

## **Audit and Governance Committee**

**Monday 20 March 2023**

### **PRESENT:**

Councillor Luggar, in the Chair.

Councillor Lowry, Vice Chair.

Councillors Stevens (substitute for Councillor Evans OBE) and Wheeler.

Apologies for absence: Councillors Evans, Tofan and Mrs Annette Benny (Independent Member).

Also in attendance: Brenda Davis (Audit Manager), Paul Dossett (External Auditor – Grant Thornton), Wendy Eldridge (Lead Accountancy Manager), Carolyn Haynes (Lead Accountancy Manager), Ross Jago (Head of Governance, Performance and Risk), Emma Jackman (Head of Legal Services), Paul Looby (Head of Corporate Finance), David Northey (Section 151 Officer), Giles Perritt (Assistant Chief Executive), Justine Thorpe (External Auditor) and Helen Rickman (Democratic Advisor).

The meeting started at 1.00 pm and finished at 3.10 pm.

*Note: At a future meeting, the committee 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.*

61. **Declarations of Interest**

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

62. **Minutes**

The Committee agreed the minutes of 16 January 2023 as an accurate record of the meeting.

63. **Chair's Urgent Business**

There were no items of Chair's urgent business.

64. **External Audit - Audit Progress Report and Sector Update**

Paul Dossett (External Auditor – Grant Thornton) presented the External Audit – Audit Progress Report and Sector Update and highlighted the following key points:

- (a) the audit of the Council's 2019/20 accounts was delayed by a historic issue surrounding the pensions transaction and a newer issue regarding the accounting of the Council's infrastructure assets; the latter issue had been resolved from a Governmental perspective due to a statutory override in place and guidance received from CIPFA. In terms of the pensions' transaction, discussions had taken place regarding this matter however the Council were required to consider the options available to them. The Section

151 officer was to put the options and implications paper to the Council's management to move the issue forward;

- (b) good progress had been made on the Council's 2020/21 financial statements; this would be presented to the Audit and Governance Committee in November 2023. Work into progressing the 2021/22 accounts had started;
- (c) the Public Accounts Committee met last week and considered the challenges of outstanding audits across the sector and the risks it posed to governance in local government. Local authorities and stakeholders (DLUHC, auditors, regulators, CIPFA) were encouraged to work together in order to accelerate signing off outstanding accounts.

In response to questions raised it was reported that –

- (d) there were no wider implications in terms of governmental action for having outstanding accounts however there was an increasing focus on the late audits and more detailed scrutiny on individual audits that were behind. The purpose of the statutory audit of accounts was to identify issues with the audit process. Grant Thornton were up to date with the Council's broader value for money responsibilities however issues and transactions may emerge from the Council's accounts that the external auditor had the responsibility to bring to the attention for those charged with governance – the external auditor wasn't able to do that fully for the late accounts and this was considered a risk;
- (e) as of 31 December 2022, there were approximately 600 outstanding audit opinions across the country for 2021/22 accounts and earlier. It was estimated that this figure had now reduced to approximately 500 with 50 local authority accounts for 2020/21 and earlier still outstanding;
- (f) the Council's Section 151 Officer highlighted the impact on the Council's finance team and the external auditor by having outstanding audits on their accounts in that they would be in a rolling audit position until all the outstanding accounts audits had been completed; the implications from the 2019/20 accounts would ripple through and potentially impact future accounting.

The Committee agreed to note the External Audit – Audit Progress Report and Sector Update.

65. **External Auditor - Housing Benefits Update - Verbal Update**

Justine Thorpe (External Auditor) provided Members with a verbal update on Housing Benefits.

Members were advised that the audit work for the housing benefits claim should have been signed off in January 2023 however there was an extension to the deadline for the 21/22 claim and work was expected to be completed for the end of April 2023. The 20/21 claim for housing benefit was signed off at the end of April 2022. It wasn't uncommon for the DWP to offer extensions to deadlines at this time.

The Committee agreed to note the External Auditor – Housing Benefits Update.

66. **External Auditor - Updated Auditor's Annual Report 20/21 and 21/22 (To Follow)**

Justine Thorpe (External Auditor) briefly presented the External Auditor Updated Auditor's Annual Report 20/21 and 21/22. Members were advised that detailed management responses to recommendations were included in the report and an extra action plan had been added.

Under this item David Northey (Section 151 Officer) advised Members that the 14 recommendations from the November report had been extracted and were included as a separate agenda item to be discussed later in the meeting.

The Committee agreed to note the External Auditor Updated Auditor's Annual Report 20/21 and 21/22.

67. **Audit Actions Review**

Paul Looby (Head of Corporate Finance) presented the Audit Actions Review report. The following key points were highlighted to Members:

- (a) the report had changed in frequency, with the agreement of the Chair, to a six monthly report due to the time it took for the audit actions to be implemented and also the resource commitment on Devon Audit Partnership;
- (b) 43% of the audit recommendations in the report were still outstanding however this compared to 47% outstanding the last time the report was submitted to committee for information;
- (c) 33% of the audit recommendations in the report were fully implemented however this compared to 40% fully implemented the last time the report was submitted to committee for information;
- (d) 24% of the audit recommendations in the report were partially implemented, however this compared to 13% partially implemented the last time the report was submitted to committee for information
- (e) the tables contained within the report detailed the recommendations and provided a summary position on those still outstanding.

In response to a question raised it was reported that the high number of recommendations associated with special guardianship orders was due to this being a complex area of work and monitoring. There were 39 recommendations, some of which were very detailed and linked to a specific piece of work that the service area had asked to be focused upon in detail. A range of service areas were involved and further changes were expected due to the recruitment of the new Strategic and Service Directors. A further piece of work to audit this area was expected in the near future.

The Committee agreed to note the Audit Actions Review.

68. **Informing the Audit Risk Assessment 2020/21**

Carolyn Haynes (Lead Accountancy Manager) presented the Informing the Audit Risk Assessment 2020/21 and highlighted the following key points:

- (a) the purpose of the report was to contribute towards an effective two way communication between the Council's external auditor and the Audit and Governance Committee, as those charged with governance;
- (b) the report covered important areas of the auditor's risk assessment where they were required to make enquiries of the Audit and Governance Committee under auditing standards and it covered fraud, risk assessment, related parties and accounting estimates. It was a management response to questions from the auditors; officers had discussed this with senior finance and legal officers to formulate the response.

In response to questions raised it was reported that –

- (c) the format of the report was set by the external auditor, it took officers a considerable amount of time to complete the form;
- (d) estimation uncertainty was specifically referred to as an issue for Members to be mindful of; it was highlighted that officers previously relied heavily upon estimates however this created a challenge from external audit. Part of the reliance on estimates was due to the time officers had to produce a statement of accounts document – the deadline this year would be 31 May 2023. The Section 151 Officer confirmed that any issues would be brought to the committee's attention.

The Committee agreed to note the Informing the Audit Risk Assessment 2020/21.

69. **14 Point Action Plan and Report**

David Northey (Section 151 Officer) presented the 14 Point Action Plan and Report. Members were advised that this report referred to the recommendations from the external auditor and was presented to committee as a standalone document for easier reference. It was highlighted that CIPFA accounting standards had recently been introduced and a Section 151 officer view had been applied as a desktop exercise and this would be brought to a future meeting for Members information.

In response to questions raised it was reported that –

- (a) in terms of the Council's reserves and if they were sufficient, it was confirmed that officers had been in conversation with the external auditors as to what was and wasn't counted as a reserve – officers were working on the balance and were to draft a new Medium Term Financial Strategy. There was assurance that there were balances;
- (b) the comment linked to recommendation 1 in the report, regarding the importance of Members being to make their own decisions as elected

individuals representing the people of Plymouth other than to just take the advice of the Section 151 Officer, was acknowledged. It was added that the Section 151 Officer himself sought advice from others and the language in recommendation could have demonstrated that more clearly.

The Committee agreed:

1. to note the responses to the 14 recommendations from the S151 Officer, as set out in the report;
2. to note the 1st Draft Desktop review of the CIPFA Financial Management Code.

70. **Internal Audit Plan 2023/24**

Brenda Davis (Audit Manager) presented the Internal Audit Annual Audit Plan 2023/24. The following key points were highlighted to Members:

- (a) page 102 of the report included a pie chart that reflected the spread of the Council's annual budget; in order to provide assurance to Members at the end of the financial year, there was a requirement to show a spread of audit work across all areas;
- (b) page 103 of the agenda demonstrated the thematic overview of audit coverage planned however it was highlighted that the approach taken for 2023/24 would be different to previous years audits in that it wasn't specified in great detail what was to be audited. The intention was for the programme of work to be developed as the year progressed as it was considered that officer were working in a rapidly changing environment and needed to be responsive to the needs and risks of the council;
- (c) whilst having a more flexible approach to the audit plan work, the key financial systems, areas defined around cyber assessment framework, user account management and grants certifications would still be included.

In response to questions raised it was reported that –

- (d) Audit work to be undertaken in relation to the office of the Director of Public Health would be discussed with Ruth Harrell as Director and her management team; as with previous years, a number of days was expected to be allocated to auditing this area of the council's responsibility;
- (e) Officers would be happy to consider how climate change works and its impact could be audited – this would be discussed with the Director for Place as to what areas of work auditors could be involved in.

The Committee agreed to review and approve the 2023/24 Internal Audit Plan.

71. **Whistleblowing Policy (To Follow)**

Emma Jackman (Head of Legal Services) presented the Whistleblowing Policy. The following key points were highlighted:

- (a) the policy was brought to committee for consideration on 30 September 2022 with proposed changes; at that meeting Members expressed concerns regarding the amendments made as it was considered that Members may potentially lose their right to whistle-blow. The report submitted before the committee included further amendments proposed that had been made subsequent to the last time presented to committee;
- (b) in terms of the report, there was legislative background to it - the Public Interest Disclosures Act 1998 introduced into the Employments Rights Act, protection for those in a work setting that wanted to raise concerns of malpractice with their employers. Under the legislation it gave rights to protection from unfair dismissal and any detriment arising from whistleblowing;
- (c) the Act defined who workers were and who the principles applied to. Nationally there was guidance from the Department for Business Energy and Industrial Strategy which gave examples of what a policy should commit to – this was taken into account as well as the report from the Public Concern at Work charity who produced a whistleblowing code of conduct which set out best practice for employers;
- (d) In the policy itself, the following paragraphs were specifically referenced to:
  - paragraph 1.2 – set out protection that specifically applied to employees only reflecting the law and the ability of the Council to act;
  - paragraph 1.3 – specific reassurance added for employees to the Council’s approach to whistleblowing;
  - paragraphs 2.1., 2.5 and 2.6 – explained the difference between employees and how the policy applied to them as opposed others including Councillors;
  - paragraph 2.8 – explanation of different policies the Council has and where appropriately used.

In response to questions raised it was reported that –

- (e) the Whistleblowing Policy had been through the Trade Unions on previous occasions – the amendments made to the policy were to clarify where the policy related to an employee or to another individual in another capacity, including a Councillor;
- (f) in terms of the policy, the Council wouldn’t take action against an Elected Member unless a standards complaint was made however the Council’s

scope in terms of outcomes was limited. It was confirmed that, in response to an example given, that if a Councillor was threatened with being removed from a committee because of whistleblowing action then that would be a matter for the political party to address.

The Committee agreed to note and approve the changes in the Whistleblowing Policy.

72. **Treasury Management Practices and Principles (To Follow)**

Wendy Eldridge (Lead Accountancy Manager) presented the Treasury Management Practices and Principles report. The following key points were highlighted:

- (a) in response to publicised items in the press, it was confirmed that the Council received regular guidance on the banking and financial market from its treasury management advisors, Arling Close and took account of the guidance provided. The Council had no financial transactions with either the Silicon Valley Bank or Credit Swiss and were advised, due to ongoing uncertainty in the financial market, to hold a maximum of 35 days duration of any unsecured bank deposits as a cautious temporary measure. Predominately the Council just held money within money market funds or the Barclays call account, therefore the Council was protected;
- (b) the CIPFA code of practice on treasury management required the Council to publish its practices, principles and schedules each year. The treasury management practices and principles were in place to ensure the Council's treasury management policy was adhered to and that working practices and controls were in place to meet the approved strategy;
- (c) the report set out 13 key treasury management practices (TMP) and reflected the updates to the treasury management code that was last reviewed in December 2021. The treasury management set out the policies and objectives and approach to risk management of all its treasury management activities and the manner in how the authority sought to achieve the policy. Each of the 13 treasury management practices set out the principal for each TMP and the schedule for how the authority applied its practices.

In response to questions raised it was reported that –

- (d) in terms of the prudential indicators, there had been some recommended additional indicators and these would be reviewed as part of the reporting structure to the Audit and Governance Committee in 2023/24;
- (e) in terms of the ethical characteristics of the organisations the Council borrowed from and invested in, guidance was provided by the Council's treasury management advisors, Arling Close; the Council was also reliant on managers within organisations they did business with to provide this information if requested. It was further added by Councillor Lowry that the Council had a treasury management working forum that had received a detailed presentation of the impact of climate change and the Council's

decisions upon its investments. There was a system in place within the Council and this was further developed by the market place.

It was suggested that the treasury management working group received an update at their earliest opportunity upon the implications of the banking crisis and the issue of ethical characteristics of the organisations that the Council borrowed from and invested in;

- (f) the Council used Barclay's bank for its daily transactions and they had gone public with their intention to carbon zero by 2030; they were considered to be a green bank and were open with their ethical intentions on their website;
- (g) it was noted that future updates upon the Treasury Management Practices and Principles should contain information upon what the Council was doing in respect of its climate change emergency in terms of its investments and borrowing and loans etc.

The Committee agreed:

1. to recommend that the Treasury Management Working Group received an update at their earliest opportunity upon the implications of the banking crisis and the issue of ethical characteristics of the organisations that the Council borrowed from and invested in;
2. to recommend that future update reports upon the Treasury Management Practices and Principles should contain information upon what the Council was doing in respect of its climate change emergency in terms of its investments and borrowing and loans etc.
3. to approve the Treasury Management Practices, Principles and Schedules for 2023/24 as set out in this report. *This will ensure compliance with the CIPFA Code of Practice for Treasury Management.*

### 73. **Review of Council Officers Code of Conduct**

Ross Jago (Head of Governance, Performance and Risk) presented the Review of the Council Officers Code of Conduct and highlighted the following key points:

- (a) the report was submitted to the committee following a request from Members to review the officers' code of conduct. The code of conduct had been a part of the Council's current constitution since it was reformatted in 2012; it was in place before the 2012 change to the constitution;
- (b) there was no statutory requirement for an officers code of conduct to be included in the Council's constitution; Government had twice looked at making it a statutory requirement but had so far refrained from doing so;
- (c) the code of conduct contained within the report had been compared to that of the Council's neighbours and unitary comparative authorities and was broadly in line with others and was similar to an officers code of conduct that



was launched back in 1994;

- (d) the Local Government Association whose predecessor body agreed the format for the officers code of conduct had not amended it since 1994; the policies and standards that reinforced and caused the implementation of the code of conduct, such as the Council's disciplinary and grievance policies and the whistleblowing policy which form the operational and enacting documents that underpin the code of conduct document.

In response to questions raised it was reported that –

- (e) in terms of political neutrality – there were certain posts that were politically restricted by law and therefore there were specific requirements on what those posts could and could not do; generally however, beyond that there were no restrictions on officers therefore the code was drafted in a way that achieved the balance of making sure that officers were sensible about how they approach their work where they're not political restricted whilst recognising that there weren't those restrictions on officers in law other than in certain cases;
- (f) in relation to the relationships between officers and Councillors, partly this would be picked up as part of the work being done on conflict of interest, as a relationship with a Councillor could be a conflict of interest – more guidance was being developed in terms of what needed to be declared and upon what basis. The code offered guidance and expectation whilst trying not to set down hard and fast rules that weren't otherwise imposed;
- (g) Plymouth's officers were used to serving different political parties when the political power changed on a fairly frequent basis. The code was designed to protect both officers and Councillors and a proactive approach would be taken if issues arose.

The Committee agreed –

1. to note the current Officer Code of Conduct as published within the constitution;
2. to note that a wider review of the constitution is underway and further reports will be provided to the Audit and Governance Committee concerning any further changes required to the Officer Code of Conduct / Protocol on Member and Officer Relations.

#### 74. **Review of Arrangements for Dealing with Complaints Through the Code of Conduct**

Emma Jackman (Head of Legal Services) presented the Review of Arrangements for Dealing with Complaints through the Code of Conduct report and highlighted the following key points:

- (a) the new code of conduct was adopted in March 2022 based on the Local Government Association (LGA) model code of conduct. At the time it was explained to Members that arrangements would follow in terms of updating

how standards complaints were dealt with. Different types of arrangements had been explored by the Monitoring Officer and a first draft had been produced for dealing with standards complaints;

- (b) the report attached to the agenda was an entirely new form of arrangements therefore track changes were not added to the document as it was not an amended document;
- (c) in terms of the legal position, the Council was required, under the Localism Act, to have arrangements in place for dealing with Councillor complaints. The legislation gave some detail as regards to what it must include but generally it was left to the discretion of each Council to determine how it would deal with standards complaints. One of the mandatory requirements was that any complaint must be in writing and must be considered in line with the arrangements. It was also mandatory that at the point of investigation, once an investigation had been conducted, the views of an independent person must be sought;
- (d) there had been a recent finding of the Social Care and Local Government Ombudsman in relation to the process for dealing with standards complaints. The Ombudsman didn't ordinarily get involved with standards complaints but chose to review a particular complaint that was referred to it; in the conclusion of the Ombudsman it was confirmed that every local authority should have in place clear arrangements, that an investigation against a Councillor in terms of its conduct could not be instigated by the Monitoring Officer unless there was a written complaint on the matter submitted to it in line with the arrangements, and that standards complaints must make clear what the allegations have been made and why in reference to the code of conduct;
- (e) in Plymouth City Council there was a consistent year on year rise in complaints since 2020; in 2017 to 2020 there were at the lowest 3 complaints and at the highest 11 complaints; in 2021 there were 29 complaints, in 2022 there were 53 complaints, and at the time of writing the draft report there had been 29 complaints from the start of the year to date; there was a need for some clarity on the procedure as there were some areas within the arrangements where it was considered not clear what would happen. The volume of complaints had led to a bottleneck in terms of dealing with them. The current arrangements didn't make clear the multi-stage approach or when an investigation commenced opposed to a fact find. If a decision could be made without a formal investigation then it would do so. Information was also provided on the role of the Standards Committee and the process for an informal resolution.

In response to questions raised it was reported that –

- (f) the list of sanctions at 11.1 in the report was not a statutory list; it was made up of what was included in the current arrangements as well as sanctions that were commonly used and referred to in the LGA guidance;

- (g) the independent person's opinion would always be a matter of record for the complaint – in the arrangements it was only intended to publish those complaints where the Member was found in breach. The primary reason for this was the public wouldn't necessarily know that a complaint had been made against a Member and it was general practice that where a Member was not found in breach then it wouldn't be published as releasing it, in itself, could cause damage in terms of reputation;
- (h) the role of an independent person was a statutory requirement; there were restrictions on the post in terms of their employment, and them not being a member of a political group. That was reflected in the terms and conditions that they signed up to. A report was due to be submitted to Council referring to this matter; the two people proposed were both politically independent, were both independent people for other local authorities and were established in terms of their practice and experience;
- (i) The arrangements were drafted in such a way whereby the Monitoring Officer was not compelled to publish a complaint where there had been a finding of no breach, however if it was a matter of public record or if the Member proactively wanted the decision published when it wasn't a bar to do that. Things would be considered on a case by case basis;
- (j) In terms of section 10.13 of the report, the new arrangements gave the Monitoring Officer less authority than she already currently had whereby the committee wasn't the decision maker at all and there was only a Standards Advisory Group which expressed its views to the Monitoring Officer. It had been changed to a Standards Committee as it was considered that there did need to be a degree of control. There could be a situation where a complainant may want their complaint to go to committee but it may not be appropriate. Some authorities had all their complaints where they were likely to be found in breach or recommended for breach, go to committee and the difficulty with that was the high volume of complaints and the potential for the committee to meet frequently with a heavy workload and the committee itself would be politically proportionate. If the Member was of the political group in overall control it would be tried by Members of its own group as the majority on the committee;
- (k) in terms of section 10.13(2) in the report, the conflict of interest was in relation to the Monitoring Officer – this would be amended to make it clear that it didn't link to the complaint;
- (l) approximately 4 months ago the proportion of complaints made from a member of the public against a Councillor, in comparison to a complaint made from a Councillor against another Councillor demonstrated an fairly equal split of 50/50; it was highlighted that some of the member of the public complaints were affiliated with Members of the Council.

The Chair made a suggestion that a meeting of the Constitutional Review Group was scheduled in order to consider a full review of the constitution in light of the issues discussed with regards to the code of conduct. The suggestion was also made in light of the following recommendations

from the 22 February 2023 Performance, Finance and Customer Focus Overview and Scrutiny Panel (minute 57):

1. to mandate the Monitoring Officer to work in conjunction with the Audit and Governance Committee to establish a sub group to review the petitions process as contained within the Council's Constitution in order to learn lessons moving forward;
2. to recommend to the Audit and Governance Committee, as part of their overall review of the Constitution, consider specifically the consultation and engagement approach and processes linked to petitions so that they were clearly defined and understood;

It was suggested that this process was undertaken in stages in that the Committee might consider approving the new arrangements now and considering this issue through the Constitutional Review Group after the May 2023 Election.

It was clarified by the Head of Governance, Performance and Risk that the Audit and Governance Committee did not have to wait until after the May election to establish a sub group as that provision was already a part of the Committee's terms of reference; it was suggested that the Committee might wish to wait until after the election as the membership of the Council might be different.

The Committee agreed

1. to amend the document at section 10.13(2) with regards to the reference to conflict of interest to clarify that this was specifically in relation to the Monitoring Officer and not the Member involved in the complaint;
2. to approve the amended arrangements for dealing with standards complaints (to comply with Section 28 of the Localism Act);
3. to include the review of the Council's Constitution to the Audit and Governance Committee's work programme for 2023/ 24 and to refer this review to the Committee's sub group for consideration. The review is to consider the code of conduct as part of this review.

75. **Risk Management Update/ Risk Register (To Follow)**

Ross Jago (Head of Governance, Performance and Risk) presented the Risk Management Update/ Risk Register report and highlighted the following key points:

- (a) the strategic risk register had updated the number of strategic risks currently managed at 22; six risks had a rating of red and these related to expenditure complexity of demand in children and young people, IT supply chain constraints, cyber-attacks, lack of adult social care workforce, accounting methods concerning a pension transaction and a new risk concerning sustainable drainage systems approval body which may need to be set up in 2024;
- (b) risk 17 concerning housing had its risk score decreased to nine and was now showing as green and the risk to vulnerable children and young people in the

- care system (risk number 6) was reported as green at the last two reviews and through discussion with the directorate was considered sufficiently mitigated so has been moved to the operation risk register for monitoring;
- (c) scrutiny panels continued to review strategic risks during their meetings; risk reporting was also part of the budget papers when the 2023/ 2024 budget was considered.

In response to questions raised it was reported that –

- (d) the risk of cyber-attack remained very high and this was addressed as such locally within the Council. This issue formed part of the scrutiny work programme and had been considered recently. Officers had been talking to Officer's at Council's that had been victim of a cyber-attack in order to learn valuable lessons. It was considered that there wasn't a absolute guarantee to prevent a cyber-attack on any large organisation however work was being undertaken to reduce the risk and enable the continuity of critical services to be delivered;
- (e) as per the risk management strategy there was an ongoing review of both the strategic risk register and the operational risk register which were both reported to the Corporate Management Team and Departmental Management Teams;
- (f) the risk register appeared of all scrutiny committee agendas – in terms of risk 19 (viability of commercial bus operators) and the potential for this to be discussed at the relevant scrutiny panel, this was possible however the panel's weren't due to meet for several months. Immediate concerns could be picked up outside of the meeting if required.

The Committee agreed to note the current position with regard to the Strategic Risk Register *(Reason: As part of the Committee's responsibility for monitoring the implementation and ongoing processes for identifying and managing key risks of the authority)*

76. **Tracking Decisions** (Pages 13 - 14)

Under this item Ross Jago (Head of Governance, Performance and Risk) referred Members attention to the additional report attached to this item of the agenda regarding the Electoral Cycle Consultation Review – this report linked to minute 60 of 16 January 2023 meeting whereby Members agreed the terms of reference and membership of the Group.

The Chair advised Members that he agreed at the previous meeting to write to the Chief Executive, Tracey Lee, to request urgent clarity on the issues raised with regards to voter ID at future elections, with specific focus upon plans for raising awareness for Plymouth residents and had received a response therefore this would be attached to the minutes for future reference. The Chair advised Members that as of Monday 13 March 2023, there were 247 VAC (voter authority certificate) applications received by the electoral department.

In response to a questions raised it was confirmed by Giles Perritt (Assistant Chief Executive) that, based on two studies undertaken by the Cabinet Office on a national basis it was considered that between 4% - 6% of the population had been estimated to not have valid photographic

identification – translating that figure from a national basis on a sample to Plymouth would equate to between 6000 – 8000 people. There was a local and national campaign with targeted advertising within the city to encourage people to apply for a VAC – this was targeted to specific areas of the city where it was considered that it would be less likely for residents to have a driving licence or passport. A reminder for photo ID would be sent out with polling card envelopes.

The Committee agreed:

1. to approve the methodology of the electoral cycle consultation as detailed in the report;
2. to approve the consultation question as follows –

**Which option would you prefer for Plymouth residents to elect their councillors?**

- Change to 'Whole Council Elections'
- Keep the current system
- I have no preference

3. to delegate to the Task and Finish Group the final approval of the communications approach in preparation of the communication campaign to begin ahead of the launch of the consultation on 5 June 2023. (Reason: To comply with the Council resolution of the 21 November 2022 (minute 24 refers);
4. to attach the response from the Chief Executive to the published minutes in relation to the Chair's request for urgent clarity on the issues raised with regards to voter ID at future elections, with specific focus upon plans for raising awareness for Plymouth residents.

77. **Work Programme**

The Committee noted the work programme.

### **Tracking Decisions Action Update:**

Action from 16 January 2023 Audit and Governance Committee – Minute 60:

“The Committee agreed that the Chair, Councillor Luggar, would write to the Chief Executive, Tracey Lee, and request urgent clarity on the issues raised with regards to voter ID at future elections, with specific focus upon plans for raising awareness for Plymouth residents.”

### **Response from Tracey Lee, Chief Executive**

Voters in English local elections this May will be required to show photo ID for the first time.

We have already begun our Voter ID awareness campaign which reinforces the Electoral Commission’s campaign

The Elections team have also started processing Voter ID applications, 35 as of 24 January 2023. We can confirm that straightforward applications take 2 minutes, applications with simple queries 8-10 minutes and for ones which requires further investigations or actions – requires at least 48 hours as these require corresponding with the elector.

Resources:

Plymouth City Council have been allocated £40K by the Cabinet office to assist us in new burdens for Voter ID, Accessibility, Training and Contact Centre costs. If the new burden funding allocation given to PCC does not cover the justified cost of Elections Act implementation, we will be able to apply for additional new burden funding via a justification led bid process.

PCC Elections team have now all been trained to process VAC applications. A definitive PCC working process map, based on the Cabinet Office. process map which has been enhanced/simplified after working through live applications, will be agreed in the next Election Board to make sure that all our process are robust, consistent and auditable.

We will be training a number of officers from the Chief Executive’s team (Democratic Support, EAs and PAs) to be part of the processing team during busy hours (pre-election period).

Full training platform will be given to all elections staff, especially for polling station staff and officers (e.g. Call Centre staff, Tactical team, Polling Station Inspectors) supporting them on the day, for the May 2023 elections.

Communications and Engagement:

Our Voter ID comprehensive communications and engagement plan is now fully operational. We are closely working with our City partners (Higher Education providers etc) in getting our core messages across:

- Register to Vote
- You will need an ID to vote in polling stations for the 2023 May elections

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- Setting out list of acceptable IDs
- How to apply for VAC
- You do not need an ID to vote if you are a postal voter

Voter ID and the issues/risks it might bring to Plymouth have been fully documented. Our work is to make sure that issues/risks we think might arise have clear and fully resourced mitigations. Voter ID and all the new processes/risks it might impose is not just a concern to Plymouth but for the entire nation. We are closely working with our colleagues in Devon and across the country, the Cabinet Office, the Electoral Commission and the Association of Electoral Administrators to make sure that all our concerns are recorded and listened to.