on this agenda. A flowchart providing guidance on interests is attached to assist councillors.

#### 3. Minutes

(Pages 1 - 14)

To sign and confirm as a correct record the minutes of the meeting held on 10 November 2020.

#### 4. Questions from the Public

To receive questions from the public in accordance with the Constitution.

Questions, of no longer than 50 words, can be submitted to the Democratic Support Unit, Plymouth City Council, Ballard House, Plymouth, PL1 3BJ, or email to [democraticsupport@plymouth.gov.uk](mailto:democraticsupport@plymouth.gov.uk). Any questions must be received at least five clear working days before the date of the meeting.

#### 5. Chair's Urgent Business

To receive reports on business which, in the opinion of the Chair, should be brought forward for urgent consideration.

#### 6. Update from the Director of Public Health on Covid-19

#### 7. Update from the Chief Executive on COVID-19 Reset/Response

#### 8. Leader's Announcements

#### 9. Cabinet Member Updates

#### 10. Brexit state of readiness report - To Follow

#### 11. Visitor Economy - To Follow

12. **Equality and Diversity Review and Action Plan 2020 - 2021** (Pages 15 - 52)
13. **Corporate Plan Quarter two Performance Report (Inc Covid-19 Update) - To Follow**
14. **Risk and Opportunity Management Strategy 2020 - 2022** (Pages 53 - 78)
15. **Internal Audit Half Year Report 2020/21** (Pages 79 - 98)
16. **Counter Fraud Services Half Yearly Report** (Pages 99 - 112)
17. **Youth Service Presentation:** (Verbal Report)

This page is intentionally left blank

## Cabinet

**Tuesday 10 November 2020**

### **PRESENT:**

Councillor Evans OBE, in the Chair.

Councillor P Smith, Vice Chair.

Councillors Haydon, Coker, Dann, Lowry, Penberthy, Jon Taylor, Laing and Kate Taylor.

Also in attendance: Ruth Harrell (Director of Public Health), Tracey Lee (Chief Executive), Councillor Darren Winter (Chair of the Brexit, Infrastructure and Legislative Change Overview and Scrutiny Committee), Giles Perritt (Assistant Chief Executive) and Kevin Mckenzie (Policy Advisor), Craig McArdle (Strategic Director for People), Alison Botham (Director of Children's Services), Amanda Ratsey (Head of Economy Enterprise and Employment), Councillor Jeremy Goslin (Assistant Cabinet Member) and Amanda MacDonald (Programme Manager) and Jamie Sheldon (Senior Governance Advisor).

The meeting started at 2.00 pm and finished at 5.00 pm.

*Note: The full discussion can be viewed on the webcast of the City Council meeting at [www.plymouth.gov.uk](http://www.plymouth.gov.uk). At a future meeting, the Council will consider the accuracy of these draft minutes, so they may be subject to change. Please check the minutes of that meeting to confirm whether these minutes have been amended.*

50. **Declarations of Interest**

There were no declarations of interest made by Councillors, in accordance with the code of conduct.

51. **Minutes**

Members agreed the minutes of 10 November 2020 as an accurate record of the meeting.

52. **Questions from the Public**

The following question was submitted by Mr Alan Ramage and answered by Councillor Sue Dann, Cabinet Member for Environment and Street Scene:

Question: At a Plymouth University event, the project manager for constructing South West Water's new treatment plant told me that a green roof was not installed to save on customers' bills. As the cost to each customer over the lifetime of the plant would be infinitesimal, and given SWW's recent handout of £20 per household, it is reasonable to assume the money could be found. A retrofit would reduce the visual impact of the plant in a sensitive area. SWW and PCC are proud of their green credentials. Will PCC press SWW to make this retrofit?

Answer: Plymouth City Council has a good working relationship with South West Water and works in partnership with the company to manage and reduce flood

risk and climate change impact in Plymouth. Plymouth City Council also works closely with neighbouring authorities to provide a consistent and regional wide strategy approach to flood risk management. Both South West Water and South Hams District Council share Plymouth City Council's commitment to following and implementing a Sustainable Urban Drainage Strategy (SUDS) hierarchy for new development, within which Green roofs are seen as effective measure to reduce surface water run off and provide Ecological benefits. Whilst the treatment works are located outside of the Plymouth administrative boundary, the Plymouth Lead Local Flood Authority have in response to the question raised, approached and invited both South West Water and South Hams District Council, to comment on the assessment and selection of SUDS solutions incorporated into the Water Treatment work design.

53. **Chair's Urgent Business**

To facilitate good meeting management Members agreed to move 12 before item 7 on the agenda.

54. **Update from the Director of Public Health on COVID-19**

Ruth Harrell (Director of Public Health) gave an update on COVID-19 –

On the Plymouth City Council official Twitter and Facebook accounts we are sending out updates on the current rates of COVID-19 in the city. Plymouth had 170 cases per 100,000 and the South West overall was just slightly below at 160. The England average was 240.

The South West had a lower rate than the rest of the UK but in places that were more densely populated e.g. Torbay, Plymouth, and a higher population means a higher chance that you will come into contact with COVID-19. Urban deprivation and barriers to following guidance also contributed to why these spots are higher.

With regards to testing the government had increased the number available and there were 3 testing sites in Plymouth, regional drive-in as well as two walk-ins – the Guildhall and Marjons Car Park.

There was no evidence now that there was a strain on testing. Some people assume that because we were testing more people now, we would definitely see more cases, but that isn't strictly true. In the summer, testing increased, but cases didn't increase rapidly, whilst we acknowledge this was a factor though in case increases, it did not explain it entirely.

National data does show that there are more people in hospital now than when we went into the first lockdown. We also know there is a time lag, and so a second lockdown was needed because otherwise the NHS could become overwhelmed and not be able to serve other patients.

COVID-19 admissions to hospital were higher than the peak of flu admissions in 2018/2019 and 2019/2020, and it isn't flu season yet either, so important as well to try and keep numbers down for this reason as well.

Rates in Plymouth were relatively low in comparison to similar sized cities elsewhere in the UK, however, they are important and significant enough to see people in the population getting ill with the virus and being admitted to hospital in some cases. COVID-19 admissions had risen to such an extent over the past month that they were now impacting the hospitals services.

We know a lockdown is difficult for everyone and we know these actions wouldn't be called for without good reason and that is has been called to get those levels of cases back under control and keep deaths to a minimum.

The Cabinet passed their best wishes onto Ruth Harrell (Director of Public Health) and her team, you are all doing an amazing job in difficult circumstances to keep Plymouth safe.

The Cabinet noted the report.

55. **Brexit Organisational Risk Report (To Follow)**

Councillor Darren Winter (Chair of the Brexit, Infrastructure and Legislative Change Overview and Scrutiny Committee), Giles Perritt (Assistant Chief Exectuvie) and Kevin Mckenzie (Policy Advisor) presented the Brexit Organisational Risk Report and Scrutiny Recommendations to Cabinet –

The report provided an update for Cabinet about our Brexit related risks. Its content had been subject to pre scrutiny by the Brexit, Infrastructure and Legislation Overview and Scrutiny Committee and the recommendations are those made by that committee.

Cabinet were asked to review the report and the recommendations made by the Brexit, Infrastructure and Legislative Change Overview and Scrutiny Committee.

Cabinet agreed to accept the following recommendations-

Cabinet should ask government to:

1. Lay out in detail what plans it has to mitigate the loss of EU funding to the city. (accepted)
2. Detail the priorities it has for the marine and maritime research sectors post-Brexit, and what will be done to mitigate the loss of EU funding in the sector. (accepted)
3. Explain why the government thinks that the South West fishing fleets will be adequately protected. (amended)
4. Encourage agricultural employers to improve the wage offer for agricultural labour so that it is a more attractive career path for young people through the Heart of the South West Local Enterprise Partnership. (amended)

Cabinet should ensure:

5. That Plymouth City Council and our key suppliers review our business continuity arrangements against the negative impacts of Brexit as identified in the risk register,

and have robust plans in place to mitigate service delivery interruption. (accepted with qualification)

6. Consider the merits of reviewing large capital projects with contractors given capacity of project managers to engage contractors within the short timeline available. (amended as detailed in report)
7. We consider the budgetary impact of the identified risks on the Medium Term Financial Plan. (accepted)
8. We continue to make a proactive offer to any foreign based businesses that may be considering leaving the City due to Brexit impact. (accepted)
9. We are successfully locating and communicating with EU citizens in Plymouth who have not yet applied for settled status, and that; (accepted)
10. A needs assessment is conducted to identify vulnerable EU citizens and the support we can offer to assist them to apply for settled status. (accepted with qualification)

Cabinet should:

11. As far as reasonably practical, ensure Plymouth City Council is proactive in communicating Brexit information to the wider city to enable preparedness of organisations and businesses, and is positive where possible in its Brexit communications where opportunities have been identified. (accepted)
12. Consider whether the resources already deployed to support business e.g. account managers are able to respond to all enquiries via a single contact number. (Proposal amended as detailed in report)
13. Ensure that Plymouth City Council works with appropriate partners with a view to agreeing a planned schedule improving landing facilities at the fishing quay (Accepted)

The rationale for accepting these recommendations was given in the table in report.

56. **Update from the Chief Executive on COVID-19 Reset/Response** (Verbal Report)

Tracey Lee (Chief Executive) advised Members that since entering this second lockdown Plymouth City Council is very much in response mode be also in reset/recovery mode and so we are trying to do both. This does mean there is a huge call on capacity across the organisation.

We have reviewed our objectives:

1. Preserve life and limit harm to the people of Plymouth.
2. Maintain public services in line with the local outbreak management plan, taking into account government guidance and minimising risk to staff, customers and citizens.
3. To provide visible and proactive community leadership
4. Promote the economic and social recovery of the city



The majority of our services were continuing as they were before lockdown, there are very few that we have had to stop under the current government guidance. Unfortunately, however, this does include our Leisure Centres and The Box. We also have restricted services in the registration service and libraries. The majority of staff were also continuing to work from home.

Thanked all our employees for all the work they have done in such a difficult year that continues to be difficult as they continue to deliver services, support each other and their families.

Craig McArdle (Strategic Director for People) –

- Kept our day centres open to ensure carers were getting support and respite, although numbers were limited but assigned on level of need. We also have a mix of face to face and virtual interactions;
- provided a winter plan to government and we have been proactive in issuing the infection control fund;
- continued to issue PPE across the city and thank you to the staff doing this. Had now issued 1.7 million items of PPE to our providers since the pandemic began. We were continuing to support our care homes who were still facing pressures, and are supporting and helping to provide rapid testing.

Alison Botham (Director of Children's Services) -

- This time, for Children's Services and our partners it was not the same as the first lockdown and was much better for lots of children and young people, e.g. schools are open, but there were continued challenges as they face incidents at different schools at different times. It was a credit to the schools in the city how they have been managing in this incredibly difficult term.
- Our frontline staff in education and children's social care have continued to work in response and recovery. Last time most of the work we were undertaking was virtually, but we are now able to provide more direct contact where needed. They are making risk based decisions on where this is needed and safe.
- We are facing an increased demand as children's social care; in September 2020 we were working with 2,004 children compared to 1,820 at the same time in 2019. Since the beginning of April, we have seen an increase to September of 46 children in care. It had been a real credit to our staff and all of our partners that moral is as good as it could be and the approach is always how can they provide the best service to the children and young people in the city.

This pandemic has brought about so many firsts and last week Councillor Tudor Evans OBE (Leader) and Tracey Lee (Chief Executive) had their first virtual royal visit with the Earl and Countess of Wessex explaining to them what was happening in the city – what was tough but also the amazing examples of how our city came together.

Cabinet noted the update.

57. **Leader's Announcements** (Verbal Report)

Councillor Evans OBE (Leader) highlighted the following in his announcements –

- Updated the Cabinet on the work Plymouth City Council had been doing on our COVID economic response plan - Resurgam. We were in the midst of the second wave of this global pandemic which was both a health emergency and an unprecedented economic shock;
- This was a time when local government really matters. Our plan remained incredibly simple: to protect jobs and address the immediate threats to lives and livelihoods, but also to reset the local economy to address structural inequalities in our city and place a fairer and greener future at the heart of our recovery;
- When we set up Resurgam during the first wave we were well aware of the possible risks of a second wave and/ or further lockdowns. We set it up to be agile knowing that there was a possibility that we would need to move back into a response phase, but also knowing that we could provide an emergency response and work on recovery simultaneously;
- Officers have therefore been busy preparing to launch the latest rounds of business grants. had been awarded £4m for those business that have had to close and this scheme will launch next week. We have also been awarded £5m for a discretionary scheme however we will wait to launch these scheme until we better understand the gaps in demand;
- Pleased that calls to extend the Furlough scheme and to prevent the October cliff edge have been listened to and that the Furlough scheme had been extended. This had been essential to support many of our residents during these unprecedented times. However there was still more that needs to be done to support those who fall outside the Furlough scheme and those who were accessing the benefits systems including the latest figures of 11,000 people in Plymouth claiming Universal Credit/ Job Seekers Allowance. This included 2,380 people under 25. We are very concerned how this data would change in the coming weeks when the impact of a second wave hits harder;
- Our Resurgam programmes objective remains focussed on protect existing jobs and create as many new opportunities for our residents as we can during these difficult times. We are doing this by supporting our key sectors, helping our people and using the spending power of the Council to kick-start the local economy;

Amanda Ratsey (Head of Economy Enterprise and Employment) gave an update –

Plymouth was lucky to have a significant bedrock industrial sectors. We have a large teaching hospital and the largest naval base in Western Europe. Between the defence and health sector they employ over 25% of the city. These sectors were continuing to recruit

and had ambitious building development pipelines (£2 billion) including new hospital building and reconfigure the naval base. However sectors such as fishing are really suffering. The price of fish is determined by a buoyant restaurant trade and exports. Tourism and hospitality in Plymouth like other areas had been hard hit, but for Plymouth it was doubly painful as the City was hoping to reinvent itself and give this sector a significant boost through Mayflower 2020.

58. **Cabinet Member Updates** (Verbal Report)

Councillor Peter Smith (Deputy Leader) made the following announcements –

- The city of Plymouth was unable to commemorate this event outside at the Hoe this year due to the need to limit the spread of COVID19. Whilst this year was different to usual, they were able to remember from home. Remembering from Home came from two civic officers, one of whom based in Plymouth. A unique service was streamed online from St Andrews for people to watch from home, which is still available on the Council website;
- The Lord Mayor of Plymouth, Naval Base Commander and representatives from the Tenancy and Commonwealth War Graves Commission privately laid wreaths at the Naval Memorial on the morning of Remembrance Sunday. They also laid wreaths at the Belvedere. The Deputy Lord Mayor led organisations in privately laying wreaths at the Civilian Memorial. 6,000 people have watched the live stream so far. Comments online have been really positive;
- Plymouth was one of 4 locations chosen by Commonwealth War Graves Commission to take part in a unique act of remembrance. A searchlight would be shone into the sky from the Naval War Memorial to remember and pay tribute to the 1.7 million Commonwealth war dead. The light will be visible from miles around and best viewed from a distance to everyone is asked to enjoy this from their homes and also asked to take a moment to step outside to look at the stars and remember the fallen;

Councillor Laing (Cabinet Member for Children, Young People and Families) made the following announcements –

- Care Leavers Week - A number of care leavers shared their stories and they were really touching and I want to thank them for sharing these stories which young people face due to adverse child experiences they live with. We hear how they overcome these experiences and the importance of trusted relationships and support so they can achieve. These stories would also form the basis of a report being put together by the participation team;
- We have asked our 236 care leavers what was important to them for the Bright Sports survey which was important to help us understand the service and provide the right support. I have also attended the unveiling of a new graffiti wall created by our care leavers as part of Care Leavers Week. We know over 21's asking for support increased over this week.

Councillor Kate Taylor (Cabinet Member for Health and Adult Social Care) made the following announcements –

- There were currently 11 care homes in outbreak status and 1 with a single case, which affects 15 residents and 26 members of staff. We were staying in touch with all care homes and providing support. We are supporting care homes with making decisions around visitors to try and encourage safe visits where possible;
- Workshops with the Health and Wellbeing board – COVID-19 and Mental Health;
- We understand that the pandemic is affecting people's mental health and this would continue until after the pandemic. We are taking this seriously and have written some clear actions to ensure that people can access the help they need, formal or informal, in a timely manner. Everyone was in the same ocean, but we aren't all in the same boat; everyone is experiencing different challenges due to the pandemic;
- To support the clinically most vulnerable who don't have established support networks in this second lockdown. Some people have now established support networks from the last lockdown, and we hope people will be able to call on these groups for this lockdown but we will be focusing on those residents who don't have this support. I would like to thank our partners and PCC staff for making this happen again so quickly and efficiently;
- Proud to Care - recruitment drive launched at the end of October 2020 which was being delivered through a virtual health careers fair this week. We were working with our partners in the city to make care a career that people want to come into and to increase their skills.

Councillor Penberthy (Cabinet Member for Housing and Co-operative Development) made the following announcements –

- Thanked everyone who was helping in Plymouth and the good neighbour scheme which hasn't stopped since the last lockdown, but was ramping up again and we are asking everyone to look out for their neighbours and people in their community that might be lonely;
- Would be meeting with food aid groups about the situation in Plymouth and to discuss how we are going to work together to ensure we were meeting the needs of those in Plymouth;
- pleased to announce we were giving our first round of COVID-19 related emergency food aid grants to 16 Plymouth based food aid organisations of £64,000 between them. This would allow them to provide longer opening hours and more food. We would be announcing a second round shortly;
- working with FairShares based in Bristol to bring a warehouse operation to Plymouth to ensure there was a pipeline of affordable surplus supermarket food in Plymouth;

- Self-Isolation Support Payments- similar to other parts of the country, the demand for the discretionary scheme was outstripping demand from eligible applications for the mandatory scheme, contrary to the way the government allocated the funding and thought it would be needed. Plymouth does not have enough funding to keep the discretionary fund going until the end of January which was concerning as low paid local residents who have been asked to self-isolate would lose vital funds if they do the right thing to protect others. We need Government to expand the offering for the discretionary scheme;
- Annual Social Enterprise Festival - our Social Enterprises have continued to support each other and their communities throughout the pandemic and created an ethical business model here in Plymouth. It was 7 years since we became the first social enterprise city in the country. There were now 200 social enterprises across the city in a variety of different sectors, collectively employing 9000 people and bring income of over £580million. The festival would be online this year but as interesting and fun as ever and their theme is education the economy.

Councillor Dann (Cabinet Member for Environment and Streetscene) made the following announcements –

- £1.3 million from PCC and Foreign Commission to plant new trees and be able to have an action plan to manage ash die back across the city;
- had received a £3.3 million grant to improve energy efficiency in hundreds of Plymouth homes;
- Garden Waste and Streets and Waste Team - 20,000 residents have already registered for a new garden waste wheelie bin;
- thanked the Streets and Waste team for stepping up this year, and for continuing their work through this second lockdown. I would also like thanked residents for supporting our public service workers who are out on the front line.

Councillor Coker (Cabinet Member for Strategic Planning and Infrastructure) made the following announcements –

- In the last week we have launched our green grants to local businesses which was a capital grant of up to £25,000 for sustainable transport improvements for their workforce. These grants form part of the PCC productive Plymouth programme. We know that business are stretched at the moment, but these grants would help them to deliver a sustainable transport initiative going forward. We would ask that any businesses that are interested to apply, the closing date is 15 Jan 2021 and more details can be found on the PCC website;
- Wished Penny Cross school the best of luck with the national award they were up for, the Plymotion Bike it to School scheme and the changes they have made.

Councillor Haydon (Cabinet Member for Customer Focus and Community Safety) made the following announcements –

- special thanks to our registration team. When the government announced the second lockdown it stopped many couples from being able to go ahead with getting married as planned. The team rang round and married 2 couples in 2 days and worked later in the evenings to fit all of this in. Our staff go above and beyond to help people. The Contact Centre have been fantastic in providing extra support during this second lockdown as well.
- Councillor Jon Taylor (Cabinet Member for Education, Skills and Transformation) made the following announcements –
  - In October, there was an increase in schools reporting cases of COVID-19 but we didn't have any full school closures and they were all using their risk management strategies well. In November, following risk assessment and contact tracing, one school has had to close for a full clean. Given the numbers of schools that are affected, we have round 400 students at any one time self-isolating and this number has remained consistent, but of course it was very disruptive for those students and their families.
  - Special schools had been most affected by partial closures. All were following Public Health advice and their risk assessments;
  - I would like to thank all the school staff for the fantastic work they are doing to keep schools open. Attendance remains relatively high across schools despite the pandemic, and Primary Schools were at 93%-95% and are above the regional and national average.
  - There were more children leaving school to be home educated, which was a concern and something we need to watch closely, although they could return after the pandemic.

The Leader, Councillor Tudor Evans OBE thanked Cabinet for their updates.

59. **Free School Meals Update** (Verbal Report)

Councillor Jon Taylor (Cabinet Member for Education, Transformation and Skills) gave an update on Free School Meals -

Demand for food had been raising rapidly across the city in recent months, due to the economic impact of the pandemic. Eligibility had risen by 15% in the past 7 months. We were likely to see the need grow further in the coming months.

When Government rejected to support Free School Meals over half term, at Plymouth City Council we knew we needed to act quickly to ensure children didn't go hungry. An incredible effort created this programme in 4 hours from officers across the Council.

Families completed an application form and if eligible they were paid £11 per child and we were able to back date it. 9000 children on free school meals with more applying every day.

We received 2700 applications for Half Term, with just under 4000 children were supported during Half Term, and the numbers show it was needed. It has cost PCC around £40,000. 45% of eligible families applied, thanks to the Communications team making sure people knew about the scheme. It has made a real difference to families across the city.

Since half term, with the continued pressure from Marcus Rashford and the Labour Party, National Government had made a U-turn and hopefully over the Christmas period there would be more support. We are asking eligible families to get in touch by 9<sup>th</sup> December so we can contact them with support once we have information and the scheme is open for the Christmas holidays.

Cabinet noted the update.

## 60. **Completed Pledges (To Follow)**

Councillor Mark Lowry (Cabinet Member for Finance) and Councillor Chris Penberthy (Cabinet Member for Housing and Co-operative Development) presented the completed pledges report –

The administration continued with its four year programme to deliver against the 100 pledges, by March 22, for a better, greener and fairer Plymouth.

Following the completion of pledges 60 and 63 in October, the total number of pledges completed is 81 of the 100. A “pledge on a page” overview had been prepared for pledges:

**Pledge 60:** In 2012 we took on Wonga, and in 2016 we introduced Fair For You to Plymouth. High street banks have disappeared from many neighbourhoods and many low earners are denied access to bank accounts altogether. So, it is important that we continue to fight for affordable access to financial services through continued support for the City of Plymouth Credit Union and Fair For You.

**Pledge 63:** The refusal of the government to pause and fix Universal Credit means a faulty system is being rolled out in Plymouth causing misery for many people. We will work with advice agencies and the Department for Work and Pensions (DWP) to ensure that people in the city get the support they need to navigate this complex and broken system.

To see a full list of pledges completed please visit our on-line pledge board.

Cabinet noted the completion of pledges 60 and 63 in October 2020, bringing the total number of completed pledges to 81.

## 61. **Capital and Revenue Monitoring Report 2020/21 – Quarter 2 (To Follow)**

Councillor Mark Lowry (Cabinet Member for Finance) presented the Capital and Revenue Monitoring Report 2020/21 – Quarter 2 –

Outlined the capital and revenue finance monitoring position of the Council as at the end of September 2020;

Set out the capital budget 2020-25, taking into account changes to the capital programme and adjustments to income assumptions as a result of the pandemic.

The forecast revenue outturn after the application of COVID grants and council mitigating actions was shown in Table I.

Cabinet thanked Andrew Hardingham (Service Director for Finance) for all his hard work and advice during his time at Plymouth City Council and wished him well in his retirement.

Cabinet agreed to -

1. Note the current capital and revenue monitoring position;
2. Recommend that the Council approved the Capital Budget 2020-2025 as revised to £621.182m (as shown in appendix I).

62. **Corporate Plan Performance Report 2020/21 - Quarter 2** (To Follow)

This item was deferred and would be considered at a future Cabinet meeting.

63. **Digital Inclusion** (Verbal Report)

Councillor Jeremy Goslin (Assistant Cabinet Member) and Amanda MacDonald (Programme Manager) gave a presentation on Digital Inclusion –

The digital divide had been made more prominent during the COVID-19 crisis and many people had found themselves unable to access services they need to go through their everyday life. With the internet being so central in modern society and those who had been digitally excluded not using it, it can be very hard to find and identify these people.

The aim was to find out who had been excluded and why on a local level. We were bringing together 50 partner organisations from across Plymouth to connect those who need help with people who can provide this help. The aim was to get a further 2000 people online and connect them with opportunities, skills and people.

Nationally 9 million people struggle to use the internet independently and so fixing the digital divide is to reduce this figure so more people could benefit from being online.

Research has shown economic benefit to being online. In the next 5 years, 90% of all jobs will require digital skills and we need to support people in Plymouth so they are prepared for future job opportunities.

The pandemic had highlighted educational benefits to being online, but lots of children don't have this access. In terms of financial benefits, each of us can save £340 saved on utilities alone if we can search for the best deals online and pay via direct debit. There was better information and access to health and wellbeing information online. Digital is also quite often the key to being able to live independently and so suffering from social exclusion. The team



estimate that there are approximately 21,000 people in Plymouth who were digitally excluded currently.

The presentation covered the reasons for digital exclusion, the impact of COVID-19 and what the response was from the team during the pandemic for the people in Plymouth, feedback on some of the teams work and plans for the future.

Cabinet noted the Digital Inclusion update.

This page is intentionally left blank

# Cabinet



Date of meeting:	08 December 2020
Title of Report:	<b>Equality and Diversity Review and Action Plan 2020 - 2021</b>
Lead Member:	Councillor Chris Penberthy (Cabinet Member for Housing and Co-operative Development)
Lead Strategic Director:	Andy Ralphs (Strategic Director of Customer and Corporate Services)
Author:	Laura Hill, Policy and Intelligence Advisor
Contact Email:	Laura.hill@plymouth.gov.uk
Your Reference:	LH25.11.20
Key Decision:	No
Confidentiality:	Part I - Official

## Purpose of Report

- Between September and November 2020 we undertook a review of our organisational practices on equality and diversity. This report provides Cabinet with a summary of the findings from this equality review.
- The paper sets out the context for this work and the methodology used within the review which included a mix of workshops, surveys and one-to-one interviews with internal and external stakeholders including employees, members and partners.
- The paper places the equality and diversity review in the wider organisational context of the Council's ambitions to reach the 'Excellence Level' of the Equality Framework for Local Government.
- The paper explores key themes that were identified through this review which include; leadership and organisational commitment, organisational culture, workforce development, community engagement and the way services are delivered.
- The paper identifies and recommends specific actions which the Council can take to ensure that equality and diversity are further mainstreamed across the organisation.

## Recommendations and Reasons

Cabinet is asked to:

1. Endorse the new draft Equality and Diversity Action Plan (2020 – 2021).
2. Endorse the proposal to develop a corporate equality and diversity group.

## Alternative options considered and rejected

Option 1 - do nothing

Under the Equality Act (2010) Plymouth City Council is subject to the General Duty and the Public Sector Equality Duty. Therefore the option to do nothing is not viable.

Option 2 - continue to make minor detail changes to the system we already have

The Equality Act anticipates that organisations will work towards the three aims of the General Duty and we continue to meet this basic requirement. However the systems and processes we have in place to support this work have been in place without significant review since 2015 and since then we have seen an unprecedented degree of organisational change and external challenge. The equality review also found areas where further work would enable the organisation to fully embed equality and diversity across the organisation.

### **Relevance to the Corporate Plan and/or the Plymouth Plan**

The Council's Corporate Plan sets out our ambition to be one of Europe's most vibrant waterfront cities, where an outstanding quality of life is enjoyed by everyone. Our key mission is making Plymouth a fairer city, where everyone does their bit. To achieve these ambitions we need to ensure any decision we take does not adversely impact communities sharing protected characteristics under the Equality Act.

### **Implications for the Medium Term Financial Plan and Resource Implications:**

Officer resources will be needed to carry out the recommended review actions. These resources will be met from within existing budgets

### **Carbon Footprint (Environmental) Implications:**

It is not anticipated that the proposed actions will cause negative environmental impacts. Where negative environmental impacts are identified an environmental analysis will be carried out in line with the Council's policies.

### **Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:**

*\* When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.*

Not applicable because the subject of the report ensures that due regard has been given to equality.

### **Appendices**

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
		1	2	3	4	5	6	7
A	Plymouth City Council Equality and Diversity Action Plan (2020 – 2021)							
B	Draft terms of reference for the equality and diversity review							
C	Equality Act Background information							
D	Pledges							

E	Costs and resources								
---	---------------------	--	--	--	--	--	--	--	--

**Background papers:**

\*Add rows as required to box below

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	Exemption Paragraph Number (if applicable)						
	If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.						
	1	2	3	4	5	6	7
Mainstreaming Equality and Diversity, Cabinet report, 18 August 2020							

**Sign off:**

Fin	pl.20. 21.1 68	Leg	lt/351 45/2/ 2711 20	Mon Off		HR	AM2 7112 0	Asset s		Strat Proc	HG/PS/5 66/CP/11 20
Originating Senior Leadership Team member: Kim Brown, Service Director for Human Resources and Organisational Development											
Please confirm the Strategic Director(s) has agreed the report? Yes Date agreed: 27/11/2020											
Cabinet Member approval: Cllr Chris Penberthy approved by email on 27/11/20 Date approved: 27/11/2020											

This page is intentionally left blank

# EQUALITY AND DIVERSITY REVIEW

Executive Office and Human Resources Department



## EXECUTIVE SUMMARY

- Between September and November 2020 we undertook a review of our organisational practices relating to equality and diversity. This report provides Cabinet with a summary of the findings from this equality review.
- The paper sets out the context for this work and the methodology used within the review which included a mix of workshops, surveys and one-to-one interviews with internal and external stakeholders including employees, members and partners.
- The paper places the equality and diversity review in the wider organisational context of the Council's ambitions to reach the 'Excellence Level' of the Equality Framework for Local Government.
- The paper explores key themes which were identified through this review which include; leadership and organisational commitment, organisational culture, workforce development, community engagement and the way services are delivered.
- Specifically, the paper identifies and recommends specific actions which the Council can take to ensure that equality and diversity are further mainstreamed across the organisation. The paper makes the following recommendations:
  - Endorse the new draft Equality and Diversity Action Plan (2020 – 2021).
  - Endorse the development of a corporate equality and diversity group.

## 1.0 INTRODUCTION

- 1.1 The aspiration to create a city where an outstanding quality of life is enjoyed by all our residents is central to the Council's vision. To achieve this, we need to ensure that we place equality and diversity at the centre of our service delivery, decision making and our employment practices. Key to this is ensuring that any decision we take does not adversely impact individuals sharing a protected characteristic under the Equality Act.
- 1.2 In August 2020 a paper went to Cabinet which acknowledged that while progress had been made towards mainstreaming equality and diversity within the organisation, further work would be required if the organisation was to fully achieve the expressed outcomes.

## 2.0 BACKGROUND

- 2.1 This October marked ten years since the introduction of the Equality Act. The Equality Act 2010 harmonised and replaced pre-existing equality legislation and extended statutory protection across nine 'protected characteristics'. It recognised forms of discrimination that were previously beyond the scope of legislation and introduced the concept of the Public Sector Equality Duty (PSED).
- 2.2 The PSED placed specific responsibilities on public sector organisations to consider equality in their decision making. It consists of a general equality duty, supported by specific duties which are imposed by secondary legislation. In summary, those subject to the equality duty must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct.
- Advance equality of opportunity between people who share a protected characteristic, and those who do not.
- Promote good relations between people who share a protected characteristic and those who do not.

2.3 In the ten years since the introduction of the Equality Act, Plymouth City Council can point to a number of standout successes;

- We committed to accommodating families under the Syrian Vulnerable Person Relocation Scheme.
- We adopted the ‘Safer Places Scheme’ that provides people with learning disabilities with a safe place to go if they feel anxious or face verbal abuse. In 2019 we celebrated successfully creating almost 200 locations under the ‘Safer Places Scheme’.
- In 2018 we supported the organisers of the largest Plymouth Pride event on the Hoe.
- We celebrated the 100th anniversary of women’s suffrage being given the right to vote and the important part Plymouth played.
- We recently made Holocaust Memorial Day (HMD) a major Civic Event.

### **3.0 SCOPE AND STRUCTURE**

3.1 The ten year anniversary of the Equality Act has shone a spotlight on already prevalent inequalities which have been exacerbated by the ongoing challenges facing communities from COVID-19. For these reasons, Cabinet endorsed a review into our current equality and diversity practice.

3.2 Underpinning the review was an acknowledgement that if Plymouth City Council wants to realise its equality and diversity ambitions of reaching the ‘Excellence Level’ of the Equality Framework for Local Government (EFLG), we must do things differently to fully mainstream equalities across the organisation.

3.3 This has provided a timely opportunity for the organisation to review and reflect on its own equality and diversity practice and to enable the organisation to start to understand where we currently sit on the EFLG. This paper is a product of that review and has sought to answer the questions set out in the terms of reference agreed by Cabinet (found in appendix B).

3.4 The Service Director for Human Resources and Organisational Development acted as ‘project champion’. The project was supported by the Policy and Intelligence Team and Human Resources and Organisational Development. The Senior Leadership Team (SLT) were invited to participate in four workshops. The workshops, which were well attended, ensured a range of perspectives and professional backgrounds were engaged in the review process.

### **4.0 ENGAGEMENT AND STAKEHOLDER ENGAGEMENT**

4.1 Our review team identified relevant stakeholders to consult with both internally and externally using a variety of mechanisms which included interviews and surveys to ensure a diversity of views were heard. To encourage open discussion and honest feedback, the review team assured participants that their contributions would be anonymised.

4.2 The analysis and recommendations in this paper have been informed by consultation with the following stakeholders:



- Members of SLT from across the organisation and a trade union representative attended four thematic EFLG workshops.
  - One-to-one conversations were held with members of the Corporate Management Team.
  - An online survey was circulated to all councillors, and 16 responses were received. One-to-one supplementary conversations were also held with 23 councillors including all of Cabinet.
  - A staff equality and diversity poll was circulated to all staff which asked for feedback specifically on the organisation's equality and diversity practice. 415 responses were received.
  - An online survey was circulated to organisations across the city asking for feedback on the organisation's practice on equality and diversity, 40 responses were received.
  - Supplementary conversations with a small number of voluntary and community groups and attendance at a small number of community forums also took place.
  - A brief desktop review of equality and diversity good practice from other local authorities was undertaken.
- 4.3 We are grateful for the contributions of stakeholders, without whom this review would not have been possible.

## **5.0 EQUALITY FRAMEWORK FOR LOCAL GOVERNMENT**

- 5.1 This section explores the organisation's practice in relation to each of the different themes within the EFLG. The Equality Framework for Local Government (EFLG) is an equality and diversity tool for local government developed by the LGA. The EFLG is also a way for organisations to deliver against the Public Sector Equality Duty (PSED). It consists of four elements assessed against three levels of achievement; 'developing', 'achieving' and 'excellence'.
- 5.2 The assessed elements are:
- Leadership and organisational commitment
  - Understanding and working with communities
  - Diverse and engaged workforce
  - Responsive services and customer care
- 5.3 The findings from this equality review have been loosely grouped under each of the above headings.

## **6.0 LEADERSHIP AND ORGANISATIONAL COMMITMENT**

- 6.1 This review has concluded that we are a council which has leaders who are in principle committed to equality and diversity and who are working hard to reduce inequality. From the engagement which took place, it is clear that our leaders, both managers and members, bring a wealth of professional and lived experiences to their roles which have shaped their understanding of equality and diversity. The review found an organisation where its leaders, both staff and members, were able to clearly articulate what equality and diversity mean in a general context and also more specifically to their particular areas of the organisation. The review also found that leaders appreciate the value, knowledge and experience which partners across the city bring to the organisation.
- 6.2 Despite this, a perception emerged from both the internal and external engagement that the organisation does not take equalities and diversity seriously. For example, participants shared their concerns that equality impact assessments (EIAs) were perceived as "cumbersome...as a chore" "completed at the last minute" and often "perceived as a tick box exercise", "...rather than a tool to actually think about the impact of decisions".

- 6.3 Section one of the Equality Act 2010 includes a socio-economic duty which if enacted would require public bodies to adopt transparent and effective measures to address socio-economic inequalities. Currently, public sector organisations do not have to demonstrate due regard to the socio-economic duty, however some have done so as a matter of good practice.
- 6.4 Due to the economic impacts which are being felt by COVID-19, we included socio-economic inequality as one of the factors which need to be considered as part of the equality impact assessment (EIA) process as a pilot.
- 6.5 While the review found that there are pockets of good practice across the organisation in relation to the completion of EIAs, this is not consistent. Given the current challenges which the organisation faces in regards to the completion of EIAs, this review does not recommend adding additional components to the current template or process permanently.
- 6.6 The continued commitment from the Service Director for Human Resources and Organisational Development to the equality and diversity agenda provides an opportunity to place a renewed focus on equality and diversity within the organisation. This will facilitate discussions with the whole leadership team on how this agenda can be most effectively taken forward.
- 6.7 The Service Director for Human Resources and Organisational Development will play a key role in championing equality and diversity across the council. However, it is important to note that responsibility for this agenda lies with the whole leadership team and not just with one individual.
- 6.8 Managers and members across the organisation must play a key role in setting priorities, modelling positive behaviours, being accountable and holding others to account on equality and diversity. The review found that both managers and members overwhelmingly felt that part of their role is to promote equality and diversity. However, only 52 per cent of respondents to the equality and diversity employee poll agreed that they see strong leadership to support Plymouth City Council's equality and diversity work.
- 6.9 To ensure that equality and diversity is fully mainstreamed across the organisation, both leaders and members need to help to mainstream equality and diversity by facilitating conversations about this. This is key to ensure there is a culture shift towards a more considered and mainstreamed approach to equality and diversity within the organisation. It is also key to ensuring the Council's values are fully embedded within the organisation.

## **7.0 UNDERSTANDING AND WORKING WITH COMMUNITIES**

- 7.0 COVID-19 has reinforced the importance of effective partnership working. The Council contributes to a number of partnerships and is keen to continue to work collaboratively with organisations across the city. We are an organisation which values the contributions and insights that partner organisations, non-statutory organisations and the wider community bring and this was underpinned by the findings from the review. A strong theme emerged throughout the review that the council was keen to listen to communities and carry out 'meaningful and balanced' engagement.
- 7.1 There is a clear ambition to facilitate strong engagement, enabling as many voices as possible to be heard within our decision-making processes, and recognition in the value of ensuring that the voices of 'seldom heard communities' are "amplified".

- 7.2 Community engagement, especially in the context of equality and diversity, needs to be mindful of ‘box-ticking’ and ‘token engagement’ and needs to ensure that the methods we use are appropriate and accessible.
- 7.3 Senior leaders were honest about the engagement challenges that they faced, noting that “engagement can be difficult” and, “we need to build trust”. Several other internal respondents observed that we need to be more honest with community partners “about what we can and can’t do” and “take a more joined-up approach”.
- 7.4 Despite this appetite for engagement and the good work which was happening across the organisation, the review found that some community groups did not feel engaged. For example, one external organisation said that the organisation needed to “...Be more proactive in engaging with diverse communities at all levels”. The review identified community engagement as an area for further work. Responses from the equality and diversity staff poll found that only 44 per cent of staff agreed that there are strong working relations between Plymouth City Council and its diverse communities.

## **8.0 DIVERSE AND ENGAGED WORKFORCE**

- 8.1 The review found that the organisation collects and analyses data on its workforce, however, more can be done to effectively use this data and the intelligence which it brings.
- 8.2 A lack of confidence around and understanding of equality and diversity issues within staff and members emerged as a consistent theme within the review. Responses to the staff survey and conversations with members indicated that both would appreciate a wide and varied training offer which goes beyond understanding the statutory legislation and includes elements of cultural competency and face-to-face workshops to facilitate discussions on sensitive and often complex issues. Only 47 per cent of responses to the equality and diversity staff snapshot poll agreed that Plymouth City Council provides adequate training on equality and diversity.
- 8.3 While learning and development is a key component in mainstreaming equalities into the organisation, it is important that learning and development is not viewed as a panacea. Emerging in the review was a strong feeling that equality and diversity needed to be embedded within the culture of the organisation and explored in different forums for example in one-ones, in APR discussions, in team meetings and through active learning and development tools such as mentoring and coaching.
- 8.4 There was a general consensus that the policies which the organisation has in place are robust, however a theme emerged throughout the review that these policies are applied inconsistently across the organisation. Several respondents to the staff survey commented that they have witnessed inappropriate language and/or behaviour which they felt had not been appropriately challenged. The perception of inaction in situations where unacceptable language or behaviour had been displayed is likely to be a strong contributing factor in the disconnection between the equality and diversity ambitions of the organisation and reality.

## **9.0 RESPONSIVE SERVICES AND CUSTOMER CARE**

- 9.1 Plymouth City Council is committed to the highest standards of customer service. Our commitments are set out in our Customer Service Standards, which are monitored against our performance framework.
- 9.2 The review found that the organisation’s approach to information management is not always consistent across the organisation. As a result, the quality and type of data collected vary across the organisation. Our primary mechanism for collecting customer feedback is through our

online system Firmstep, however, it is not currently possible to breakdown our customer experience data by demographic group.

- 9.3 A strong theme which emerged from the workshops was that in order to fully embed our equality and diversity work across all of the services which we are responsible for, equality and diversity need to be embedded within the different stages of our procurement activities consistently across the organisation.
- 9.4 There was also a recognition that equality and diversity, and more specifically our equality objectives, need to be embedded within service plans.

## 10.0 CONCLUSION

- 10.1 This paper intends to provide a snapshot of some of the key findings from the equality review. It is important to note that the paper does not detail all the specific activities underway across the organisation which are being carried out to reduce inequality within the city.
- 10.2 The review found that across the organisation people wanted to listen, engage, understand and work with communities and partners. The review observed examples of good practice around engagement across the organisation. Areas such as Sports Development, the City Change Fund, the Community Youth Team, Green Minds, Digital Inclusion, Unify Plymouth and Public Health were all cited as examples of good engagement practice.
- 10.3 The review found that effective leadership and a strong organisational commitment is key for the delivery of positive equality and diversity outcomes and effective mainstreaming of equality and diversity within the organisation. The review found that the organisation is committed to equality and diversity. The Chief Executive, and the portfolio holder for equality and diversity, set out their commitment towards equality and diversity along with the organisation's equality objectives in our recently published 'Our Commitment to Equality and Diversity' document. Our recently updated Equality and Diversity Policy reinforces this commitment and expands on the commitment within the Council's constitution to promote and foster equality and diversity. There has also been progress on a number of pledges which are relevant to equality and diversity which were published by our current administration.
- 10.4 Members in particular have a unique role to play in holding the organisation to account and have been engaged throughout this process, recognising the important role which they play. A key theme which emerged from the review is that members, CMT, senior leaders and managers across the organisation must play a key role in being accountable, setting priorities, modelling positive behaviours and holding others to account on equality and diversity. This is key to ensure that there is culture shift towards a more considered and mainstreamed approach to equality and diversity within the organisation.
- 10.5 It is also important to note that while the review attempted to engage with as many stakeholders as possible, engagement has been unfortunately low amongst both employees and external organisations. This means that while the feedback gathered as part of the review has been useful, it may not necessarily be representative of the wide range of views which exist across our organisation and community. This low level of engagement could in itself be telling of the external perception of how the organisation promotes and addresses issues of equality and diversity.
- 10.6 To ensure that equality and diversity is fully mainstreamed within the organisation, the paper makes the following recommendations to Cabinet:
- Endorse the new draft Equality and Diversity Action Plan (2020 – 2021).
  - Endorse the proposal to develop a corporate equality and diversity group

## APPENDIX A: DRAFT EQUALITY AND DIVERSITY ACTION PLAN 2020

# Plymouth City Council

## Equality and Diversity Action Plan 2020 – 2021

The Equality and Diversity Strategy Action Plan 2020 - 2021 supports the Council's equality and diversity ambitions. This document is a live document and will be updated periodically to reflect changing organisational priorities and community needs. The equality and diversity actions included within this action plan have been identified around the following:

- **Themes** – the objectives and milestones in this plan have been grouped under 4 thematic areas. These thematic areas are used in the Equality Framework for Local Government which will be used to benchmark our equality practice and progress. The four thematic areas are:
  - Leadership and organisational commitment
  - Understanding and working with our communities
  - Responsive Services and Customer Care
  - Diverse and engaged workforce
- **Equality and Diversity Objectives** – Having equality objectives is a requirement under the Equality Act 2010. Our objectives were developed through consultation in January 2020 and set our organisational equality priorities for the next four years. Based on the feedback gathered during our consultation we made slight amendments to our equality objectives, which have been agreed as the following:
  - We have set one overarching objective to celebrate diversity and ensure that Plymouth is a welcoming city.
  - We have also set four additional equality objectives which are:

- Pay equality for women, and employees with disabilities in our workforce
  - Supporting our workforce through the implementation of Our People Strategy 2020 – 2024
  - Supporting victims of hate crime so they feel confident to report incidents, and working with, and through our partner organisations to achieve positive outcomes.
  - Ensuring that Plymouth is a city where people from different backgrounds get along well.
- **Equality and Diversity Outcomes** – these are areas identified as good practice, meeting them will help us to ensure equality and diversity good practice across the organisation.

<b>Leadership and organisational commitment</b>				
<b>Context</b>	<ul style="list-style-type: none"> <li>▪ Effective leadership is key to realising our equality ambitions.</li> <li>▪ Our Chief Executive and Portfolio Holder for Equalities set out their commitment to realising the organisation’s equality and diversity ambitions in the ‘Our commitment to equality and diversity’ document.</li> <li>▪ The document sets out how the organisation is working hard to challenge discrimination, promote equality of opportunity and understanding and foster good relations within our community.</li> </ul>			
<b>Outcome</b>	<b>Action</b>	<b>Measure of success</b>	<b>Timescale</b>	<b>Lead</b>
Our city is a welcoming city for everyone.	Explore how we want to foster community cohesion to ensure that Plymouth is a welcoming city for everyone.	<ul style="list-style-type: none"> <li>▪ We have set out our approach to community cohesion.</li> <li>▪ We have published our ‘Welcoming City Strategy’.</li> <li>▪ We have included a question to measure levels of community cohesion within our City Survey and Resident Survey.</li> </ul>	Start March 2021 - Complete February 2022 TBC	Policy & Intelligence Team (TBC)

		We have considered using tools such as the <a href="#">Home Office Indicators of Integration Framework 2019</a> to measure cohesion within the city and develop our KPIs.		
Equality and diversity is considered within service planning.	Service managers embed equality issues when drafting their service plans and evidence how they do this.	<ul style="list-style-type: none"> <li>The corporate service plan template has been updated to include our equality objectives and a particular space for equality considerations.</li> <li>All departments have embedded our equality objectives into their service plans.</li> </ul>	Start February/March 2021 – Complete March 2021	<p>Oversight and Governance Team to lead</p> <p>All service managers to update their equality action plans</p>
Equalities and diversity is monitored by senior management.	Senior managers consider equalities issues in their management meetings and beyond.	<ul style="list-style-type: none"> <li>Equality and diversity linked to performance becomes a regular item on the CMT/ DMT/ agenda.</li> </ul>	Start January 2021 – Ongoing	<p>Corporate Performance Team to lead.</p> <p>DMT to action within their departments</p>

Equalities and diversity is regularly discussed within teams.	Teams consider equalities issues in their team meetings.	<ul style="list-style-type: none"> <li>Equality and diversity becomes a regular item on all team meeting agendas.</li> </ul>	Start February 2021 – Ongoing	All council managers to action within their teams
Equality and diversity continues to be recognised as an organisational priority.	Senior officers meet to discuss equality and diversity related issues in their service area regularly.	<ul style="list-style-type: none"> <li>An officer led corporate equality and diversity group chaired by the Service Director for Human Resources and Organisational Development which reports to Scrutiny.</li> <li>Scrutiny Management Board to consider where this fits within the scrutiny structure.</li> </ul>	Start February 2021 – Ongoing	Human Resources & Organisational Development lead with support from Oversight and Governance Team and Policy & Intelligence Team
We ensure that marginalised voices within our community are provided with an opportunity to be heard.	As an organisation we advocate on issues which particularly impact our residents and run specific campaigns where appropriate.	<ul style="list-style-type: none"> <li>Our public affairs activities include a mechanism to ensure equalities issues are picked up.</li> </ul>	Start March 2021 – Ongoing	Policy & Intelligence Team with support from Communications
Leaders' commitment to equalities is visible to employees.	Increase the visibility of equalities issues across the organisation.	<ul style="list-style-type: none"> <li>Equalities issues feature prominently on Staff Room and are included within Tracey's Team Talks.</li> <li>We have published an equality and diversity communication plan.</li> </ul>	Start March 2021 – Ongoing Start January 2021 –	Communications with support from Policy & Intelligence and Human Resources &



			Complete February 2021	Organisational Development
Senior officers feel confident in discharging their responsibility to ensure high quality and robust equality impact assessments.	Good practice on the completion of equality impact assessments is shared within the council.	<ul style="list-style-type: none"> <li>▪ We have published refreshed equality impact template and guidance.</li> <li>▪ We have also refreshed our Equality Impact Assessment e-learning course.</li> <li>▪ We have commissioned in person training or delivered briefings to officers on good practice EIA completion.</li> </ul>	Start January 2021 – Complete March 2021	Policy & Intelligence Team to lead with support from Human Resources & Organisational Development
Senior officers can monitor the progress of their service areas around equality and diversity.	Senior officers understand how to assess their service area against our equality priorities.	<ul style="list-style-type: none"> <li>▪ Developed a self-assessment tool to enable senior leaders to assess where their service area sits on the EFLG.</li> <li>▪ CMT to carry out a self-assessment on their service area.</li> </ul>	Start May 2021 – Complete July 2021	Policy & Intelligence Team to lead and Human Resources & Organisational Development to support
Our equality objectives are well understood across the organisation.	Integrate our equality objectives across the organisation.	<ul style="list-style-type: none"> <li>▪ We have published SMART action plans for each of our equality objectives.</li> </ul>	Start March 2021- Complete June 2021	Policy & Intelligence Team with support from Community

		<ul style="list-style-type: none"> <li>We have developed KPIs for each of our equality objectives.</li> </ul>		Connections, Human Resources & Organisational Development
We have measures of success for our equality our diversity progress.	We have a clear monitoring framework in place for our equality and diversity work.	<ul style="list-style-type: none"> <li>We have developed corporate KPIs for our equality and diversity work which are regularly monitored.</li> </ul>	Start March 2021 - Complete June 2021	Policy & Intelligence Team with support from the Performance Team and Public Health
Equality impact assessments (EIA) are fully embedded into the decision making process and are completed to a high standard across the organisation.	Corporate Governance Team to screen all reports submitted to ensure they are accompanied by an equalities impact assessment or include clear reasoning why an EIA is not required.	<ul style="list-style-type: none"> <li>All published papers include either an EIA or a reason why an EIA is not included. (The Corporate Governance Template has been updated to reflect this)</li> <li>Democratic Advisors receive additional information/ training on equality impact assessments.</li> <li>A mechanism for tracking EIA mitigation activity is developed.</li> </ul>	Start February 2021 – Complete May 2021	Policy & Intelligence Team to lead with support from the Oversight & Governance Team

<b>Understanding and working with our communities</b>				
<b>Context</b>	<ul style="list-style-type: none"> <li>▪ Understanding our communities is key to ensuring that our services meet the ever changing needs of our residents.</li> <li>▪ We need to continue to work in partnership and continue to build and maintain effective and positive relationships with different organisations to encourage good practice sharing and knowledge exchange.</li> <li>▪ It is also about ensuring we have different mechanisms in place to provide opportunities for as many people as possible to participate in public life.</li> </ul>			
<b>Equality Outcomes</b>	<b>Action</b>	<b>Measure of success</b>	<b>Timescale</b>	<b>Lead</b>
<ul style="list-style-type: none"> <li>▪ We understand who the different communities living in Plymouth are.</li> <li>▪ We understand the different challenges facing these different communities.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Publish information about our different communities.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Updated pen profiles and updated ward profiles are published.</li> </ul>	Start January 2021 - Complete March 2021	Policy & Intelligence Team
<ul style="list-style-type: none"> <li>▪ We have a range of mechanisms in place for communities to communicate issues to us.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ensure accessible, formal and informal mechanisms for communities to provide feedback to the council.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Our new community engagement framework is published.</li> <li>▪ Examples of good engagement practice around the organisation are shared.</li> <li>▪ The EFLG 'Understanding and working with communities' outcomes are embedded into the corporate community empowerment programme of work.</li> </ul>	Start January 2020 – Complete March 2021	Public Health to lead with support from Strategic Commissioning, Community Connections and Policy & Intelligence Team

<ul style="list-style-type: none"> <li>▪ We support victims of hate crime.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Raise awareness of the mechanisms for victims to report hate crime.</li> </ul>	<ul style="list-style-type: none"> <li>▪ We explore how to measure positive outcomes for victims of hate crime.</li> <li>▪ We share communication messages to raise awareness of hate crime within the city and the mechanisms for hate crime reporting.</li> <li>▪ Council officers have information on how to support a victim of hate crime report their experience.</li> </ul>	<p>Start December 2021 - Ongoing</p>	<p>Community Connections leads with support from the Safer Community Partnership and support from Human Resources &amp; Organisational Development and Corporate Communications</p>
<ul style="list-style-type: none"> <li>▪ We use data and intelligence to help inform our priorities.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Carry out research to understand the different challenges facing our communities.</li> </ul>	<ul style="list-style-type: none"> <li>▪ We have analysed the results of the Residents' Survey by demographic to identify the trends across different protected characteristics.</li> </ul>	<p>Start January 2021 - Complete June 2021</p>	<p>Policy &amp; Intelligence Team</p>
<ul style="list-style-type: none"> <li>▪ We celebrate and support the diversity of our different communities within Plymouth.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Continue to support community events.</li> </ul>	<ul style="list-style-type: none"> <li>▪ We have a programme of events which recognise our diverse communities.</li> </ul>	<p>Starts January 2021 – Ongoing</p>	<p>Community Connections and Policy &amp; Intelligence Team with support from the Events Team</p>

<ul style="list-style-type: none"> <li>▪ Plymouth is a city that celebrates diversity.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Celebrate the diversity of the different communities within Plymouth.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Communications are shared on widely recognised religious and cultural occasions.</li> </ul>	<p>Starts - March 2021 – Ongoing</p>	<p>Corporate Communications</p>
<ul style="list-style-type: none"> <li>▪ We understand who the wide range of the different voluntary, community and groups and organisations in Plymouth are.</li> </ul>	<ul style="list-style-type: none"> <li>▪ We hold up to date and easily accessible information on the different voluntary, community and groups and organisations in Plymouth.</li> </ul>	<ul style="list-style-type: none"> <li>▪ An increased range of diverse community groups are published on the Plymouth Online Community Directory.</li> <li>▪ A centrally held list of different voluntary, community and social enterprise groups is kept up to date.</li> </ul>	<p>Starts March 2021 – Ongoing</p> <p>Starts March 2021 – Ongoing</p>	<p>Strategic Commissioning leads with support from Policy &amp; Intelligence Team</p>
<ul style="list-style-type: none"> <li>▪ We provide a range of engaging and accessible information about the different communities within Plymouth.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Our website reflects the organisation’s commitment to equality and diversity.</li> </ul>	<ul style="list-style-type: none"> <li>▪ We have updated the equality and diversity section on the PCC website.</li> </ul>	<p>Start June 2021 – Ongoing</p>	<p>Policy &amp; Intelligence Team</p>

<b>Responsive Services and Customer Care</b>				
<b>Context</b>	<ul style="list-style-type: none"> <li>Responsive Services is key to ensuring that our services meet the ever changing needs of our residents. It is about using data to know who does and does not use our services, identifying areas of disadvantage and under representation and ensuring that equality is fully embedded within our procurement activities.</li> </ul>			
<b>Equality Outcomes</b>	<b>Action</b>	<b>Measure of success</b>	<b>Timescale</b>	<b>Lead</b>
<ul style="list-style-type: none"> <li>Our employees feel confident to identify good equality practice during the procurement process.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that equality and diversity is embedded within our procurement processes.</li> </ul>	<ul style="list-style-type: none"> <li>Publish guidance for officers on how they can effectively consider equality and diversity issues throughout the procurement cycle.</li> <li>Review questions in the SQ to ensure that they are meaningful and provide real evidence of commitment.</li> <li>Publish guidance for officers on what good practice looks like to support them when evaluating supplier responses.</li> <li>Promote inclusion of equality and diversity related Social Value measures in the award of contracts where relevant and proportional.</li> </ul>	Start March 2021 - Complete May 2021	Policy and Intelligence Team to jointly lead with Procurement Service
<ul style="list-style-type: none"> <li>Our employees feel confident to hold providers to account to ensure good</li> </ul>	<ul style="list-style-type: none"> <li>Quality performance is managed as part of our contracts.</li> </ul>	<ul style="list-style-type: none"> <li>Publish guidance for officers on how they can effectively consider equality and</li> </ul>	Start March 2021-	Procurement Services lead with support from

practice around equality and diversity.		diversity issues when they are managing a contract.	Complete May 2021	Policy & Intelligence Team
<ul style="list-style-type: none"> <li>Our employees understand the different barriers people with disabilities face.</li> </ul>	Develop a single accessibility policy and set of accessibility standards for the Council.	<ul style="list-style-type: none"> <li>Draft an options paper to consider if an accessibility strategy would be viable.</li> </ul>	Start April 2021 - Complete July 2021	Policy & Intelligence Team supported by Planning

<b>Diverse and Engaged Workforce</b>				
<b>Context</b>	<ul style="list-style-type: none"> <li>Understanding our workforce is key to ensuring that our employment practices meet the needs of our employees and service users. We need to understand who does and does not work for us, who applies for jobs with us and who progresses within the organisation.</li> <li>Our <u>People Strategy</u> will help us become a workforce that is adaptable to the changes local authorities will face over the next five years. It is a blueprint for the organisation and has strong equality, diversity and inclusion themes running through out. The actions below sit alongside and complement our existing People Strategy.</li> </ul>			
<b>Equality Outcomes</b>	<b>Action</b>	<b>Measure of success</b>	<b>Timescale</b>	<b>Lead</b>
<ul style="list-style-type: none"> <li>We understand our local labour market.</li> </ul>	<ul style="list-style-type: none"> <li>Colleagues across the organisation share information about the local labour market.</li> </ul>	<ul style="list-style-type: none"> <li>We have undertaken a labour market profile for our organisation.</li> </ul>	Start April 2021 - Complete May 2021	Human Resources & Organisational Development with support

				from Economic Development
<ul style="list-style-type: none"> <li>We understand the demographics of our workforce.</li> </ul>	<ul style="list-style-type: none"> <li>Encourage employees to record their sensitive information on Core HR.</li> </ul>	<ul style="list-style-type: none"> <li>Increase the percentage of employees who have recorded their sensitive information on Core HR.</li> <li>Carry out data analysis to fully understand workforce demographics, identify workforce trends and present this information in a monthly workforce dashboard.</li> </ul>	<p>Start January 2021 – Complete June 2021</p>	<p>Human Resources &amp; Organisational Development to lead.</p> <p>All SLT members to encourage their staff to provide their sensitive information.</p>
<ul style="list-style-type: none"> <li>There is a good understanding amongst employees of different cultures.</li> </ul>	<ul style="list-style-type: none"> <li>Provide engaging information for employees to develop cultural awareness and competency.</li> </ul>	<ul style="list-style-type: none"> <li>We have published and shared with employees an organisational equality calendar which provides information on widely recognised awareness days and key religious and cultural occasions to help raise awareness and understanding of different cultures.</li> <li>We have run internal briefings/ toolbox talks on</li> </ul>	<p>Start January 2021 - Complete February 2021</p> <p>Start February 2021 – Ongoing</p>	<p>Human Resources &amp; Organisational Development with support from Communications</p> <p>Human Resources &amp;</p>



		cultural awareness and understanding.		Organisational Development
<ul style="list-style-type: none"> <li>We are working towards reducing our gender pay gap and our disability pay gap.</li> </ul>	<ul style="list-style-type: none"> <li>We understand what factors are contributing to our gender pay gap and have identified the steps which will take to reduce this.</li> </ul>	<ul style="list-style-type: none"> <li>We have published our gender pay gap report.</li> <li>We have explored the factors contributing to our gender and disability pay gap.</li> <li>We have created an action plan to address our gender and disability pay gap.</li> </ul>	Start January 2021 - Complete March 2021	Human Resources & Organisational Development
<ul style="list-style-type: none"> <li>Our employees are supported to feel confident around equalities issues.</li> </ul>	<ul style="list-style-type: none"> <li>We provide a varied equality and diversity training offer.</li> </ul>	<ul style="list-style-type: none"> <li>Review and update online e-learning provision to ensure that it meets organisational needs and consider expanding the current provision.</li> </ul>	Start December 2020 - Complete January 2021	Human Resources & Organisational Development
<ul style="list-style-type: none"> <li>Our members are supported to feel confident around equalities issues.</li> </ul>	<ul style="list-style-type: none"> <li>Provide a varied equality and diversity training offer.</li> </ul>	<ul style="list-style-type: none"> <li>Review member training offer and create a bespoke equality and diversity training offer for members which includes an equality and diversity learning offer as part of the member induction process.</li> </ul>	Start January 2021- Complete March 2020	Human Resources & Organisational Development to lead with support from Oversight and Governance

<ul style="list-style-type: none"> <li>Information about equality and diversity is easily accessible to employees.</li> </ul>	<ul style="list-style-type: none"> <li>We provide a range of information and guidance on different equality related topics.</li> </ul>	<ul style="list-style-type: none"> <li>Create an online 'equality hub' which includes engaging, useful and up to date equalities and diversity information to supplement the formal learning and development offer for employees and councillors. This will include refreshing the 'Councillor Toolkit'.</li> </ul>	<p>Start February 2021 - Ongoing</p>	<p>Led by Human Resources &amp; Organisational Development and supported by subject matter experts from across the organisation where required</p>
<p>Employees understand that they are entitled to be treated with dignity and respect.</p>	<ul style="list-style-type: none"> <li>Explore implementing a corporate standard/charter to communicate to our customers that discriminatory behaviour will not be tolerated.</li> </ul>	<ul style="list-style-type: none"> <li>An options paper is drafted looking considering a corporate standard/charter.</li> </ul>	<p>Start March 2021 – Complete June 2021</p>	<p>Human Resources &amp; Organisational Development</p>
<p>Employees understand the different ways which trauma can present in residents and service users.</p>	<ul style="list-style-type: none"> <li>Work with colleagues across the organisation to raise awareness of a trauma informed approach.</li> </ul>	<ul style="list-style-type: none"> <li>Continued to deliver training sessions on trauma informed practice.</li> </ul>	<p>January 2021 – Ongoing</p>	<p>Community Connections to lead with  Human Resources &amp; Organisational Development to support</p>
<p>Our organisation attracts a wide range of talent.</p>	<ul style="list-style-type: none"> <li>Review our current recruitment practices.</li> </ul>	<ul style="list-style-type: none"> <li>Our recruitment policies have been reviewed.</li> <li>Analysis has been undertaken by demographics</li> </ul>	<p>Start February 2021 –</p>	<p>Human Resources &amp; Organisational</p>

		to identify 'drop off' points within the recruitment process.	Complete June 2021	Development and Recruitment
--	--	---	--------------------	-----------------------------

## Implementation of this plan

To enable the organisation to realise its equality and diversity ambitions, it is important that we ensure that activities in this plan are completed. To do this, it is important that all employees clearly understand the role which they play in relation to this action plan and the wider aim to embed equalities within the organisation.

- The Portfolio Holder who has equalities within their portfolio is responsible for championing equalities and holding departments to account.
- The Corporate Management Team are responsible for overseeing the implementation of this plan, championing equalities across the organisation and providing challenge where actions are not being completed.
- The Senior Leadership Team are responsible for leading on the actions identified for their respective departments as well as ensuring that they take into account equality and diversity in the way they deliver their services.
- Human Resources & Organisational Development are responsible for ensuring good practice employment practice within the organisation and provision of learning and development opportunities.
- Policy & Intelligence are responsible for ensuring that the organisation is meeting its statutory duty and will coordinate activities in liaison with Human Resources & Organisational Development.

## **APPENDIX B: DRAFT TERMS OF REFERENCE FOR THE EQUALITY AND DIVERSITY REVIEW**

### **1. Objectives:**

- This review aims to successfully mainstream equality and diversity within Plymouth City Council. The review will look at equality, diversity and inclusion across the organisation.
- The review will be completed and a refreshed action plan will be presented to Cabinet by Autumn 2020.

### **2. Areas of exploration:**

This equality and diversity review will aim to answer the following questions:

- Where are examples of good practice equality and diversity work across the organisation?
- What is preventing the organisation from meeting its equality and diversity ambitions?
- What data is held across the organisation which can help to inform our equality and diversity work?
- How can we demonstrate effective equality and diversity leadership internally and externally?
- How can we continue to improve our equality impact assessment process?
- How can we respond meaningfully as an organisation to the Black Lives Matter movement?
- How can we further continue to embed equality and diversity into our procurement processes?
- How will we meaningfully engage within communities in relation to equality and diversity?
- How can we celebrate and showcase diversity across the city?
- How can we work with our partners to advance and promote equality and diversity within the city?
- How can we ensure that the language that we use is inclusive and consistent with our statutory duties?

### **3. Membership of meetings:**

- Meetings are chaired by the Service Director of Human Resources & Organisational Development
- Membership comprises senior and influential officers. (Max 12 people; one for every SLT)
- Where appropriate subject matter experts will be invited to meetings.
- Additional meetings comprising members of the community may be organised where required.

### **4. Partnership working:**

- Although the review is council led we recognise the value which our partners bring to discussions on equality and diversity and will engage and consult with them where appropriate.

### **5. Frequency:**

- Meetings will be held when required to progress the equalities review.
- Where appropriate additional task and finish groups may be convened to progress specific actions.

### **6. Governance:**

- Regular updates on the progress of the review will be provided to the portfolio holder.

## APPENDIX C EQUALITY ACT BACKGROUND INFORMATION

### 1. CONTEXT

- The Equality Act 2010 harmonised and replaced pre-existing equality legislation and extended statutory protection across nine 'protected characteristics'. It recognised forms of discrimination that were previously beyond the scope of legislation and introduced the concept of the Public Sector Equality Duty (PSED).
- The equality duty covers the nine protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first aim of the duty applies to this characteristic but that the other aims (advancing equality and fostering good relations) do not apply.

### 2. SPECIFIC DUTIES

- The aims of the PSED are supported by specific duties intended to improve performance on the general duty. These are set out in separate regulations made by the Secretary of State, they were most recently set out in the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017. Listed authorities in England are required to:
  - at least annually, from 31 March 2018, publish information about its employees and other persons affected by its policies and practices to demonstrate compliance with the general duty;
  - at least every four years, prepare and publish one or more objectives that it thinks it needs to achieve to further any of the aims of the General Equality Duty; and
  - publish gender pay gap information relating to employees, the form and content of this publication is set out in a schedule to the regulations.

### 3. GIVING DUE REGARD

- These are three aims of the General Equality Duty. The Act explains that having due regard for advancing equality involves:
  - Removing or minimising disadvantages suffered by people due to their protected characteristics.
  - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
  - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
- The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

**APPENDIX D: PLEDGES**

- The organisation has committed to working towards several pledges which are relevant to equality and diversity. A progress update for each of the pledges can be found in the table below.

<b>Pledge</b>	<b>Commitment made</b>	<b>Update</b>
<a href="#">Pledge 57</a>	We will adopt the 'safer places scheme' that provides people with learning disabilities with a safe place to go if they feel anxious, or face verbal abuse, harassment or bullying.	We have adopted the 'safer places scheme' that provides people with learning disabilities with a safe place to go if they feel anxious, or face verbal abuse, harassment or bullying. There are now 195 'Safe places' across Plymouth including all council buildings where this is possible. Over the next year, we will work towards increasing the number of 'Safe Places'.
<a href="#">Pledge 64</a>	We will support Women Against State Pension Inequality (WASPI) women (women born in the 1950s) in their fight for pension justice.	In October 2019, the Cabinet member for Housing and Co-operative Development publically wrote to both the Secretary of State for Work and Pensions and the Secretary of State for International Trade, and the Minister for Women and Equalities, following the recent ruling against the WASPI Women by the Royal Courts of Justice. This was shared on social media and received much positive support.
<a href="#">Pledge 71</a>	We will continue to celebrate the 100th anniversary of some women being given the right to vote and the important part Plymouth played both in 1918 and in 1919, with the first woman to take her seat in the House of Commons, representing Plymouth Sutton.	We will continue to celebrate the 100th anniversary of some women being given the right to vote and the important part Plymouth played both in 1918 and in 1919, with the first woman to take her seat in the House of Commons, representing Plymouth Sutton. A plaque to commemorate the life of Nancy Astor was unveiled at her former home on the Hoe in August 2018 which was supported by Plymouth City Council.
<a href="#">Pledge 72</a>	Make Holocaust Memorial Day (HMD) a major Civic Event	There was a civic commemoration and special public ceremony at the Peace Garden on Plymouth Hoe on 27 January 2020, the date of HMD, to remember all those who have died in the Holocaust and subsequent genocides. HMD has been added to the civic calendar of events.
<a href="#">Pledge 76</a>	We will continue to support the organisers and we will arrange to have Pride flags flown from the Hoe flagstaffs and illuminate Smeaton's Tower with the rainbow.	In 2018, a range of activities took place across the city starting with a parade from North Cross through the city centre and ending at the Hoe, where the festival began

		at 1pm. Unfortunately, our celebrations were cancelled in 2019 due to poor weather and will be cancelled this year due to COVID-19. We will continue to support the organisers and we will arrange to have Pride flags flown from the Hoe flagstaffs and illuminate Smeaton's Tower with the rainbow.
<a href="#">Pledge 65</a>	We will review the progress made in implementing the recommendations of the Plymouth Fairness Commission.	We have reviewed the progress made in implementing the recommendations of the Plymouth Fairness Commission. Although there have been key developments in the progress of many recommendations, more can be done to make Plymouth a fairer city. We have identified and will focus on some of the key themes from the report that we feel would make Plymouth even fairer.
<a href="#">Pledge 78</a>	Plymouth has been a welcoming city throughout our history. Our city will continue to provide shelter and support for those fleeing terror, conflict and famine.	<p>Plymouth has been a welcoming city throughout our history. Our city will continue to provide shelter and support for those fleeing terror, conflict and famine as we have done previously.</p> <p>Partners in Plymouth came together in June 2019 to mark the national Refugee Week as the city prepared to launch a pledge to be a 'City of Sanctuary', and to celebrate the contribution of displaced people to British society.</p>

## APPENDIX E: COSTS AND RESOURCES

- This section of the report considers the costs and resources required to progress the equalities work detailed in the draft Equalities Action Plan.
- Any required work will be carried out using existing resources.
- Equality and diversity training is a priority for the organisation. Any required spend will come from the existing corporate learning budget.



# EQUALITY IMPACT ASSESSMENT

Equality and Diversity Review



## STAGE 1: WHAT IS BEING ASSESSED AND BY WHOM?

<b>What is being assessed - including a brief description of aims and objectives?</b>	<p>Between September and November 2020 Human Resources &amp; Organisational Development with support from the Policy and Intelligence Team undertook a review of our organisational practices on equality and diversity. This EIA assesses a report entitled 'Equality Review Update' which provides Cabinet with a summary of the findings</p> <p>As part of the review we held four equality workshops with representatives from the Senior Leadership Team themed around the four elements of the Equality Framework for Local Government. We shared equality and diversity surveys with employees, members and community partners. Conversations also happened across the organisation with the Chief Executive, Corporate Management Team, Senior Leadership Team and elected members.</p> <p>Specifically this EIA assesses the recommendations to Cabinet included within the paper which are the following:</p> <ul style="list-style-type: none"> <li>▪ Endorse the new draft Equality and Diversity Action Plan (2020 – 2021).</li> <li>▪ Endorse the proposal to develop a corporate equality and diversity group.</li> </ul>
<b>Author</b>	Laura Hill
<b>Department and service</b>	Policy and Intelligence Advisor
<b>Date of assessment</b>	20 November 2020

Page 45

## STAGE 2: EVIDENCE AND IMPACT

Protected characteristics (Equality Act)	Evidence and information (eg data and feedback)	Any adverse impact See <a href="#">guidance</a> on how to make judgement	Actions	Timescale and who is responsible
<b>Age</b>	Community profile:	No adverse impact	No action required	N/A

	<ul style="list-style-type: none"> <li>▪ 18 per cent of the population are aged 15 and under</li> <li>▪ 63 per cent of the population are aged 16-64</li> <li>▪ 18 per cent are aged over 65</li> <li>▪ 2 per cent of the population are aged 85 or older</li> </ul> <p>Workforce profile:</p> <ul style="list-style-type: none"> <li>▪ 0.40 per cent of our workforce are aged between 16-19</li> <li>▪ 3.8 per cent of per cent of our workforce are aged between 20-24</li> <li>▪ 7 per cent of per cent of our workforce are aged between 25-29</li> <li>▪ 6.7 per cent of per cent of our workforce are aged between 30-34</li> <li>▪ 9.7 per cent of per cent of our workforce are aged between 35-39</li> <li>▪ 10.7 per cent of per cent of our workforce are aged 40 – 44</li> <li>▪ 13.8 per cent of per cent of our workforce are aged 44-49</li> </ul>			
--	--	--	--	--

	<ul style="list-style-type: none"> <li>▪ 17.7 per cent of per cent of our workforce are aged 50-54</li> <li>▪ 16.2 per cent of per cent of our workforce are aged 55-59</li> <li>▪ 10.3 per cent of per cent of our workforce are aged 60-64</li> <li>▪ 3.4 per cent of per cent of our workforce are aged 65 and over</li> </ul>			
<p><b>Disability</b></p>	<p>Community profile:</p> <ul style="list-style-type: none"> <li>▪ According to the 2011 census 10 per cent of our population have their day-to-day activities limited a lot by a long-term health problem or disability. The England average was 8.3 per cent.</li> <li>▪ The 2011 census also reported fewer Plymouth residents thought their health was 'good' or 'very good', compared to England.</li> </ul> <p>Workforce profile:</p> <ul style="list-style-type: none"> <li>▪ 4 percent of our employees have declared that they have a disability (note that 45.48 per cent have not provided information).</li> </ul>	<p>No adverse impact</p>	<p>No action required</p>	<p>N/A</p>

<p><b>Faith/religion or belief</b></p>	<p>Community profile:</p> <ul style="list-style-type: none"> <li>▪ Christianity is the biggest faith in the city with more than 58 per cent of the population (148,917 people).</li> <li>▪ 32.9 per cent (84,326) of the Plymouth population stated they had no religion.</li> </ul> <p>Those with a Hindu, Buddhist, Jewish or Sikh religion combined totalled less than 1 per cent.</p> <p>Workforce profile:</p> <ul style="list-style-type: none"> <li>▪ The majority of our employees identify their faith/belief as Christianity (30.14 per cent).</li> <li>▪ Employees identifying their faith/belief as Jewish, Muslim, Sikh or 'Other' comprised less than 2 per cent of employees.</li> </ul>	<p>No adverse impact</p>	<p>No action required</p>	<p>N/A</p>
<p><b>Gender - including marriage, pregnancy and maternity</b></p>	<p>Community profile:</p> <ul style="list-style-type: none"> <li>▪ Overall 50.2 per cent of our population are women and 49.8 per cent are men:</li> <li>▪ This reflects the national figure of 50.7 per cent women and 49.3 per cent men.</li> </ul> <p>Workforce profile:</p>	<p>No adverse impact</p>	<p>No action required</p>	<p>N/A</p>

	<ul style="list-style-type: none"> <li>▪ 37 per cent of our employees identified as male.</li> <li>▪ 63 per cent of our employees identified as female.</li> </ul>			
<b>Gender reassignment</b>	<p>Community profile</p> <ul style="list-style-type: none"> <li>▪ There are no official estimates for gender reassignment at either national or local level.</li> <li>▪ However, in a study funded by the Home Office, the Gender Identity Research and Education Society (GIRES) estimate that between 300,000 and 500,000 people aged 16 or over in the UK are experiencing some degree of gender variance.</li> </ul>	No adverse impact	No action required	N/A
<b>Race</b>	<p>Community profile:</p> <ul style="list-style-type: none"> <li>▪ According to the 2011 census:</li> <li>▪ 92.9 per cent of Plymouth’s population identify as White British.</li> <li>▪ 7.1 per cent identify as Black and Minority Ethnic (BME) with White Other (2.7 per cent), Chinese (0.5 per cent) and Other Asian (0.5 per cent) the most common ethnic groups.</li> </ul>	No adverse impact	No action required	N/A

	<ul style="list-style-type: none"> <li>▪ The Black and Minority Ethnic (BAME) population rose from 3 per cent in 2001 to 6.7 per cent in 2011, and therefore has more than doubled since the 2001 census.</li> <li>▪ The census data suggests we have at least 43 main languages spoken in the city, showing Polish, Chinese and Kurdish as the top three.</li> </ul> <p>Workforce profile:</p> <ul style="list-style-type: none"> <li>▪ Just over 5 per cent of our staff identify as BAME.</li> </ul>			
<p><b>Sexual orientation - including civil partnership</b></p>	<p>Community Profile</p> <ul style="list-style-type: none"> <li>▪ The 2011 census data does not include information about sexual orientation.</li> <li>▪ The proportion of the UK population identifying as lesbian, gay or bisexual (LGB) has increased from 1.5% in 2012 to 2.0% in 2017, although the latest figure is unchanged from 2016.</li> <li>▪ In 2017, there were an estimated 1.1 million people aged 16 years and over identifying as LGB out of a UK population aged 16 years and over of 52.8 million.</li> </ul>	<p>No adverse impact</p>	<p>No action required</p>	<p>N/A</p>

	<ul style="list-style-type: none"> <li>▪ Males (2.3%) were more likely to identify as LGB than females (1.8%) in 2017.</li> <li>▪ People aged 16 to 24 years were most likely to identify as LGB in 2017 (4.2%).</li> </ul> <p>Our workforce profile</p> <ul style="list-style-type: none"> <li>▪ Just over 2 per cent of our workforce identifies as either lesbian, gay or bisexual.</li> </ul>			
--	---	--	--	--

**STAGE 3: ARE THERE ANY IMPLICATIONS FOR THE FOLLOWING? IF SO, PLEASE RECORD ACTIONS TO BE TAKEN**

Local priorities	Implications	Timescale and who is responsible
<b>We have set one overarching objective to celebrate diversity and ensure that Plymouth is a welcoming city.</b>	We will publish and share with staff an organisational equality calendar which provides information on widely recognised awareness days and key religious and cultural occasions to help raise awareness and understanding of different cultures. The calendar will also set out how as an organisation we will respond to different awareness days and religious festivals.	January 2021
<b>We have set specific objectives where we will work with our partners towards:</b>		
<b>Pay equality for women, and staff with disabilities in our workforce.</b>	We will set a smart action plan for this equality objective.	March 2021 – June 2021
<b>Supporting our workforce through the implementation of our People Strategy 2020 – 2024.</b>	The equality and diversity training offer is being refreshed and additional learning and development opportunities will be provided for staff to deepen their understanding of equality and diversity and their cultural competencies.	Ongoing

<b>Supporting victims of hate crime so they feel confident to report incidents, and working with, and through our partner organisations to achieve positive outcomes.</b>	We will explore how to measure positive outcomes for victims of hate crime. We will set a smart action plan for this objective.	February 2021 – ongoing action March 2021 – June 2021
<b>Plymouth is a city where people from different backgrounds get along well. relations between different communities (community cohesion)</b>	We will publish our welcoming city/ community cohesion strategy and will also set a smart action plan for this objective.	Start March 2021 - February 2022
<b>Human rights</b> Please refer to <a href="#">guidance</a>	No adverse impacts in relation to human rights are anticipated.	N/A

**STAGE 4: PUBLICATION**

Responsible Officer Kim Brown, Service Director Human Resources & Organisational Development Date 20<sup>th</sup> November 2020

Strategic Director, Service Director or Head of Service



# Cabinet



Date:	08 December 2020
Title of Report:	<b>Risk and Opportunity Management, Strategy 2020-2022</b>
Lead Member:	Councillor Mark Lowry (Cabinet Member for Finance)
Lead Strategic Director:	Giles Perritt (Assistant Chief Executive)
Author:	Robert Sowden (Senior Performance Advisor)
Contact Email:	<a href="mailto:Robert.sowden@plymouth.gov.uk">Robert.sowden@plymouth.gov.uk</a>
Your Reference:	ROMS202021
Key Decision:	No
Confidentiality:	Part I - Official

## **Purpose of Report**

Risk and opportunity management is the culture, processes and structures that are directed towards effective management of potential opportunities and threats to an organisation achieving its objectives and delivering services to the community.

The Strategy is intended to reaffirm and improve effective risk and opportunity management in Plymouth, comply with good practice and in doing so, effectively manage potential opportunities and threats to the Council achieving its objectives.

The Strategy provides a comprehensive framework and process designed to support members and officers in ensuring that the Council is able to discharge its risk management responsibilities fully. The strategy is reviewed annually to ensure it remains current and fit for purpose. A copy of the latest version is attached at appendix A

The Strategy was agreed by the Audit and Governance Committee on the 30<sup>th</sup> November 2020.

## **Recommendations and Reasons**

That Cabinet:

Approve the Risk and Opportunity Management Strategy 2020-22

## **Alternative options considered and rejected**

Effective risk management processes are an essential element of internal control and as such are an important element of good corporate governance. For this reason alternative options are not applicable.

## **Relevance to the Corporate Plan 2018-2022**

Maintaining sound systems of internal control and risk management enables the council to monitor and review the key risks that may prevent it from achieving its corporate and service objectives.

## **Implications for the Medium Term Financial Plan and Resource Implications:**

None arising specifically from this report.

## **Carbon Footprint (Environmental) Implications:**

None arising specifically from this report.

### Other Implications: e.g. Child Poverty, Community Safety, Health and Safety and Risk Management

The Risk and Opportunity Management Strategy specifically supports the council's overall governance arrangements.

[Click here to enter text.](#)

### Appendices

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
		1	2	3	4	5	6	7
A	Risk and Opportunity Management Strategy 2020-22							

### Background papers:

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of background paper(s)	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
	1	2	3	4	5	6	7

### Sign off:

Fin	djn.20.21.162	Leg	35672/A C/19/11/ 20	Mon Off		HR		Assets		Strat Proc	
Originating Senior Leadership Team member: Giles Perritt (Assistant Chief Executive)											
Please confirm the Strategic Director(s) has agreed the report? Yes Date agreed: 25/11/2020											
Cabinet Member signature of approval: Councillor Mark Lowry (verbally) by email Date: 25/11/2020											

# APPENDIX A

## RISK AND OPPORTUNITY MANAGEMENT STRATEGY 2020-2022



### CONTENTS

Para	Title	Page
	Introduction	2
1	Definitions	3
2	Types of risk	3
3	Risk Management Responsibilities	3
4	Policy Statement	4
5	Framework	4
6	Approach:	5
	▪ Core purpose/outcomes	6
	▪ Identify risks	6
	▪ Assess raw risk	8
	▪ Identify existing controls	12
	▪ Assess residual risk	12
	▪ Risk response (including risk appetite)	12
	▪ Review and report	16
7	Evaluating Key Controls	17
8	Fraud Risk Controls	17
9	Health, Safety and Wellbeing Performance Standards and Risk Assessments	18
10	Embedding Risk and Opportunity Management	19
11	Guidance and Assistance	19
12	Corporate Governance and Integrated Assurance	19
13	Roles and Responsibilities	21

## INTRODUCTION

We live in very challenging times, where the city and its citizens face significant risks but also where innovation is critical. We are a large, complex organisation and need to continuously look at how we can safeguard and support our communities in challenging financial circumstances. Risk and opportunity management is both a statutory requirement and an indispensable element of good corporate governance and good management. It has never been more important to have an effective Risk and Opportunity Management Strategy in place to ensure we are able to discharge our various functions and deliver public services efficiently and cost effectively.

Risk is unavoidable. It is an important part of life that allows us all to move forward and develop. Successful risk management is about ensuring that we have the correct level of control in place to provide, as far as reasonably practicable, sufficient protection from harm without stifling our development. The Council's overriding attitude to risk is to operate in a culture of creativity and innovation, in which all key risks are identified in all areas of the business and are understood and proactively managed, rather than avoided. In respect of health and safety risks, this requires the weighing up of the risk versus the time, cost and effort to control the risk, irrespective of the risk score. We need to have the structures and processes in place to ensure the risks and opportunities of daily Council activities are identified, assessed and addressed in a standard way. We do not shy away from risk; we seek to proactively manage it. This will allow us not only to meet the needs of the community today, but also be prepared to meet future challenges.

The Council will record the significant risks identified as potential threats to the delivery of its objectives within Risk and Opportunity Registers and incorporate mitigation controls within action plans to include details of any opportunities that may arise from the successful management of each risk. Risks will be monitored every six months and findings reported via the Council's formal reporting process.

The benefits gained with a Risk and Opportunity Management Framework are improved strategic, operational and financial management, better decision making, improved compliance and, most importantly, improved customer service delivery and better outcomes for the citizens of Plymouth.

We embrace risk and opportunity management to support the delivery of our vision for the city and to enable the provision of high quality services to the citizens of Plymouth.

Cllr Mark Lowry  
Cabinet Member for Finance

Tracey Lee  
Chief Executive

Giles Perritt  
Assistant Chief Executive

## **THE RISK AND OPPORTUNITY MANAGEMENT STRATEGY**

### **1. Definitions**

What is a Risk?

Risk is most commonly held to mean “hazard” and something to be avoided but it has another face – that of opportunity. Improving public services requires innovation – seizing new opportunities and managing the risks involved. In this context risk is defined as uncertainty of outcome, whether positive opportunity or negative threat of actions and events. It is the combination of likelihood and impact, including perceived importance.

What is Risk and Opportunity Management?

Risk and opportunity management is the culture, processes and structures that are directed towards effective management of potential opportunities and threats to an organisation achieving its objectives and delivering services to the community.

This Strategy is intended to reaffirm and improve effective risk and opportunity management in Plymouth, comply with good practice and in doing so, effectively manage potential opportunities and threats to the Council achieving its objectives.

### **2. Types of risk - Strategic and Operational**

Strategic risks affect or are created by our business strategy and strategic objectives. They can be defined as the uncertainties and untapped opportunities embedded in strategic intent and how well they are executed. As such, they are key matters for our political and managerial leadership and impact on the whole organisation, rather than just an isolated department. Inclusion of a risk in the strategic risk and opportunity register indicates that it is one of a number of risks that the Council (particularly elected members and senior managers) need to be aware of and ensure appropriate management arrangements are in place to manage/mitigate them.

Operational risk is defined as the risk of loss resulting from inadequate or failed processes, people and systems. Operational risks should link to each service area’s Business Plan/Performance Framework or Partnership Plan, high level documents that bring key information together in one place and demonstrate the service’s focus on Council and city priorities. All major risks facing the service and to other services and partners resulting from the consequences of a service’s plans should be recorded with brief mitigation and potential outcome.

### **3. Risk management responsibilities**

Risk and opportunity management is the responsibility of all employees, working together within teams and management structures to ensure timely consideration and control at the appropriate level.

The Corporate Risk Management Group will monitor and manage the delivery of the Risk and Opportunity Management Strategy at a strategic level. The Group’s purpose is to effectively embed risk and opportunity management within the ethos of the Council’s culture as an integral part of strategic planning, decision-making and its performance management framework. The Group is also responsible for the development and monitoring of the Strategic Risk and Opportunity Register.

The Operational Risk Management Group, comprising departmental Risk Champions and chaired by the Head of Governance Performance and Risk, will be responsible for the delivery of this strategy at an operational level and for the development and monitoring of service level Operational Risk and Opportunity Registers.

Any risks to health, safety or wellbeing of our employees or others affected by our operations are compiled into a separate risk register and additionally monitored by the HSW Steering Group on a

quarterly basis. This may result in additional assurance being required to ensure controls are reducing risk to as low as reasonably practicable. HSW Assurance Specialists support service areas to ensure risk assessments are suitable and sufficient.

#### **4. Risk and Opportunity Management Policy Statement**

Plymouth City Council is aware that, as a large organisation, it is exposed to a very wide range of risks and threats to the delivery of key services to the community it serves.

The Council recognises that it has a responsibility to identify, evaluate and manage risk whilst still creating a fertile climate for innovation. It therefore supports a structured approach to risk and opportunity management through this corporate Risk and Opportunity Management Strategy, the aims and objectives of which are described below:

The aims of the Risk and Opportunity Management Strategy are to:

- Integrate and raise awareness of risk and opportunity management for all those connected with the delivery of Council services
- Embed risk and opportunity management as an integral part of strategic, service, information use, business, financial and project planning and policy making
- Establish a standard systematic approach to risk identification, analysis, control and monitoring and reviewing
- Provide a process for identifying threats or drawbacks that also includes finding and considering opportunities
- Provide a robust and transparent framework for managing risk and supporting decision making
- Support well thought-through risk taking
- Anticipate and respond to changing external and internal environment
- Embed risk and opportunity management as an integral part of delivering and aligning successful partnerships

The objectives of the Risk and Opportunity Management Strategy are:

- To embed Risk and Opportunity Management as part of the Council's culture of governance
- To provide a robust and systematic framework for identifying, managing and responding to risk
- To provide a robust and transparent track record of managing, communicating and responding to risk
- To encourage staff to think creatively about ways to work better, simpler and more effectively

#### **5. Framework**

The Council maintains two main types of Risk and Opportunity Register; Strategic and Operational. The Strategic Register records risks that affect the aims and objectives of the corporate body – risks that could have an effect on the successful achievement of our long term core priorities and outcomes, e.g:-

- risks that could potentially have a council-wide impact; and/or
- risks that cannot be managed solely at a business unit level because higher level support/intervention is needed.

The Operational Register records those risks affecting the day to day departmental operations, e.g:-

- Potential process failures
- Failure to adhere to internal policies
- Poor quality management

Both registers detail the following:-

- possible consequences of the risks identified, both negative (risks and threats) and positive (opportunities)
- potential impact and likelihood of the risk identified
- existing controls in place to mitigate the risks
- actions planned to mitigate the risks with relevant timescales and the responsible officers

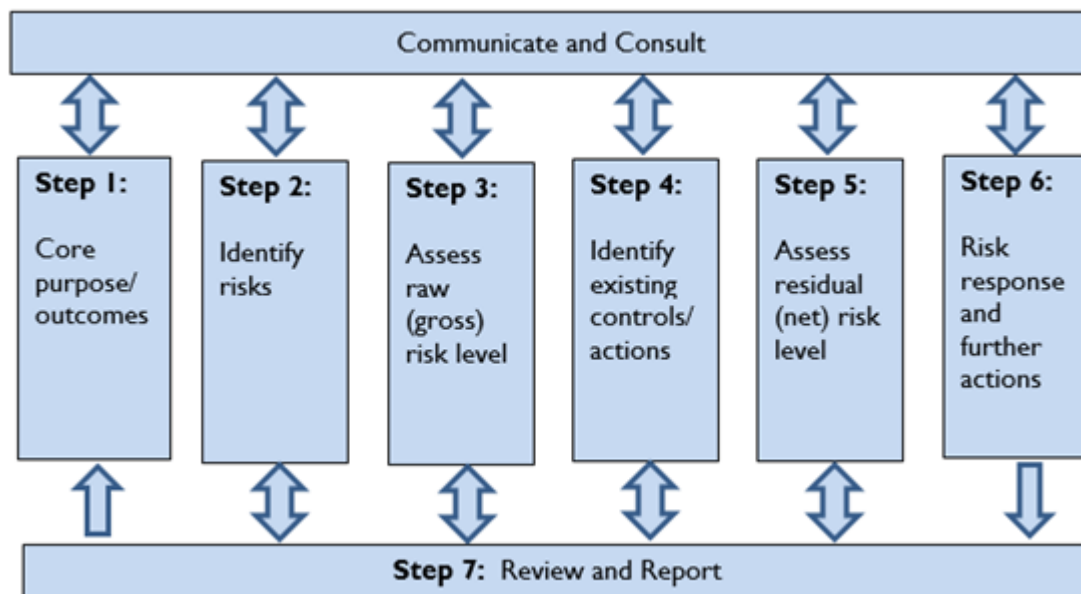
The Strategic Register is owned by the Corporate Management Team in its capacity as the Corporate Risk Management Group and maintained by the Performance and Risk Team. Operational Registers are owned by the relevant Service Director and maintained by the relevant department's Risk Champion.

## 6. Approach

For a number of years the Council has been working towards a comprehensive and integrated approach to risk management where:

- staff are clear about what risk management is intended to achieve;
- significant risks are being identified and managed effectively;
- training and guidance on risk management are easily accessible;
- a consistent corporate approach is followed using a common 'risk language'; and
- it is seen as an integral part of good corporate governance.

This section details the agreed arrangements that are needed to ensure the effective management of risk across the organisation. The Council's approach to risk management is based on best practice and involves a number of key steps as outlined below:-



Effective communication and consultation are critical to the successful management of risk. These are not one off standalone events but important factors at every point of the process and it is vital that staff at all levels across the organisation are involved if risk management is to be truly embedded and a useful management tool.

### **Step 1: Core purpose / outcomes**

Before we can identify our risks we need to establish the context by looking at what we are trying to achieve and what our proposed outcomes are. Depending on the area under review, the relevant objectives and outcomes will usually be detailed in existing documents, including the following:

- Corporate Plan (for core purpose, priorities and outcomes)
- Business Plans (for directorate/departments aims, priorities and actions)
- Project Plans (for project aims and objectives)
- Partnership Agreements (for partnership aims and objectives)

### **Step 2: Identify risks**

There are a number of different types of risks that an organisation may face including financial loss, failure of service delivery, risks to people and damage to reputation. The process involves managers and their teams identifying what outcomes are expected from planned activities and what factors might hinder their delivery. The reasons relating to these factors needs to be further explored to ensure that the underlying causes relating to these potential risks are correctly identified and articulated.

### **Programme Risks**

Risks that relate to a specific programme are likely to comprise of a mixture of the most serious project risks (see below) and cross-cutting risks that could affect two or more of the projects within the programme. All major programmes must have a risk register, owned by the programme manager. It should be reviewed by the programme board and at the most senior level of the directorate in question.

### **Project Risks**

Risks relating to or that flow from a specific project. A project risk has the potential to impact on the project's scope, outcomes, budget or timescales. Where the risk could impact on other projects or objectives, or the project is considered a high priority and the level of risk is such that it could lead to a failure to deliver project objectives, the risk should be escalated to the programme level.

### **Opportunities**

Opportunities can also be identified by giving consideration to those that have been neglected because of perceived, but unexamined risk. These include:-

- Learning from the past – whilst past experience cannot necessarily be a predictor for future performance, signals that were ignored and missed opportunities can provide insight into organisational blind spots.
- Customer sensitivity – trying to understand customer needs and creating systems to exploit this information can lead to great gains.
- Learning from others – exploring and sharing best practice with other organisations can lead to benefits.
- Scenario planning – can be a powerful tool for generating new ideas.



Once the opportunity has been identified it should be described to include the expected benefits, contributions to business objectives and stakeholders.

A checklist for risk and opportunity identification is shown below as a guide (not an exhaustive list):

Category of Risk	Risk Examples
Compliance, Regulation and Safeguarding	<ul style="list-style-type: none"> <li>▪ Legislation and internal policies/regulations</li> <li>▪ Health, safety and wellbeing</li> <li>▪ Grant funding conditions</li> <li>▪ Legal challenges, legal powers, judicial reviews or public interest reports</li> <li>▪ Change in government policy</li> </ul>
Operational/Service Delivery	<ul style="list-style-type: none"> <li>▪ Emergency preparedness/business continuity</li> <li>▪ Poor quality/reduced service delivery</li> <li>▪ Health and safety</li> <li>▪ Information security and retention accuracy</li> <li>▪ ICT integrity and availability</li> <li>▪ Damage to physical assets</li> <li>▪ Changing needs and expectations of customers – poor communication/consultation</li> </ul>
Financial	<ul style="list-style-type: none"> <li>▪ Budgetary pressures</li> <li>▪ Loss of/reduction in income/funding, increase in energy costs</li> <li>▪ Cost of living, interest rates, inflation etc.</li> <li>▪ Financial management arrangements</li> <li>▪ Investment decisions, sustainable economic growth</li> <li>▪ Affordability models and financial checks</li> <li>▪ Inadequate insurance cover</li> <li>▪ System/procedure weaknesses that could lead to fraud</li> </ul>
Reputation	<ul style="list-style-type: none"> <li>▪ Negative publicity (local and national)</li> <li>▪ Image</li> <li>▪ Increase in complaints</li> <li>▪ Brand building</li> <li>▪ Fines</li> </ul>
Strategic Change	<ul style="list-style-type: none"> <li>▪ New initiatives, new ways of working, new policies and procedures</li> <li>▪ New relationships – accountability issues/unclear roles and responsibilities</li> <li>▪ Monitoring arrangements</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Managing change</li> <li>▪ Add value or improve customer experience/satisfaction</li> <li>▪ Reduce waste and inefficiency</li> <li>▪ Improve staff skills/morale</li> <li>▪ Business alignment</li> <li>▪ New operating models and revenue streams</li> <li>▪ Market needs/growing competition</li> <li>▪ New technologies</li> </ul>
Development and Regeneration	<ul style="list-style-type: none"> <li>▪ Demographics</li> <li>▪ Economic downturn – prosperity of local businesses/local communities</li> <li>▪ Impact of planning or transportation policies</li> <li>▪ Environmental, landscape, countryside, historic environment, open space</li> <li>▪ Property, land, buildings and equipment</li> </ul>
People & Culture	<ul style="list-style-type: none"> <li>▪ Political personalities</li> <li>▪ Member support/approval</li> <li>▪ New political arrangements</li> <li>▪ Loss of key staff, recruitment and retention issues</li> <li>▪ Training issues</li> <li>▪ Lack of/or inadequate management support</li> <li>▪ Poor communication/consultation</li> <li>▪ Capacity issues – availability, sickness and absence etc.</li> </ul>

**Risk Description**

The risks and opportunities identified need to be recorded in a structured format. A description covering the Cause, Event and Effect is used to scope a risk or opportunity. Guidance on some typical phrasing or statements are listed below:-

Cause	Event	Effect
Because of .... As a result of .... Due to ....	<an uncertain event i.e. risk or opportunity> may occur	which would lead to <effect on objective(s)>
Event	Cause	Effect
Risk of .... Failure to .... Failure of .... Lack of .... Loss of .... Uncertainty of .... Delay in .... Inability to .... Inadequate .... Partnership with .... Development of / Opportunity to ....	.... due to ....	.... leads to .... and/or .... result in ....

*Example of risk description – Risk of being unable to deliver Council services within the envelope of the resources provided in (year) which would lead to a negative impact on budgets, loss of reputation, negative impact on front line services and a negative opinion from external audit.*

### **Step 3: Assess raw (gross) risk level**

To ensure resources are focussed on the most significant risks, the Council's approach to risk management is to assess the risks in terms of both the potential likelihood and impact so that actions can be prioritised.

The risk management process requires each new risk to be assessed twice – raw (gross) and residual (net) levels.

The first assessment (the raw/gross risk level) is taken on the basis that there is no action being taken to manage the identified risk and/or any existing actions are not operating effectively. In other words, the worst case scenario if the risk were to occur.

To ensure that a consistent scoring mechanism is in place across the Council, risks are assessed using the agreed criteria for likelihood and impact. Risk scoring guidance is shown below:-

### **Risk Analysis and Scoring Guidance**

Score	Likelihood	Threat / Risk
5	Almost Certain (80-100%)	Is expected to occur in most circumstances Will undoubtedly happen, possibly frequently e.g. annually or more frequently Imminent/near miss For health and safety risk – one in 100 chance of the adverse event happening
4	Likely (50-80%)	Will probably occur in many circumstances Will probably happen, but not a persistent issue e.g. once in three years Has happened in the past For health and safety risk – one in 1000 chance of the adverse event happening
3	Possible (25-50%)	Could occur in certain circumstances May happen occasionally, e.g. once in 10 years Has happened elsewhere For health and safety risk – one in 10,000 chance of the adverse event happening
2	Unlikely (10-25%)	May occur only in exceptional circumstances Not expected to happen, but is possible e.g. once in 25 years Not known in this activity For health and safety risk – one in 100,000 chance of the adverse event happening
1	Rare	Is never likely to occur

	(0-10%)	Very unlikely this will ever happen e.g. once in 100 years For health and safety risk – one in a million chance of the adverse event happening
<b>Risk Impact (Severity)</b>		
Score	Impact	Threat / Risk
5	Catastrophic Risk	<p>Risks which can have a catastrophic effect on the operation of the Council or service. This may result in critical financial loss, severe service disruption or a severe impact on the public. Examples:-</p> <p>Unable to function without the aid of government or other external Agency</p> <p>Inability to fulfil obligations</p> <p>Medium – long term damage to service capability</p> <p>Severe financial loss – supplementary estimate needed which will have a catastrophic impact on the Council's financial plan and resources are unlikely to be available</p> <p>Death (single or multiple) or work related diagnosis leading to death</p> <p>Adverse national publicity – highly damaging, severe loss of public confidence</p> <p>Significant public interest</p> <p>Litigation certain and difficult to defend</p> <p>Breaches of law punishable by imprisonment</p> <p>Very significant exposure of public funds with funding being managed across organisations and complex reporting</p> <p>Very complex stakeholder community with new partnerships, collaborations and suppliers/stakeholder environment volatile or with significant external change factors</p> <p>Extensive use of leading edge, novel or innovative technology which requires specialist management and external audit</p>
4	Major Risk	<p>Risks which can have a major effect on the operation of the Council or service. This may result in major financial loss, major service disruption or a significant impact on the public. Examples:-</p> <p>Significant impact on service objectives</p> <p>Short–medium term impairment to service capability</p> <p>Major financial loss – supplementary estimate needed which will have a major impact on the Council's financial plan</p> <p>Extensive injuries, major permanent harm, long term sick</p> <p>Permanent/significant disability</p> <p>Major adverse local publicity, major loss of confidence</p> <p>Litigation likely and may be difficult to defend</p> <p>Breaches of law punishable by fines or possible imprisonment</p>

3	Moderate Risk	<p>Risks which have a noticeable effect on the services provided. Each one will cause a degree of disruption to service provision and impinge on the budget. Examples:-</p> <p>Service objectives partially achievable</p> <p>Short term disruption to service capability</p> <p>Significant financial loss – supplementary estimate needed which will have an impact on the Council’s financial plan</p> <p>RIDDOR (Reporting of injuries, diseases and dangerous occurrences regulations) or major injury</p> <p>Medical treatment required, semi-permanent harm up to one year</p> <p>Some adverse publicity, needs careful public relations</p> <p>High potential for complaint, litigation possible</p> <p>Breaches of law punishable by fines only</p>
2	Minor Risk	<p>Risks where the consequences will not be severe and any associated losses will be minor. As individual occurrences they will have a negligible effect on service provision. If action is not taken, then such risks may have a more significant cumulative effect. Examples:-</p> <p>Minor impact on service objectives</p> <p>No significant disruption to service capability</p> <p>Moderate financial loss – can be accommodated at head of service level</p> <p>Three day + injury</p> <p>First aid treatment, non-permanent harm up to one month</p> <p>Some public embarrassment, no damage to reputation</p> <p>May result in complaints/litigation</p> <p>Breaches of regulations/standards</p> <p>Budget within delegation</p>
1	Insignificant Risk	<p>Risks where the consequences will not be severe and any associated losses will be relatively small. As individual occurrences they will have a negligible effect on service provision. If action is not taken, then such risks may have a more significant cumulative effect. Examples:-</p> <p>Minimal impact, no service disruption</p> <p>Negligible impact on service capability</p> <p>Minimal loss – can be accommodated at senior technical accounting level</p> <p>First aid injury</p> <p>Unlikely to cause any adverse publicity, internal only</p> <p>Breaches of local procedures/standards</p> <p>Budget within delegation and relatively small or within operational costs</p>

When assessing the risk, the highest measure identified in each table is the score taken to plot the risk level on the risk matrix. The risk ratings for each part of the assessment are multiplied to give an overall ranking for each risk. The risk matrix uses a “traffic light” approach to show high (red), medium (amber) and low (green) risks.

**Risk Matrix Table**

Likelihood / Probability	Almost Certain	5	10	15	20	25
	Likely	4	8	12	16	20
	Possible	3	6	9	12	15
	Unlikely	2	4	6	8	10
	Rare	1	2	3	4	5
		Insignificant	Minor	Moderate	Major	Catastrophic
		Impact / Severity				

**Risk Tolerance**

Red (High Risk)	20 - 25	Must be managed down urgently
Amber (Med/High Risk)	12 - 16	Seek to influence medium term/monitor (as per risk appetite escalation)
Amber (Medium Risk)		
Green (Low Risk)	6 - 10	Acceptable – continue to monitor if circumstances are subject to change, if not, remove from register
Yellow (No risk)	1 - 5	Can be removed from register and managed locally within team but consider adding to risk register if controls are likely to change

**Step 4: Identify existing risk controls / actions**

Existing controls and actions, which are helping to eliminate or minimise the likelihood and/or impact of the risk occurring, are identified for each risk. These actions are specifically those in place or completed.

**Step 5: Assess residual (net) risk level**

The second assessment (the residual or net level) re-evaluates the risk, taking into consideration the effectiveness of the identified existing actions. In other words, the reality if the risk were to

occur in the immediate future. Residual risks are prioritised by applying the same criteria and matrix for assessing the raw risk level (Step 3). It is the risk owner's responsibility to ensure the agreed residual risk level for each risk is an accurate reflection of the likelihood and impact measures.

#### **Step 6: Risk response and further actions**

Not all risks can be managed all of the time, so having assessed and prioritised the identified risks, cost effective action needs to be taken to manage those that pose the most significant threat. Risk response may be managed in one, or a combination of, the following ways:-

Risk Response	Risk Examples (not exhaustive list)
Avoid – The risk is avoided by process changes which bypass the risk or deciding where possible not to continue with the activity in view of the level of risk involved.	Some political risks e.g. adverse public opinion. Some technical/operational/infrastructure risks e.g. maintenance problems.  Legal and regulatory risks e.g. regulatory controls, licensing requirements.
Transfer – Some or all of the risk is transferred to a third party e.g. insurance.	Some strategic/commercial risks e.g. theft insolvency can be insured against.  Environmental risks e.g. natural disasters, storms, flooding may also be insured against.
Treat/Reduce – Action is taken to reduce either the likelihood of the risk occurring or the impact that it will have, if cost effective. Consider use of KPI metrics to monitor progress of risk treatment action plans and key controls.	The most frequently used response to risk. Widely applicable –  Technical/Operational/Infrastructure e.g. negligence, performance failure, scope creep, unclear expectations.  Organisational/management/human factors e.g. personality clashes, poor leadership and poor staff selection.
Tolerate/Accept – The risk may be accepted perhaps because there is a low impact or likelihood. A contingency plan will be identified should it occur.	Some political, legal and regulatory and economic / financial risks may need to be accepted with a contingency plan in place e.g. civil disorder, exchange rate fluctuation.
Opportunity response	Opportunity Types (not exhaustive list)
Share – An opportunity is shared with a partner or supplier to maximise the benefits	Shared resource/technology/infrastructure,  Improved designs
Exploit – A project could be adjusted to take advantage of a change in technology or a new market	Economic/financial/market e.g. new and emerging markets, positive changes in exchange rates or interest rates
Enhance – Action is taken to increase the likelihood of the opportunity occurring or the positive impact it could have	Strategic/commercial opportunities such as new partnerships, new capital investment, new promoters

Reject – Here no action is taken and the chance to gain from the opportunity is rejected	*Contingency plans may be put in place should the opportunity occur.  Political or environmental e.g. new transport links, change of government bringing positive changes in policy/opportunities for lobbying etc.
* <b>Note:</b> Contingency plans should identify the actions that will be taken if a risk occurs. Contingent actions will often have associated costs and a budget should be set aside in the business case to cover this.	

**Risk Appetite**

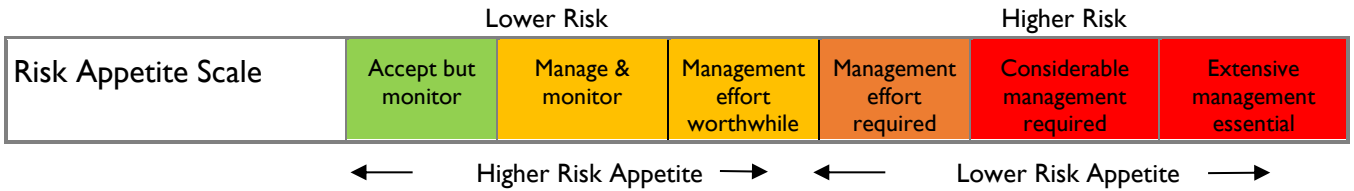
Risk appetite is the amount of risk, on a broad level, that Plymouth City Council is willing to accept in pursuit of value. It is strategic and reflects the organisations risk management philosophy, and in turn influences the organisation’s culture and operating style. Risk appetite guides resource allocation and provides the infrastructure necessary to effectively respond to and monitor risks. Our aim is to consider all options to respond to risk appropriately and make informed decisions that are most likely to result in successful delivery of benefits whilst also providing an acceptable level of value for money.

The risk appetite table below helps to align risk exposure with management and escalation activities. An event or risk is assessed and assigned a risk score by multiplying the impact and likelihood scores. Ranges of risk scores are then associated with different levels of management attention. The acceptance of risk is subject to ensuring that all potential benefits and risks are fully understood and that appropriate measures to mitigate risk are established before decisions are made. We recognise that the appetite for risk will vary according to the activity undertaken and hence different appetites and tolerances to risk apply. Specifically, our approach is to minimise exposure to compliance, regulation, safeguarding, reputation and financial risk, whilst accepting and encouraging an increased degree of risk in other areas in pursuit of our strategic and business objectives as illustrated in the following table:

Residual Risk Score		6-10	12-15	16	20	25
<b>Risk Category</b>	Compliance, Regulation & Safeguarding (including Health, Safety & Wellbeing)	Accept but monitor	Management effort worthwhile	Management effort required	Extensive management essential	Extensive management essential
	Financial	Accept but monitor	Management effort worthwhile	Management effort required	Extensive management required	Extensive management essential
	Reputation	Accept but monitor	Manage effort worthwhile	Management effort required	Extensive management required	Extensive management essential
	Operational/Service Delivery	Accept but monitor	Manage & monitor	Management effort worthwhile	Considerable management required	Extensive management essential
	Strategic Change	Accept but monitor	Manage & monitor	Management effort worthwhile	Considerable management required	Extensive management essential



Development & Regeneration	Accept but monitor	Manage & monitor	Management effort worthwhile	Considerable management required	Extensive management essential
People & Culture	Accept but monitor	Manage & monitor	Management effort worthwhile	Considerable management required	Extensive management essential



Appetite Level	Escalation / Action Required
Extensive management essential	<p>Escalate to Strategic Risk Register and brief Portfolio Holder.</p> <p>Monthly review at Senior Leadership Team level.</p> <p>Programme/project risks - Programme Board escalate to Strategic Risk Register.</p> <p>Quarterly review at Corporate Management Team.</p> <p>Risk owner to review monthly.</p> <p>Consider use of performance indicators to monitor performance of action plans and key risk controls.</p>
Considerable management required	<p>Consider escalation to Strategic Risk Register and brief Portfolio Holder.</p> <p>Monthly review at Department Management Team level.</p> <p>Programme/project risks - Programme Board consider escalation to Strategic Risk Register.</p> <p>Quarterly review at Corporate Management Team.</p> <p>Risk owner to review monthly.</p> <p>Consider use of performance indicators to monitor performance of action plans and key risk controls.</p>
Management effort required	<p>Add to Operational Risk Register and review at least quarterly at Department Management Team level (consider escalation to Strategic Risk Register if risk cannot be mitigated at department level and ensure Portfolio Holder is briefed).</p> <p>Programme/project risks - Programme Board oversight and consider escalation to Directorate Operational Risk Register.</p> <p>Six month review by Corporate Management Team.</p> <p>Risk owner to review monthly.</p> <p>Consider use of performance indicators to monitor performance of action plans and key risk controls.</p>
Management effort worthwhile	<p>Add to Operational Risk Register and review quarterly at Department Management Team level.</p> <p>Risk owner to review at least quarterly.</p>

	Consider use of performance indicators to monitor performance of action plans and key risk controls.
Manage and monitor	Add to Operational Risk Register. Risk owner to review at least quarterly.
Accept but monitor	Risk owner to review every six months.

## Risk Classifications

**Compliance, Regulation and Safeguarding** (no appetite for risk) - The Council recognises the need to place high importance on compliance, health, safety and wellbeing, regulation, and public protection and has no appetite for breaches in statute, regulation, professional standards, ethics, bribery or fraud. It is not acceptable for any hazard, risk or safety incident to be ignored by any member of our workforce and the Council will ensure that systems and processes exist to identify and mitigate risk as well as for reporting, investigating and learning from incidents when they do occur. All health, safety and wellbeing risks should be managed as per absolute duties cited in relevant regulations or to as low as reasonably practicable irrespective of risk score.

**Operational/Service Delivery** (higher appetite for risk) - The Council accepts a moderate to high level of risk arising from the nature of the Council's business operations and service delivery to deliver an appropriate level of service at value for money, whilst minimising any negative reputational impact.

**Financial** (lower appetite for risk) - The Council acknowledges the responsibility it has for administration of public funds, and wishes to emphasise to both the public and its employees the importance it places upon probity, financial control and honest administration. Financial Regulations provide the framework for managing the Council's financial affairs and should be adhered to at all times. All schemes must be fully financed and approved by the Capital Delivery Board. Finance Business Partners are an integral part of Department Management Teams and should be consulted when planning any new project.

**Reputation** (lower appetite for risk) - It is regarded as essential that the Council preserves a high reputation and hence it has set a low appetite for risk in the conduct of any of its activities that puts its reputation in jeopardy through any adverse publicity.

**Strategic Change** (higher appetite for risk) - The environment the Council works in is continually changing through both its internal operations and the services it provides. Change projects provide the Council with an opportunity to move forward and develop and establish benefits for the longer term. The Council recognises that this may require increased levels of risk and is comfortable accepting the risk subject to always ensuring that risks are appropriately managed.

**Development and Regeneration** (higher appetite for risk) - The Council has a continuing obligation to invest in the development and regeneration of the city. To continue to be progressive and innovative in the work performed the Council is willing to accept a higher risk appetite whilst ensuring that benefits are assessed and risks are fully scrutinised and appropriately mitigated in both economic terms but also social and environmental terms before developments are authorised.

**People and Culture** (higher appetite for risk) - The Council recognises that staff are critical to achieving its objectives and therefore the support and development of staff is key to making the Council an inspiring and safe place to work. It has moderate to high appetite for decisions that involve staffing or culture to support transformational change and ensure the Council is continually improving.

The Council's Risk Appetite Statement will be continually monitored to ensure it supports the organisation's risk and opportunity management strategy. Risk appetite is an important tool for effective risk monitoring and provides the following benefits:-

- Forms an integral part of corporate governance
- Guides the allocation of resources
- Guides an organisations infrastructure, supporting its activities related to identifying, assessing, responding to and monitoring risks in pursuit of organisational objectives
- Is multi-dimensional, including when applied to the pursuit of value in the short term and the longer term of the strategic planning cycle
- Requires effective monitoring of the risk itself

### **Step 7 – Review and report**

The reason for monitoring key risks is to create an early warning system for any movement in risk – key risks are defined as those which score 12 or above in accordance with the Council's risk appetite. High level red risks may be referred to the Scrutiny Board subject to Audit and Governance Committee recommendation. Risks scoring below 12 are considered to be managed effectively and therefore within the Council's "risk tolerance". Any risk scored below six can be removed from the risk register and archived.

Risk Registers are living documents and therefore must be regularly reviewed and amended. The Risk and Opportunity Management Strategy requires risks recorded on the Strategic Risk and Opportunity Register and service level Operational Risk and Opportunity Registers to be formally monitored every six months by departmental risk champions in consultation with senior managers and lead officers.

Monitoring reports are presented for approval to the Corporate Risk Management Group prior to final ratification by the Audit and Governance Committee. Operational red risks may be referred to the Overview and Scrutiny Management Board.

The questions asked during monitoring are:-

- Is the risk still relevant?
- Is there any movement in the risk score?
- Are the controls still in place and operating effectively?
- Has anything occurred which might change its impact and/or likelihood?
- Have potential opportunities been considered and maximised?
- Have any significant control failures or weaknesses occurred since the last monitoring exercise?
- If so, does this indicate whether the risk is increasing or decreasing?
- If the risk is increasing do I need to devise more controls or think of other ways of mitigating the risk?
- If the risk is decreasing can I relax some existing controls?
- Are controls/actions built into appropriate documented action plans?
- Are there any new or emerging risks?
- Have any of the existing risks ceased to be an issue (and can therefore be archived?)

## 7. Evaluating Key Controls

A framework exists to performance measure effectiveness of key controls aligned to the Council's risk appetite. Risks where we have a lower appetite for risk taking are treated with a higher level of management activity and oversight.

### Examples of key controls

Preventative key controls	Detective key controls	Corrective key controls
Policies and procedures	Review of performance	Business continuity plans
Authorisation and approval	Reconciliations	Insurance
Verifications	Audit and investigations	Disaster recovery plans
Staff training	Data analysis	Variance reports
	Monitoring	Case reviews

Managers should contact the Performance and Risk Team for further advice on setting up key control performance measures for risks categorised under compliance, regulation, safeguarding, financial and reputation.

## 8. Fraud Risk Controls

Fraud is a major drain on the Public Purse and it is therefore imperative that all staff prevent fraudulent activity and understand the threats and risks. The Anti-Fraud, Bribery and Corruption Strategy and [Policy](#) will assist the Council in becoming more resilient to fraud risks. The aim is to minimise fraudulent activity with a zero tolerance approach to those who commit criminal acts of fraud against Plymouth City Council whether the threat is from outside or internally within the Council.

Operational managers and supervisors are responsible for:-

- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively;
- Preventing and detecting fraud;
- Assessing the types of risk involved in the operations for which they are responsible;
- Reviewing and testing the control systems for which they are responsible regularly;
- Ensuring that controls are being complied with and their systems continue to operate effectively;
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

## 9. Health, Safety and Wellbeing Performance Standards and Risk Assessments

The Council's health and safety policies, performance standards and [guidance](#) notes should be regarded as the health and safety standard each department, service unit and team is expected to achieve and against which health and safety performance will be monitored and audited.

The purpose of the performance standard is to:

- Support the implementation of a health and safety risk management system and assist the Council in meeting its legal obligations in providing a safe working environment where risks are effectively controlled to their lowest tolerable level.
- Identify managers and risk assessors' responsibilities and encourage employees to recognise and inform their managers of hazards and risks associated with their work activities, report defects in processes and equipment and to assist in developing a positive health and safety culture.

It is the manager's responsibility to develop and maintain action plans relating to risk assessments and record them in a Health, Safety and Wellbeing Risk Assessment Register (HSWRAR). The action plan also assists in prioritising, planning and monitoring the effectiveness of the actions and controls that have been identified to reduce the risk of a particular hazard.

Risk assessments follow Health and Safety Executive (HSE) guidance and scoring methodology.

Any significant hazard requires risk control measures and/or a risk treatment plan to be put into place in order to minimise risk to an acceptable level either by reducing the likelihood of an adverse event or the severity of its consequence, or both.

Generally actions relating to risk assessments can be managed locally at team level, however, it may be necessary to escalate a health, safety and wellbeing risk to the departments Operational Risk Register in order to achieve a higher degree of management oversight. Examples of escalation criteria are:-

- Treatment of the risk requires decisions/actions, e.g. expenditures that are beyond what the budget holder is authorised to decide;
- risk controls cannot be implemented within appropriate timescales (as identified in consultation with a HSW Advisor);
- the risk is widespread beyond local area span of control;
- the risk is assessed to be significant - one in which staff, members of the public or facilities may be subject to legal, media or other interest and where, if not managed effectively, the risk could result in loss of life or significant loss of the council's assets or reputation;
- addressing the risk requires corporate changes to policy;
- Grievances from stakeholders have been received to which the risk owner cannot impartially and/or effectively respond.

A HSW risk escalation procedure within The Council's HSW Policy ensures that risks threatening the health, safety and wellbeing of employees and other people using Council premises and services are escalated in real time. Risks should be managed at the most local level, however there are some circumstances that should be notified to relevant members of the Corporate Management Team and to the Chief Executive as the accountable person for HSW as quickly as possible. [Click here](#) for access to the Council's HSW Risk Escalation Procedure.

## **10. Embedding Risk and Opportunity Management**

The Risk and Opportunity Management Strategy is reviewed annually to ensure it remains up to date and presented to the Audit and Governance Committee. The Cabinet Member for Finance and the Assistant Chief Executive jointly champion the process.

Each directorate has an officer appointed as Risk Champion who is trained to advise staff on best practice to ensure that the risk and opportunity management process is embedded in the Council's business processes, including:-

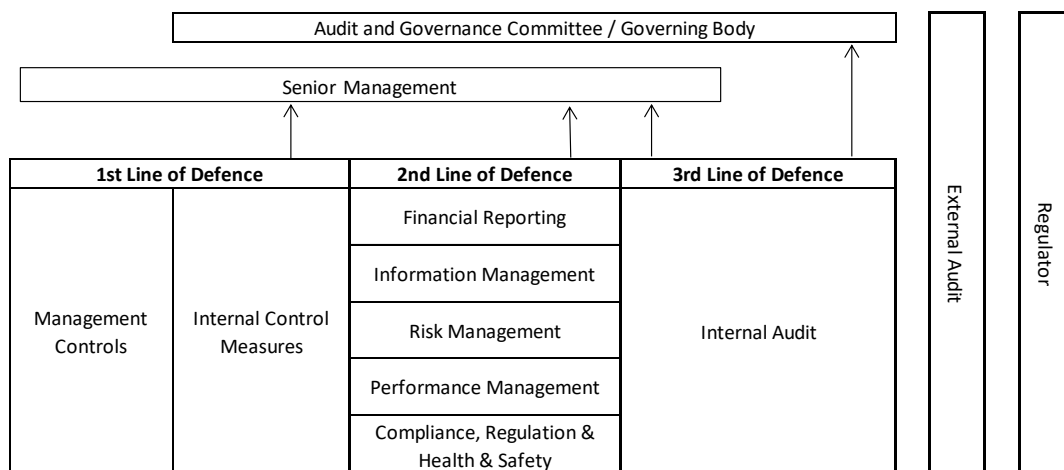
- strategic and business planning
- information quality and use
- financial planning
- policy making and review
- project management

## **11. Guidance and Assistance**

The Chief Executive Office, through the Head of Governance, Performance and Risk and the Performance and Risk Team, will promote and monitor good practice, provide guidance, support, advice and information and organise training. There is also a Risk Management eLearning module available on the Staff Room Page of the intranet within the Learning Zone.

## 12. Corporate Governance and Integrated Assurance

Integrated Assurance has resulted in risk management being formally aligned and working alongside other compliance functions to promote a joined-up approach to all aspects of corporate governance. The Three Lines of Defence Model is used as the primary means to demonstrate and structure roles, responsibilities and accountabilities for decision making, risk and control to achieve effective governance and integrated assurance. The diagram below shows the relationship between these functions:-



### First Line of Defence – Management Controls and Internal Control Measures

Line managers are responsible for ensuring that a risk and control environment is established as part of day to day operations. Line management should be adequately skilled to create risk definitions and make risk assessments. The risk profile needs to be proactively reviewed, updated and modified for changes to the business environment and emerging risk changes. Active risk management and periodic reporting on risk is crucial to quick identification and response.

The first line of defence provides management assurance by identifying risks and business improvement actions, implementing controls and reporting on progress.

### Second Line of Defence – Oversight Functions

The second line of defence consists of activities covered by several components of internal governance. This line of defence monitors and facilitates the implementation of effective risk management practices by operational management and assists the risk owners in reporting adequate risk related information across the organisation. These are usually management functions that may have some degree of objectivity, but are not entirely independent from the first line.

### Third Line of Defence – Internal Audit

Internal audit forms the third line of defence. An independent internal audit function will, through a risk-based approach to its work, provide assurance to the organisation’s senior management. This assurance will cover how effectively the organisation assesses and manages its risks and will include assurance on the effectiveness of the first and second lines of defence. It encompasses all elements of the council’s risk management framework (from risk identification, risk assessment and response, to communication of risk related information) and all categories of organisational objectives.

### Financial Reporting

Financial Regulations provide the framework for managing the Council’s financial affairs. They apply to every member, committee, school governing body, department, officer, partner, employee of the Council, and anyone acting on behalf of the Council. The Responsible Finance Officer (Section 151 Officer) carries out the statutory duties in relation to the financial administration and

stewardship of the Council. Departmental finance managers are required to bring the Responsible Finance Officer's attention to any section 151 issue they are unable to resolve.

### **Information Management**

Like its people, information is a key Council asset. Information management is how our information is collected, used, evaluated, protected and distributed. Information must be obtained, handled, retained and disposed of in line with organisation guidelines.

Information practices must help to improve the efficiency of the services offered by the Council.

### **Performance Management**

Managing employee or system performance and aligning their objectives facilitates the effective delivery of strategic and operational goals and maintains transparency. Effective performance management by using performance indicators to monitor performance of action plans and risk mitigation can also provide an early warning indicator so that issues can be resolved before they become a risk to the achievement of objectives.

### **Compliance, Regulation and Health and Safety**

Adequate compliance monitoring is required in order to ensure we are working within applicable laws and regulations in areas such as health and safety, supply chain, business continuity, civil protection, statutory complaints, environmental, anti-fraud, legal, safeguarding, HR and equalities.

### **External Auditors and Regulators**

External auditors and regulators reside outside of the Council structure but have an important role in the overall governance and control structure by providing an independent and objective function to assess the whole, or some part of the first, second or third line of defence.

### **Audit and Governance Committee**

All three lines of defence have specific tasks in the internal control governance framework. It is the Audit and Governance Committee's role to maintain oversight and to monitor the effectiveness of internal controls and risk management processes, as well as internal audit activities.

## **13. Roles and Responsibilities**

### **Cabinet**

- Approve the Council's Risk and Opportunity Management Strategy and receive an annual Risk and Opportunity Management report

### **Cabinet Member for Finance**

- Receive and approve monitoring reports on the Strategic Risk and Opportunity Register

### **Corporate Risk Management Group/CMT**

- Ensure the Council implements and manages risk effectively through the delivery of the Risk and Opportunity Management Strategy and consider risks affecting delivery of services
- Appoint a Senior Information Risk Officer (currently the Strategic Director of Customer and Corporate Services). This role also includes being the Senior Responsible Officer for overseeing the impact on the Council from the use of covert surveillance
- Ensure risk and opportunity management is considered by the Corporate Management Team Agenda on a quarterly basis
- Provide assurance to Members and the Audit and Governance Committee regarding risk and opportunity management compliance
- Be responsible for and monitor the Strategic Risk and Opportunity Register

- Receive and approve risk and opportunity management status reports from the Operational Risk Management Group
- Approve and monitor the progress and effectiveness of the Risk and Opportunity Management Strategy and Operational Risk Management Group
- Support the embedding of risk and opportunity management within the culture of the Council as an integral part of strategic/business planning, decision-making and performance management framework
- Approve risk and opportunity management monitoring reports to Members and the Audit and Governance Committee.

#### **Lead Member and Officer for Risk and Opportunity Management**

- The Cabinet Member for Finance and the Assistant Chief Executive act as Member and Officer risk champions respectively
- Ensure that the Council manages risk effectively through the development of a robust and comprehensive Risk and Opportunity Management Strategy.

#### **Head of Governance, Performance and Risk / Performance and Risk Team**

- Support the Council and its departments in the effective development, implementation and review of the Risk and Opportunity Management Strategy
- Share experiences across the Council and partners, promoting, facilitating and overseeing the arrangements for managing and monitoring of risk
- Provide training and guidance in risk and opportunity management
- Support the Corporate Risk Management Group
- Lead and direct the work of the Operational Risk Management Group.

#### **Operational Risk Management Group**

- Monitor, review and communicate information on operational and strategic risks within their directorate
- Ensure risk and opportunity management is embedded within departmental business plans.
- Review cross cutting operational issues
- Report to the Corporate Risk Management Group every six months
- Meet at least four times per year

#### **Audit and Governance Committee**

- Provide independent assurance to the Council on the effectiveness of the Council's risk and opportunity management, internal control and overall assurance framework.

#### **Directors**

- Take responsibility for the promotion of the Risk and Opportunity Management Strategy within their areas
- Ensure that operational risk and opportunity registers are managed, monitored, responded to and communicated effectively in their areas
- Ensure that risk and opportunity management is a key consideration in the delivery of the Council's priorities.

#### **Managers**



- Identify, evaluate, prioritise and control risks and opportunities facing the Council in achieving its objectives
- Support, assist and inform their Directorate Risk Champion on risk issues
- Include staff without direct responsibility for owning and managing risk in risk discussions to ensure teams identify potential risks associated with service delivery.

### **Programme and Project Managers**

- Embed risk management, in line with the council's risk and opportunity management framework, within the programme/project lifecycle to support project definition, approval, change control, decision making and delivery
- Agree risk appetite with the programme/project board and the overall approach for managing and escalating risk
- Maintain a project/programme risk register aligned to programme/project objectives and outcomes
- Assign clear accountabilities for risk, including risk owners and risk action owners
- Put in early warning mechanisms
- Communicate clearly risks to stakeholders and ensure risk is comprehensively covered in project initiation documentation and monitoring reports
- Evaluate key themes and escalate risks to directors and senior managers where appropriate, and if the overall risk exposure is particularly serious, to either the directorate operational risk register or the council's strategic risk register
- Seek out expertise to help effectively identify and control risks
- Maintain records of historic and current risk register, forming an effective audit trail.

### **Risk Champions**

- Attend Operational Risk Management Group meetings
- Promote, maintain and monitor risk and opportunity registers in line with risk and opportunity management/business planning guidance
- Support and provide guidance on the risk and opportunity management process in their department
- Promote and advise on the risk and opportunity management strategy
- Integrate and raise awareness of risk and opportunity management within their directorate.

### **Employees**

- Assess and manage risks effectively in their job and report hazards/risks to their service managers
- Undertake their job within contractual, policy and statutory guidelines
- Consult with department Risk Champion as necessary.

### **Devon Audit Partnership**

- Provide a risk based Audit Plan to monitor the effectiveness of internal controls and provide a trigger and action plan for management intervention
- Audit the Risk and Opportunity Management Strategy and processes
- Deliver professional counter fraud advice, guidance and investigatory work via its dedicated Counter Fraud Team.

**Insurance**

- Ensure appropriate risk-financing arrangements are in place to mitigate against identified insurable risks
- Work with the Corporate Risk Advisor to identify and control insurable risks effectively and economically.

**Health, Safety and Wellbeing (HSW)**

- Provide independent health and safety advice to the Operational Risk Management Group
- Ensure that risks threatening the health, safety and wellbeing of employees and other people using Council premises and services are escalated in real time via the HSW Steering Group
- Support the Council in managing and monitoring health and safety performance.

**Civil Protection Team**

- Assess, manage and monitor risks associated with civil emergencies
- Co-ordinate and advise on the production, maintenance and testing of a Business Continuity Management Plan for the council.

# Cabinet



Date of meeting:	08 December 2020
Title of Report:	<b>Internal Audit Half Year Report 2020/21</b>
Lead Member:	Councillor Mark Lowry (Cabinet Member for Finance)
Lead Strategic Director:	Andrew Hardingham (Service Director for Finance)
Author:	Brenda Davis, Audit Manager
Contact Email:	Brenda.davis@devonaudit.gov.uk
Your Reference:	AUD/BD
Key Decision:	No
Confidentiality:	Part I - Official

## Purpose of Report

This paper to Cabinet was originally prepared to provide Members of the Audit and Governance Committee with:

- a position statement on the audit work carried out since April 2020;
- the reviews scheduled for quarters 3 and 4;
- those areas which can be delivered as part of next year's audit plan or, are no longer required;
- the Head of Internal Audit's mid-year assurance opinion of "Reasonable Assurance" on the adequacy and effectiveness of the Authority's internal control framework

Due to impact of Covid-19 it has been necessary for Devon Audit Partnership review our approach to delivery of audit work in these rapidly changing and difficult times. We recognise that tying up key staff who continue to work under immense pressure responding to the challenges brought by the pandemic would not be welcomed and our approach has been to liaise with managers and where possible, use remote access to information and to minimise client disruption.

We also continue to liaise closely with management to identify changes in processes and procedures and new areas of expenditure. This risk-based approach has resulted in changes to the audit plan with new areas being included which in turn necessitates some areas being deferred to next year.

## Recommendations and Reasons

Cabinet is recommended to:

- Note the Internal Audit half year report

## Alternative options considered and rejected

None, as failure to maintain an adequate and effective system of internal audit would contravene the Accounts and Audit Regulations 2015.

### Relevance to the Corporate Plan and/or the Plymouth Plan

The Internal Audit service assists the Council in delivering robust standards of public accountability and probity in the use of public funds and has a role in promoting high standards of service planning, performance monitoring and review throughout the organisation, together with ensuring compliance with the Council's statutory obligations.

Our work supports delivery of the values and priorities set out in Corporate Plan by ensuring that resources are used wisely, and service areas understand and deliver quality public services which meet customer and community needs and keep people safe.

### Implications for the Medium Term Financial Plan and Resource Implications:

Delivery of the audit plan will assist the council in delivering value for money services and help ensure an effective control environment as the Council respond to the ongoing challenges of the Covid-19 pandemic.

### Carbon Footprint (Environmental) Implications:

No direct carbon/environmental impacts arising from the recommendations.

### Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

*\* When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.*

The work of the internal audit service is an intrinsic element of the Council's overall corporate governance, risk management and internal control framework.

### Appendices

*\*Add rows as required to box below*

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
		1	2	3	4	5	6	7
A	DAP – Internal Audit Half Year Report 2020/21							

### Background papers:

*\*Add rows as required to box below*

*Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.*

Title of any background paper(s)	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
	1	2	3	4	5	6	7

**Sign off:**

Fin	pl.20.21. 137	Leg	lt/35624/1 11120	Mon Off		HR		Assets		Strat Proc	
Originating Senior Leadership Team member: Andrew Hardingham (Service Director for Finance)											
Please confirm the Strategic Director(s) has agreed the report? Yes Date agreed: 09/11/2020											
Cabinet Member approval: Cllr Lowry by email Date approved: 25/11/2020											

This page is intentionally left blank

# DAP - Internal Audit Half Year Report 2020-21

## Plymouth City Council Audit & Governance Committee

November 2020

Official

Robert Hutchins  
Head of Audit Partnership



Auditing for achievement

## Introduction

The Audit and Governance Committee, under its Terms of Reference contained in Plymouth City Council's Constitution, is required to consider the Chief Internal Auditor's annual report, to review and approve the Internal Audit programme, and to monitor the progress and performance of Internal Audit.

The Accounts and Audit (Amendment) (England) Regulations 2015 introduced the requirement that all Authorities need to carry out an annual review of the effectiveness of their internal audit system and need to incorporate the results of that review into their Annual Governance Statement (AGS), published with the annual Statement of Accounts.

The Internal Audit plan for 2020/21 was presented and approved by the Audit Committee in July 2020 but Covid-19 has presented considerable operational challenges to the Council which has inevitably introduced some different risks. We have worked with management and "flexed" the plan to incorporate new areas of work and recognising that there is less than six months available to complete the IA annual plan, we have identified and agreed those areas which can be delivered as part of next year's audit plan or, are no longer required. This approach will ensure that the work we deliver has the correct focus to enable us to continue support the Council through these difficult times and provide an annual assurance opinion at the end of 2020/21.

The following report and appendices set out the background to audit service provision; the review of work undertaken in the year to date highlights the areas not included in the original audit plan and details those assignments we propose for deferral until 2021/22 or which are no longer required. The report also provides an opinion on the overall adequacy and effectiveness of the Authority's internal control environment.

The Public Sector Internal Audit Standards require the Head of Internal Audit to provide an annual report providing an opinion that can be used by the organisation to inform its governance statement. This report supports that opinion.

### Expectations of the Audit and Governance Committee from this report

Audit Committee members are requested to consider:

- the assurance statement within this report;
- the basis of our opinion and the completion of audit work against the plan;
- the scope and ability of audit to complete the audit work;
- audit coverage and findings provided;
- the overall performance and customer satisfaction on audit delivery and;
- review and approve the in-year changes to the audit plan.

In review of the above the Audit Committee are required to:

- consider the assurance provided alongside that of the Executive, Corporate Risk Management and external assurance including that of the External Auditor as part of the Governance Framework and satisfy themselves from this assurance that the internal control framework continues to be maintained at an adequate level to mitigate risks and inform the Executive for governance requirements, and
- review and approve the in-year changes to the audit plan.

**Robert Hutchins**  
**Head of Devon Audit Partnership**



## Opinion Statement

**Overall, based on work performed to date during 2020/21 and our experience from the current year progress and previous years’ audit, the Head of Internal Audit’s Opinion is of “Reasonable Assurance” on the adequacy and effectiveness of the Authority’s internal control framework**

The professional practice of internal audit within the public sector is governed by the Public Sector Internal Audit Standards (PSIAS). Whilst these are now consistent across the public sector, there has been no common practice regarding how best to report the overall results, i.e. the “engagement opinion”, of internal audit work at the end of each assignment or the Head of Internal Audit’s overall assurance opinion.

The CIPFA Special Interest Group (SIG) for Internal Audit considered this issue and in April 2020 reported that they had identified a range of current reporting practices and opinions in use, and by far the most common practice was four levels of assurance opinion on the engagement. Based on their analysis of existing practice, the CIPFA SIG

recommended the use of four standard internal audit assurance opinions which DAP has adopted.

The ratings of:

- Substantial Assurance
- Reasonable Assurance
- Limited Assurance
- No Assurance

replaces the previous High Standard, Good Standard, Improvements Required and Fundamental Weaknesses ratings that we have used when reporting on each audit assignment, and the Full Assurance, Significant Assurance, Limited Assurance, No Assurance previously used for the overall Head of Internal Audit opinion. The work undertaken in the year to date together with knowledge from previous reviews have informed the Head of Internal Audit’s Opinion on the internal control framework. Should any significant weaknesses be identified in specific areas, they will need to be considered by the Authority in preparing its Annual Governance Statement later in the year for publication alongside the Statement of Accounts for 2020/21.

<b>Substantial Assurance</b>	A sound system of governance, risk management and control exists across the organisation, with internal controls operating effectively and being consistently applied to support the achievement of strategic and operational objectives.	<b>Limited Assurance</b>	Significant gaps, weaknesses or non-compliance were identified across the organisation. Improvement is required to the system of governance, risk management and control to effectively manage risks and ensure that strategic and operational objectives can be achieved.
<b>Reasonable Assurance</b>	There are generally sound systems of governance, risk management and control in place across the organisation. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of some of the strategic and operational objectives.	<b>No Assurance</b>	Immediate action is required to address fundamental control gaps, weaknesses or issues of non-compliance identified across the organisation. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of strategic and operational objectives.

## Review of Audit Coverage

There are challenges in completing the 2020/21 audit plan in our traditional manner and we have developed different practices to enable us to deliver our assurance. This includes confirmation of key controls, remote testing wherever possible of these controls (so as not to disturb / disrupt operational staff) and using data analytics generated from system data. This approach was discussed and agreed with the SI51 officer and the DAP Management Board prior to bringing a report to the July meeting of the Audit and Governance Committee.

Overall, reasonable progress has been made in the first half of the year, including completion of any work carried forward from 2019/20 and real time support provided to service areas where new systems have had to be rapidly put in place to help the citizens of Plymouth, in the administration of grants and adaptations within some services.

In the course of our work we have witnessed how officers of the Council have faced up to the challenges resulting from Covid and worked tirelessly to deliver services and pay grants. Business rates grants is an example where funding in excess of £47m has paid in respect of nearly 4000 accounts and we have found that the administration of the grant scheme was in accordance with scheme guidance, all payments made have been fully reconciled and state aid rules complied with.

Migration of the iTrent HR/Payroll solution to CoreHR has been a critical project for the Council. This Plymouth City Council / Delt project has benefitted from strong governance, ensuring that decision making has been timely, well informed and made by appropriately senior board members. In our opinion the use of 'Extraordinary' Project Board meetings has been well judged and appropriate to circumstances. The Project Manager continues to draw on their considerable experience in orchestrating large projects and programmes and has previously worked closely with the current Project Team which also brings benefits.

However, the financial impact of Covid-19 on the Council (and other Authorities across the Country) due to increased demand for services such as children's social care and homelessness, combined with loss of income from taxation and charges cannot be underestimated and will remain a significant and enduring challenge unless the Government fully fund the shortfall.

The rapid and necessary move to home working for many has the potential to impact the IT controls system in different parts of the business. How this risk is mitigated against will be one of our key considerations when we embark on our Cyber Security work. The risk of reduced control due to a socially distanced workforce is also considered as part of our other reviews.

A table showing the status of planned, unplanned and deferred audits and their associated reported executive summaries is contained at Appendix I.

## Fraud Prevention and Detection

Counter-fraud arrangements are a high priority for the Council and assist in the protection of public funds and accountability. The Cabinet Office runs a national data matching exercise, The National Fraud Initiative (NFI), every two years. For the 2019/20 exercise, DAP have co-ordinated the extract of relevant Council datasets, as defined by the Cabinet Office. Departments have supplied their datasets (listed below) and these were uploaded onto the NFI secure website in October in accordance with the NFI timetable. The subsequent matching reports are due back from the Cabinet Office in February 2021

NFI datasets:

- Council Tax;
- Creditor Payments;
- Housing Benefits;
- Payroll / Pensions;
- Housing Waiting Lists;
- Taxi Licencing \*
- Transport Passes (including blue badges and concessionary bus passes).
- Covid 19 Grants (note this data had a different timetable and has yet to be submitted but will be provided by the deadline of 21 January 2021).

\*Market trader licences and personal alcohol licences are no longer a part of the mandatory NFI requirements and as such have not been submitted this year. Local Authorities can choose to pay an additional fee to process this data and DAP will be confirming costs and checking interest with relevant officers once the mandatory data has been processed by the Cabinet Office. However, it should be noted that the datasets were removed from the mandatory requirements as nationally they were not found to have yielded significant positive results since their inclusion in NFI. The results in Plymouth are consistent with the national picture with no fraud or error having been identified relating to these datasets during the last NFI exercise in 2017/18.

**Irregularities** – DAP have provided management with a range of advice and support on courses of action or improvements to controls.

**Active Counter Fraud Investigation** – The Plymouth City Council Corporate Fraud Team transferred to the Devon Audit Partnership (DAP) in May 2018 and is now known as the Counter Fraud Services Team within DAP. The team continue to offer a full and comprehensive investigation service to Plymouth, whilst offering a commercialised service to other DAP partners in order to provide Plymouth City Council with a return on its investment.

The Counter Fraud Team Manager has prepared a separate report summarising work undertaken in the year to date.

## Appendix I - Assurance Opinion and Extract Executive Summaries – up to 30 October 2020

### Risk Assessment Key

ANA - Audit Needs Assessment risk level

Client Request - no risk assessment information available

Risk Area / Audit Entity	Assurance Opinion	Residual Risk / Audit Comment
<b>Customer and Corporate / Finance</b>		
<b>Core Assurance – Key Financial System</b>		
Payroll (iTrent System) Payroll (CoreHR) ANA – High <i>Time was only allowed for CoreHR payroll system in the original plan and not iTrent</i>	Status: In Progress	<p>Work has commenced on the final audit of the iTrent Payroll system to provide assurance on the control environment for the period April to October.</p> <p>A separate review of the new CoreHR system which has gone live in November will be carried out in quarter 4 to provide assurance for the remainder of the year.</p>
CoreHR System Implementation ANA – High <i>Not included in original plan</i>	Reasonable Assurance Status: Final	<p>Internal Audit have monitored Delt's CoreHR project during the past year. Issues identified within the CoreHR solution have either been resolved or workaround processes evolved to ensure accurate payment and administering of statutory and non-statutory deductions. Governance has been of a high standard and the project has significantly benefitted from the highly experienced project team.</p> <p>Effective workaround procedures have been built into 'Pay Cycle' processes for initial live operation following testing and refinement during the five parallel run testing that has been undertaken. Review of the process and content of the parallel run testing confirmed that anomalies have been identified and used to inform live operation process and remediation as appropriate.</p> <p>The third-party hosting of the Councils data introduces additional risks, with 'Cyber' threats of particular relevance. Following the conducting of Penetration Testing to identify potential data security vulnerabilities by an accredited testing company the limited issues identified have been remedied by Delt.</p>
Business Rates (NNDR) ANA - Low	Status: In Progress	Work has commenced on the annual review of the system for the billing and collection of Business Rates.

Risk Area / Audit Entity	Assurance Opinion	Residual Risk / Audit Comment
<p>The following reviews are scheduled to start across quarters 3 and 4.</p> <ul style="list-style-type: none"> <li>• Civica Financials:               <ul style="list-style-type: none"> <li>❖ Creditors ANA - High</li> <li>❖ Main Accounting ANA - High</li> <li>❖ Debtors ANA – Medium</li> <li>❖ Material Systems – System Admin ANA - High</li> </ul> </li> <li>• Academy Revs &amp; Bens:               <ul style="list-style-type: none"> <li>❖ Housing Benefits ANA - High</li> <li>❖ Council Tax ANA - Medium</li> </ul> </li> <li>• Treasury Management ANA – Medium</li> </ul>		
<p>There is no start date for the implementation of the new Civica Icon Income Management module, therefore time will be allowed in the 2021/22 audit plan for this work.</p>		
<p><b>Core Assurance - Other</b></p>		
<p>Payment Modernisation Board <i>Not included in original plan</i></p>	<p>Status: Ongoing</p>	<p>The Council has set up a Payment Modernisation Board and it has been requested that there is DAP representation on the Board. The first meeting was in October.</p>
<p>Health &amp; Safety Follow-Up (Street Services) <i>Not included in original plan</i></p>	<p>Improvements Required Status: Draft</p>	<p>All improvement works requested in our December 2019 internal audit report, have been addressed. We have undertaken some follow-up work that concentrated on key areas such as the use of the HAV VECS calculator and the establishment of electronic personnel files which contain health surveillance information on Hand Arm Vibration. Changes in staff and the Covid-19 pandemic lockdown have impacted progress in developing the effectiveness of the administrative procedures. There is a time limited action plan in place to respond to the recommendations, overseen by the Service Director in Street Services. The HSW Annual Report for 2019-20 provides further detail.</p>
<p>Health &amp; Safety Follow-Up (Bereavement Service &amp; Mt Edgecumbe Country Park) <i>Not included in original plan</i></p>	<p>Improvements Required Status: Draft</p>	<p>All improvement works requested in our December 2019 internal audit report, have been addressed. Plans are in place to undertake follow up audits within the Mount Edgecumbe Country Park to review any further progress made.</p>
<p>Housing Benefit Overpayments – Potential Impact on Recovery Following Migration to Universal Credits</p>	<p>Value Added Status: Final</p>	<p>At the end of May 2020, the Council had circa 1500 cases where overpayments were being recovered direct from ongoing Housing Benefits (HB). Most of these cases relate to working age customers, and therefore likely that the majority will in due course migrate to Universal Credits (UC). As subsidy payments have been received from the DWP in respect of these</p>

Risk Area / Audit Entity	Assurance Opinion	Residual Risk / Audit Comment
		overpayments, following migration to UC the historic debt will remain with the Council. Recovering by way of attachment to a UC claim is seen as a last resort once other recovery methods have been exhausted, The Revenues & Benefits department advise that the continued use and prioritisation of the HB Debt Recovery Service remains the most effective way of targeting recovery as and when benefit claimants move into employment.
Purchasing Cards	Status: In Progress	Work is nearing completion on our review of the use of Council Purchasing Cards which included a survey of purchasing card users and approvers to identify the effectiveness of the control framework and gain insight into the knowledge and understanding of card users.
Information Asset Management Client Request	Added Value Status: Final	A review of a limited number of the Council's key business solutions identified that there are opportunities to further evolve and develop them to optimise their potential value as opposed to introducing new business solutions. In addition, the Office 365 suite provides document management and storage opportunities that could improve information management and facilitate an exit from the existing corporate arrangement (S:Drive). To maximise the benefit that can be obtained from the Councils information assets, reporting and data analytics should be employed, with the corporate wide use of the Office 365 PowerBI solution the most logical approach.
Real Time Ad-Hoc Support Provided in Relation to Covid-19 <i>Not included in original plan</i>	Status: Complete	Applications for cash grants for businesses in receipt of small business rates relief or for retail, hospitality and leisure businesses with a rateable value of £51,000 or less were run through the government 'Spotlight tool' which performs automated due diligence checks. Any rejections were referred to DAP to perform further manual checks, including contacting the ratepayer, to determine if the application should be rejected or if there has been an error and it should be paid.
Business Rates Grant Post Event Review <i>Not included in original plan</i>	Status: In Progress	In response to COVID 19 the Government provided a financial support package for small businesses and businesses in the retail, hospitality and leisure sectors. This support took the form of two grant funding schemes which were funded by Central Government but administered and paid by Local Authorities. In Plymouth, the Council identified 3949 NNDR accounts who appeared eligible for support. Of the accounts identified, grant funding in excess of £47m was paid in respect of 3715 accounts.

Risk Area / Audit Entity	Assurance Opinion	Residual Risk / Audit Comment
		<p>Assurance can be provided that the administration of the grant scheme within Plymouth was done so in accordance with scheme guidance, all payments made have been fully reconciled, state aid rules have been complied with and any identified instances of error or suspected fraud subject to appropriate recovery action and / or referral to the DAP Counter Fraud Team. To provide further assurance that the scheme has not been adversely impacted by fraud the DAP Counter Fraud Team have undertaken a risk assessment, based on local knowledge and experience, of grant recipients and are continuing to work through a sample of grants to confirm eligibility.</p>
Schools Financial Value Standards (SFVS)	Status: Complete	Assurance was reported in the September 2020 Progress Report; please refer to that report for details.
<p>The following reviews are scheduled across quarter 3 and 4.</p> <ul style="list-style-type: none"> <li>• Cyber Security ANA – High</li> <li>• Declarations of Interest ANA – Medium</li> <li>• Client Financial Services F/Up ANA – High</li> </ul>		<ul style="list-style-type: none"> <li>• Recruitment ANA - High</li> <li>• Acting Up Duties ANA – Medium</li> </ul>
<p>It has been agreed with management that the following reviews will be deferred until 2021/22.</p> <ul style="list-style-type: none"> <li>• Finance Service ANA – Medium</li> <li>• Collection Fund ANA – Medium</li> </ul> <p>The review of Procurement is no longer required as it was linked with the possibility of the service transferring to Delt which has not happened, neither is there any longer a need for us to undertake work around Governance Arrangements (Statutory Officer).</p>		
<p><b>Executive Office</b></p>		
<p><b>Core Assurance - Other</b></p>		
Electoral Services ANA High	Status: In Progress	<p>Work is being carried out by DAP to compliment a review of aspects of the electoral registration process which the Council has commissioned from the Association of Electoral Administrators (AEA). With the increasing use of electronic data, DAP will specifically validate the effectiveness of the protocols in place to administer electoral registration data as well as compliance with existing Quality Assurance (QA) processes. Broad assurance will also be</p>

Risk Area / Audit Entity	Assurance Opinion	Residual Risk / Audit Comment
		provided in terms of the actions taken by the Council to improve protocols to ensure the accuracy and integrity of the its electoral register.
<p>It has been agreed with management within the Executive Office to defer the following reviews to 2021/22.</p> <ul style="list-style-type: none"> <li>• Minute Books ANA Low, Client Request</li> <li>• Gifts &amp; Hospitality F/Up to the 2019/20 review ANA Medium</li> </ul>		
<b>People</b>		
<b>Core Assurance – Key Financial System</b>		
<p>The final report from the original review was not finalised until March 2020 and the follow-up to this report will be carried out early in 2021/22.</p> <ul style="list-style-type: none"> <li>• CareFirst - Children Independent Placements F/Up ANA – Medium</li> </ul>		
<b>Core Assurance - Other</b>		
OLM Eclipse System Implementation <i>Not included in original plan</i>	Status: Ongoing	CareFirst 6 is the case management, payment and charging system used by Children’s and Adult Social Care teams for more than 20 years. The next-generation replacement for CareFirst is OLM Eclipse and the Project Manager, Strategic Co-operative Commissioning has requested real-time support and challenge for this highly sensitive and critical project from DAP’s Senior IT Auditor on both the Social Care IT Project Board together and at the pending ‘Discovery’ workshops
Infection Control Fund for ASC <i>Not included in original plan</i>	Value Added Status: Final	Care Home Providers who were recipients of Infection Control funding were required to complete and submit a return to Plymouth City Council detailing how their allocation of the grant had been spent. Based on our examination of the first tranche of returns we can provide assurance that the majority of spend linked to broader infection control measures. The detailed findings from our work has been considered by officers as they communicated with Providers regarding the second tranche of funding.
Children's Short Break Contracts ANA – Medium, Client Request	Status: Final	Assurance was reported in the September 2020 Progress Report; please refer to that report for details.



Risk Area / Audit Entity	Assurance Opinion	Residual Risk / Audit Comment
FullyCATERed Ltd (Accounting Arrangements) Client Request	Value Added Status: Final	Assurance was reported in the September 2020 Progress Report; please refer to that report for details.
Finance & Assurance Review Group (FARG) ANA – High Client Request	Status: Ongoing	The purpose of FARG is to provide oversight, scrutiny and assurance of the integrated fund and internal audit continue to have a seat on FARG providing real time.
Real Time Ad-Hoc Support Provided in Relation to Covid-19 <i>Not included in original plan</i>	Value Added Status: Complete	We worked with Co-Operative Commissioning to develop procedures for staff working across the community assisting people with shopping or accessing cash to ensure that officers had a clear, proportionate but robust process to follow.
Grant Certification Statutory	Regulatory Requirement	Grants certified without amendment: <ul style="list-style-type: none"> <li>• IBCF Disabled Facilities Capital Grant 31/3710</li> </ul>

The following reviews are scheduled across quarters 3 and 4.

- Alliance Contract ANA – Medium, Client Request
- Children's Additional Spend ANA – Low, Client Request

It has been agreed with the Head of SEND that the following review will be carried out early in 2021/22.

- Special Educational Needs & Disability (SEND) Contracts ANA – Medium, Client Request

Due to the increase in demand for services provided by Community Connections (CC) as a result of Covid, the loss of a key member of staff and delays in the delivery of the new IT solutions, we have agreed to defer the following reviews to 2021/22.

- Anti-Social Behaviour Tools ANA – Medium, Client Request
- Community Connections - New Business Solutions

Risk Area / Audit Entity	Assurance Opinion	Residual Risk / Audit Comment
<b>Office of the Director of Public Health</b>		
It was agreed with ODPH to include a small “pot of days” in the plan but as a result of Covid19, work for the service has changed and the Director has advised that the service have not been able to identify any areas that would be useful this year.		
<b>Place</b>		
Street Lighting ANA - Medium	Status: In Progress	We have commenced work on this review to evaluate and report on the adequacy of systems, controls, processes and procedures used to manage the Council’s street lighting infrastructure.
Garage Follow-Up ANA – Medium, Client Request	Status: In Progress	The Council’s Fleet & Garage service was transferred to Plymouth Highways in May 2017 and subsequently restructured to provide separate management responsibility for the Fleet and Garage elements of the service. In 2019/20 we carried out a review of the governance and administrative arrangements within the Garage Service and we have just commenced a follow-up review to measure the progress in implementing the recommendations from that report.
Capital Programme Governance ANA – High Client Request	Substantial Assurance Status: Draft	Assurance was reported in the September 2020 Progress Report; please refer to that report for details.
Empty Homes Scheme ANA – Medium Client Request	Reasonable Assurance Status: Draft	Overall, the administration, operational and management arrangements to support empty homes back into use are of a good standard. A comprehensive financial assistance policy, which is reviewed on an annual basis, is in place and used effectively by Housing Delivery Officers to support suitable empty homes being brought back into use. Homeowners must meet the eligibility criteria set out, complete an application and provide a range of documentary evidence to support their application which is then subject to due diligence checks and formal approval by the Service Director for Strategic Planning and Infrastructure prior to a loan being made. At the end of 2019/20 a total of 244 empty homes has been brought back into use.
New Business Solutions - Tech Forge (Cloud) ANA – Medium Client Request	Status: Ongoing	DAP have monitored and provided ongoing support to the implementation project migrating the Tech Forge (TF) Facility database to a TF Cloud asset management system.

Risk Area / Audit Entity	Assurance Opinion	Residual Risk / Audit Comment
		Phase 1 of the project, including the property register and compliance modules, successfully went live on Monday 12 October 2020. Phase 2 remains ongoing, focussing on capital accounting and system interfaces and is due to go live in early 2021.
Real Time Ad-Hoc Support Provided in Relation to Covid-19 <i>Not included in original plan</i>	Status: Complete	Social distancing, coupled with many shops declining cash, has presented a real problem for Plymouth Credit Union (PCU) and some of its members. DAP worked with officers setting up a cashless card system and in drawing up an Operational Agreement and Service User Agreement.
Grant Certification Statutory	Regulatory Requirement	Grants certified without amendment: <ul style="list-style-type: none"> <li>• LGF (GD33) Oceansgate</li> <li>• LGF (GD18) Northern Corridor</li> <li>• LGF (GD19) Eastern Corridor</li> <li>• LGF (GD20) Charles Cross and Exeter Street</li> <li>• Innovate UK - Clean Streets EV Infrastructure Toolkit (31831)</li> </ul>
It has been agreed with senior management within Place that the following reviews will be deferred until 2020/21 <ul style="list-style-type: none"> <li>• Trade Waste ANA – High, Client Request</li> <li>• Street Services – Stores, Stock &amp; Fuel Control ANA – Medium, Client Request</li> <li>• Commercial Properties - Rent Roll ANA – High, Client Request</li> </ul>		

## Appendix 2 - Audit Standards and Customer Delivery

### Conformance with Public Sector Internal Audit Standards (PSIAS)

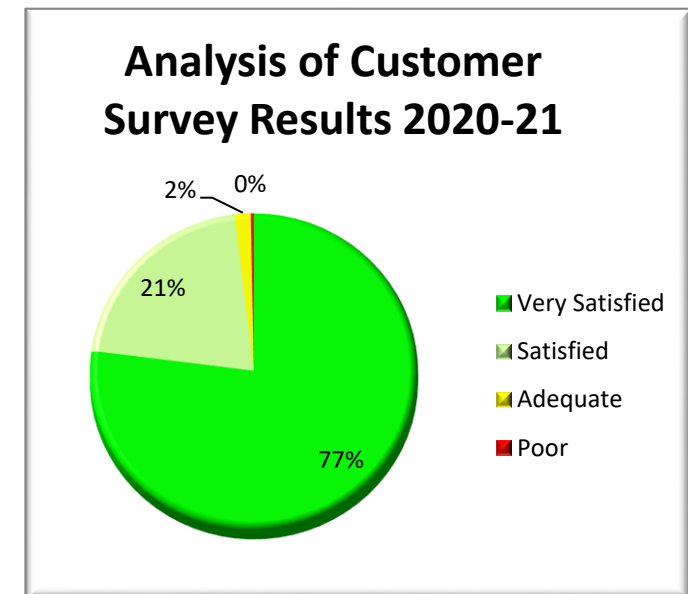
**Conformance** - Devon Audit Partnership conforms to the requirements of the PSIAS for its internal audit activity. The purpose, authority and responsibility of the internal audit activity is defined in our internal audit charter, consistent with the Definition of Internal Auditing, the Code of Ethics and the Standards. Our internal audit charter was approved by senior management and the Audit Committee in July 2020. This is supported through DAP self-assessment of conformance with Public Sector Internal Audit Standards & Local Government Application note.

**Quality Assessment** – through external assessment December 2016 “DAP is considered to be operating in conformance with the standards” External Assessment provides independent assurance against the Institute of Internal Auditors (IIA) Quality Assessment & Public Sector Internal Audit Standards (PSIAS). The Head of Devon Audit Partnership also maintains a quality assessment process which includes review by audit managers of all audit work. The quality assessment process and improvement is supported by a development programme.

**Improvement Programme** – DAP maintains a rolling development plan of improvements to the Service and customers. All recommendations of the external assessment of PSIAS and quality assurance were included in this development plan and have been completed. This will be further embedded with revision of our internal quality process through peer review. Our development plan is regularly updated, and a status report provided to the Management Board.

### Customer Service Excellence

DAP maintains accreditation by G4S Assessment Services of the CSE standard during the year. We continue to issue client survey forms with our final reports and the results of the surveys returned are, although low in number, very good and again are very positive. The overall result is very pleasing, with near 98% being "satisfied" or better across our services, see appendix 4. It is very pleasing to report that our clients continue to rate the overall usefulness of the audit and the helpfulness of our auditors highly.



## Appendix 3 - Definitions

### Definitions of Audit Assurance Opinion Levels

### Confidentiality under the Government Security Classifications

Assurance	Definition	Marking	Definition
Substantial Assurance	“A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.”	Official	The majority of information that is created or processed by the public sector. This includes routine business operations and services, some of which could have damaging consequences if lost, stolen or published in the media, but are not subject to a heightened threat profile.
Reasonable Assurance	“There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.”	Official: Sensitive	The systems and controls generally mitigate the risk identified but a few weaknesses have been identified and / or mitigating controls may not be fully applied. There are no significant matters arising from the audit and the recommendations made serve to strengthen what are mainly reliable procedures.
Limited Assurance	“Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.”		
No Assurance.	“Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.”		

#### Devon Audit Partnership

The Devon Audit Partnership has been formed under a joint committee arrangement. We aim to be recognised as a high-quality internal audit service in the public sector. We work with our partners by providing a professional internal audit service that will assist them in meeting their challenges, managing their risks and achieving their goals. In carrying out our work we are required to comply with the Public Sector Internal Audit Standards along with other best practice and professional standards.

The Partnership is committed to providing high quality, professional customer services to all; if you have any comments or suggestions on our service, processes or standards, the Head of Partnership would be pleased to receive them at [robert.hutchins@devonaudit.gov.uk](mailto:robert.hutchins@devonaudit.gov.uk)



# Cabinet



Date of meeting:	08 December 2020
Title of Report:	<b>Counter Fraud Services Half Yearly Report</b>
Lead Member:	Councillor Mark Lowry (Cabinet Member for Finance)
Lead Strategic Director:	Andrew Hardingham (Service Director for Finance)
Author:	Ken Johnson
Contact Email:	Ken.johnson@plymouth.gov.uk
Your Reference:	HY/CFST/20
Key Decision:	No
Confidentiality:	Part I - Official

## **Purpose of Report**

This report summarises the work carried out during the first 6 months of 2020/21 by the Counter Fraud Services Team in order to counter fraudulent threats to the Council's budget and reputation. On the 30/11/2020 this report was recommended for note at the Audit and Governance Committee to give assurance that Plymouth City Council continues to support robust counter fraud measures in order to protect the public purse.

## **Recommendations and Reasons**

The Cabinet is recommended to note the Counter Fraud Services Half Yearly Report.

## **Alternative options considered and rejected**

Effective counter fraud processes are an essential element of internal control and as such are an important element of good corporate governance. For this reason alternative options are not applicable.

## **Relevance to the Corporate Plan and/or the Plymouth Plan**

Maintaining sound systems of internal control and protecting the public purse ensures that those who legitimately need the support and services of the Council get them and this therefore supports the achievement of corporate and service objectives.

## **Implications for the Medium Term Financial Plan and Resource Implications:**

None arising specifically from this report.

## **Carbon Footprint (Environmental) Implications:**

Efficient and correct use of Council resources can only positively affect its Carbon Footprint, however no direct impact can be proven from this report.

**Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:**

\* When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.

The Counter Fraud Services Team specifically support the council's overall governance arrangements

**Appendices**

\*Add rows as required to box below

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.						
		1	2	3	4	5	6	7
A	Counter Fraud Services Half Yearly Report							

**Background papers:**

\*Add rows as required to box below

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	Exemption Paragraph Number (if applicable) If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.						
	1	2	3	4	5	6	7

**Sign off:**

Fin	<b>pl.20 .21.1 47</b>	Leg	lt/356 38/24 1120	Mon Off		HR		Asset s		Strat Proc	
Originating Senior Leadership Team member: Andrew Hardingham											
Please confirm the Strategic Director(s) has agreed the report? Yes											
Date agreed: 05/11/2020											
Cabinet Member approval: <i>Approved by email</i>											
Date approved: 25/11/2020											





devon**audit**partnership

Counter Fraud Services

## Counter Fraud Services

Half Year Report 2020 -  
2021

Plymouth City Council  
Audit & Governance  
Committee

Date November 2020



Support, Assurance & Innovation

## 1. Introduction

- 1.1 Counter Fraud work has continued throughout the current year and the Counter Fraud Team along with the rest of the wider Devon Audit Partnership (DAP) Team have supported Plymouth City Council in enabling and supporting Council business at these unprecedented times to ensure that services are provided to those with genuine entitlement.
- 1.2 It has been reported that there has been a general upturn in fraudulent activity during the COVID 19 (C19) crisis. Many frauds which are often referred to as Scams have adopted a C19 camouflage in order to play on people fears and lack of knowledge. Fraud activity had already significantly increased in the years prior to C19, therefore an accurate picture of the direct effects of the current crisis on fraud statistics will remain unclear for some time.
- 1.3 Fraud is by definition a crime and should not be tolerated. Any fraud against Plymouth City Council is a fraud against the public purse and therefore we will continue to acknowledge the threat from fraud, build processes and policies that will prevent fraud and pursue those who would commit fraud to ensure that the public retain confidence in the Council. Collaboration across the public sector will continue and strengthen under the current working arrangements through DAP and its partners.
- 1.4 The following report is a half year summary of the counter fraud work undertaken in support of Plymouth City Council.

## 2. Fraud Prevention and Detection

- 2.1 Counter-fraud arrangements are a high priority for the Council and assist in the protection of public funds and accountability. The Cabinet Office runs a national data matching exercise, The National Fraud Initiative (NFI), every two years. The data submission for the latest 2020/21 exercise is underway and DAP are co-ordinating the extracts of relevant Council datasets, as defined by the Cabinet Office. Departments have or are in the process of supplying their datasets (listed below) and these are being or will be uploaded onto the NFI secure website by December in accordance with the NFI timetable. The subsequent matching reports will be returned and actioned through the relevant Departments at the start of 2021.
- 2.2 PCC, datasets being matched against the NFI
- Council Tax,
  - Creditor Payments,
  - Housing Benefits, ,
  - Payroll / Pensions.
  - Housing Waiting Lists,
  - Licencing (including taxi licences and personal alcohol licences)
  - Market Traders, and
  - Transport Passes (including blue badges and concessionary bus passes)
  - Covid 19 Grants
- 2.3 Statistical analysis from the latest [NFI Report](#) released in July 2020 shows that significant savings continue to be achieved and that the average fraud value per case has risen from £2,727.64 to £2,944.23 an average increase of 7.94%.
- 2.4 The overall savings linked to the NFI exercise are recognised as significant and an important step in organisations minimising the losses to their business and the public purse.

"I am therefore delighted to report that the National Fraud Initiative, the Cabinet Office's data matching service, has enabled participating organisations to prevent and detect £245 million fraud and error in the period 1st April 2018 to 4th April 2020. This brings cumulative outcomes for NFI participants to £1.93 billion."

*(Lord Agnew, Minister of State at the Cabinet Office and Her Majesty's Treasury)*

2.5 Irregularities – DAP have provided management with a range of advice and support on courses of action and or improvements to controls on relevant internal matters. Audit and Counter Fraud disciplines are now working closer than ever to provide as high a level of service as possible.

2.6 The statistics for the current year show that there are consistent savings to be made by countering fraud. There have been 235 allegations of fraud made so far this year resulting in 13 recommended prosecutions and 21 recommendations for Cautions and other forms of sanction. Along with various compliance visits a total savings figure of £377,146.22 has been realised at time of writing this half yearly report. The team continue to investigate 145 fraud allegations.

Case reviews are available on **Appendix A**

### **3. Areas of current fraud investigations**

3.1 As part of its ongoing commitment to countering fraud in Plymouth, the Counter Fraud Services Team continues to undertake investigations in the following areas:

- Internal cases
- COVID 19 Grant Fraud
- Council Tax Support / Single Person Discount
- Blue Badge misuse
- Social Housing Fraud (involving our partner Registered Social Landlords)
- Client Financial Fraud (Special guardianship)
- Insurance fraud
- Bus pass misuse
- Parking Permit selling
- Disabled Facilities Grants

3.2 The Counter Fraud Services Team will continue to work closely with all PCC departments to ensure that fraud risks are minimised and wherever possible, those found committing offences are dealt with robustly and in line with PCC's Anti-Fraud, Bribery and Corruption Policy and its linked Strategy and Response Plan.

### **4. General COVID19 related fraud**

4.1 As previously mentioned fraudsters are taking advantage of the current pandemic in order to play on people's fears and lack of knowledge and or understanding. The Counter Fraud Services Team have utilised the National Anti-Fraud Network (NAFN) to regularly update and assist Plymouth City Council to ensure that it and its customers are kept up to date with the detected and suspected fraud threats. The following are examples of fraud and attempted frauds that have been uncovered nationally -

- Victim alleged to have breached stay home regulations scam, fraudulent text messages from .GOV.UK issuing fines for leaving home.
- Free school meals scam, fraudulent messages to parents entitled to free school meals requesting bank details. Messages received via email and text.

- Fraudsters purporting to be from a research group that mimic the Centre for Disease Control and Prevention (CDC) and World Health Organisation (WHO). They claim to provide the victim with a list of active infections in their area but to access this information the victim needs to either: click on a link which redirects them to a credential-stealing page; or make a donation of support in the form of a payment into a Bitcoin account.
- Fraudsters providing articles about the virus outbreak with a link to a fake company website where victims are encouraged to click to subscribe to a daily newsletter for further updates.
- Lender Loan Fraud – there are already media reports circulating about parents concerned that they may not be able to feed their children if they are not at school and those who will be made redundant or self-employed receiving a much reduced income with potentially the same or increased living costs. This may mean people look to quick loans to see them through.

4.2 Where people feel that they are at risk, medically or financially, the same methods are used in an attempt to appeal to individuals need for security and stability -

- Fraudsters sending investment scheme and trading advice encouraging people to take advantage of the coronavirus downturn encouraging victim to divulge details and or click on fraudulent links.
- Fraudsters purporting to be from HMRC offering a tax refund and directing victims to a fake website to harvest their personal and financial details. The emails often display the HMRC logo making it look reasonably genuine and convincing. We have also had reports of people receiving similar text messages.
- Since lockdown eased, fake websites have offered cheap holidays abroad and at home with links that steal personal data and or encourage payment when no product is available.
- Holiday rental homes scam, where there is no rental home available.

4.3 As the crisis deepened, we became more settled in our new reality and many wanted to help others less fortunate as well as those who are on the front line during the pandemic, fraudsters took advantage of individual's good nature in the following ways.

- Scam emails purporting to be from the Government asking for donations to the NHS.
- Emails, texts, letters and telephone calls purporting to be from legitimate charities requesting financial support.
- Scam emails requesting details of individuals to sign up to volunteering schemes in the local area.

4.4 Plymouth City Council should also be aware of the following expected and emerging frauds both for their business their constituents and customers, we continue to work closely with the Trading Standards Team to ensure that's all threats are highlighted so that awareness remains high.

- Online Shopping and Auction Fraud – more people at home socially distancing increases the number of people online shopping through necessity but also the fact they have more time on their hands to browse the internet.
- Computer Software Service Fraud – more people working from home will increase demand on IT systems causing slower responses and making some scripts seem more believable.
- Mandate Fraud – with more people working at home, it may be easier for fraudsters to impersonate senior decision makers, with seemingly valid reasons why they cannot be contacted, and request a change in direct debit or standing order payments.
- Investment Fraud including Pension Liberation Fraud – fraudsters could take the opportunity to create bogus investments in commodities in high demand, for example

oxygen, and if people are worried that they might not have enough money to see them through this financially uncertain time, they may be more prepared to invest.

## 5. Specific C19 Grant Fraud

5.1 In response to the pandemic the Government announced there would be support for small businesses, and businesses in the retail, hospitality and leisure sectors. This support took the form of grant funding schemes, including the Small Business Grant Fund and the Retail, Hospitality and Leisure Grant Fund. There has also been a Discretionary Business Grants Fund developed separately by LA's.

5.2 Business Grants have proven a high value target for fraudsters. This has prompted a national wide response from HM Government and since the implementation of the schemes many organisations have come forward offering support, especially in the data matching and analysis area in an attempt to provide tools to LA's so that they in turn are able provide full 'Assurance' that the £20 billion spent nationally in support for businesses that –

- Only genuine claims are processed and or have been paid and
- Where claims have been identified as incorrect, false or spurious, that they have been highlighted for follow up action and or redress.

5.3 All Local Authorities will be affected by fraud in this area whether they have direct responsibility for the dispersal of funds, or not, as it is all funding from the 'Public Purse' and eventually this will affect all areas of public life in the UK.

5.4 With such large amounts of money available, it is unsurprising that opportunistic as well as organised fraudsters have taken advantage of the urgency and confusion caused by the C19 global pandemic, in order to line their own unscrupulous pockets. Below are some known successful and attempted frauds in this area of Council Business.

- Scam one: Someone emails the council pretending to be the liable party on a business rates account. They ask to be reminded what their account number is because they don't have access to the paperwork. They then use this account number to apply for a Covid-19 business grant.
- Scam two: Someone emails the council saying they moved to a new business premises in the area before March 2020. Often they use a tactic to add pressure, e.g claiming they tried to contact the council months ago, but their application form was lost. They don't have to actually pay the business rates because they've been suspended. They can access a Covid-19 business grant with the account information provided (up to £25k).
- Business owners, whose business liquidated prior to 11/03/20, attempt to claim and fail to notify that the business has folded prior to qualification. This may take the form of the owner maintaining that there is a new business taking over from the old one.

5.5 All involved LA's have a Single Point of Contact (SPOC) who is responsible for fraud reporting at the national level. Any frauds that cross LA borders or are considered related to organised crime must be reported in real time. The SPOC for Plymouth City Council is the Counter Fraud Services Manager at DAP.

5.6 National Fraud Initiative Response (NFI) A recent consultation document issued by the Cabinet Office (CO) made it clear that it is the Government's intention to ensure that Grant Payments made during the C19 crisis are included in this year's data submission for the NFI. This data will need to be submitted by Dec 2020.

- 5.7 The resultant matches/mismatches will have to be investigated, justified or corrected. Where fraud is identified it may be necessary for LA's to use the full weight of the law in order to be able to recover fraudulent debt. This may / will undoubtedly uncover more sophisticated frauds that cross LA borders.
- 5.8 The Counter Fraud Services Team are currently assisting Plymouth City Council in providing Assurance to the Department for Business, Energy & Industrial Strategy in the form of a monthly Assurance Report. A separate 'Assurance Strategy' is supported by the effective work that the relevant Departments are doing along with input from both Audit and Counter Fraud sections within DAP.
- 5.9 The Counter Fraud Services Manager will continue to act for PCC in C19 Grant Fraud related matters until resolution of all suspected or alleged frauds in this area. There are currently 9 separate investigations into this area of business with a Grant Value of £105k. The nationally detected figure for fraud in this area is so far £8 Million and increasing as more and more frauds are detected.

## **6. Statistical evidence**

- 6.1 The problem of fraud is an ever growing one, which is constantly changing and evolving. Research shows that detected or reported examples of fraud do not represent the total cost of fraud, as much remains undetected and or hidden. Investing in the appropriate strategies means that organisations can continue to increase their resilience to fraud as this is recognised as one of the most effective ways to reduce the risk of fraud.
- 6.2 Various organisations have seen an upturn in the reporting of fraudulent activity. Whilst this is to be expected, the full extent of fraud activity will not be known for some time and the total of losses are unknown. At this time it is difficult to say whether there is more fraud activity due to C19 or whether reporting has increased and fraud has just taken on a C19 cover, whereas prior it hid in many different guises. Below are some headlines from counter fraud teams across the country.
- 6.3 We know from previous experience that reported fraud is the tip of the iceberg and that most goes undetected and or unreported as it is a hidden crime.

### **Action Fraud**

- Animal lovers looking for pets in lockdown defrauded of nearly £300,000 in two months - Tuesday, 5 May, 2020
- Cyber experts shine light on online scams as British public flag over 160,000 suspect emails - Thursday, 7 May, 2020
- 260 reports of coronavirus-related TV Licensing emails so far this month - Wednesday, 27 May, 2020
- A total of £11,316,266 has been reported lost by 2,866 victims of coronavirus-related scams.
- Action Fraud have received 13,820 reports of coronavirus-related phishing emails. 12 June, 2020
- Over £16 million lost to online shopping fraud during lockdown - Friday, 19 June, 2020

### **Her Majesties Revenues and Customs (HMRC)**

- More than 10,000 COVID related phishing scams are being investigated by Her Majesty's Revenue & Custom (HMRC)

- In May alone more than 5,000 scams were reported to HMRC by the public. A rise of 337% if compared to March figures, when lockdown began. During the month, HMRC asked internet service providers to remove 292 scam websites to help combat the issue.

## GOV.UK

- Fraudsters are exploiting the spread of coronavirus (COVID-19) in order to carry out fraud and cybercrime. Police have reported an increase in coronavirus related scams.
- We are issuing an alert to help charities minimise the risk of becoming a victim of such frauds and cyber-attacks. All charities, but especially those providing services and supporting local communities during the coronavirus crisis, could be targeted by fraudsters.

## 7. Where can PCC customers get advice?

7.1 Detailed counter fraud advice is available online, including from these trusted sites. **Only use trusted sites and or those displaying that they are secure.** (site address starts with “https” or displays a padlock image next to the site address)

- [Scamsmart](#),
- [ActionFraud](#),
- [CIFAS](#),
- [TakeFive](#),
- [Citizens Advice](#),
- [Trading Standards](#)
- [National Cyber Security Centre](#).
- [Fraud Advisory Panel](#)

## 8. Conclusion

8.1 The DAP Counter Fraud Services Team can state that Plymouth City Council remains highly committed to its moral and legal duties to the public and that it effectively acts in line with its own ‘Plan, Mission, Value and Priorities’ where countering fraud is concerned.

8.2 Plymouth City Council has made provable Accumulated savings over the past 5 years in cashable and non-cashable savings of £6,196,659. 96 by countering fraud in all areas of its business.

8.3 Local authorities continue to face a significant and unprecedented fraud challenges. Official figures are dated, however the argument for protecting the public purse remains an ongoing priority. The National Fraud Authority (2013) estimated local authorities face the threat of £2.1bn fraud a year. In fact, the [Annual Fraud Indicator](#), produced by Crowe Clark Whitehill, estimates that figure may be as high as £7.8bn in 2017, out of a total of £40.4bn for the public sector as a whole. [The Government’s Economic Crime Plan](#) states that the numbers of fraud offences rose by 12% during 2018 to 3.6 million – constituting a third of all crimes in the UK.

It is therefore crucial to commend Plymouth City Council for the continued support and commitment that it shows in protecting the public purse year on year, especially during these extremely difficult times when every penny of public funding counts more than ever.

8.4 A full contact list for DAP Counter Fraud Services is available on **Appendix B**

## COUNTER FRAUD SERVICES TEAM CASE STUDIES



## Social Housing Fraudster Fined in Plymouth for unlawful sublet.



The Counter Fraud Services Team at Devon Audit Partnership are proud to report that in collaboration with Plymouth City Council (Legal Team) and Plymouth Community Homes staff, that another illegal sublet has ended and the perpetrator has been prosecuted, enabling another family home to be let out to those with a genuine entitlement who were waiting patiently on the housing list.

A woman living in Cornwall has pled guilty to an illegal sublet of her Plymouth Social Housing property for 5 years in court this week after admitting an offence contrary to the Prevention of Social Housing Fraud Act 2013 S2(1)

She left her Plymouth house in March 2014 to live with her partner in Cornwall who she later married and failed to inform her Social Landlord that she was moving out and that she would be allowing her grown up



children (who were not entitled to succession) to live there and pay the rent and utility bills, under her name.

In an attempt to hide the fact that she was acting illegally she continued to use her previous married name when dealing with authorities in Plymouth, but used her new married name when dealing with authorities in Cornwall.

She later allowed her daughter to pretend to be her in an attempt to obtain a mutual exchange so that she could obtain another social housing property by deception in the Plymouth area.

She was sentenced to a fine of £600, with a Victim surcharge of £60 and costs of £450 meaning she will have to repay £1,110.

Despite the evidence to the contrary the defendant maintained that she didn't know she was doing anything wrong, however the Magistrate stated "You also went to great lengths to disguise your behaviour" when passing sentence.

Social housing fraud is a blight on society at a time when social housing is at a premium. The monetary cost for this type of fraud is estimated to cost the public purse around £900 million annually, however the human cost for those in genuine need of a home is unmeasurable.

Katrina Robinson MBE, Solicitor and Chair of the Tenancy Fraud Forum stated that –

*"This is a fantastic result from the Devon Audit Partnership and clearly shows that they are resilient and determined to stop tenancy fraud in its tracks. It's quite clear that the tenant was fully aware that what she was doing was wrong and that her children had no need for a social home with the support and significantly reduced rent that comes with that.*

*This sends out a clear message that tenancy fraud is not a victimless crime and the property will now be allocated to a family who need the security of a social home. If you are committing tenancy fraud in Devon, then you will be investigated and risk a prison sentence and a large fine."*

## Plymouth woman admits 56 Fraud Act Offences to get a Social Housing property.



Just two weeks after our last success the Counter Fraud Services Team at Devon Audit Partnership are proud to report that in collaboration with Plymouth City Council (Community Connections and Legal Teams) and Plymouth Community Homes staff, that a Plymouth woman has been convicted of lying in an attempt to obtain a Social Housing property ahead of those with a genuine entitlement waiting patiently on the housing list.

The Plymouth woman who repeatedly lied about owning a property while trying to get social housing has been given an 18 month community order at Plymouth magistrates.

The 49 year old was also ordered to perform 20 rehabilitation activity days, seek mental health treatment as well as pay £450 costs and £85 victim surcharge.

Plymouth magistrates heard Wright applied to Devon Home Choice for a social housing property in September 2017 and gave an address history back to 2011 with no reference to a property in Kirkstall Close - which she jointly owned with an ex-partner.

The following month she presented as homeless and filled in forms which stated that she did not own a property or had an interest in one. In January 2018 she put in another Devon Home Choice application with an updated address as she had moved in with her parents. Again, she gave an address history dating back to 2011 but did not include the property she owned.

In total she placed bids on 43 properties before being offered a property from Plymouth Community Homes. Each time she bid she had to confirm her details were correct and that she understood it was an offence to use incorrect information.

In May 2018, she completed a pre-tenancy assessment with PCH, but a credit search showed up an active mortgage and the offer of a property was suspended.

Over the following weeks, she repeatedly denied she had a property or a mortgage. She even got in touch with her local councillor to complain her application had been suspended.

In June 2018 her case was passed on to the Counter Fraud Services Team at Devon Audit Partnership (DAP) to investigate. She continued to deny owning a property or having a mortgage until she was shown her own mortgage account information and the land registry details. At that stage she confirmed that she must still own the property, but as she split from her ex-husband, had assumed her details had been taken off the property.

She was, however, also shown her bank account information which showed her making payments towards the mortgage and receiving payments from tenants living in the property.

She still claimed no knowledge of some of the bank accounts and argued with investigators that she only had one account and may have forgotten to close another. It was only when investigators pointed out that cash point withdrawals were being made she finally confessed that she owned the property, had arranged for it to be rented out, was paying the mortgage and receiving rent for the property.

In mitigation, she said her relationship with her ex-husband had badly broken down and she no longer wanted to live at the property they owned. She also had a very poor credit history so private renting was not possible as she would not pass a credit check. She also suffered from mental health issues.

Plymouth City Council Cabinet member for Housing and Cooperative Development Councillor Chris Penberthy said: "We have a waiting list of around 10,000 households looking for somewhere to call home. If you already own a property, you must declare it. There may be compelling reasons why you can no longer use that property, but to just repeatedly lie time after time, is just not on."

"This is fraud. This is lying to gain an unfair advantage over others who are in need. We ask people to be honest when they fill in forms for a reason."

DAP will continue to act for Local Authorities across Devon and support the Devon Tenancy Fraud Forum where required in order to ensure that those in genuine need are not cheated by this type of selfish criminal behaviour.

## Appendix B

### Devon Counter Fraud Services Contacts

Name	Position	Telephone	Email
Ken Johnson	Counter Fraud Services Manager	01752 307625	<a href="mailto:Ken.johnson@plymouth.gcsx.gov.uk">Ken.johnson@plymouth.gcsx.gov.uk</a>

<b>Pete Burgoyne</b>	<b>Fraud Investigator</b>	<b>01752 305977</b>	<a href="mailto:Peter.burgoyne@plymouth.gcsx.gov.uk"><u>Peter.burgoyne@plymouth.gcsx.gov.uk</u></a>
<b>Paul Clayton</b>	<b>Fraud Investigator</b>	<b>01752 305249</b>	<a href="mailto:Paul.clayton@plymouth.gcsx.gov.uk"><u>Paul.clayton@plymouth.gcsx.gov.uk</u></a>
<b>Dina Williams</b>	<b>Fraud Investigator</b>	<b>01752 307619</b>	<a href="mailto:Dina.williams@plymouth.gcsx.gov.uk"><u>Dina.williams@plymouth.gcsx.gov.uk</u></a>
<b>Ashley Varley</b>	<b>Fraud Investigator</b>	<b>01752 304182</b>	<a href="mailto:Ashley.varley@plymouth.gcsx.gov.uk"><u>Ashley.varley@plymouth.gcsx.gov.uk</u></a>
<b>Sue Roach</b>	<b>Intelligence Officer</b>	<b>01752 307618</b>	<a href="mailto:Susan.roach@plymouth.gcsx.gov.uk"><u>Susan.roach@plymouth.gcsx.gov.uk</u></a>
<b>Rob Rogers</b>	<b>Compliance Officer</b>	<b>01752 398556</b>	<a href="mailto:Robert.rogers@plymouth.gov.uk"><u>Robert.rogers@plymouth.gov.uk</u></a>
<b>Fraud referral email address</b>			<a href="mailto:Corporatefraud@plymouth.gov.uk"><u>Corporatefraud@plymouth.gov.uk</u></a>
<b>Tenancy Fraud referral email address</b>			<a href="mailto:socialhousingfraud@plymouth.gov.uk"><u>socialhousingfraud@plymouth.gov.uk</u></a>
<b>Fraud Telephone referrals</b>		<b>01752 304450</b>	