Appendix 1

Audit Committee 28 March 2023, agreed by Cabinet April 2023

Shapley Heath Management Review Action Plan

FROM LGA 'MANNY GATT' REPORT

ACTION	MANAGEMENT UPDATE
i. Cabinet roles and elected members responsibilities to protect and assure that the council operates effectively within its governance structures must not be altered by any future use of emergency powers.	Implemented. Constitution update March 2023 with the agreement of the three Group Leaders
ii. Informal and formal cabinet meetings should be structured so that portfolio holders keep cabinet members appraised of key projects, early alerts escalated and properly addressed through the council's governance procedures.	Implemented. The Leader attends all monthly meetings of Project Board. All Cabinet Members receive a monthly updated major Project List. It is discussed as a standing item at informal Cabinet. Directors/Service Managers also go through the Project List with Portfolio Holders at monthly 1-2-1 service meetings
iii. Clear lines of accountability, separating the duties of cabinet/portfolio holder, accountable officer, and project manager for each significant project.	Implemented. The Project Initiation Document (PID) template has been reviewed and changed to address this.
iv. Portfolio holder, accountable officer and project manager must meet regularly so that early alerts can be flagged. This is an essential element of the governance arrangements. Trust is important, with lead members having 'open book access' to all the	Implemented. The Leader attends all monthly meetings of Project Board. All Cabinet Members receive a monthly updated major project List. It is discussed as a standing item at informal Cabinet. Directors /Service Managers also go through the project list with Portfolio Holders at monthly 1-2-1 service meetings

information and be empowered to constructive challenge and ask ‘awkward’ questions of officers.	
v. All projects to operate within the existing governance arrangements including a more positive and proactive role for overview and scrutiny, using it to review outcomes, policy, and compliance to governance arrangements.	Agreed.
vi. vi. Expand the role of the Project Board so that cabinet members/portfolio members with major project responsibilities can be plugged in.	Implemented. The Leader attends all monthly Project Board meetings. All Cabinet Members receive a monthly updated major project List. It is discussed as a standing item at informal Cabinet. Directors/Service Managers also go through the project list with Portfolio Holders at monthly 1-2-1 service meetings

FROM STAFFING COMMITTEE

ACTION	MANAGEMENT UPDATE
A. The Council should review its Constitution and revisit the scheme of delegation to officers to ensure that in the event of a civil emergency, powers are used sparingly and only used to incur immediate expenditure, so as to provide support to the emergency services, and that there should be no prolonged or other use of emergency powers where the normal democratic structures of the Council are available and functioning.	Implemented. Constitution update March 2023 with the agreement of the three Group Leaders:
B. The Council must never again create a scenario where a major project is set up with governance	Agreed.

arrangements that move the project outside the Council's normal scrutiny process.	
C. All governance arrangements should make clear who has delegated authority and for what purpose.	Agreed
D. The Council's Whistleblowing Policy should be revised to ensure that there is confidentiality and the opportunity for independent assessment and review of any complaints made by a member of staff against any member of the Council's Strategic Leadership Team (SLT).	Implemented
E. Human Resources (HR), in consultation with Senior Management, should ensure that	Implemented
a) all roles within the Council have a current Job Description which is recorded on the relevant HR file	Audit of JDs completed July 2023
b) internal secondments should be for a maximum of two years only, with a clear return to original post and salary management plan effective at the time of appointment	This is now part of the normal staff approval process – HR ensure compliance with this requirement
c) no internal secondment opportunity should be agreed without a service and financial impact assessment being agreed with the 'donor' service.	This is now part of the normal staff approval process – HR ensure compliance with this requirement
d) all internal secondments should be advertised within the Council with a record kept as to why the post has not been advertised externally	This is now part of the recruitment process – HR advise the recruitment managers who should ensure compliance with this requirement

e) any appointment (whether internal or external) should clearly state how the post holder meets the specifications of the job description.	This is now part of the recruitment process – HR advise the recruitment managers who should ensure compliance with this requirement

FROM TIAA REPORT

Area identified in tiaa report	Recommendation from tiaa report	Management comment and action
Assurance over the risk management framework including governance and transparency.	1. Governance arrangements to be reviewed and once established and approved to be followed at all times	Agreed. The tiaa report found that the bespoke arrangements for this project were appropriate and adequate, however, they were not adhered to. Major projects now follow a standard approach with oversight from the corporate Project Board and reporting through the normal governance routes
	2. In line with good practice and the expectations set out in the Council's template PID document, action should be taken to ensure that a project risk register is produced and agreed for all projects, which is a live document and regularly reviewed and updated by the Project team. Significant risks and any mitigating actions should be appropriately reported and reviewed at the Project Panel.	Implemented. This is now in place for all projects meeting the criteria for Project Board, and for other minor projects where necessary
	3. All projects to have a clearly defined project board/panel which should meet on a regular basis to review risks and mitigations with minutes and actions	Implemented for all projects meeting the criteria for Project Board, and for other minor projects where necessary. Document retention will be reviewed

	recorded and retained for a minimum of six years.	as part of wider policy taking into account GDPR and retention policies (Information Commissioners document retention policy to be followed at all times)
Assurance over the project management framework used.	4. A lessons learned report should be produced, along with a separate action plan to improve project management processes at the Council, including (but not limited to) the following considerations: • Training needs should be identified to ensure that standard project documentation is utilised effectively in all cases, with additional guidance notes created where appropriate, in particular around monitoring risks, issues and budgets. • Where the standard project structure is not utilised, the PID should clearly set out the roles and responsibilities of each individual/team. Similarly, reporting lines should be clearly set out to enable at least the same level of review and scrutiny as there would be under the standard project structure. • Minutes of relevant project meetings should be formally recorded, and all relevant emails and other data should be maintained in project folders so that a full audit trail is maintained.	Lessons learned reporting is now in place for all projects meeting the criteria for Project Board, and for other minor projects where necessary. The Terms of Reference for Project Board now specifically refers to lesson learned, and Project Board meetings consider reports from project leads during and at the close of projects. All the detailed suggested improvements under recommendation 4 have all been applied where necessary and proportionate to the project's size and complexity and all working practices reviewed and adjusted accordingly.

	• The frequency, format and content of project reporting to the Corporate Project Board and to Members should be reviewed. Examples of good practice identified at other local authorities include: • Standardised monthly progress reports, with the level of details dependent on the complexity of the project. • For more complex projects, this may include: Details of approved budget, committed budget and actual spend; RAG ratings for key elements of the project (Time, Quality, Budget, Risks & Issues, Resources), along with an overview of the RAG status update; Activities completed within the last month, planned activities due for completion but not delivered, and activities scheduled for next month; An overview of the risks and issues, with the impact and mitigation measures; An outline of project milestones with target dates and actual completion dates. • For less complex projects, this may include RAG ratings for Time, Quality, Budget, Risks & Issues, and Resources, along with a general project progress update. • Project portfolio reporting including an overview of the progress of all corporate projects provided monthly to the Chief Executive.	

Assurance over budgetary control and financial risks.	5. Budgets to be clearly defined to include all income and expenditure (including any recharges).	Implemented. The Finance Business Partner implemented this to support the capital programme 2023/24 and the approach has been adopted for new schemes and future years' programmes.
Assurance over budgetary control and financial risks.	6. Budgets to be regularly monitored clearly showing actuals as the project progresses. In addition: See recommendation 4 in relation to reviewing the format and content of project reporting, including in relation to financial information	Implemented. Standard template being reported to project managers and Project Board. Capital spend by project also included in qtly monitoring to O&S and Cabinet
Assurance over the monitoring and reporting of financial information	7. Standard template documentation be used for the management and monitoring of all projects. In addition: See recommendation 4 in relation to (i) identifying training needs for the effective use of standard project budget monitoring documentation and (ii) reviewing the format and content of project reporting, including in relation to financial information.	Implemented. The Finance Business Partner that supports Project Board has designed a standard template documentation and this was agreed for implementation by Project Board
Assurance over compliance with contract procedure rules and contract management arrangements.	8. Procurement guidance and standard form evaluation documents should be reviewed to ensure that panel evaluation criteria are clearly set out and panel members are appropriately recorded.	Implemented Procurement guidance was reviewed in Dec 2022 and rolled out to Managers Group, this takes account of recommendation 8.

		New Contract Procedural Rules (CPR) were approved by Council in Feb 2023.
Assurance over compliance with contract procedure rules and contract management arrangements.	9. Training needs for project managers/buying managers in relation to procurement processes should be identified, to ensure that standard procedures are followed in all cases and full audit trails are maintained.	The new CPRs and accompanying guidance were presented to Managers Group in Jan 2023. Internal Audit on procurement completed in March 2023 undertook a sample check of procurements and found no CPR compliance issues.
Assurance over information governance arrangements to include FOI, Transparency and GDPR	10. As emails are only retained for one year, FOI processes should be reviewed to ensure that relevant data is moved from email folders to SharePoint folders so that a full audit trail of FOI requests and responses is maintained for a minimum six-year period from when the project ends.	Action not agreed by Audit Committee. There is no legal or operational justification for holding FOI information of 6 years. The relevant information is currently transferred from the email folder to Idox and the Retention and Disposal Schedule says that information relating to FOI/EIR requests is kept on Idox for 3 years from when the case is closed. There is no need to duplicate this in SharePoint. No change is therefore necessary. The current retention policy is longer that Information Commissioner Guidance which states thar all records should be deleted 12 months from the last substantive action. The Council otherwise has no

		lawful or operation reason to hold FOI data for longer – it would breach GDPR obligations. GDPR and operational necessity reasons would be required before any further document retention changes are considered.
Assurance over information governance arrangements to include FOI, Transparency and GDPR	11. Training needs for project managers in relation to FOI responses should be identified, to ensure that full and accurate responses are provided in all cases	Agreed. Annual FOI, Data governance, including GDPR, training is already in place for both members and offices. In this case, notwithstanding biennial refresher training, procedures were simply not followed.