

# **NOTICE OF MEETING**

### **GOVERNANCE & AUDIT & STANDARDS COMMITTEE**

# THURSDAY, 29 SEPTEMBER 2022 AT 10.00 AM

# **COUNCIL CHAMBER - THE GUILDHALL, PORTSMOUTH**

Telephone enquiries to James Harris on 023 9260 6065 Email: james.harris@portsmouthcc.gov.uk

If any member of the public wishing to attend the meeting has access requirements, please notify the contact named above.

# Public health guidance for staff and the public due to Winter coughs, colds and viruses, including Covid-19

- Following the government announcement 'Living with Covid-19' made on 21 February and the end of universal free testing from 1<sup>st</sup> April, attendees are no longer required to undertake any asymptomatic/ lateral flow test within 48 hours of the meeting; however, we still encourage attendees to follow the public health precautions we have followed over the last two years to protect themselves and others including vaccination and taking a lateral flow test should they wish.
- We strongly recommend that attendees should be double vaccinated and have received any boosters they are eligible for.
- If unwell we encourage you not to attend the meeting but to stay at home. Updated government guidance from 1 April advises people with a respiratory infection, a high temperature and who feel unwell, to stay at home and avoid contact with other people, until they feel well enough to resume normal activities and they no longer have a high temperature. From 1 April, anyone with a positive Covid-19 test result is still being advised to follow this guidance for five days, which is the period when you are most infectious.
- We encourage all attendees to wear a face covering while moving around crowded areas
  of the Guildhall.
- Although not a legal requirement, attendees are strongly encouraged to keep a social distance and take opportunities to prevent the spread of infection by following the 'hands, face, space' and 'catch it, kill it, bin it' advice that protects us from coughs, colds and winter viruses, including Covid-19.
- Hand sanitiser is provided at the entrance and throughout the Guildhall. All attendees are encouraged to make use of hand sanitiser on entry to the Guildhall.

• Those not participating in the meeting and wish to view proceedings are encouraged to do so remotely via the livestream link.

### Membership

Councillor Leo Madden (Chair)
Councillor Dave Ashmore
Councillor Stuart Brown
Councillor Judith Smyth
Councillor Benedict Swann
Councillor Daniel Wemyss

# **Standing Deputies**

Councillor Simon Bosher
Councillor Graham Heaney
Councillor Ian Holder
Councillor Mark Jeffery
Councillor Abdul Kadir
Councillor Scott Payter-Harris
Councillor John Smith

(NB This Agenda should be retained for future reference with the minutes of this meeting.)

Please note that the agenda, minutes and non-exempt reports are available to view online on the Portsmouth City Council website: www.portsmouth.gov.uk

Deputations by members of the public may be made on any item where a decision is going to be taken. The request should be made in writing to the contact officer (above) by 12 noon of the working day before the meeting, and must include the purpose of the deputation (for example, for or against the recommendation/s). Email requests are accepted.

#### AGENDA

- 1 Apologies for Absence
- 2 Declarations of Members' Interests
- 3 Minutes of the meeting held on 20 July 2022 (Pages 7 12)

RECOMMENDED that the minutes of the meeting held on 20 July 2022 be approved and signed by the Chair as a correct record.

# 4 Consideration of any matters or referral arising from the 27 September 2022 Meeting of the Scrutiny Management Panel

To consider any referral made to the committee by the Scrutiny Management Panel following its consideration of the call-in of the decision taken by the Cabinet Member for Planning Policy & City Development on 26 July 2022 in respect of item 4 on that agenda "Options for increasing Planning Committee Capacity"

'Link to Scrutiny Management Panel Agenda'

# 5 External Audit verbal update - change in risk assessment since presentation of 2021/22 Audit Planning Report

In our 2021/22 Audit Plan, presented to the 20 July 2022 meeting of the Governance and Audit and Standards Committee, we reported an inherent risk related to Infrastructure Assets. The background to this risk was reported in our Plan. We noted in our Plan that we would engage further with management in relation to this issue.

We have now discussed this in more detail with officers, to understand the current approach to accounting for these assets, and re-assessed the potential level of audit risk.

Having considered the matter further as a result, we have increased this to an area of significant risk for the audit, and it will be reported on as such in our Audit Results Report to a future GAS meeting. The change in risk arises from the size of the balance involved, and the degree of likelihood that gross values could be materially misstated based on our understanding of the granularity of the information available to the Council and the current processes to assess the accounting implications of this.

We would continue to highlight that this is a sector-wide issue impacting many Councils, and that work is ongoing by CIPFA and DLUHC to review the underlying accounting guidance, with a view to producing a possible short-term resolution to the issue.

# Treasury Management Monitoring Report for the First Quarter of 2022/23 (Pages 13 - 22)

### **Purpose**

The purpose of the report is to inform members and the wider community of the Council's Treasury Management position, ie. its borrowing and cash investments at 30<sup>th</sup> June 2022 and of the risks attached to that position.

Whilst the Council has a portfolio of investment properties and some equity shares which were acquired through the capital programme; these do not in themselves form part of the treasury management function.

### Recommendations

- (i) That the Council's Treasury Management activities have remained within the Treasury Management Policy 2022/23 in the period up to 30<sup>th</sup> June 2022 be NOTED; and
- (ii) That the actual Treasury Management indicators as at 30<sup>th</sup> June 2022 set out in Appendix A be NOTED.
- 7 Overview of Portsmouth City Council complaints, including Local Government and Social Care Ombudsman Complaints 2021/2022 (Pages 23 34)

### **Purpose**

To bring to the attention of the Governance & Audit & Standards Committee the Annual Review of Complaints by the Local Government and Social Care Ombudsman (LGSCO) dated 20<sup>th</sup> July 2022, regarding complaints it has considered against Portsmouth City Council for the year 2021/22, and to provide an overall review of complaints.

RECOMMENDED that the Governance Audit & Standards Committee notes the report.

8 Data Security Breaches Report (Pages 35 - 54)

#### Purpose

The purpose of this report is to inform the Committee of any Data Security Breaches and enable them to determine whether any trends appear and whether any further actions should be recommended.

### Recommendation

RECOMMENDED that the Governance & Audit & Standards Committee notes the breaches that have arisen.

9 Review of Polling Districts and Polling Places (Pages 55 - 88)

#### Purpose

The purpose of this report is to detail the outcomes of the review of polling districts and polling places recently undertaken and to invite members to consider the recommendations made.

### Recommendations

That the Governance & Audit & Standards Committee Recommends to

#### **Full Council:**

- (i) That the changes to the current polling scheme recommended in paragraphs 5.2 to 5.6 are approved and implemented on publication of the 2023 Register of Electors; and
- (ii) That it be reconfirmed that the Returning Officer has delegated authority to make such variations to polling places as may be necessary arising from the availability of premises for use at a particular election.
- 10 Internal Audit Performance Status Report to 31 August 2022 (Pages 89 116)

# <u>Purpose</u>

The purpose of this report is to update the Governance and Audit and Standards Committee on the Internal Audit Performance for 2022/23 to 31 August 2022 against the Annual Audit Plan, highlight areas of concern and areas where assurance can be given on the internal control framework.

#### Recommendation

**RECOMMENDED** that the Governance & Audit & Standards Committee NOTES:

- (i) The Audit Performance for 2022-23 to 31 August 2022; and
- (ii) the highlighted areas of concern in relation to audits completed from the 2022/23 Audit Plan, including follow up work performed.

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Whilst every effort will be made to webcast this meeting, should technical or other difficulties occur, the meeting will continue without being webcast via the Council's website.

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# Agenda Item 3

#### **GOVERNANCE & AUDIT & STANDARDS COMMITTEE**

MINUTES OF THE MEETING of the Governance & Audit & Standards Committee held on Wednesday, 20 July 2022 at 10.00 am at the Council Chamber - The Guildhall, Portsmouth

(NB These minutes should be read in conjunction with the agenda for the meeting which can be found at <a href="https://www.portsmouth.gov.uk">www.portsmouth.gov.uk</a>.)

#### Present

Councillor Leo Madden (in the chair)

Councillor Dave Ashmore Councillor Stuart Brown Councillor Judith Smyth Councillor Benedict Swann

#### Officers

Peter Baulf, City Solicitor
Elizabeth Goodwin, Chief Internal Auditor
Michael Lloyd, Finance Manager (Technical & Financial Planning)
Richard Lock, Procurement Manager
Kelly Nash, Corporate Performance Manager
Julian Pike, Deputy Director of Finance & S151 Officer
Paul Somerset, Deputy Chief Internal Auditor

#### **External Auditor**

David White, Manager, Assurance - Government and Public Sector, Ernst & Young

### 22. Apologies for Absence (Al 1)

Apologies were received from Councillor Daniel Wemyss. Councillor John Smith was in attendance as Standing Deputy.

### 23. Declarations of Members' Interests (Al 2)

Councillor Stuart Brown declared a personal interest in agenda item 6, Draft Annual Governance Statement, as his employer, Shaping Portsmouth, was mentioned within the document as a partner that worked with the Council.

### 24. Minutes of the meeting held on 4 March 2022 (Al 3)

RESOLVED that the minutes of the meeting held on 4 March 2022 be approved and signed by the Chair as a correct record.

# 25. External Audit Plan 2021-22 (Al 4)

# (TAKE IN REPORT)

David White from Ernst & Young, the Council's external auditors, introduced the report, which provided the committee with a basis to review on the proposed audit approach and scope for the 2021/22 audit in accordance with the requirements of the Local Audit and Accountability Act 2014, the National Audit Office's 2020 Code of Audit Practice, the Statement of Responsibilities issued by Public Sector Audit Appointments (PSAA) Ltd, auditing standards and other professional requirements.

The report set out the Risk Assessment, the work to address the risks and the timetable for the audit which was geared towards meeting the 30 November 2022 deadline.

The committee was advised that many of the risks remained consistent with the 2020/21 audit, however the following new risks had been added:

- Risk of fraud in revenue and expenditure recognition inappropriate recognition of trading and investment property income;
- New ledger system (Fusion); and
- Infrastructures Asset Valuation.

In response to a question about the significant risk attached to the council's investment property valuation of Lakeside it was confirmed that there were no specific concerns, but this area remained a significant risk due to the values associated to this investment. The risk category may in future be downgraded if there continued to be no concerns.

Following the discussion, it was RESOLVED that the committee NOTED the information only update report.

# 26. Internal Audit Performance Status Report to 20 July 2022 & Annual Audit Opinion 2021/22 (AI 5)

(TAKE IN REPORT)

Elizabeth Goodwin, Chief Internal Auditor, introduced the report which updated on the internal audit performance for 2021/22 to 20 July 2022 against the Annual Audit Plan, highlighted areas of concern and areas where assurance could be given on the internal control framework.

In addition to this the annual opinion on the effectiveness of the internal control environment was detailed in Appendix B. This opinion fed into the Annual Governance Statement and was a requirement of the Local Government Act 1999 and the Public Sector Internal Audit Standards.

The committee was advised that there was a national picture of increasingly sophisticated cyber-attacks, which had resulted in some procedures being upgraded to counter this risk.

Overall, 2021/22 had seen an improved level of assurance across the council with an overall rating of reasonable assurance. This was a very positive step and the first time in a decade that the council had achieved this overall rating.

In response to questions from the committee it was confirmed that:

- There were no specific concerns with the IT systems and processes in place to counter the cyber security threat.
- In relation to three areas of weakness relating to fire drills, stay put
  policy and checks on fire extinguishers it was explained that the
  reminders sent had not been effective in all cases. This would
  continue to be monitored closely and it was agreed that the committee
  would be informed of the areas of the council which had not complied;
- Income compensation claims would always result in a green rating due to the council's processes and the requirement for them to meet stringent conditions and signed off as compliant;
- In relation to the petty cash limits being exceeded quite regularly by Portico, there was an action to increase the safe limit because the existing limit was not sufficient.

### **RESOLVED that the Governance, Audit & Standards Committee NOTED:**

- (i) the Audit Performance and results for 2021/22 to 20 July 2022;
- (ii) any highlighted areas of concern in relation to audits completed from the 2021/22 Audit Plan, including follow up work performed; and
- (iii) the Annual Audit Report and Opinion for 2021/22.

### 27. Draft Annual Governance Statement (Al 6)

(TAKE IN REPORT)

Kelly Nash, Corporate Performance Manager, introduced the report which sought approval from the committee for the council's draft Annual Governance Statement (AGS) for 2021/22 (Appendix 1 to the report).

In response to a question about the focus of the document being more about improving processes, rather than outcomes, it was explained that the document was by necessity focussed more on procedures. However, the partner document, the narrative in the Statement of Accounts, would be more outcome based.

RESOLVED that the Committee APPROVED the draft Annual Governance Statement 2021/22.

### 28. Treasury Management Outturn Report 2021/22 (Al 7)

(TAKE IN REPORT)

Michael Lloyd, Finance Manager (Technical and Financial Planning), introduced the report, the purpose of which was to inform members of the council's treasury management activities in 2021/22 and of the council's treasury management position as at 31 March 2022.

In response to a question, it was confirmed that the council had operated within the agreed Treasury Management Policy to ensure the security of investments. With the predicted increases to the Bank of England base rate it was expected that slightly higher returns on investments would be realised going forwards.

RECOMMENDED that the actual prudential and treasury management indicators based on the unaudited accounts, as shown in Appendix B, be noted (an explanation of the prudential and treasury management indicators is contained in Appendix C).

# 29. Consideration of the political balance rules in relation to the constitution of Sub-Committees considering complaints against Members (Al 8)

(TAKE IN REPORT)

Peter Baulf, City Solicitor, introduced the report.

The Committee was asked to consider whether it wished to disapply the political balance rules in respect of its Sub-Committees and the Initial Filtering Panels which considered complaints against Members.

The committee had no questions in respect of this item.

RESOLVED that the political balance rules are disapplied in respect of Governance and Audit and Standards Sub-Committees which are considering complaints against Members and also the same arrangement should apply in respect of Initial Filtering Panel membership.

# 30. Exclusion of Press and Public (Al 9)

The Chair advised that proceedings would be kept open until such time as there was any discussion relating to the exempt appendices included in the report on the following item on the agenda and would move into exempt session at that point.

### 31. Procurement Management Information (Al 10)

(TAKE IN REPORT)

Richard Lock, Procurement Manager, introduced the report which provided evidence to allow the committee to evaluate the extent that Portsmouth City Council is producing contracts for goods, works and services in a legally compliant value for money basis.

The report also updated the committee on progress developing procurement performance reporting and sought comments in respect of proposed further developments.

### **Spend Compliance**

Through developments in the roll out of Oracle FUSION, the spend compliance report now encompassed spend processed across a range of Council systems rather than just spend via Oracle FUSION as was previously the case.

In respect of Oracle FUSION, when the sub £5k transactions or non-linked transactions to known contracts were removed the council was at the highest compliance levels that it had ever been at. Nothing of any concern had been identified in the non-compliant transactions above £100k.

The committee noted that further analysis would be undertaken on transactions outside of Fusion and links built into those transactions to give improved assurance to the committee going forwards.

The committee agreed to quarterly rather than monthly monitoring to bring the reports into line with others considered by the committee and that the financial transaction elements be slimmed down for the next report for the committee to judge how it compared to previous reports.

#### Waiver

The committee was advised that there were no waivers of high risk. There were a number of medium risk waivers, which in a large part were linked to a necessary extension of a supported living framework agreement in Adult Social Care which had affected contracts that sat under it.

It was recognised that work needed to be undertaken to reduce waivers, however the retendering of the supported living framework agreement was predicted to considerably reduce the number of waivers

# Contract Management KPI

The committee was advised that this report had been made clearer and had focussed on the contracts above £100k. Of those sampled there had been no red KPI's in the last quarter and 4% were amber. From the information

received in respect of the amber KPI's it appeared likely that these would be improved in the coming quarter.

The committee approved of the simplified approach to the report and was pleased to learn that there was service led contract management in place.

In response to a question about the impact of rising fuel and material prices it was explained that the impact varied by contract type. Some were set fee contracts; however, the suppliers were required to evidence best value. Some contracts were negotiated annually.

In terms of the budgetary effect on the council of the rising cost of fuel and energy the Deputy Director of Finance and Resources explained that the Q1 Monitoring report would be considered by Cabinet in September, however the Medium-Term Financial Strategy would potentially be impacted.

# **RESOLVED** that the committee **NOTED** the update report.

Councillor Leo Madden

The meeting concluded at 11.25 am.

Chair

# Treasury Managem A Q and Care and the First Quarter of 2022/23

Title of meeting: Governance and Audit and Standards Committee

**Date of meeting:** 29 September 2022

**Subject**: Treasury Management Monitoring Report for the First Quarter

of 2022/23

Report by: Chris Ward, Director of Finance and Resources (Section 151

Officer)

Wards affected: All

Key decision: No

Full Council decision: No

# 1. Executive Summary

This report outlines the Council's performance against the treasury management indicators approved by the City Council on 15<sup>th</sup> March 2022.

# 2. Purpose of report

The purpose of the report is to inform members and the wider community of the Council's Treasury Management position, ie. its borrowing and cash investments at 30<sup>th</sup> June 2022 and of the risks attached to that position.

Whilst the Council has a portfolio of investment properties and some equity shares which were acquired through the capital programme; these do not in themselves form part of the treasury management function.

#### 3. Recommendations

It is recommended that the following be noted:

- 3.1 That the Council's Treasury Management activities have remained within the Treasury Management Policy 2022/23 in the period up to 30<sup>th</sup> June 2022.
- 3.2 That the actual Treasury Management indicators as at 30<sup>th</sup> June 2022 set out in Appendix A be noted.

# 4. Background

The Council's treasury management operations encompass the following:

- Cash flow forecasting (both daily balances and longer-term forecasting)
- Investing surplus funds in approved cash investments
- Borrowing to finance short term cash deficits and capital payments
- Management of debt (including rescheduling and ensuring an even maturity profile)

The key risks associated with the Council's treasury management operations are:

- Credit risk ie. that the Council is not repaid, with due interest in full, on the day repayment is due
- Liquidity risk ie. that cash will not be available when it is needed, or that the ineffective management of liquidity creates additional, unbudgeted costs
- Interest rate risk that the Council fails to get good value for its cash dealings (both when borrowing and investing) and the risk that interest costs incurred are more than those for which the Council has budgeted
- Maturity (or refinancing risk) this relates to the Council's borrowing or capital financing activities, and is the risk that the Council is unable to repay or replace its maturing funding arrangements on appropriate terms
- Procedures (or systems) risk ie. that a treasury process, human or otherwise, will fail and planned actions are not carried out through fraud or error

The treasury management budget accounts for a significant proportion of the Council's overall budget.

The Council's Treasury Management Policy aims to manage risk whilst optimising costs and returns. The Council monitors and measures its treasury management position against the indicators described in this report. Treasury management monitoring reports are brought to the Governance and Audit and Standards Committee for scrutiny.

The Governance and Audit and Standards Committee noted the recommendations to Council contained within the Treasury Management Policy 2022/23 on 4<sup>th</sup> March 2022. The City Council approved the Treasury Management Policy 2022/23 on 15<sup>th</sup> March 2022.

#### 5. **Reasons for Recommendations**

To highlight any variance from the approved Treasury Management Policy and to note any subsequent actions.

To provide assurance that the Council's treasury management activities are effectively managed.

#### 6. Integrated impact assessment

An integrated impact assessment is not required as the recommendations do not directly impact on service or policy delivery. Any changes made arising from this report would be subject to investigation in their own right

#### 7. Legal Implications

The Section 151 Officer is required by the Local Government Act 1972 and by the Accounts and Audit Regulations 2015 to ensure that the Council's budgeting, financial management, and accounting practices meet the relevant statutory and professional requirements. Members must have regard to and be aware of the wider duties placed on the Council by various statutes governing the conduct of its financial affairs.

#### 8. Director of Finance and Resources (Section 151 Officer) comments

All financial considerations are contained within the body of the report and the attached appendices.

Signed b	y Director of	Finance and	Resources	(Section 151	Officer)

### Appendices:

**Appendix A: Treasury Management Monitoring Report** 

### Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

	Title of document	Location
1	Treasury Management Records	Financial Services



# **APPENDIX A**

# TREASURY MANAGEMENT POSITION FOR THE FIRST QUARTER OF 2022/23

### A1. SUMMARY OF TREASURY MANAGEMENT INDICTORS

The City Council approved the authorised limit (the maximum amount of borrowing permitted by the Council) and the operational boundary (the maximum amount of borrowing that is expected) when it considered the budget on 15<sup>th</sup> February 2022. The Council's debt on 30<sup>th</sup> June was as follows:

Prudential Indicator	Limit	Actual
	£m	£m
Authorised Limit - the maximum amount of borrowing permitted by the Council	1,009	759
Operational Boundary - the maximum amount of borrowing that is expected	995	759

The maturity structure of the Council's fixed rate borrowing was:

	Under 1 Year	1 to 2 Years	3 to 5 Years	6 to 10 Years	11 to 20 Years	21 to 30 Years	31 to 40 Years	41 to 50 Years
Minimum proportion of loans maturing	0%	0%	0%	0%	0%	0%	0%	0%
Maximum proportion of loans maturing	10%	10%	10%	20%	30%	40%	40%	40%
Actual proportion of loans maturing	1%	1%	4%	13%	14%	6%	34%	27%

The maturity structure of the Council's variable rate borrowing was:

	Under 1 Year	1 to 2 Years	3 to 5 Years	6 to 10 Years	11 to 20 Years	21 to 30 Years	31 to 40 Years	41 to 50 Years
Minimum proportion of loans maturing	0%	0%	0%	0%	0%	0%	0%	0%
Maximum proportion of loans maturing	10%	10%	10%	20%	30%	40%	40%	40%
Actual proportion of loans maturing	2%	2%	7%	11%	23%	25%	15%	15%

Surplus cash invested for periods longer than 365 days on 30<sup>th</sup> June 2022 was:

	Limit	Quarter 1 Actual
	£m	£m
Maturing after 31/3/2023	125	55
Maturing after 31/3/2024	50	9
Maturing after 31/3/2025	50	5

# **A2. GOVERNANCE**

The Treasury Management Policy approved by the City Council on 15<sup>th</sup> March 2022 provides the framework within which treasury management activities are undertaken.

There have been no breaches of these policies during 2022/23 up to the quarter ending 30<sup>th</sup> June 2022.

### A3. INTEREST RATE FORECASTS

The Council has appointed Link Group as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates.

The latest forecasts are shown below.

Link Group Interest Rate View	09.08.22												
	Sep-22	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25
BANK RATE	2.25	2.50	2.75	2.75	2.75	2.50	2.50	2.25	2.25	2.25	2.25	2.25	2.00
3 month ave earnings	2.50	2.80	3.00	2.90	2.80	2.50	2.40	2.30	2.30	2.30	2.20	2.20	2.20
6 month ave earnings	2.90	3.10	3.10	3.00	2.90	2.80	2.70	2.60	2.50	2.50	2.40	2.30	2.30
12 month ave earnings	3.20	3.30	3.20	3.10	3.00	2.90	2.80	2.70	2.40	2.40	2.40	2.40	2.40
5 yr PWLB	2.80	3.00	3.10	3.10	3.00	3.00	2.90	2.90	2.80	2.80	2.80	2.70	2.70
10 yr PWLB	3.00	3.20	3.30	3.30	3.20	3.10	3.10	3.00	3.00	3.00	2.90	2.90	2.80
25 yr PWLB	3.40	3.50	3.50	3.50	3.50	3.40	3.40	3.30	3.30	3.20	3.20	3.20	3.10
50 yr PWLB	3.10	3.20	3.20	3.20	3.20	3.10	3.10	3.00	3.00	2.90	2.90	2.90	2.80

PWLB is the Public Works Loans Board

After the Bank of England became the first major western central bank to put interest rates up in the current cycle in December, it has quickly followed up its first 0.15% rise by a further four 0.25% rises to 1.25% on 30<sup>th</sup> June 2022. The Bank of England raised its base rate by a further 0.50% to 1.75% in August. Link now expect a further 0.50% increase in September; another 0.25% increase in November and a further 0.25% hike in February.

Link view the markets as having built in, already, nearly all the effects on gilt yields of the likely increases in Bank Rate and the poor inflation outlook

#### A4. BORROWING ACTIVITY

No borrowing was undertaken during the first quarter of 2022.

The Council's gross borrowing on 30<sup>th</sup> June 2022 of £759m is within the Council's Authorised Limit (the maximum amount of borrowing approved by City Council) of £1,009m and within the Council's Operational Boundary (the limit beyond which borrowing is not expected to exceed) of £995m.

The Council plans for gross borrowing to have a reasonably even maturity profile. This is to ensure that the Council does not need to replace large amounts of maturing borrowing when interest rates could be unfavourable.

The actual maturity profile of the Council's borrowing is within the limits contained within the Council's Treasury Management Policy (see paragraph A1).

# Early Redemption of Borrowing

Debt rescheduling opportunities have been limited in the current economic climate and following the various increases in the margins added to gilt yields which has impacted PWLB new borrowing rates since October 2010.

Apart from two loans all the Council's borrowings to finance capital expenditure are fixed rate and fixed term loans. This reduces interest rate risk and provides a high degree of budget certainty.

The Council's borrowing portfolio is kept under review to identify if it would be financially beneficial to repay any specific loans early. Repaying borrowing early invariably results in a premium (early repayment charges) by the PWLB that are sufficiently large to make early repayment of borrowing financially unattractive to the Council.

No debt rescheduling or early repayment of debt has been undertaken during the first quarter of 2022/23 as it has not been financially advantageous for the Council to do so.

#### A5. INVESTMENT ACTIVITY

The Council's investments averaged £469m to 30<sup>th</sup> June. 95% of the Council's investments were in simple vanilla deposits, 3% was invested in long term managed funds and 2% was invested in a tradable collared floating rate note. The Council's investments made an average annualised return of 0.31% in the first quarter of 2022/23.

Available investment returns were low through the Covid pandemic but improved dramatically in the first quarter of 2022/23. This is shown in the table below.

Period	20/21 Q1	20/21 Q2	20/21 Q3	20/21 Q4	21/22 Q1	21/22 Q2	21/22 Q3	21/22 Q4	22/23 Q1
Long Term Managed Funds	24.28	38.16	25.97	-3.36	9.96	-2.84	1.2	-27.03	-20.59
Structured Notes	22.55	23.26	1.63	-3.06	-0.47	-1.84	0.37	-3.4	-10.74
Vanilla Deposits	0.98	0.43	0.45	0.22	0.27	0.45	0.77	0.61	1.16
Overall Return	2.02	1.66	0.94	0.08	0.42	0.28	0.77	0.02	0.31

When market interest rates increase, the returns available to investors also increase. This can be seen in the near doubling of the return on the Council's vanilla deposits in the first guarter of 2022/23. However, the returns on long term managed funds and tradable structured notes often move the other way. This can be seen in the first half of 2020/21 when the returns on vanilla deposits were falling, but the returns from long term managed funds and structured nates were increasing because the previous higher market interest rates had been locked into, causing these investments to trade at a premium above their face value. Conversely, in the first guarter of 2022/23, when returns on vanilla deposits increased, the returns on long term managed funds and structured notes fell because the previous lower market rates had been locked into, causing these investments to trade at a discount below their face value. Despite trading at a discount below their face value structured notes and the underlying investments in long term managed funds will still make the contractual payments of principal and interest providing that the underlying investments do not default. It can also be seen from the graph above that, although the returns on long term managed funds and tradable structured notes are volatile with returns sometimes being negative, overall, they have had a stabilizing influence on the investment portfolio, increasing overall returns when the returns on vanilla deposits have fallen, but reducing overall returns when the returns on vanilla deposits have risen.

Significant levels of downgrades to Short- and Long-Term bank credit ratings have not materialised since the crisis in March 2020. In the main, where they did change, any alterations were limited to Outlooks. However, as economies have reopened, there have been some instances of previous lowering of Outlooks being reversed.

Although CDS prices (these are market indicators of credit risk) for banks (including those from the UK) spiked at the outset of the pandemic in 2020, they have subsequently returned to near pre-pandemic levels.

# A6. COMBINED BORROWING AND INVESTMENT POSITION (NET DEBT)

The Councils net debt position on 30th June 2022 is summarised in the table below.

	Principal	Average Interest Rate	Interest to 30 <sup>th</sup> June 2022
Borrowing (including finance leases & private finance initiative (PFI) schemes)	£759m	3.40%	£6.45m
Investments	(£472m) *	(0.31%)	(£0.36m)
Net Debt	£287m		£6.09m

<sup>\*</sup>Although the Council's investments were £472m on 30<sup>th</sup> June 2022, the average sum invested over this period was £469m.

# Agenda Item 7



**Title of meeting:** Governance and Audit and Standards Committee

**Date of meeting:** 29 September 2022

Subject: Overview of Portsmouth City Council complaints, including

Local Government and Social Care Ombudsman Complaints

2021/2022

**Report by:** Assistant director of Corporate Services

Wards affected: All

Key decision: No

Full Council decision: No

# 1. Purpose of report

To bring to the attention of the Governance & Audit & Standards Committee the Annual Review of Complaints by the Local Government and Social Care Ombudsman (LGSCO) dated 20<sup>th</sup> July 2022, regarding complaints it has considered against Portsmouth City Council for the year 2021/22, and to provide an overall review of complaints.

### 2. Corporate complaint policy

The current corporate complaint policy sets out a two-stage process for corporate complaints, including timescales the council aims to adhere to when responding to complaints. The current policy and process has been in place since 1<sup>st</sup> December 2021, replacing the former three-stage complaints policy. The change to the policy was made following a review of complaints management and in line with best practice guidance from the LGSCO and was approved by this committee in September 2021.

The data in this report covers the period from April 2021 - March 2022. During the first eight months of the reporting period, complaints were managed under the old three-stage process. During the last four months of the reporting period, complaints were managed under the new two stage complaints process.

# 3. Corporate complaint system

Respond, the corporate complaints system, was introduced in August 2019, replacing an old IT system that had been built in-house. The Respond system enables significantly improved reporting around complaints. All the data for 2021/22 contained in this report



comes from the Respond system: comparative data from previous years comes from the old in-house system.

### 4. Corporate complaints resources

The council has one corporate complaints officer, based in the city helpdesk. The corporate complaints officer is supported in her role by senior customer service officers from the city helpdesk who help administer corporate complaints, in addition to their wider duties in the city helpdesk.

# 5. Corporate complaints overview

In 2021/22, the council managed 686 stage one, stage two and stage three complaints through the previous and existing corporate complaints process, set out in the current and previous corporate complaints policies (included in the background documents).

This compares to 384 complaints in 2020/21, 443 in 2019/20, and 531 in 2018/19.

Corporate complaints exclude complaints relating to Adult Social Care (ASC) and Children's Social Care (CSC), which are managed in line with separate policies and referenced in section 8 (below).

### 5.1. Stage one complaints

There were 553 stage one complaints in 2021/22.

Of those 553 stage one complaints, 380 were managed under the former three stage complaint process with 68% managed within the 10-working day timescale for response.

The remaining 173 stage one complaints were managed under the new two-stage complaint process with 83% managed in line with the 15-working day timescale for response set out in the new policy.

Corporate complaints are continuing to work with directorates to improve adherence to timescales. However, there are various legitimate reasons for delays, including officer capacity to investigate complaints and provide responses, particularly where complaints are very complex, as well as time taken to gather evidence. Where the council is unable to meet policy timelines, the customer is kept informed.

# 5.2. Stage two and stage three complaints

In 2021/22, 120 complaints were taken to stage two of the process.



Of the 120 complaints, 73 were managed under the former three-stage complaint process with 70% managed in line with the 15-working day timescale for response.

The remaining 47 complaints were managed under the new two-stage complaint process with 81% managed in line with the 20-working day timescale for response.

In 2021/22, 13 complaints were taken to stage three of the process compared with 24 complaints taken to stage three the previous year. The percentage of stage three complaints managed within the 20-working day timescale set out in the old policy was 71%, compared with 42% in 2020/21.

### 6. Complaint trends

This complaints review covers the period from April 2021 to March 2022.

There were 553 stage one complaints in 2021/22, compared with 309 stage one complaints in 2020/21. While the number of complaints in 2020/21 was lower because of the covid-19 pandemic, which impacted on overall demand, the number of stage one complaints handled last year is still higher than the 383 stage one complaints managed two years previously in 2019/20.

The overall number of stage two complaints also increased in 2021/22, with 120 complaints escalated to stage two of the process, compared with 51 stage two complaints the previous year.

The corporate complaints team have now implemented a new quality assurance process around stage two complaints, to ensure complaints are only escalated to the second stage of the process where there is a clear and justifiable reason to do so. Stage two complaint responses are also reviewed by corporate complaints, to ensure responses at what is now the final stage of the council's process fully investigate and respond to all the concerns raised by the customer.

The number of complaints escalated to stage three of the process during the period covered by the previous complaints policy decreased. There were 24 stage three complaints in 2020/21, compared with 13 stage three complaints in the eight months from April-November 2021/22.

The increase in the number of stage one and stage two complaints can be partially explained by the 139 complaints received about rubbish and recycling collections, which followed changes to collection rounds. The issues relating to rubbish and recycling collections have now been resolved.



There were also 141 complaints linked to the timeliness of the council's responses to customers in 2021/22, compared with 43 complaints categorised in this way in 2020/21. The increase can be partially attributed to known issues, including a backlog of planning applications that developed during the pandemic that the council has already taken steps to address, as well as increased demand for some services in the wake of the pandemic, for example housing needs and support. There was also a significant increase in the number of complaints around maintenance, from four complaints in 2020/21 to 55 complaints in 2021/22, again partially as a result of backlogs of work created by the pandemic.

As part of the new corporate complaints policy, the council has implemented quarterly reporting around complaints to ensure issues highlighted by complaint trends are brought to the attention of the chief executive, section 151 officer and monitoring officer, as well as shared with directors and their lead officers for complaints. The quarterly monitoring will enable closer scrutiny of complaints moving forwards and will allow overall trends to be identified and addressed earlier.

# 6.1. Policy timeline trends

In 2020/21, adherence to policy timelines for stage one and stage two complaints remained static, with 70% of complaints managed within the timescales set out in the policy.

In 2021/22, 68% of stage one complaints handled under the old policy were managed in line with timescales, compared with 83% of complaints handled under the new policy timescales. In 2021/22, 70% of stage two complaints handled under the old policy were managed in line with timescales, compared with 81% of complaints handled under the new policy timescales. In advance of making changes to the policy, the proportion of stage three complaints managed within timescales had improved significantly, increasing from 46% in 2020/21 to 71% from April-November 2021.

In reducing the number of complaint stages from three to two, the new complaint policy clearly allows more time for stage one and stage two complaints to be robustly investigated, while remaining within the LGSCO's recommended timelines for concluding the council's own complaint process. The change should result in on-going improvements to adherence to timescales, supported by on-going work by corporate complaints to monitor timeliness of responses and to engage lead and link officers in supporting complaint management in directorates.

### 6.2. Trends by directorate



As in previous years and as would be expected, the services with the highest numbers of complaints are those with the highest levels of front-line customer engagement.

# Table two: complaints by stages, by directorate 2021/22

Directorate	Stage	Stage	Stage	2021/22
	one	two	three	total
Children, Families	16	10	3	29
and Education				
Corporate Services	15	3	1	19
Culture, Leisure and	41	7	0	48
Regulatory Services				
Finance, Revenues	33	2	1	36
and Benefits				
Housing,	363	77	6	446
Neighbourhoods and				
Building Services				
Port	1	0	0	1
Public Health	0	0	0	0
Regeneration	82	20	3	105
Total	551	119	14	684

# 7. Compliments

The complaints process also allows for suggestions and compliments. In 2021/22, the council received 66 compliments through corporate complaints, compared with 87 in 2020/21.

Housing, Neighbourhoods and Building Services received the most compliments at 24, followed by Culture, Leisure and regulatory services with 12.

### 8. ASC and CSC complaints and compliments

Complaints for Adult Social Care (ASC) and Children's Social Care (CSC) are managed by a dedicated social care complaint team, in line with specific social care complaint policies.

### 8.1. ASC complaints and compliments

In 2021/22, ASC received 51 statutory complaints, a reduction on the 62 received in 2020/21. In addition to statutory complaints, there were 28 customer contacts and 5



contacts that were responded to under different procedures. They also received 44 enquiries from MPs or councillors.

ASC received 16 compliments.

### 8.2. CSC complaints

In 2021/22, CSC received 37 statutory complaints, 85 non-statutory complaints: an increase on the 16 statutory and 75 non-statutory complaints received in 2020/21.

CSC received 22 compliments.

# 9. LGSCO complaint review information

The ombudsman investigates complaints about all local authorities and social care providers in England. Every year it publishes the information it sends to councils to help with transparency and improve local services for residents.

While issuing the figures, the ombudsman is keen to point out that a high number of complaints do not necessarily mean a council is performing poorly. It may indicate an authority that welcomes and encourages feedback, through a transparent system which signposts people appropriately when its own processes have been exhausted.

# 9.1. Complaints and enquiries about Portsmouth City Council

The ombudsman received 38 complaints and enquiries about PCC in 2021/22 compared with 34 in 2020/21. During the same period, 12 decisions were made about complaints referred to the ombudsman about PCC, compared with 27 decisions in 2020/21.

Table five: complaints and enquiries to the LGSCO about Portsmouth City Council

Directorate		Num	ber of com	plaints rec	eived	
	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17
Adult Social care	5	7	5	9	7	10
Benefits and Tax	2	2	1	2	4	3
Corporate and Other	2	5	5	4	3	2
Service						
Education and Children's	12	7	8	10	13	10
Services						
Environmental Services	5	0	3	3	4	2
Highways and Transport	1	1	6	8	4	2
Housing	4	8	5	7	7	6
Planning and Development	5	3	1	2	4	6
Other	2	1	1	0	0	1



Directorate	Number of complaints received					
	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17
Total	38	34	35	45	46	42

# 9.2. Decisions made about complaints relating to Portsmouth City Council by the LGSCO

The LGSCO investigated 12 cases and upheld 33%, this compares to an average of 62% of cases upheld in similar authorities (as defined by the LGSCO). The Ombudsman was satisfied PCC had successfully implemented its recommendations in 100% of cases, compared with recommendations successfully implemented in 100% of cases in similar authorities. The LGSCO found the council had not provided a satisfactory remedy in any of the four upheld cases before the complaint reached the ombudsman: this compares to the average for similar authorities where 29% of upheld complaints have already been satisfactorily remedied prior to LGSCO intervention.

Table six: decisions made by the LGSCO about complaints relating to Portsmouth City Council

	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17
Upheld	4	2	6	8	9	7
Not Upheld	8	2	5	8	3	5
Advice given	2	4	0	2	5	1
Closed after initial enquiries	17	10	15	13	13	13
Incomplete/Invalid	4	1	3	0	1	2
Referred for local resolution	11	8	11	12	15	11
Total	46	27	40	43	46	39

# 9.3. LGSCO complaints: comparisons to other local authorities

The LGSCO now focuses on the following comparison data for local authorities: the number of detailed investigations and the number of complaints upheld, the percentage of cases where the ombudsman's recommendations were successfully implemented, and the percentage of cases where the local authority had implemented a satisfactory remedy before the complaint reached the ombudsman.

The below table provides data for Portsmouth City Council alongside data from comparable local authorities in Southampton, Luton and Brighton.

Table seven: LGSCO complaints data for Portsmouth City Council in comparison to other local authorities



	Portsmouth	Brighton and Hove	Luton	Southampton
Number of complaints investigated	12	28	17	7
Number of complaints upheld	4	21	12	3
% cases where LGSCO recommendations implemented	100%	100%	100%	100%
% of upheld cases where satisfactory remedy implemented before the complaint reached LGSCO	0%	19%	0%	67%

# 10. Upheld complaints

The following section includes a summary of the complaints upheld by the LGSCO.

# 10.1. Antisocial behaviour

### LGSCO complaint number 21 003 296

https://www.lgo.org.uk/decisions/environment-and-regulation/antisocial-behaviour/21-003-296

Decision date: 17 December 2021

Summary: The LGSCO found the council was at fault in this case because of delays in responding to Mr X's complaints about a suspected unlicensed HMO and anti-social behaviour by its residents, as well as failing to respond to a further complaint about misuse of and blocking of his bins. The LGSCO found the faults caused avoidable time and trouble and frustration to Mr X. The council has now apologised to Mr X, made a payment to Mr X in respect of the time and trouble, and has put staff training in place to make improvements to the way the complaints that involve multiple teams across directorates are better coordinated to avoid similar issues in the future.

# 10.2. Disabled facilities grants LGO complaint number 20 007 473

https://www.lgo.org.uk/decisions/adult-care-services/disabled-facilities-grants/20-007-473

Decision Date: 16 Dec 2021

Summary: Miss B complained about the way the council had considered her application for a hard standing and dropped kerb. Miss B said she needs parking next to her house due to her medical conditions, but said the council was unprofessional and did not properly assess her application. The ombudsman found fault in the council's occupational therapy



policy for being overly prescriptive around specific conditions that it said needed to be met in relation to disabled facilities grants, rather than looking at the full circumstances and the person's individual needs. The ombudsman also found fault because the council did not initially inform Miss B that she was entitled to a full occupational therapy assessment, although an offer of a full assessment was made later in the process and found fault in the way the council communicated with Miss B over the issue.

The council has now apologised to Miss B for the way her case was handled, made a formal offer of a full occupational therapy assessment, and made a payment to Miss B in recognition of the distress caused. The council has now also reviewed and updated its occupational therapy policy.

### 10.3. Commercial and contracts

# LGO complaint number 20 008 105

https://www.lgo.org.uk/decisions/other-categories/commercial-and-contracts/20-008-105 Decision Date: 25 Jun 2021

Summary: Mr C said the council had failed to properly complete a tender process in which Mr C was unsuccessful, which left Mr C with uncertainty about whether the outcome would have been different if the process had been properly completed. The ombudsman found the tender process was flawed but was unable to determine that the outcome would have been different had the tender process been correctly applied. The ombudsman found this left Mr C with some uncertainty, frustration and upset at the flawed process. The council has now apologised to Mr C and made a payment in recognition of the uncertainty, frustration, time and trouble. The council has also taken steps to improve procurement processes to prevent future problems, for example the tender process is now assessed by a cross Council panel of officers.

#### 10.4. Enforcement

### LGO complaint number 20 003 465

https://www.lgo.org.uk/decisions/planning/enforcement/20-003-465

Summary: Mr X complained about the council's decision to suspend a planning enforcement investigation, pending the submission of a planning application by the owner/operator of a business. Mr X said the business had breached conditions of its planning permission and wanted the council to take enforcement action on the planning breaches as well as enforcement action on parking restrictions. The ombudsman found fault in the council's consideration of evidence provided by Mr X of the issues with the business, and that failure to consider evidence did not align with the council's advice to the business to apply for planning permission for a change of use. The council has agreed to increase parking enforcement action, and to make a payment to Mr X for time and trouble.



# 11. Summary

The number of complaints handled by the council increased significantly in 2021/22 compared with previous years. While the LGSCO is clear that numbers of complaints are not necessarily indicative of poor performance by a council and can indicate an organisation that is open to feedback, it is clear the council needs to ensure insight from complaints is highlighted within the organisation so issues can be responded to.

Quarterly complaints reports have already been introduced as part of the new policy and are shared with the chief executive and directors to ensure issues are identified and addressed. The quarterly reports are also published on the council website to increase transparency.

The corporate complaints officer continues to work with directorate lead and link officers for complaints, with a focus in 2022/23 on increasing the % of complaints managed within timelines and improving complaint responses at stage one so fewer complaints need to be escalated through the process.

PCC continues to compare well to other similar local authorities in relation to its performance around LGSCO complaints. However, the number of complaints upheld by the LGSCO will be monitored closely over the 2022/23 period to make sure the new two stage complaint process is as robust as the old three stage process and is not resulting in more upheld ombudsman complaints.

Signed by:		
Appendices: Nil		

Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title of document	Location



Portsmouth City Council:	https://www.portsmouth.gov.uk/services/council-and-
Corporate Complaints Policy	democracy/your-say/complaints/corporate-complaints-
	policy-2021/
Southampton City Council	https://www.lgo.org.uk/your-councils-
LGSCO complaints data	performance/southampton-city-council/statistics
Luton Borough Council	https://www.lgo.org.uk/your-councils-
LGSCO complaints data	performance/luton-borough-council/statistics
Brighton and Hove City	https://www.lgo.org.uk/your-councils-
Council LGSCO complaints	performance/brighton-hove-city-council/statistics
data	

The recommendation(s)	set out above were approved/ approved as amended/ deferred/
rejected by	on
Signed by:	



# Agenda Item 8



# THIS ITEM IS FOR INFORMATION ONLY

(Please note that "Information Only" reports do not require Integrated Impact Assessments, Legal or Finance Comments as no decision is being taken)

Title of meeting: Governance & Audit & Standards Committee

Subject: Data Security Breaches Report

Date of meeting: 29 September 2022

Report by: Elizabeth Goodwin, Senior Information Risk Owner

Wards affected: All

# 1. Requested by

Governance & Audit & Standards Committee

### 2. Purpose

To inform the Committee of any Data Security Breaches and enable them to determine whether any trends appear and whether any further actions should be recommended.

### 3. Information Requested

The appendix provides an overview of the breaches that have occurred since March 2022

70% of all incidents were as a result of human error. In each case, if the member of staff concerned had not completed the mandatory Data Protection e-learning within the last 12 months, they were required to do so.

There was an increase in this reporting period of breaches caused by inappropriate action taken by staff (i.e. not complying with council policies and/or procedures). The Information Governance team has worked with the respective areas of the council to ensure staff are aware of the correct procedures so that similar errors are not repeated.

It is planned that a regular series of messages goes out to all staff (using the "In The Know" communication, to raise awareness of data breaches and how they can be avoided.

Two of the incidents in the reporting period reached the threshold for reporting to the Information Commissioner's Office (ICO). In both cases, the incident involved records



# THIS ITEM IS FOR INFORMATION ONLY

(Please note that "Information Only" reports do not require Integrated Impact Assessments, Legal or Finance Comments as no decision is being taken)

being accessed by individuals without a business need to. The first of these incidents involved a member of staff employed by the council and the formal action policy was instigated. The ICO confirmed it was satisfied with our investigation, that all necessary actions had been taken and considered the case closed.

The second of these breaches related to a member of staff employed by one of the council's contractors and the outcome from the ICO is still awaited.

The council takes these matters very seriously and a number of measures are in place to deter staff from inappropriately accessing records, for example:-

- Access to the case recording system used by Children's Social Care (Mosaic) is regularly audited to identify anomalies in access to records and any concerns are followed up by the relevant manager.
- Highly detailed reports can be run to show who accessed the system and what information was viewed.
- All staff in social care sign a declaration before being granted access to the system, stating they will not access records unless they have a business need to. A reminder of this will be sent.

The highest number of breaches continue to be caused by emails being sent to the wrong recipient. This is consistent with national trends as reported by the Information Commissioner's Office. The council is currently working on the next phase of the rollout of Microsoft 365 which will include Data Loss Prevention Tools. A set of bespoke rules will be created to examine email messages and files for pre-defined sensitive information and either display a warning to the user to check the information and recipient or actively block the email or file sharing from taking place. The council is confident this will significantly reduce the number of errors.

Following a request from the Governance & Audit & Standards Committee, some additional information is included in this report relating specifically to data breaches in Children's Social Care as it was noted the number of incidents in this area is typically higher than others.

This is thought to be due to a number of factors:-

- The culture encouraged by the Director of Children's Services & Education, the Caldicott Guardian and Senior Management Team whereby officers feel they can proactively report incidents
- The large volume of personal data being processed
- The frequency with which communications are sent outside the council



### THIS ITEM IS FOR INFORMATION ONLY

(Please note that "Information Only" reports do not require Integrated Impact Assessments, Legal or Finance Comments as no decision is being taken)

All breaches are robustly investigated by a senior manager and overseen by the Caldicott Guardian with involvement from the Director when necessary. This has proved to be to the satisfaction of the Information Commissioner's Office when cases have been reported.

Monthly meetings are held between the Caldicott Guardian and the Information Governance Team to identify areas of concern and provide advice, guidance and training to staff to minimise the risk of breaches re-occurring. Procedures are always reviewed to see if changes can be made to reduce the need to process personal data and therefore the risk of disclosing it in error.

The Information Governance Team will continue to work with all areas of the council to reduce the number of breaches and report to this committee.

Signed by (Director)	
Appendices:	
One Appendix - Appendix A	

Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title of document	Location
None	





**Data Breaches March to August 2022** 

### **Executive Summary**

This report has been prepared to provide an update on data breach incidents for the period from March 1 2022 to August 31 2022.

Clear guidance is provided to staff, via training and Policy Hub, regarding what constitutes a potential data breach and the steps they should take when a potential data breach is identified.

The Council's response to potential data breaches is managed by a central team, following the stages summarised below:

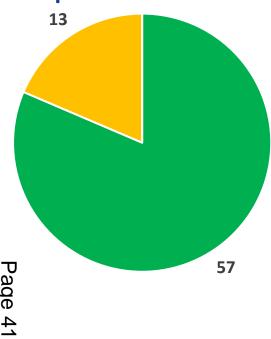
- Notification to central team.
- Initial assessment by central team.
- Escalation to the Senior Information Risk Owner SIRO (Chief Internal Auditor) if necessary; this may lead to the Information Commissioner (ICO) being notified, dependent on the severity of the incident.
- Remedial action, for example corrective action, training, revised processes and potential disciplinary action.

Overall there have been 70 data breaches, 57 being notified to the central team in under 72 hours and 2 requiring notification to the ICO. Responses by the ICO are shown below:

Agtion	Number
further action	1
Issue of an Information Notice requiring additional information for the case to be considered)	0
Issue of and Enforcement Notice (requiring the organisation to sign an agreement to confirm certain actions will be carried out)	0
Issue of and Assessment Notice (requiring the inspection of records or premises)	0
Issue of a Court Order (for failing to comply with a notice)	0
Issue of a Penalty Notice (a monetary penalty)	0
Prosecution	0
Awaiting Outcome	1

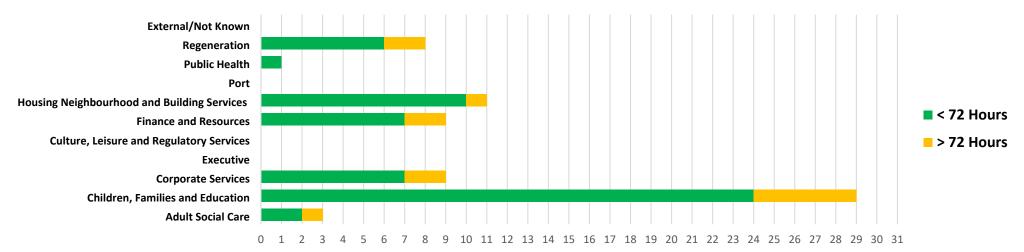
A detailed breakdown of data breaches is provided at the end of this report.

### Response Time



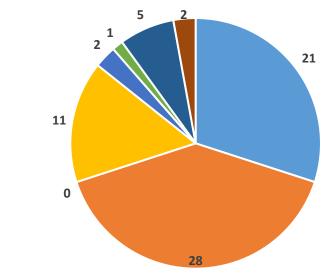
	< 72 hours	> 72 hours	TOTAL
Adult Social Care	2	1	3
Children, Families and Education	24	5	29
Corporate Services	7	2	9
Executive	0	0	0
Culture, Leisure and Regulatory Services	0	0	0
Finance and Resources	7	2	9
Housing Neighbourhood and Building Services	10	1	11
Port	0	0	0
Public Health	1	0	1
Regeneration	6	2	8
External/Not Known	0	0	0
TOTAL	57	13	70

Response time is the time taken for the central team to be notified by the service within which the breach has taken place. ICO guidance is that this should take place within a maximum72-hour timeframe.



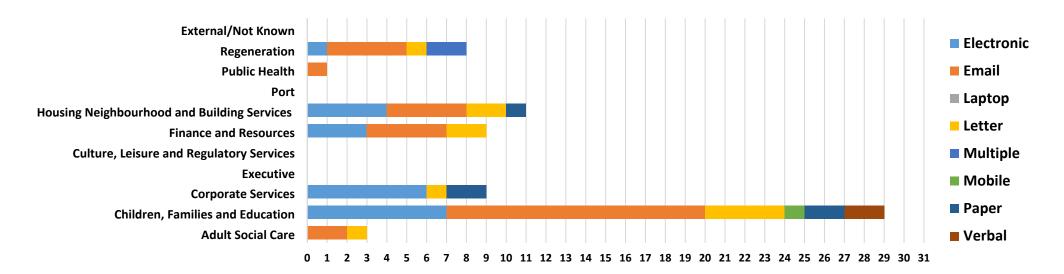
### Medium

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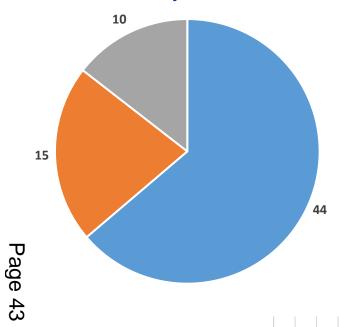


	Electronic	Email	Laptop	Letter	Multiple	Mobile	Paper	Verbal	TOTAL
Adult Social Care	0	2	0	1	0	0	0	0	3
Children, Families and Education	7	13	0	4	0	1	2	2	29
Corporate Services	6	0	0	1	0	0	2	0	9
Executive	0	0	0	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	0	0	0	0	0	0	0	0	0
Finance and Resources	3	4	0	2	0	0	0	0	9
Housing Neighbourhood and Building Services	4	4	0	2	0	0	1	0	11
Port	0	0	0	0	0	0	0	0	0
Public Health	0	1	0	0	0	0	0	0	1
Regeneration	1	4	0	1	2	0	0	0	8
External/Not Known	0	0	0	0	0	0	0	0	0
TOTAL	21	28	0	11	2	1	5	2	70

These refer to the format in which the data breach occurred. Often data breaches can occur across multiple mediums. Where this is the case data breaches are recorded against 'multiple' on this page, with more detail provided on the detail summary, towards the back of this report.

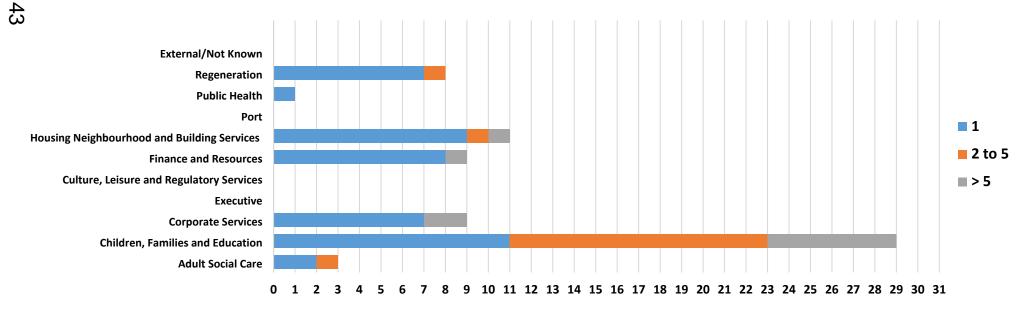


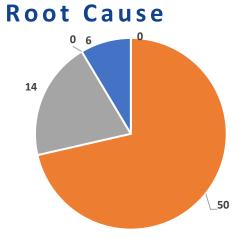
## **Number Impacted**



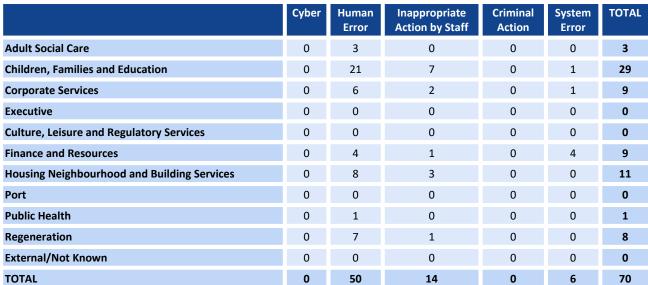
	1	2 to 5	> 5	TOTAL
Adult Social Care	2	1	0	3
Children, Families and Education	11	12	6	29
Corporate Services	7	0	2	9
Executive	0	0	0	0
Culture, Leisure and Regulatory Services	0	0	0	0
Finance and Resources	8	0	1	9
Housing Neighbourhood and Building Services	9	1	1	11
Port	0	0	0	0
Public Health	1	0	0	1
Regeneration	7	1	0	8
External/Not Known	0	0	0	0
TOTAL	45	15	10	70

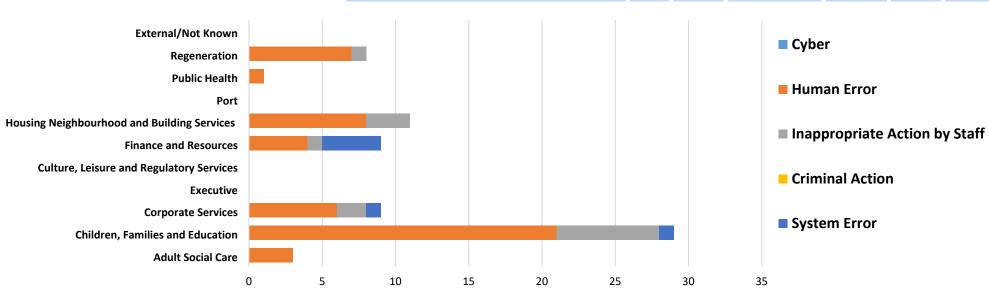
Totals refer to the number of individuals either confirmed or likely to have been impacted.



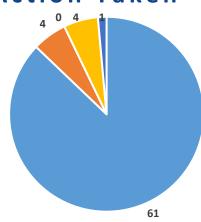


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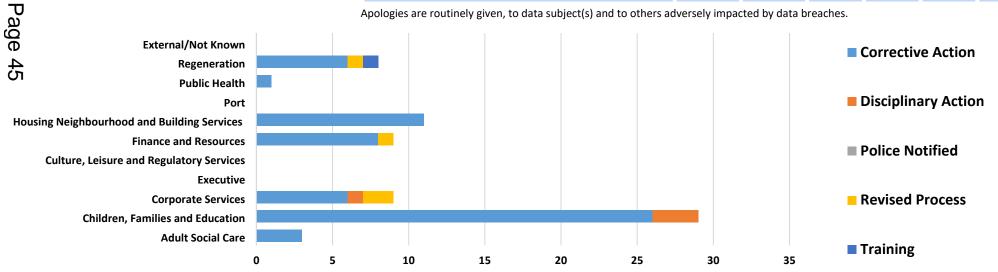




# Action Taken



	Corrective Action	Disciplinary	Police Notified	Revised Process	Training	TOTAL
Adult Social Care	3	0	0	0	0	3
Children, Families and Education	26	3	0	0	0	29
Corporate Services	6	1	0	2	0	9
Executive	0	0	0	0	0	0
Culture, Leisure and Regulatory Services	0	0	0	0	0	0
Finance and Resources	8	0	0	1	0	9
Housing Neighbourhood and Building Services	11	0	0	0	0	11
Port	0	0	0	0	0	0
Public Health	1	0	0	0	0	1
Regeneration	6	0	0	1	1	8
External/Not Known	0	0	0	0	0	0
TOTAL	61	4	0	4	1	70



# **Data Breaches Summary**

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022020	Corporate Services	Υ	N	Human Error	Corrective Action	Customers details emailed to the wrong customer
DB2022021	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Rent letter sent to incorrect address
DB2022022	Regeneration	Y	N	Inappropriate Action by Staff	Training	Incorrect address input onto system resulting in letter being sent to wrong address.
DB2022023	Children, Families and Education	Υ	N	Human Error	Corrective Action	Letter sent to wrong address
<b>9</b> B2022024 (D	Children, Families and Education	Υ	N	Human Error	Corrective Action	Court order sent to incorrect person due to illegible handwriting of member of public
A O) DB2022025	Housing Neighbourhood and Building Services	Y	N	Inappropriate Action by Staff	Corrective Action	Complaint sent directly to contractor, disclosing member of public's name and email address
DB2022026	Children, Families and Education	Υ	N	Human Error	Corrective Action	Lost mobile phone
DB2022027	Finance and Resources	Y	N	Human Error	Corrective Action	Staff member given access to another staff member's account on Fusion in error
DB2022028	Children, Families and Education	Υ	N	Human Error	Corrective Action	Email addresses of multiple recipients included in "to" field rather than "bcc" field so visible to all
DB2022029	Housing Neighbourhood	Υ	N	Inappropriate Action by Staff	Corrective Action	Email address of supplier shared without consent

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
	and Building Services					
DB2022030	Corporate Services	Y	N	System Error	Corrective Action	Staff member's personal phone number visible on Outlook in error due to data entry on Fusion
DB2022031	Finance and Resources	Y	N	System Error	Corrective Action	Council tax letter mis-delivered to wrong address by Royal mail
DB2022032	Corporate Services	Y	N	Human Error	Corrective Action	Pedestal removed for recycling with paper notes inside.
DB2022033	Children, Families and Education	Y	N	Human Error	Corrective Action	Staff File left in meeting room overnight
DB2022034	Finance and Resources	Υ	N	System Error	Corrective Action	Council tax bill issued to the wrong address
βB2022035 Φ 4	Children, Families and Education	Y	N	Human Error	Corrective Action	Personal data shared with multiple schools in error
DB2022036	Children, Families and Education	Y	N	Inappropriate Action by Staff	Corrective Action	Allegation of over-sharing of information with another council department
DB2022037	Public Health	Υ	N	Human Error	Corrective Action	Email sent to wrong internal mailing list
DB2022038	Children, Families and Education	Y	N	Inappropriate Action by Staff	Corrective Action	Personal details in Outlook calendar can be seen by all staff.
DB2022039	Children, Families and Education	N	N	Human Error	Corrective Action	Personal supervision file left overnight in meeting room in Civic Offices
DB2022040	Children, Families and Education	Υ	N	Human Error	Corrective Action	Letters sent to recipient's previous address in error

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
005.03.2022	Adult Social Care	Υ	N	Human Error	Corrective Action	Email sent to wrong recipient
006.03.2022	Adult Social Care	N	N	Human Error	Corrective Action	Documents sent to wrong address due to recipient providing wrong details
DB2022041	Corporate Services	Υ	N	Human Error	Corrective Action	Incorrect permissions granted in Fusion allowing 4 members of school staff to view staff information relating to another school
DB2022042	Regeneration	Υ	N	Human Error	Corrective Action	Vehicle license documents sent to wrong internal mailing list
DB2022043	Children, Families and Education	N	N	Inappropriate Action by Staff	Disciplinary Action	Member of staff accessed records without a business need to.
DB2022044 U	Finance and Resources	N	N	Inappropriate Action by Staff	Corrective Action	Personal details in Outlook calendar can be seen by all staff.
7.04.2022	Adult Social Care	Υ	N	Human Error	Corrective Action	Email sent to wrong recipient
<b>8</b> 2022045	Regeneration	N	N	Human Error	Corrective Action	PCN sent to the wrong address
DB2022046	Corporate Services	Y	N	Human Error	Corrective Action	Attachment containing confidential information included in error in email sent to IT service desk.
DB2022047	Children, Families and Education	N	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022048	Regeneration	Υ	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022049	Children, Families and Education	Y	N	Human Error	Corrective Action	Meeting invitation sent to wrong recipient
DB2022050	Children, Families and Education	Υ	N	Human Error	Corrective Action	Email sent to wrong recipient

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022051	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022052	Corporate Services	N	N	Human Error	Revised Process	Letter sent to parents containing name of the wrong child
DB2022053	Regeneration	N	N	Human Error	Revised Process	Penalty charge notice with name of vehicle keeper sent to the wrong vehicle keeper
DB2022054	Regeneration	Υ	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022055	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
<del>ല്</del> ള2022056 വ വ ന	Children, Families and Education	Υ	N	Human Error	Corrective Action	Email sent to wrong recipient
₱ <b>3</b> 2022057	Finance and Resources	Y	N	System Error	Corrective Action	Incorrect login details provided to staff member for Fusion enabling them to access someone else's account
DB2022058	Children, Families and Education	Y	N	Inappropriate Action by Staff	Corrective Action	Mobile phone given to student contained previous users contacts
DB2022059	Corporate Services	Υ	N	Inappropriate Action by Staff	Corrective Action	P60 sent to employee's manager in error
DB2022060	Finance and Resources	Υ	N	System Error	Corrective Action	Council tax email sent with incorrect name and council tax reference number.
DB2022061	Children, Families and Education	Y	N	Human Error	Corrective Action	Long term absence letter sent to spouse's place of work.

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums
DB2022062	Children, Families and Education	Y	N	Inappropriate Action by Staff	Disciplinary Action	Member of staff employed by contractor inappropriately accessed records
DB2022063	Corporate Services	Y	N	Inappropriate Action by Staff	Disciplinary Action	Family member of employee appears to have accessed council laptop
DB2022064	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022065	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Tenant information viewed by another tenant accidentally at the Housing Office
<b>9</b> B2022066	Finance and Resources	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
<b>2022067</b>	Children, Families and Education	N	N	Inappropriate Action by Staff	Disciplinary Action	Confidential information disclosed to other family members during a child protection assessment
DB2022068	Children, Families and Education	Y	N	Human Error	Corrective Action	Foster carer's details emailed to professionals in error
DB2022069	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient
DB2022070	Children, Families and Education	Y	N	System Error	Corrective Action	Email sent to wrong recipient
DB2022071	Corporate Services	N	N	Human Error	Revised Process	Education letter included wrong child's name in letter heading
DB2022072	Housing Neighbourhood	Y	N	Human Error	Corrective Action	Email sent to wrong internal recipients

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums	
	and Building Services						
DB2022073	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient	
DB2022074	Regeneration	Y	N	Human Error	Corrective Action	Email sent to wrong recipient	
DB2022075	Finance and Resources	N	N	Human Error	Revised Process	Email sent to wrong recipient	
DB2022076	Housing Neighbourhood and Building Services	Y	N	Human Error	Corrective Action	Letter issued with certificate with wrong name and address	
ന്ത്മ2022077 വ ധ ന	Children, Families and Education	N	N	Human Error	Corrective Action	Child in need plan sent to a former partner's address in error	
<u>9</u> 82022078	Regeneration	Y	N	Human Error	Corrective Action	Incorrect vehicle registration number inserted in a penalty charge notice (PCN)response	
DB2022079	Children, Families and Education	Y	N	Inappropriate Action by Staff	Corrective Action	Allegation of personal data being disclosed by a member of staff to a resident (unfounded)	
DB2022080	Housing Neighbourhood and Building Services	Y	N	Inappropriate Action by Staff	Corrective Action	Staff login alleged to have been shared (unfounded	
DB2022081	Housing Neighbourhood and Building Services	N	N	Human Error	Corrective Action	Name and address of people commenting on planning application who asked to remain anonymous published in error	
DB2022082	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient	

Reference No.	Directorate	Response in 72 Hours	Reported to ICO	Root Cause	Action	Comments, including detail where a breach spans multiple mediums	
DB2022083	Housing Neighbourhood and Building Services	Υ	N	Human Error	Corrective Action	Email sent to wrong recipient	
DB2022084	Children, Families and Education	Y	N	Human Error	Corrective Action	Email sent to wrong recipient	
DB8022085	Finance and Resources	Υ	N	Human Error	Corrective Action	Email sent to wrong recipient	
DB8022086	Children, Families and Education	Y	N	Human Error	Corrective Action	PCC mobile phone lost	

### **Glossary**

#### Information Commissioner's Office (ICO)

The Information Commissioner's Office is a non-departmental public body which reports directly to the United Kingdom Parliament and is sponsored by the Department for Digital, Culture, Media and Sport. Its role is to uphold information rights in the public interest.

#### https://ico.org.uk/

#### Response time/Notifying the ICO of Data Breaches

The ICO needs to be notified of more serious data breaches. A self-assessment is available on the ICO's website, to identify if it needs to be notified of a data breach. This needs to be done within 72 hours, which is the key response metric monitored by the internal team.

https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach-assessment/

#### Medium

The is the format of the information constituting the data breach. In the summary graph towards the beginning of the report where a breach occurs in multiple formats this is categorised as 'multiple'; more detail is provided in the comments column of the data breaches detail page within this report.

### mber Impacted

This is the number of individuals whose personal information was potentially compromised through a data breach.

#### **Root Cause**

The categories of root cause are based on guidance for the NHS Security Toolkit; this is widely used across the public sector, to assess arrangements against good practice.

#### **Action Taken**

These are the primary actions taken to respond to/rectify a data breach; all breaches result in an apology to those impacted.

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## Agenda Item 9



Title of meeting: Governance and Audit and Standards Committee

Date of meeting: 29 September 2022

Subject: Review of Polling Districts and Polling Places

Report by: Electoral Services Manager

Wards affected: All

Key decision: No

Full Council decision: Yes

### 1. Purpose of report

To detail the outcomes of the review of polling districts and polling places recently undertaken and to invite members to consider the recommendations made.

#### 2. Recommendations

- 1) That the changes to the current polling scheme recommended in paragraphs 5.2 to 5.6 are approved and implemented on publication of the 2023 Register of Electors
- 2) That it be reconfirmed that the Returning Officer has delegated authority to make such variations to polling places as may be necessary arising from the availability of premises for use at a particular election

#### 3. Background

- 3.1 The Council is required under section 18 of the Representation of the People Act 1983 (as amended) to divide each electoral ward into polling districts and to designate a polling place for each polling district. These regulations also require the Council to conduct a review every five years and at such other times as may be necessary to make adjustments to the existing scheme.
- This review has been initiated to adjust and clarify the Council's polling arrangements due to some circumstances that have arisen since the last statutory review undertaken in 2019.
- 3.2 Definitions:



- A polling district is a sub-division of an electoral ward into a smaller geographical unit comprising a number of streets and properties
- ii) A polling place is a building or location in which polling stations will be designated by the Returning Officer
- iii) A polling station is the actual room or building in which the poll is held
- 3.4 The duties of the Council in the review process are:
  - a) To ensure that all the electors have such reasonable facilities for voting as are practicable in the circumstances
  - b) To seek to ensure that so far as is reasonable and practicable, the polling places are accessible to all electors, including those who are disabled, and when considering the designation of a polling place, have regard to the accessibility needs of disabled persons
- 3.5 Certain practical limitations such as the availability and suitability of venues must also be considered when designating polling places.
- The next statutory review is due to be undertaken within the period 1 October 2023 and 31 January 2025.

### 4. Representations received

- 4.1 A six-week consultation period was undertaken between 4 July and 15 August. A summary of the representations received is shown in Appendix A.
- 4.2 The Returning Officer is a statutory respondent to the review and submitted proposals which include the reconfiguration of polling district boundaries in Baffins, Copnor and Milton wards and a number of polling place amendments across the city to reflect the current availability of polling venues.
- 4.3 Two representations were received proposing different changes in Hilsea ward. A meeting was convened to discuss these proposals and reach a consensus. These joint proposals are detailed in Appendix A.
- 4.4 Each of the representations received has been carefully considered and reflected in the recommendations made as appropriate.

#### 5. Recommendations

- 5.1 The following are recommended changes to the current polling scheme:
- The revised polling arrangements for Baffins ward as proposed by the Returning Officer and shown in Appendix B should be adopted. The revised scheme



increases the number of polling districts and polling places from five to six and therefore provides improved convenience for voters. Furthermore, it reduces the potential for overcrowding at Baffins Community Centre and the Stacey Centre where a large number of electors are allocated under the existing polling scheme.

- 5.3 The revised polling arrangements for Copnor ward as shown in Appendix C should be adopted. These are based on the Returning Officer's proposals but adjusted to incorporate Cllr Swann's proposal to designate Copnor Snooker Club as the polling place for polling district 'JD'. A revised scheme for Copnor ward is required due to changes in the availability of the existing designated polling places. The proposal provides a convenient and accessible scheme as required.
- The revised polling arrangements for Hilsea ward as shown in Appendix D should be adopted. These proposals were developed by Cllr Payter-Harris, Cllr Simpson and Cllr Wemyss.

The polling place at Northern Parade Children's Centre has limited space and is congested at busy times. Relocating the polling places for 'KA' to the Christian Science Centre and 'KB' to St Francis' Church will provide improved voting facilities. A small realignment of the polling district boundary for 'KB' is included.

It should be noted that during the review new information became available regarding the availability of Howard Road Community Centre which is the designated polling place for polling district 'KC' under the current scheme. It is therefore recommended that this is retained as the polling place for polling district 'KC'.

- The revised polling arrangements for Milton ward as proposed by the Returning Officer and shown in Appendix E should be adopted. The proposals improve access for voters in the eastern part of the ward where voters numbers are expected to increase due to housing development underway at the former St James's Hospital site. The congestion at Eastney Methodist Church in recent elections is also addressed in this proposal.
- 5.6 In addition to the revised polling arrangements for Baffins, Copnor, Hilsea and Milton wards, the following individual polling place amendments should be formalised:
  - a) Havelock Community Centre (Fawcett Road) is designated as the polling place for polling districts 'CE' (Central Southsea ward) replacing Trinity Church Hall which has been determined to be too small to accommodate two polling stations.
  - b) Court Lane Junior School (is designated as the polling place for polling district 'NF' (Drayton & Farlington ward) replacing Court Lane Infant School which is no longer available.



- c) St Wilfrid's Church (George Street) is designated as the polling place for polling district 'FB' (Fratton ward) replacing Newbridge Junior School which is no longer available.
- d) The Phoenix Public House (Torrington Road) is designated as the permanent polling place for polling district 'KE' (Hilsea ward) replacing the original interim status designated at the last review on 2019.
- e) The Salvation Army (Powerscourt Road) is designated as the polling place for polling district 'IE' (Nelson ward) replacing Isambard Brunel School which is no longer available.
- f) St Simon's Church (Waverley Road) is designated as the polling place for polling district 'BC' (St Jude ward) replacing Wimbledon Park Sports Hall which is no longer available.
- 5.7 A full schedule of polling places incorporating these recommendations is set out in Appendix F.

#### 6. **Integrated impact assessment**

- 6.1 The review of polling districts and polling places takes into consideration matters regarding accessibility as detailed in paragraph 3.8 and the recommendations made in this report are in line with this requirement.
- 6.2 An Integrated Impact Assessment has been completed and is attached at Appendix G.

#### 7. Legal implications

The relevant recommendations are in line with legislation as noted within the body of this report.

#### 8. **Director of Finance's comments**

The above changes are not considered to have any material financial affect to

	the service. Any additional costs arising from these changes can be met from
	the existing portfolio budget.
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Signed by	<i>'</i> .
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	www.poritsageutile.gov.uk



Appellates	App	end	lices	
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Appendix A - Summary of representations received

Appendix B - Map showing the existing and recommended schemes for Baffins

Appendix C - Map showing the existing and recommended schemes for Copnor

Appendix D - Map showing the existing and recommended schemes for Hilsea

Appendix E - Map showing the existing and recommended schemes for Milton

Appendix F - Proposed schedule of polling places

Appendix G - Integrated Impact Assessment (IIA)

### **Background list of documents: Section 100D of the Local Government Act 1972**

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title of document	Location
Review of polling districts and polling	Published on website and hard copy
places 2022; Returning Officer's	available at the Election Services Office
comments and proposals	

The recommendation(s	) set out above were approv	ved/ approved as amended/	deferred/
rejected by	on		
Signed by:			





### Appendix A

### **Summary of Representations Received**

### 1 David Williams, Returning Officer

Submitted on Monday 11 July 2022 (published document)

#### **Baffins ward**

The existing polling scheme for Baffins ward places almost 7,000 electors into three polling districts at two locations; Baffins Community Centre and the Stacey Centre. To improve the provision of voting facilities and reduce the number of voters allocated to these two venues, a reconfiguration of the central part of Baffins ward is proposed. The proposed scheme is shown in Appendix B.

#### **Central Southsea ward**

Havelock Community Centre (Fawcett Road) is designated as the polling place for polling district 'CE' in place of Trinity Methodist Church (Trinity Methodist Church will continue to be the designated polling place for polling district 'DA' in Eastney & Craneswater ward).

#### **Copnor ward**

Since the last review of polling districts in 2019 several venues in Copnor ward have become unavailable for use. It is therefore necessary to designate new polling places and reconfigure the polling district boundaries to reflect the revised polling places. The proposed scheme is shown in Appendix C.

#### **Drayton & Farlington ward**

Court Lane Junior School is designated as the polling place for polling district 'NF' in place of Court Lane Infant School which is no longer available.

#### Fratton ward

St Wilfrid's Church (George Street) is confirmed as the designated polling place for polling district 'FB' in place of Newbridge Junior School which is no longer available.

#### Hilsea ward

St Francis' Church (Northern Parade) is designated as the polling place for polling district 'KC' in place of Howard Road Community Centre which is no longer available.

#### Milton ward

Since the last review in 2019, it has become apparent that some changes to the configuration of polling districts in Milton ward are required due to the following factors:

 The loss of Meon Junior School as a polling station venue means that a new polling place must be designated for polling district 'EB'.

- The area at the eastern end of Locksway Road is more isolated from the rest of polling district 'EB' and the redevelopment of the former St James's Hospital site will increase the electorate in the eastern part of the ward.
- The closure of the Frank Sorrell Centre has caused an overload of voters at Eastney Methodist Church which also accommodates a polling station with a high turnout in Eastney & Craneswater ward

A reconfiguration of polling districts in Milton ward should be undertaken to improve the distribution of polling places across the ward. The proposed scheme is shown in Appendix E.

#### St Jude ward

St Simon's Church (Waverley Road) is confirmed as the designated polling place for polling district 'BC' in place of Wimbledon Park Sports Hall which is no longer available.

### 2 Councillor Benedict Swann

Submitted 12 July 2022 (by email)

#### **Copnor ward**

Copnor Snooker Club should be designated as the polling place for polling district 'JD' (Copnor ward) as it is more conveniently located and would avoid the need for voters to cross Copnor Road. This proposal was also supported by Councillor Lewis Gosling.

### 3 Councillor Scott Payter-Harris

Submitted 12 July 2022 (in person)

#### Hilsea ward

- The western boundary of polling district 'KF' should be extended northwards on London Road so that the northern part of polling district 'KC' comprising the Military Road/Rampart Gardens area is included within polling district 'KF'
- The boundary between polling districts 'KB' and 'KC' should be redrawn to extend northwards on Northern Parade from Oakwood Road so that the Northwood Road/Fawley Road area is moved from polling district 'KC' to polling district 'KB'
- The polling place for polling district 'KA' should be relocated to the Christian Science Centre (which is also the polling place for polling district 'KD') because this is a more natural direction of travel for residents
- Howard Road Community Centre should be retained as the polling place for polling district 'KC' as a change in circumstances now means that the venue will be available for use once more

### 4 Councillor Russell Simpson

Submitted 8 August 2022 (by email)

#### Hilsea ward

- St Francis' Church should be designated as the polling place for polling district 'KC' due to its more prominent location on the Northern Parade
- No changes should be made to the polling district boundaries in the ward

# 5 Councillor Scott Payter-Harris, Councillor Russell Simpson and Councillor Daniel Wemyss

Meeting arranged by the Electoral Services Manager on 9 August 2022

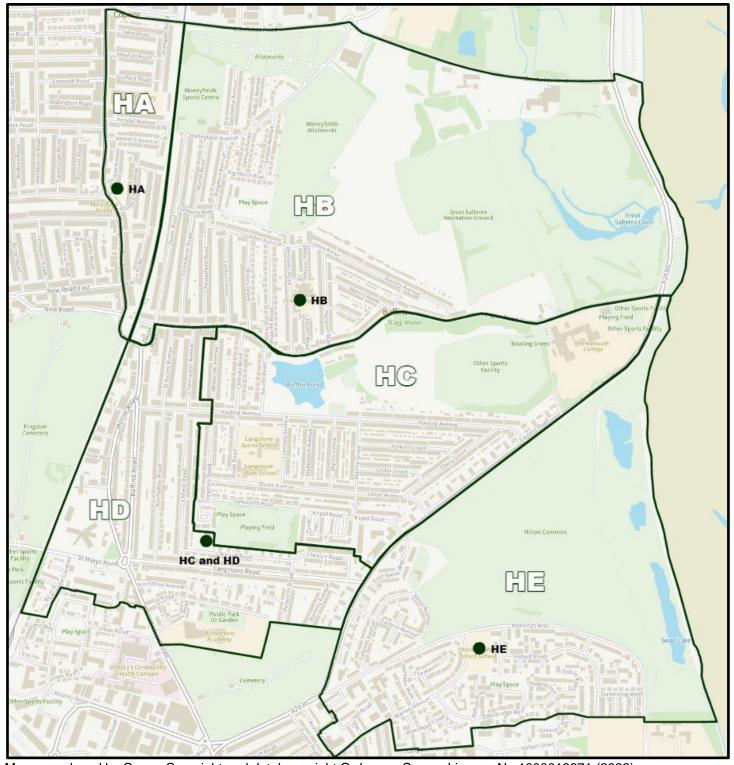
#### Hilsea ward

- Howard Road Community Centre should continue to be the designated polling place for polling district 'KC' because this will ensure continuity and will avoid the need for voters to cross the main road
- It was noted that Northern Parade Children's Centre had limited space and so could become congested at busy times of the day, particularly when children arrive/leave when parking was also an issue
- St Francis' Church should therefore be designated as the polling place for polling district 'KB' because it is a large space with good facilities and is conveniently located on Northern Parade
- The boundary for polling district 'KB' should be extended to include the Northwood Road/Fawley Road area (the area immediately adjacent to the north of St Francis' Church)
- The Christian Science Centre should be designated as the polling place for polling district 'KA' (as had been the case before Northern Parade Children's Centre has been designated)
- The map in Appendix D shows the polling districts proposed at this meeting
- The proposed changes would be reviewed after the 2023 local elections to evaluate any impact on turnout



### **Appendix B**

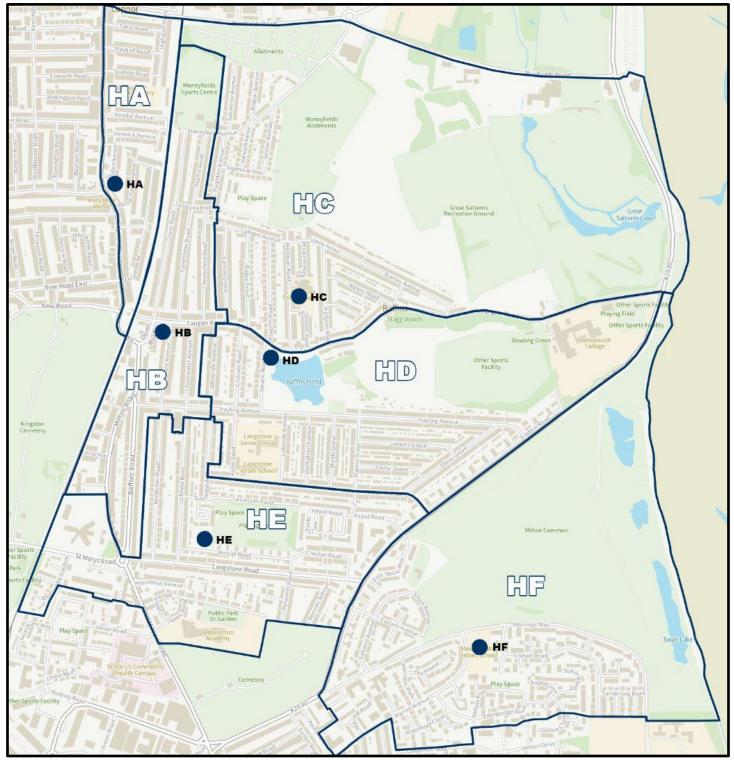
## Baffins ward: existing polling scheme



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### Appendix B

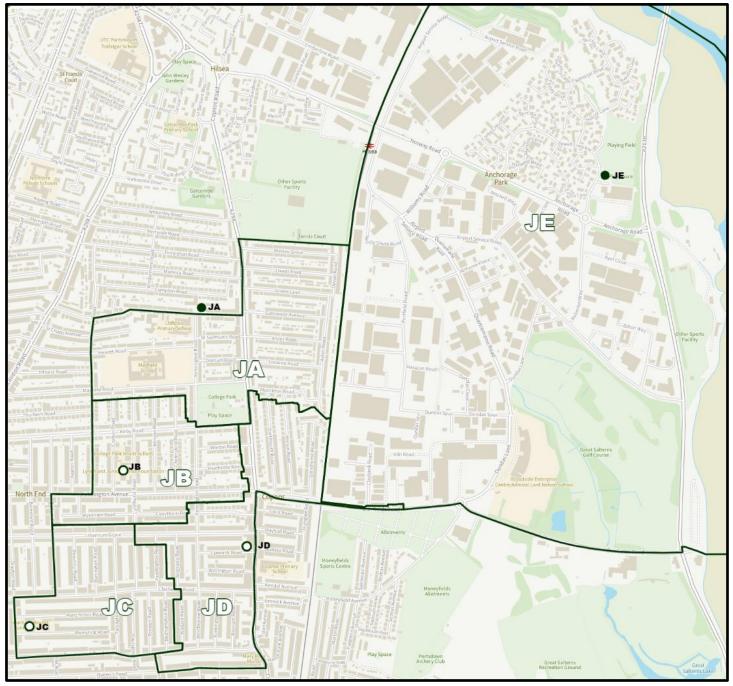
### Baffins ward: recommended polling scheme



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## Appendix C

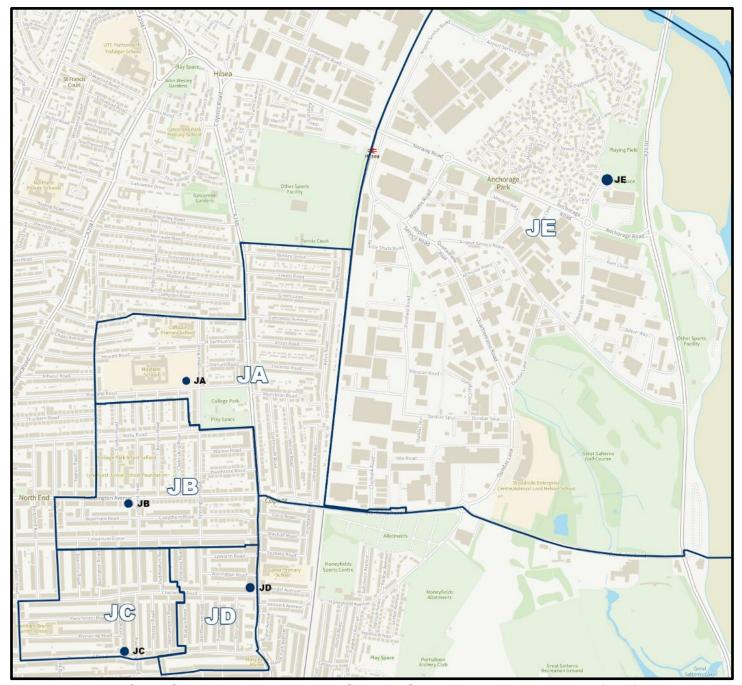
## Copnor ward: existing polling scheme



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## **Appendix C**

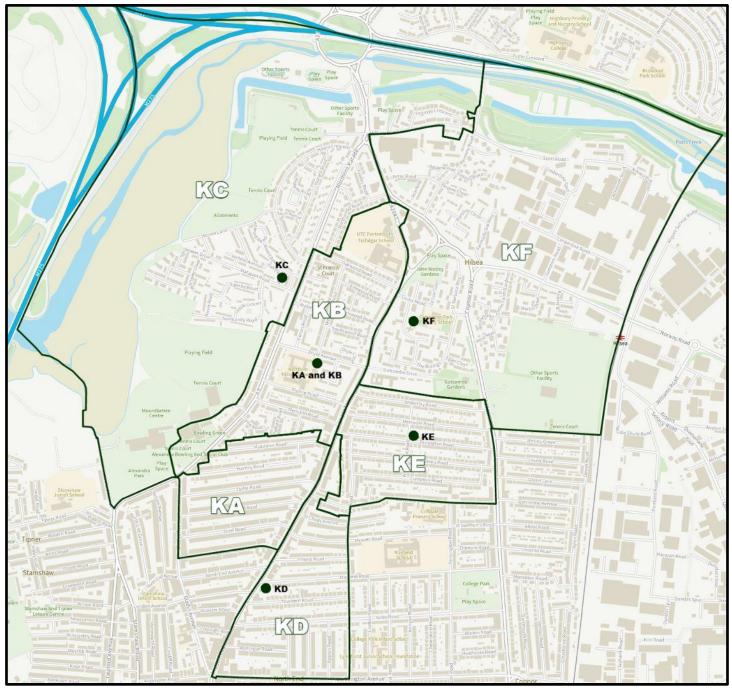
## Copnor ward: recommended polling scheme



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## Appendix D

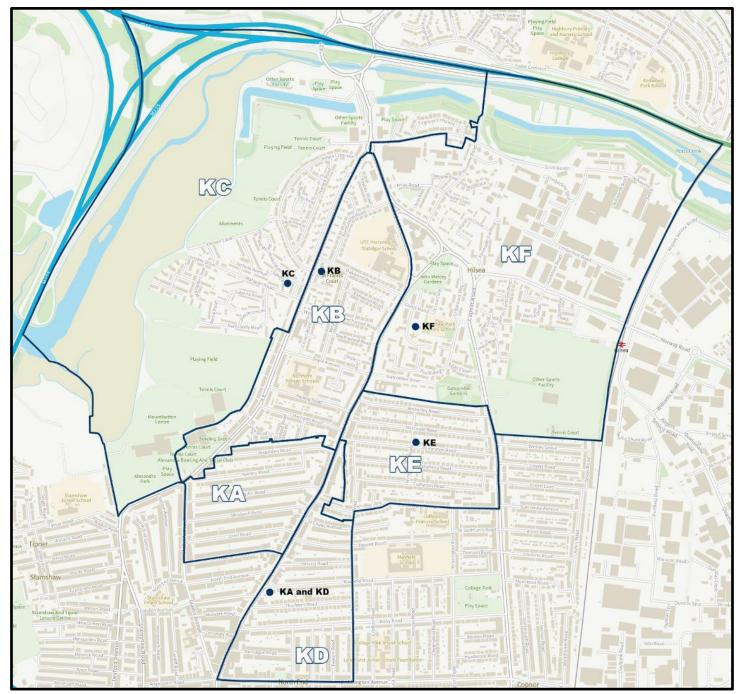
## Hilsea ward: existing polling scheme



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### **Appendix D**

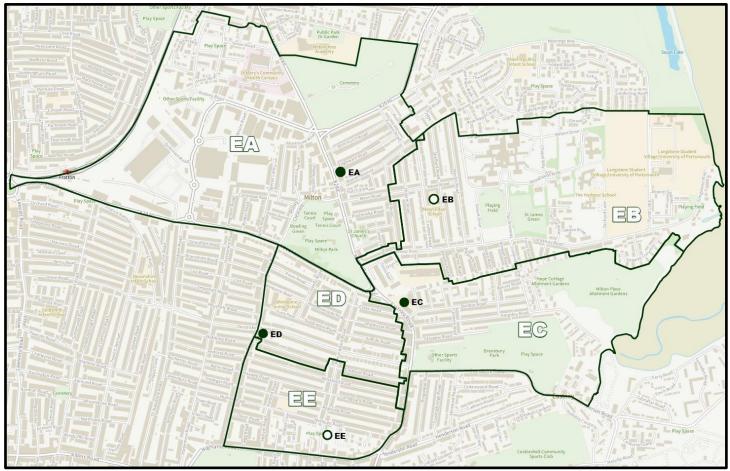
## Hilsea ward: recommended polling scheme



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### Appendix E

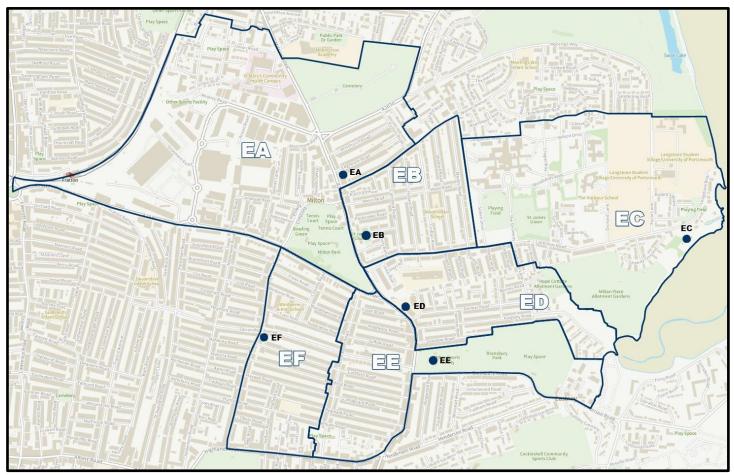
## Milton ward: existing polling scheme



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### Appendix E

## Milton ward: recommended polling scheme



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# **Appendix F**



# **Designated Polling Places (Recommendations)**

This document sets out the recommended polling places to be designated for each polling district. Also included is an estimate of the number of electors (excluding postal voters) expected to be allocated to each polling place at the next City Council elections on 4 May 2023.

Ward	Polling	Polling place (usual polling station)	Polling station	Wheelchair
	District		electorate	accessible
Baffins	HA	St Alban's Church, Copnor Road	1,000	Accessible
Baffins	HB	St Joseph's Church, Tangier Road	1,700	Accessible
Baffins	HC	Baffins Community Centre, Westover Road	1,700	Accessible
<b>To</b> affins	HD	Baffins Library, Tangier Road	1,400	Accessible
₿affins	HE	The Stacey Centre, Walsall Road	2,000	Accessible
<b>B</b> affins	HF	Moorings Way Infant School, Moorings Way	1,500	Accessible
<b>⊠</b> entral Southsea	CA	Holy Spirit Church, Fawcett Road	2,900	Accessible
Central Southsea	CB	Fernhurst Junior School, Francis Avenue/Heidelberg Road	2,800	Accessible
Central Southsea	CC	Devonshire Avenue Baptist Church, Devonshire Avenue	1,700	Accessible
Central Southsea	CD	St Margaret's Parish Centre, Highland Road	1,400	Accessible
Central Southsea	CE	Havelock Community Centre, Fawcett Road	1,500	Accessible
Charles Dickens	GA	Charles Dickens Activity Centre, Lake Road	1,800	Accessible
Charles Dickens	GB	St Faith's Church, Crasswell Street	1,900	Accessible
Charles Dickens	GC	St Faith's Church, Crasswell Street	1,500	Accessible
Charles Dickens	GD	Somerstown Hub, Winston Churchill Avenue	2,500	Accessible
Charles Dickens	GE	John Pound's Centre, Aylward Street	2,500	Accessible
Charles Dickens	GF	Charles Dickens Activity Centre, Lake Road	1,500	Accessible
Copnor	JA	Mayfield School, Mayfield Road	2,400	Accessible
Copnor	JB	Church of the Ascension, Stubbington Avenue	2,000	Accessible
Copnor	JC	North End Baptist Church, Powerscourt Road	1,800	Accessible
Copnor	JD	Copnor Snooker Club, Copnor Road	1,300	Accessible
Copnor	JE	Anchorage Lodge, Sywell Crescent	1,200	Accessible
Cosham	MA	Portacabin, Fairfield Square	1,300	Temporary ramp

Ward	Polling	Polling place (usual polling station)	Polling station	Wheelchair
	District		electorate	accessible
Cosham	MB	Cosham Baptist Church, Havant Road	2,000	Accessible
Cosham	MC	Court Lane Junior School, Hilary Avenue	1,200	Temporary ramp
Cosham	MD	St Philip's Church, Hawthorn Crescent	2,500	Accessible
Cosham	ME	St Peter & St Paul Hall, Old Wymering Lane	1,600	Accessible
Drayton & Farlington	NA	Cosham Baptist Church, Havant Road	800	Accessible
Drayton & Farlington	NB	Drayton Centre, Havant Road	2,000	Accessible
Drayton & Farlington	NC	Solent Infant School, Evelegh Road	1,600	Accessible
Drayton & Farlington	ND	The Sunshine Inn, Havant Road	1,600	Accessible
Drayton & Farlington	NE	Drayton United Church Hall, Station Road	1,700	Accessible
Drayton & Farlington	NF	Court Lane Junior School, Hilary Avenue	1,000	Temporary ramp
Drayton & Farlington	NG	Christchurch Church Hall, London Road	300	Accessible
Eastney & Craneswater	DA	Trinity Methodist Church, Francis Avenue	1,500	Accessible
Eastney & Craneswater	DB	St Simons Church, Waverley Road	1,700	Accessible
Eastney & Craneswater	DC	Canoe Lake Pavilion, St Helen's Parade	800	Accessible
sastney & Craneswater	DD	Eastney Methodist Church, Highland Road	1,700	Accessible
astney & Craneswater	DE	Eastney Community Centre, Bransbury Park	1,100	Accessible
Eastney & Craneswater	DF	Cockleshell Naval Community Centre, Henderson Road	1,100	Accessible
<b>£</b> ratton	FA	Binsteed Community Centre, Langley Road	1,900	Accessible
Fratton	FB	St Wilfrid's Church, George Street	1,600	Accessible
Fratton	FC	St Wilfrid's Church, George Street	1,900	Accessible
Fratton	FD	Fratton Community Centre, Trafalgar Place	2,100	Accessible
Fratton	FE	Penhale Infant School, Penhale Road	1,900	Accessible
Hilsea	KA	Christian Science Centre, London Road	1,300	Accessible
Hilsea	KB	St Francis' Church, Northern Parade	1,500	Accessible
Hilsea	KC	Howard Road Community Centre (Hilsea Hub), Howard Road	1,600	Accessible
Hilsea	KD	Christian Science Centre, London Road	1,500	Accessible
Hilsea	KE	The Phoenix PH, Torrington Road	1,300	Accessible
Hilsea	KF	The Scout Hut, The Ridings	1,600	Accessible
Milton	EA	Milton United Reformed Church Hall, Milton Road	1,900	Accessible
Milton	EB	St James' Church, Milton Park Avenue	1,400	Accessible
Milton	EC	The Thatched House PH, Locksway Road	600	Accessible
Milton	ED	Milton Park Primary School, Eastney Road	1,500	Accessible
Milton	EE	Eastney Community Centre, Bransbury Park	1,500	Accessible
Milton	EF	Devonshire Avenue Baptist Church, Devonshire Avenue	2,000	Accessible

Ward	Polling	Polling place (usual polling station)	Polling station	Wheelchair
	District		electorate	accessible
Nelson	IA	Stamshaw & Tipner Leisure Centre, Wilson Road	1,300	Accessible
Nelson	IB	Stamshaw & Tipner Leisure Centre, Wilson Road	1,500	Accessible
Nelson	IC	Stamshaw Infant School, North End Avenue	1,900	Accessible
Nelson	ID	St Mark's Church Centre, Derby Road	1,400	Accessible
Nelson	IE	Salvation Army, Powerscourt Road	1,400	Accessible
Nelson	IF	Buckland Community Centre, Malins Road	1,700	Accessible
Paulsgrove	LA	Highslopes Community Centre, Carlton Road	700	Accessible
Paulsgrove	LB	Castle View Academy, Allaway Avenue	1,400	Temporary ramp
Paulsgrove	LC	Paulsgrove Baptist Church, Woofferton Road	1,800	Accessible
Paulsgrove	LD	St Michael's Church, Hempsted Road	2,100	Accessible
Paulsgrove	LE	Portacabin, Blakemere Crescent	1,000	Temporary ramp
Paulsgrove	LF	Hillside & Wymering Centre, Cheltenham Road	600	Accessible
Paulsgrove	LG	Port House, Marina Keep, Port Solent	1,000	Accessible
St Jude	BA	St Jude's Church, Kent Road	1,400	Accessible
হ্ল Jude	BB	St Jude's Church, Kent Road	1,400	Accessible
လွှင်t Jude	BC	St Simon's Church, Waverley Road	1,200	Accessible
St Jude	BD	St Jude's Church, Kent Road	1,400	Accessible
💲 Jude	BE	Salvation Army, Albert Road	2,500	Accessible
<b>ॐ</b> t Thomas	AA	Portsmouth City Museum, Museum Road	1,800	Accessible
St Thomas	AB	Cathedral House, St Thomas's Street	1,700	Accessible
St Thomas	AC	Somerstown Hub, Winston Churchill Avenue	1,500	Accessible
St Thomas	AD	Cottage Grove Primary School, Chivers Close	2,000	Temporary ramp
St Thomas	AE	King's Church, Playfair Road/Somers Road	2,200	Temporary ramp

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# Integrated Impact Assessment (IIA)

Integrated impact assessment (IIA) form December 2019

## www.portsmouth.gov.uk

The integrated impact assessment is a quick and easy screening process. It should:

- identify those policies, projects, services, functions or strategies that could impact positively or negatively on the following areas:
  - Communities and safety
  - Regeneration and culture

New / proposed

Changed

- Environment and public space
- Equality & DiversityThis can be found in Section A5

Directorate:	Corporate Services	
Service, function:	Election Services	
Title of policy, serv	ice, function, project or strategy (new or old) :	
2022 Review of Polli	ng Districts and Polling Places	
Type of policy, serv	rice, function, project or strategy:	
Existing		

What is the aim of your policy, service, function, project or strategy?

This IIA is being completed as part of a Review of Polling Districts and Polling Places. The review seeks to ensure that the configuration of polling districts and the provision of polling places remains both suitable and convenient for all voters.

Page 77

A polling district is a sub-division of a ward into a smaller geographica streets/properties.	al unit comprisin	g a number of
A polling place is a building or area in which polling stations are locate	ed.	
A polling station is the individual room or building in which the poll is h	ne <b>l</b> d.	
The duties of the council in the review process are two-fold:  a) To ensure that all the electors in the constituency have such reaso practicable in the circumstances  b) To ensure that so far as is reasonable and practicable, polling placincluding those who are disabled, and when considering the designat regard to the accessibility needs of disabled persons	es are accessib	le to all electors,
When designating polling places there are practical limitations such a venues that must also be considered.	s the availability	and suitability of
Has any consultation been undertaken for this proposal? What were the out anything changed because of the consultation? Did this inform your proposal.		nsultations? Has
A six-week consultation period was undertaken as part of the review process. The responincluded in the recommendations as appropriate.	ses received have b	een considered and
A - Communities and safety	Yes	No
Is your policy/proposal relevant to the following questions?		
is your policy/proposal relevant to the following questions:		
A1-Crime - Will it make our city safer?		*
		*
A1-Crime - Will it make our city safer?	s?	*
A1-Crime - Will it make our city safer?  In thinking about this question:  How will it reduce crime, disorder, ASB and the fear of crime? How will it prevent the misuse of drugs, alcohol and other substances How will it protect and support young people at risk of harm?		
A1-Crime - Will it make our city safer?  In thinking about this question:  How will it reduce crime, disorder, ASB and the fear of crime? How will it prevent the misuse of drugs, alcohol and other substances. How will it protect and support young people at risk of harm? How will it discourage re-offending?	to:	
A1-Crime - Will it make our city safer?  In thinking about this question:  How will it reduce crime, disorder, ASB and the fear of crime? How will it prevent the misuse of drugs, alcohol and other substances How will it protect and support young people at risk of harm? How will it discourage re-offending?  If you want more information contact Lisa.Wills@portsmouthcc.gov.uk or go	to: <u>20.pdf</u>	e any negative
A1-Crime - Will it make our city safer?  In thinking about this question:  How will it reduce crime, disorder, ASB and the fear of crime? How will it prevent the misuse of drugs, alcohol and other substances How will it protect and support young people at risk of harm? How will it discourage re-offending?  If you want more information contact Lisa.Wills@portsmouthcc.gov.uk or go https://www.portsmouth.gov.uk/ext/documents-external/cou-spp-plan-2018-2	to: <u>20.pdf</u>	e any negative
A1-Crime - Will it make our city safer?  In thinking about this question:  How will it reduce crime, disorder, ASB and the fear of crime? How will it prevent the misuse of drugs, alcohol and other substances How will it protect and support young people at risk of harm? How will it discourage re-offending?  If you want more information contact Lisa.Wills@portsmouthcc.gov.uk or go https://www.portsmouth.gov.uk/ext/documents-external/cou-spp-plan-2018-2	to: <u>20.pdf</u>	e any negative
A1-Crime - Will it make our city safer?  In thinking about this question:  How will it reduce crime, disorder, ASB and the fear of crime? How will it prevent the misuse of drugs, alcohol and other substances. How will it protect and support young people at risk of harm? How will it discourage re-offending?  If you want more information contact Lisa.Wills@portsmouthcc.gov.uk or go https://www.portsmouth.gov.uk/ext/documents-external/cou-spp-plan-2018-2  Please expand on the impact your policy/proposal will have, and how you primpacts?	to: <u>20.pdf</u>	e any negative

A2-Housing - Will it provide good quality homes?		*
In thinking about this question:		
<ul> <li>How will it increase good quality affordable housing, including s</li> <li>How will it reduce the number of poor quality homes and accommendated.</li> <li>How will it produce well-insulated and sustainable buildings?</li> <li>How will it provide a mix of housing for different groups and need.</li> </ul>	nmodation?	
If you want more information contact <a href="mailto:Daniel.Young@portsmouthcc.gov">Daniel.Young@portsmouthcc.gov</a>	<u>v.uk</u> or go to:	
https://www.portsmouth.gov.uk/ext/documents-external/psh-providing-apdf	affordable-housing-in-p	oortsmouth-april-19.
Please expand on the impact your policy/proposal will have, and how y impacts?	ou propose to mitigate	e any negative
How are you going to measure/check the impact of your proposal?		
A - Communities and safety	Yes	No
Is your policy/proposal relevant to the following questions?		
A3-Health - Will this help promote healthy, safe and independent living	J?	*
In thinking about this question:		
<ul> <li>How will it improve physical and mental health?</li> <li>How will it improve quality of life?</li> <li>How will it encourage healthy lifestyle choices?</li> <li>How will it create healthy places? (Including workplaces)</li> </ul>		
If you want more information contact <a href="mailto:Dominique.Letouze@portsmouthe">Dominique.Letouze@portsmouthe</a>	cc.gov.uk or go to:	
https://www.portsmouth.gov.uk/ext/documents-external/cons-114.86-he	ealth-and-wellbeing-str	rategy-proof-2.pdf
Please expand on the impact your policy/proposal will have, and how y impacts?	ou propose to mitigate	e any negative
How are you going to measure/check the impact of your proposal?		
A - Communities and safety	Yes	No
D 70		

Is your policy/proposal relevant to the following questions? A4-Income deprivation and poverty-Will it consider income deprivation and reduce poverty? In thinking about this question: • How will it support those vulnerable to falling into poverty; e.g., single working age adults and lone parent households?

- · How will it consider low-income communities, households and individuals?
- How will it support those unable to work?
- How will it support those with no educational qualifications?

If you want more information contact Mark.Sage@portsmouthcc.gov.uk or go to:

https://www.portsmouth.gov.uk/ext/documents-external/cou-homelessness-strategy-2018-to-2023.pdf https://www.portsmouth.gov.uk/ext/health-and-care/health/joint-strategic-needs-assessment

Please expand on the impact your policy/proposal will have, and how you impacts?	u propose to mitigate	any negative
How are you going to measure/check the impact of your proposal?		
A - Communities and safety	Yes	No

Is your policy/proposal relevant to the following questions?

A5-Equality & diversity - Will it have any positive/negative impacts on the protected characteristics?





In thinking about this question:

- How will it impact on the protected characteristics-Positive or negative impact (Protected characteristics under the Equality Act 2010, Age, disability, race/ethnicity, Sexual orientation, gender reassignment, sex, religion or belief, pregnancy and maternity, marriage and civil partnership, socio-economic)
- What mitigation has been put in place to lessen any impacts or barriers removed?
- How will it help promote equality for a specific protected characteristic?

If you want more information contact <a href="mailto:gina.perryman@portsmouthcc.gov.uk">gina.perryman@portsmouthcc.gov.uk</a> or go to:

https://www.portsmouth.gov.uk/ext/documents-external/cmu-equality-strategy-2019-22-final.pdf

Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?

The purpose of the review is to ensure that the polling scheme, including the allocation of polling stations, is both accessible and convenient for all voters. The changes proposed as part of this review are intended to improve polling arrangements. It is not anticipated that any specific community will be disadvantaged by the changes proposed.

How are you going to measure/check the impact of Ago sal?

Feedback from local support groups

Feedback from local groups covering a wide range of disabilities

Feedback from elected members

Presiding Officer feedback from election day.

Liaison with various PCC Staff working with harder to reach groups, including the Cross Cultural Womens Group, Shared Lives, Learning Disability Champion, Learning Disability Partnership, Care Leavers Support Team.

B - Environment and climate change	Yes	No
Is your policy/proposal relevant to the following questions?		
B1-Carbon emissions - Will it reduce carbon emissions?		*
In thinking about this question:		
<ul> <li>How will it reduce greenhouse gas emissions?</li> <li>How will it provide renewable sources of energy?</li> <li>How will it reduce the need for motorised vehicle travel?</li> <li>How will it encourage and support residents to reduce carbon emission</li> </ul>	ns?	
If you want more information contact <u>Tristan.thorn@portsmouthcc.gov.uk</u> or g	o to:	
https://www.portsmouth.gov.uk/ext/documents-external/cmu-sustainability-stra	ategy.pdf	
Please expand on the impact your policy/proposal will have, and how you pro impacts?	pose to mitigate ar	ny negative
How are you going to measure/check the impact of your proposal?		
B - Environment and climate change	Yes	No
B - Environment and climate change  Is your policy/proposal relevant to the following questions?	Yes	No
	Yes	No Mo
Is your policy/proposal relevant to the following questions?	Yes	No Mo
Is your policy/proposal relevant to the following questions?  B2-Energy use - Will it reduce energy use?	Yes	No ***
Is your policy/proposal relevant to the following questions?  B2-Energy use - Will it reduce energy use?  In thinking about this question:  • How will it reduce water consumption?  • How will it reduce electricity consumption?  • How will it reduce gas consumption?		No Mo
Is your policy/proposal relevant to the following questions?  B2-Energy use - Will it reduce energy use?  In thinking about this question:  • How will it reduce water consumption? • How will it reduce electricity consumption? • How will it reduce gas consumption? • How will it reduce the production of waste?	o to:  boost-adoption.pdf 20Appendix%2019	<b>★</b> 20-%20Energy%
Is your policy/proposal relevant to the following questions?  B2-Energy use - Will it reduce energy use?  In thinking about this question:  • How will it reduce water consumption? • How will it reduce electricity consumption? • How will it reduce gas consumption? • How will it reduce the production of waste?  If you want more information contact Triston.thorn@portsmouthcc.gov.uk or good https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-phttps://democracy.portsmouth.gov.uk/documents/s24685/Home%20Energy%20and%20water%20at%20home%20-%20Strategy%202019-25.pdf Please expand on the impact your policy/proposal will have, and how you pro	o to:  boost-adoption.pdf 20Appendix%2019	<b>★</b> 20-%20Energy%
Is your policy/proposal relevant to the following questions?  B2-Energy use - Will it reduce energy use?  In thinking about this question:  • How will it reduce water consumption? • How will it reduce electricity consumption? • How will it reduce gas consumption? • How will it reduce the production of waste?  If you want more information contact Triston.thorn@portsmouthcc.gov.uk or good https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-phttps://democracy.portsmouth.gov.uk/documents/s24685/Home%20Energy%20and%20water%20at%20home%20-%20Strategy%202019-25.pdf Please expand on the impact your policy/proposal will have, and how you pro	o to:  boost-adoption.pdf 20Appendix%2019	<b>★</b> 20-%20Energy%

B - Environment and climate change	Yes	No
Is your policy/proposal relevant to the following questions?		
<b>B3 - Climate change mitigation and flooding-</b> Will it proactively mitigate against a changing climate and flooding?		*
In thinking about this question:		
<ul> <li>How will it minimise flood risk from both coastal and surface flooding in</li> <li>How will it protect properties and buildings from flooding?</li> <li>How will it make local people aware of the risk from flooding?</li> <li>How will it mitigate for future changes in temperature and extreme western</li> </ul>		
If you want more information contact <u>Tristan.thorn@portsmouthcc.gov.uk</u> or g	jo to:	
https://www.portsmouth.gov.uk/ext/documents-external/env-surface-water-mahttps://www.portsmouth.gov.uk/ext/documents-external/cou-flood-risk-manage Please expand on the impact your policy/proposal will have, and how you proimpacts?	ement-plan.pdf	•
How are you going to measure/check the impact of your proposal?		
B - Environment and climate change	Yes	No
	Yes	No
Is your policy/proposal relevant to the following questions? <b>B4-Natural environment</b> -Will it ensure public spaces are greener, more	Yes	No **
Is your policy/proposal relevant to the following questions? <b>B4-Natural environment</b> -Will it ensure public spaces are greener, more sustainable and well-maintained?	Yes	No **
Is your policy/proposal relevant to the following questions? <b>B4-Natural environment</b> -Will it ensure public spaces are greener, more sustainable and well-maintained?	Yes	No ***
Is your policy/proposal relevant to the following questions?  B4-Natural environment-Will it ensure public spaces are greener, more sustainable and well-maintained?  In thinking about this question:  How will it encourage biodiversity and protect habitats? How will it preserve natural sites? How will it conserve and enhance natural species?		No ***
Is your policy/proposal relevant to the following questions?  B4-Natural environment-Will it ensure public spaces are greener, more sustainable and well-maintained?  In thinking about this question:  How will it encourage biodiversity and protect habitats? How will it preserve natural sites? How will it conserve and enhance natural species?  If you want more information contact Daniel.Young@portsmouthcc.gov.uk or	go to: mitigation-strate	<b>★</b> gy-dec-17.pdf
<ul> <li>How will it preserve natural sites?</li> <li>How will it conserve and enhance natural species?</li> <li>If you want more information contact <a href="mailto:Daniel.Young@portsmouthcc.gov.uk">Daniel.Young@portsmouthcc.gov.uk</a> or</li> <li><a href="https://www.portsmouth.gov.uk/ext/documents-external/pln-solent-recreation-">https://www.portsmouth.gov.uk/ext/documents-external/pln-solent-recreation-</a></li> </ul>	go to: mitigation-strate	gy-dec-17.pdf
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Is your policy/proposal relevant to the following questions?  B4-Natural environment-Will it ensure public spaces are greener, more sustainable and well-maintained?  In thinking about this question:  How will it encourage biodiversity and protect habitats? How will it preserve natural sites? How will it conserve and enhance natural species?  If you want more information contact Daniel.Young@portsmouthcc.gov.uk or https://www.portsmouth.gov.uk/ext/documents-external/pln-solent-recreation-https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-plan-preserved on the impact your policy/proposal will have, and how you pro	go to: mitigation-strate	gy-dec-17.pdf

B - Environment and climate change	Yes	No
Is your policy/proposal relevant to the following questions?		
B5-Air quality - Will it improve air quality?		*
In thinking about this question:		
<ul> <li>How will it reduce motor vehicle traffic congestion?</li> <li>How will it reduce emissions of key pollutants?</li> <li>How will it discourage the idling of motor vehicles?</li> <li>How will it reduce reliance on private car use?</li> </ul>		
If you want more information contact <u>Hayley.Trower@portsmouthcc.gov.uk</u>	or go to:	
https://www.portsmouth.gov.uk/ext/documents-external/env-aq-air-quality-pl	an-outline-busines	ss-case.pdf
Please expand on the impact your policy/proposal will have, and how you primpacts?	ropose to mitigate	any negative
How are you going to measure/check the impact of your proposal?		
B - Environment and climate change	Yes	No
B - Environment and climate change Is your policy/proposal relevant to the following questions?	Yes	No
	Yes	No
Is your policy/proposal relevant to the following questions? <b>B6-Transport -</b> Will it improve road safety and transport for the	Yes	No ***
Is your policy/proposal relevant to the following questions? <b>B6-Transport -</b> Will it improve road safety and transport for the whole community?	over users of priva can walk and cycl le and active trans	te vehicles? e safely in the area? sport?
Is your policy/proposal relevant to the following questions?  B6-Transport - Will it improve road safety and transport for the whole community?  In thinking about this question:  How will it prioritise pedestrians, cyclists and public transport users of the how will it allocate street space to ensure children and older people How will it increase the proportion of journeys made using sustainable.	over users of priva can walk and cycl le and active trans pedestrians and cy	te vehicles? e safely in the area? sport?
Is your policy/proposal relevant to the following questions? <b>B6-Transport -</b> Will it improve road safety and transport for the whole community?  In thinking about this question:  • How will it prioritise pedestrians, cyclists and public transport users of the How will it allocate street space to ensure children and older people of the How will it increase the proportion of journeys made using sustainable of How will it reduce the risk of traffic collisions, and near misses, with	over users of priva can walk and cycl le and active trans pedestrians and cy	te vehicles? e safely in the area? sport?
Is your policy/proposal relevant to the following questions?  B6-Transport - Will it improve road safety and transport for the whole community?  In thinking about this question:  How will it prioritise pedestrians, cyclists and public transport users of the How will it allocate street space to ensure children and older people. How will it increase the proportion of journeys made using sustainable. How will it reduce the risk of traffic collisions, and near misses, with public transport users of the how will it reduce the risk of traffic collisions.	over users of priva can walk and cycl le and active trans pedestrians and cy go to:	te vehicles? e safely in the area? sport? yclists?
Is your policy/proposal relevant to the following questions? <b>B6-Transport -</b> Will it improve road safety and transport for the whole community?  In thinking about this question:  • How will it prioritise pedestrians, cyclists and public transport users of the How will it allocate street space to ensure children and older people of How will it increase the proportion of journeys made using sustainable. How will it reduce the risk of traffic collisions, and near misses, with purpose with the proportion of the impact your policy/proposal will have, and how you propose expand on the impact your policy/proposal will have, and how you propose the proposal will have.	over users of priva can walk and cycl le and active trans pedestrians and cy go to:	te vehicles? e safely in the area? sport? yclists?
Is your policy/proposal relevant to the following questions? <b>B6-Transport -</b> Will it improve road safety and transport for the whole community?  In thinking about this question:  • How will it prioritise pedestrians, cyclists and public transport users of the How will it allocate street space to ensure children and older people of How will it increase the proportion of journeys made using sustainable. How will it reduce the risk of traffic collisions, and near misses, with public transport users of the How will it reduce the proportion of pourneys made using sustainable. How will it reduce the risk of traffic collisions, and near misses, with public transport users of the How will be proportion of pourneys made using sustainable. How will it reduce the risk of traffic collisions, and near misses, with public transport users of the How will be proportion of pourneys made using sustainable. How will it reduce the risk of traffic collisions, and near misses, with public transport users of the How will be proportion of pourneys made using sustainable. How will it reduce the risk of traffic collisions, and near misses, with public transport users of the How will be proportion of pourneys made using sustainable. How will it reduce the risk of traffic collisions, and near misses, with public transport users of the How will be proportion of pourneys made using sustainable.	over users of priva can walk and cycl le and active trans pedestrians and cy go to:	te vehicles? e safely in the area? sport? yclists?

B - Environment and climate change	Yes	No
Is your policy/proposal relevant to the following questions?		
<b>B7-Waste management -</b> Will it increase recycling and reduce the production of waste?		*
In thinking about this question:		
<ul> <li>How will it reduce household waste and consumption?</li> <li>How will it increase recycling?</li> <li>How will it reduce industrial and construction waste?</li> </ul>		
If you want more information contact_Steven.Russell@portsmouthcc.gov.uk_c	or go to:	
https://documents.hants.gov.uk/mineralsandwaste/HampshireMineralsWaste	PlanADOPTED.p	<u>df</u>
Please expand on the impact your policy/proposal will have, and how you proimpacts?	pose to mitigate	any negative
How are you going to measure/check the impact of your proposal?		

C - Regeneration of our city	Yes	No
Is your policy/proposal relevant to the following questions?		
C1-Culture and heritage - Will it promote, protect and enhance our culture and heritage?		*
In thinking about this question:		
<ul> <li>How will it protect areas of cultural value?</li> <li>How will it protect listed buildings?</li> <li>How will it encourage events and attractions?</li> <li>How will it make Portsmouth a city people want to live in?</li> </ul>		
If you want more information contact Claire.Looney@portsmouthcc.gov	<u>.uk</u> or go to:	
https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-	-plan-post-adoptio	n.pdf
Please expand on the impact your policy/proposal will have, and how you impacts?	ou propose to mitiç	gate any negative
How are you going to measure/check the impact of your proposal?		
C - Regeneration of our city	Yes	No
Is your policy/proposal relevant to the following questions?		
C2-Employment and opportunities - Will it promote the development of a skilled workforce?		*
In thinking about this question:		
<ul> <li>How will it improve qualifications and skills for local people?</li> <li>How will it reduce unemployment?</li> <li>How will it create high quality jobs?</li> <li>How will it improve earnings?</li> </ul>		
If you want more information contact <a href="mailto:Mark.Pembleton@portsmouthcc.g">Mark.Pembleton@portsmouthcc.g</a>	ov.uk or go to:	
https://www.portsmouth.gov.uk/ext/documents-external/cou-regeneration	on-strategy.pdf	
Please expand on the impact your policy/proposal will have, and how you impacts?	ou propose to mitiç	gate any negative
How are you going to measure/check the impact of your proposal?  Page 86		

C - Regeneration of oւ	ur city			Yes	No
ls your policy/proposal	relevant to t	he following que	stions?		
C3 - Economy - Will it en support sustainable growt	th and regene		n the city,		*
In thinking about this ques	stion:				
<ul> <li>How will it encoura</li> <li>How will it improve</li> <li>How will it create v</li> <li>How will it promote</li> </ul>	e the local eco valuable empl	onomy? loyment opportuni	ties for local peop	ole?	
lf you want more informat	ion contact M	ark.Pembleton@p	oortsmouthcc.gov	.uk or go to:	
https://www.portsmouth.g	ov.uk/ext/doc	uments-external/o	ou-regeneration-	strategy.pdf	
Please expand on the impmpacts?	oact your poli	cy/proposal will ha	ive, and how you	propose to miti	gate any negative
How are you going to me	asure/check t	he impact of your	proposal?		
Q8 - Who was involve	ed in the Inte	egrated impact	assessment?		
lan Fitchett, Election Se Marguerite Bowers, Ele					
This IIA has been app	roved by:	Ian Fitchett			
Contact number:	023 9283 4	217			
Date:	31.08.2022				



# Agenda Item 10



**Title of meeting:** Governance & Audit & Standards Committee

**Date of meeting:** 29 September 2022

**Subject**: Internal Audit Performance Status Report to 31st August 2022

Report by: Chief Internal Auditor

Wards affected: All

Key decision: No

Full Council decision: No

## 1. Summary

1.1 This is an Internal Audit Performance Status Report for the 2022-23 planned audit activities. Appendix A includes the detail of progress made against the annual plan and documents individual audit findings.

## 2. Purpose of report

2.1 This report is to update the Governance and Audit and Standards Committee on the Internal Audit Performance for 2022/23 to 31st August 2022 against the Annual Audit Plan, highlight areas of concern and areas where assurance can be given on the internal control framework.

### 3. Recommendations

- 3.1 That Members note the Audit Performance for 2022-23 to 31st August 2022.
- That Members note the highlighted areas of concern in relation to audits completed from the 2022/23 Audit Plan, including follow up work performed.

## 4. Background

4.1 The Annual Audit Plan for 2022-23 has been drawn up in accordance with the agreed Audit Strategy and was approved by this Committee on 4<sup>th</sup> March 2022 following consultation with Directors and relevant parties. The Plan is reviewed monthly in order to take account of any further changes in risks levels or corporate priorities.



#### 5 **Integrated Impact Assessment**

5.1 The contents of this report do not have any relevant equalities and environmental impact and therefore an Integrated Impact assessment is not required.

#### 6. **Legal Implications**

- 6.1 The City Solicitor has considered the report and is satisfied that the recommendations are in accordance with the Council's legal requirements and the Council is fully empowered to make the decisions in this matter.
- 6.2 Where system weaknesses have been identified he is satisfied that the appropriate steps are being taken to have these addressed.

#### 7 **Finance Comments**

- 7.1 There are no financial implications arising from the recommendations set out in this report.
- 7.2 The S151 Officer is content that the progress against the Annual Audit Plan and the agreed actions are sufficient to comply with his statutory obligations to ensure that the Authority maintains an adequate and effective system of internal audit of its accounting records and its system of internal control.

Signed by: Elizabeth Goodwin, Chief Internal Auditor

### **Appendices:**

Appendix A – Internal Audit Progress Report

## Background list of documents: Section 100D of the Local Government Act 1972

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title	of document	Location
1	Accounts and Audit Regulations	http://www.legislation.gov.uk/uksi/2011/817/contents/made
2	Previous Audit Performance Status and other Audit Reports	Refer to Governance and Audit and Standard meetings – reports published online.



3	Public Sector Internal Audit	http://www.cipfa.org/policy-and-guidance/standards/public- sector-internal-audit-standards
	Standards	

The recommendation(s)		• •	
rejected by	on		
Signed by:			





# **Internal Audit Progress Report 14th September 2022**

**Elizabeth Goodwin, Chief Internal Auditor** 



## 1. Introduction

Internal Audit is a statutory function for all local authorities.

The requirement for an Internal Audit function in local government is detailed within the Accounts and Audit (England) Regulations 2015 as to:

Undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance

The standards for 'proper practices' are set out in the Public Sector Internal Audit Standards [the Standards – updated 2016].

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes

This report includes the status against the 2022/23 internal audit plan.



# 2. Audit Plan Progress as of 31st August 2022

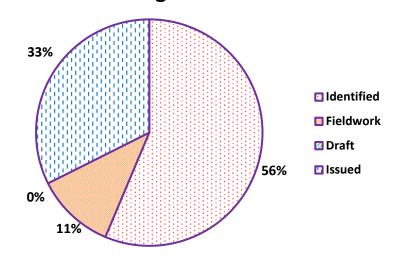
There are 38 Full Audits, 12 Follow ups, 6 2<sup>nd</sup> follow up reviews and 25 grants, in the revised plan for 2022/23, totalling 72 reviews.\*

To date, 32 (44%) have been completed or are in progress as of 31st August 2022. This represents 24 (33%) audits where the report has been finalised.

Status	Audits
Identified	40
Fieldwork	8
Draft Report	0
Final Report	24

# \*Figures are only in relation to PCC audits and are excluding any SLEP or Portico reviews.

# Audit Plan Progress as of 31st August 2022





## 3. Ongoing Internal Audit Involvement

Internal Audit has provided advice, ongoing reviews and involvement work in the following areas. (For reference, advice is only recorded when the time taken to provide the advice exceeds one hour):

- 2 Regulation of Investigatory Powers Act (RIPA) authorisations (reported annually) and policy review
- Anti-Money Laundering monitoring, reporting and policy review
- Financial Rules Waivers
- National Fraud Initiative (NFI) to facilitate national data matching carried out by the Cabinet Office
- National Anti-Fraud Network (NAFN) bulletins and intelligence follow up
- Counter Fraud Programme proactive work to reduce the risk exposure to the authority
- Governance & Audit & Standards Committee reporting and attendance
- Audit Planning and Consultation
- Risk Management & Annual Governance Statement
- Performance Management
- 72 open investigation cases (includes, corporate, benefit and council tax support cases)
- 8 items of advice



## 4. Audit Plan Status/Changes.

The original audit plan agreed on the 4<sup>th</sup> Match 2022 had a total of 67 reviews. 11 reviews have been removed from the original audit plan, 2 have been amended and 16 have been added to the 2022/23 plan totalling 72 reviews. Details are as followed:

#### Audits removed from the Audit Plan:

- Domiciliary Care F/U No high risks were raised during the original review therefore no follow-up required.
- Libraries Removed to accommodate additional grants and audit work.
- Council Tax and NNDR Area is regularly audited, removed to accommodate additional grants and audit work.
- System One Removed to accommodate additional grants and audit work.
- Bring Your Own Device (BOYD) Removed to accommodate additional grants and audit work.
- Expenses (Fusion) Removed to accommodate additional grants and audit work.
- Voids Removed to accommodate additional grants and audit work.
- Parking Zones & Digital Permits Removed to accommodate additional grants and audit work.
- Website & App Accessibility Compliance F/U Removed due to lack of resources from client.
- Accounts Receivable Area is regularly audited and assurance was provided in the 2021/22 year. Removed to accommodate additional grants and audit work.
- Deprivation of Liberty Removed to accommodate additional grants and audit work.

#### Amendments made to the Audit Plan:

- Payroll Full audit amended to a follow-up on high-risk exceptions raised during the 2021/22 audit.
- School 1 Determined as Medina Primary School

#### Audits added to the Audit Plan:

- Modern Slavery Following up on high-risk exceptions that remain open during the original follow-up.
- Wimbourne Primary School School 2 determined and added to the audit plan.
- Universal Drug Treatment Grant verification required from Chief Executive and Chief Internal Auditor.



- School Conditional Funding Grant verification required from Chief Executive and Chief Internal Auditor.
- ABP Contract Following up on high-risk exceptions that remain open during the original follow-up.
- Emergency Procedures Following up on high-risk exceptions that remain open during the original follow-up.
- Estate Services Following up on high-risk exceptions that remain open during the original follow-up.
- Omicron Business Grants Grant verification required from Chief Executive and Chief Internal Auditor.
- Test & Trace £500 Grant verification required from Chief Executive and Chief Internal Auditor.
- Orpheus Grant (on the spot claim required as part of overall grant, unknown at the time of the audit plan submission)
- Educational Health Care Plans for up to 25 years old Following up on high-risk exceptions raised during the original audit review
- St Pauls Catholic Primary Nursery School Following up on high-risk exceptions raised during the original audit review
- Southsea Infant School Following up on high-risk exceptions raised during the original audit review
- Information Governance Following up on high-risk exceptions that remain open during the original follow-up.
- Right to Buy Following up on high-risk exceptions that remain open during the original follow-up.
- Coffee Shops Following up on high-risk exceptions raised during the original audit review



## 5. Areas of Concern

One critical risk exception has been raised as part of the 2021/22 Accounts Payable Audit in relation to the lack of sufficient checks that could be evidenced on a suppliers record when a supplier's bank details are being changed. This exception has been followed up on as part of the 2022/23 Accounts Payable Follow-up. The exception is currently in progress.

Below is an extract of the critical risk exception follow up from the Accounts Payable exceptions report.

PCC-2223-019-002 Supplier Bank Details	Follow-up	In Progress				
Safeguarding of Assets						
Initial Exception	Initial Risk	Critical				

A report of all supplier bank account changes was highlighted using the PCC Supplier Detail Report Outlet from Fusion. The report highlighted 779 changes between 01/04/2021 - 31/01/2022. A sample of 15 were selected and the attachments within the 'supplier module' in fusion was reviewed to ensure that checks were conducted and no fraudulent changes had been requested. Testing confirmed for 4/15 no bank changes had occurred; however, the PCC Supplier Detail Report Outlet had indicated otherwise. An ongoing ticket (3991) has been raised with the Fusion Support Team to indicate the rationale towards this.

1/15 - During the migration of supplier details the bank details did not transfer as the supper was a non-CIS site which was outside the parameters during supplier migration and therefore needed to be added for payment to be made. Historic records from when the supplier was set up in 2008 was reviewed and testing confirmed that the bank details have not changed but manually migrated.

The remaining 10 did not have evidence of sufficient checks conducted prior to the bank details being changed. Below is the justification provided by the Accounts Payable Team Leader and the Business Support Manager:

- 4/10 had made changes due to a different bank details being provided on the invoice following the supplier providing goods/services.
- 5/10 had made the change as the request had come in on a company headed letter signed by the Director/ Group Financial Controller.
- 1/10 had made the change as the bank detail change request came in an email addressed from the contact on file for the supplier.

It should be noted that processes were in place which are followed (however testing has highlighted that these processes were not evidenced). There is a growing development in cyber-fraud which has been a nation-wide issue. Figures from 'UK Finance' shoes that fraudsters stole almost £93 million from UK firms in 2018 through invoice and mandate fraud. This authority itself experienced an attempt to defraud by means of changing supplier bank details, as have all neighbouring Unitary Authorities. The attempts to defraud are becoming more and more sophisticated with criminal gangs operating at a global level. As such, it is heavily advised that additional checks beyond those normally deployed must now be conducted to ensure that bank details are accurate and due care is taken to prevent cases of invoice and mandate fraud.



## **Initial Risks and Consequences**

Failure to use reliable data could lead to difficulties and inaccuracy for comparing and monitoring data for bank changes.

Failure to ensure appropriate checks are conducted when changing a suppliers bank detail can lead to invoices being paid to fraudulent parties therefore losing out on income that may not be recoverable and the relevant supplier losing out on income that is rightfully theirs.

Initial Agreed Action	Initial Person Responsible / Action Date
To re-iterate the importance to capture all checks conducted when changing a supplier's bank detail.	Sharon Denham (Accounts Payable Team Leader) / Already Implemented - Audit Verified
To explore the option to make checks as automated and advances as possible with software specifically for the use of verifying bank details.	Lynn Randall (Income and Payments Manager) / 31/05/2022
To review and amend the current bank changes process to include additional controls beyond those that have been established.	Lynn Randall (Income and Payments Manager) / Already Implemented - Audit Verified
The Payments team will be attending a Barclays webinar regarding cyber security as some refresher training.	Lynn Randall (Income and Payments Manager) / 09/06/2022
Follow Up Results	Follow Up Action Required
Follow-up testing evidenced a screenshot to the payments 'teams' group chat re-iterating the importance on capturing all checks conducted when changing a supplier's bank detail.	A Payments Officer post has been created to assist the team with the increase in work bought about by the additional bank checks, The first task for the new team
In addition, Experian Bank Wizard has been procured to conduct checks on bank account details against company names and company addresses. The checks provide a risk rating on the supplier. Log ins were provided on the 25/08/2022 and use of the system is imminent.	member will be to review all bank changes made from
Testing sighted the bank changes process which has now been amended to ensure that additional checks such as security verification is included.	
The Income & Payments Manager has also stated that all members of the team have attended the Barclays webinar for cyber security.	



Follow-up testing reviewed a sample of 10/61 bank changes (between the period 01/07/2022 - 24/08/2022).

### Testing confirmed:

- 1/10 Was not a change of bank detail but an additional site being added onto the record The test sample was therefore reduced to 9.
  - 4/9 An email was sent to the contact on the supplier/remittance/purchasing file, 2 security questions were asked, and responses were given for both questions. Bank details were changed, and acknowledgement was given to the supplier of the change.
  - 3/9 An email was sent to the contact on the supplier/remittance/purchasing file, 2 security questions were asked, and responses were given for one question. Bank details were changed, and acknowledgement was given to the supplier of the change.
  - 2/9 An email was sent to the contact on the supplier/remittance/purchasing file, 2 security questions were asked; however, the questions were not answered by the supplier. Bank details were changed, and acknowledgement was given to the supplier of the change.

Overall, 44% of the sample followed the correct process, an improvement since the original audit where only 10% had followed the original process. Testing sighted verification questions being asked off from the suppliers; however, as detailed above there are instances where a full response (33%) or no response (22%) has been provided and the bank details have been changed. The Income and Payments Manager has informed Internal Audit that the process will be amended to only ask one security question rather than two as a response from the supplier to the email sent out is a check itself.

Although the exception is yet to be fully mitigated Internal Audit has evidenced progress towards the actions and in testing.



## 6. Assurance Levels

Internal Audit reviews culminate in an opinion on the assurance that can be placed on the effectiveness of the framework for risk management, control and governance designed to support the achievement of management objectives for the area under review.

Assurance Level	Description / Examples
Assurance	No issues or minor improvements noted within the audit but based on the testing conducted, assurance can be placed that the activity is of low risk to the Authority
Reasonable Assurance	Control weaknesses or risks were identified but overall the activities do not pose significant risks to the Authority
Limited Assurance	Control weaknesses or risks were identified which pose a more significant risk to the Authority
No Assurance	Major individual issues identified or collectively a number of issues raised which could significantly impact the overall objectives of the activity that was subject to the Audit
NAT	No areas tested

Audits rated No Assurance are specifically highlighted to the Governance and Audits and Standards Committee along with any Director's comments. The Committee is able to request any director attends a meeting to discuss the issues.



# 7. Exception Risk Ranking

The following table outline the exceptions raised in audit reports, reported in priority order and are broadly equivalent to those previously used.

Priority Level	Description
Low Risk (Improvement)	Very low risk exceptions or recommendations that are classed as improvements that are intended to help the service fine tune its control framework or improve service effectiveness and efficiency. An example of an improvement recommendation would be making changes to a filing system to improve the quality of the management trail.
Medium Risk	These are control weaknesses that may expose the system function or process to a key risk but the likelihood of the risk occurring is low.
High Risk	Action needs to be taken to address significant control weaknesses but over a reasonable timeframe rather than immediately. These issues are not 'show stopping' but are still important to ensure that controls can be relied upon for the effective performance of the service or function. If not addressed, they can, over time, become critical. An example of an important exception would be the introduction of controls to detect and prevent fraud.
Critical Risk	Control weakness that could have a significant impact upon not only the system function or process objectives but also the achievement of the Council's objectives in relation to: The efficient and effective use of resources, The safeguarding of assets, The preparation of reliable financial and operational information, Compliance with laws and regulations and corrective action needs to be taken immediately.

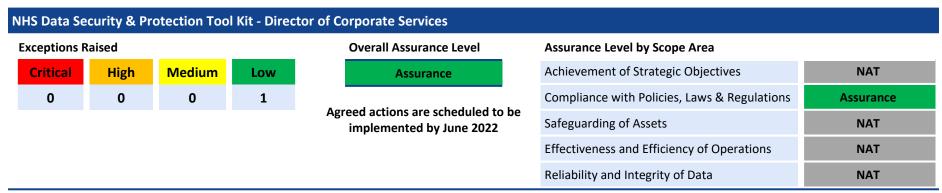
Any critical exceptions found the will be reported in their entirety to the Governance and Audits and Standards Committee along with Director's comments



## 8. 2020/21 Audits completed to date (31st August 2022)

Childcare Development and Early Years Education - Director of Children's, Families and Education						
Exceptions Raised				Overall Assurance Level	Assurance Level by Scope Area	
Critical	High	Medium	Low	Reasonable Assurance	Achievement of Strategic Objectives	Assurance
0	0	1	1		Compliance with Policies, Laws & Regulations	Reasonable Assurance
				Agreed actions are scheduled to be implemented by August 2023	Safeguarding of Assets	NAT
					Effectiveness and Efficiency of Operations	Assurance
					Reliability and Integrity of Data	NAT

One medium risk exception was raised during this review. The Early Years Pupil Premium (EYPP) gives providers additional funding to support disadvantaged pupils. The Eligibility Checking Service is overseen by the Department for Work and Pensions (DWP) and require data to be inputted into the Capita system. Up to 1000 records are required to be inputted and it was highlighted that this can only be done manually which could result in inaccurate entries. One low risk exception was also raised as a result of this review.



One low risk exception was raised as it was highlighted that 2 of the 42 elements checked were in need of more evidence to satisfy the NHS Digital mandatory requirements. In addition, 13 of the 40 requirements marked as compliant were in relation to policies that the Authority must have in place regarding data security, sharing of data etc.



Health and Safety - Director of Corporate Services							
Exceptions R	aised			Overall Assurance Level	Assurance Level by Scope Area		
Critical	High	Medium	Low	Limited Assurance	Achievement of Strategic Objectives	NAT	
0	5	3	0	A award antique que cabadulad to be	Compliance with Policies, Laws & Regulations	Limited Assurance	
				Agreed actions are scheduled to be implemented by April 2023	Safeguarding of Assets	NAT	
					Effectiveness and Efficiency of Operations	NAT	
					Reliability and Integrity of Data	NAT	

Five high risk exceptions were raised in relation to; lack of completion for health and safety mandatory training (only 36% have completed within the required timescale), failure to sight a copy of a 'Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations' RIDDOR report therefore testing was unable to verify if the required 15 days timescale has been met and, in another instance, testing confirmed that the RIDDOR report was eight weeks after the 15 days timescale. Staff failure to complete the PCC Mandatory Fire Training (only 4/20 within the sample testing had completed within the required timescale). Failure to complete the First aid Work course for 3/10 officers within the sample tested. Failure of completing, evidencing, and monitoring Display Screen Equipment (DSE) assessments. Lastly a high-risk exception was raised as overall, testing highlighted significant gaps in compliance with PCC's Health and Safety Policies. Three medium risk exceptions were also raised as a result of this review.

#### **Pyramids - Director of Culture, Leisure and Regulatory Services** Overall Assurance Level **Exceptions Raised Assurance Level by Scope Area Critical** High Medium Achievement of Strategic Objectives **Assurance** Low **Reasonable Assurance** 0 0 3 0 Compliance with Policies, Laws & Regulations NAT Agreed actions are scheduled to be **Reasonable Assurance** Safeguarding of Assets implemented by September 2022 Effectiveness and Efficiency of Operations Reasonable Assurance Reliability and Integrity of Data NAT

Three medium risk exceptions were raised in relation to a lack of a comprehensive list in place of PCC owned plant and equipment at the Pyramids Centre which would be used to inform regular maintenance / servicing, a lack of inventory of PCC owned equipment and inconsistency in monthly performance reporting.



Community Funerals - Director of Culture, Leisure and Regulatory Services						
Exceptions Ra	aised			Overall Assurance Level	Assurance Level by Scope Area	
Critical	High	Medium	Low	Assurance	Achievement of Strategic Objectives	NAT
0	0	0	0		Compliance with Policies, Laws & Regulations	Assurance
					Safeguarding of Assets	Assurance
					Effectiveness and Efficiency of Operations	Assurance
					Reliability and Integrity of Data	NAT

No exceptions were raised as a result of this review.

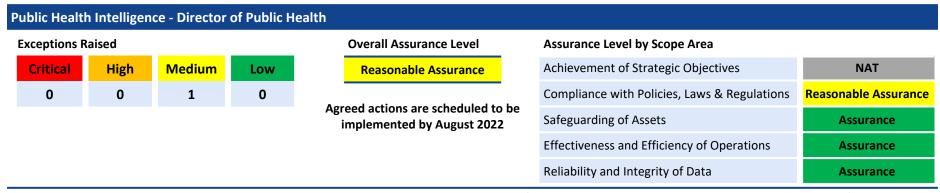
Purchase Cards - Director of Finance and Recourses									
Exceptions Raised				Overall Assurance Level Assurance Level by Scope Area					
Critical	High	Medium	Low	Limited Assurance	Achievement of Strategic Objectives	NAT			
0	4	1	0		Compliance with Policies, Laws & Regulations	Limited Assurance			
				Agreed actions are scheduled to be implemented by September 2022	Safeguarding of Assets	Reasonable Assurance			
					Effectiveness and Efficiency of Operations	Limited Assurance			
					Reliability and Integrity of Data	NAT			

Four high risk exceptions were raised as it was highlighted that the purchasing cards have been utilised for transactions such as parking fines and IT equipment both deemed as forbidden expenditure. It was also highlighted for 16/114 transactions sufficient evidence of VAT has not been uploaded into Barclaycard Spend Management. Lastly it was highlighted 16/17 officers that are on Long Term Absence or Maternity Leave have not had their cards temporarily suspended. One medium risk exception was also raised as a result of this review.



Asset Management - Director of Port									
Exceptions Raised				Overall Assurance Level	Assurance Level by Scope Area				
Critical	High	Medium	Low	Reasonable Assurance	Achievement of Strategic Objectives	NAT			
0	0	2	0	A succed anti-success and adult of the hor	Compliance with Policies, Laws & Regulations	Assurance			
				Agreed actions are scheduled to be implemented by January 2023	Safeguarding of Assets	Reasonable Assurance			
					Effectiveness and Efficiency of Operations	Assurance			
					Reliability and Integrity of Data	NAT			

Two medium risk exceptions were raised as testing found that there was insufficient evidence held by PCC / The Port to verify that 3 assets were actually protected by valid insurance. In addition, testing highlighted that 3 assets were overdue for rent review or renewal by between 4 months and over 1 year.



One medium risk exception was raised in relation to seven documents containing data from the data sharing agreement that preceded 2012 (10-year period) and was in need of destruction.



Craneswater School - Schools									
Exceptions Raised		Overall Assurance Level	Assurance Level by Scope Area						
Critical	High	Medium	Low	Reasonable Assurance	Achievement of Strategic Objectives	Assurance			
0	2	3	1	A d	Compliance with Policies, Laws & Regulations	Reasonable Assurance			
				Agreed actions are scheduled to be implemented by September 2022	Safeguarding of Assets	Reasonable Assurance			
			Effectiveness and Efficiency of Operations	Limited Assurance					
					Reliability and Integrity of Data	NAT			

Two high risk exceptions were raised in relation to payments that were not processed in line with PCC's Contract Procedure Rules. In addition, testing highlighted 1/5 personnel file where a DBS certificate was being held. Three medium and one low risk exceptions was also raised as a result of this review.

Medina Primary School - Schools									
Exceptions Raised				Overall Assurance Level Assurance Level by Scope Area					
Critical	High	Medium	Low	Reasonable Assurance	Achievement of Strategic Objectives	Assurance			
0	2	2	0		Compliance with Policies, Laws & Regulations	Reasonable Assurance			
				Agreed actions are scheduled to be implemented by September 2022	Safeguarding of Assets	Reasonable Assurance			
					Effectiveness and Efficiency of Operations	Assurance			
					Reliability and Integrity of Data	NAT			

Two high risk exceptions were raised as it was highlighted 2/3 invoices were dated prior to the purchase order. In addition, testing highlighted a lack of a master copy of the register and spot checks of the register have not been conducted nor scheduled. An annual check of all items on the inventory should be conducted in order to verify location, review condition and to take appropriate action in relation to any surpluses or deficiencies, annotating the inventory accordingly. Two medium risk exceptions were also raised as a result of this review.



Wimborne Primary - Schools									
Exceptions Raised				Overall Assurance Level	Assurance Level by Scope Area				
Critical	High	Medium	Low	Reasonable Assurance	Achievement of Strategic Objectives	Reasonable Assurance			
0	1	3	2	A d d	Compliance with Policies, Laws & Regulations	Assurance			
				Agreed actions are scheduled to be implemented by September 2022	Safeguarding of Assets	Assurance			
					Effectiveness and Efficiency of Operations	Limited Assurance			
					Reliability and Integrity of Data	NAT			

One high risk exception was raised as a result of this review in relation to 1/5 personnel file where a DBS certificate was being held. Three medium and two low risk exceptions was also raised as a result of this review.

Omicron Business Grant - Director of Finance and Resources								
Exceptions Raised				Overall Assurance Level	Assurance Level by Scope Area			
Critical	High	Medium	Low	Reasonable Assurance	Achievement of Strategic Objectives	NAT		
0	0	0	0		Compliance with Policies, Laws & Regulations	Reasonable Assurance		
					Safeguarding of Assets	NAT		
					Effectiveness and Efficiency of Operations	NAT		
					Reliability and Integrity of Data	NAT		

Testing was performed as part of the conditions of the grant to assess the effectiveness of fraud prevention arrangements. No significant issues were noted; however, overall testing highlighted six grants that had been paid incorrectly, five were due to fraud (£14,668) and one due to error (£1333). This represents a failure rate of 0.96%.

## Orpheus Grant - Director of Children, Families and Education

Grant Verification - Sample testing was able to evidence that the terms and conditions had been met which allowed the Chief Executive and Chief Internal Auditor to sign the declaration confirming compliance.



### Test & Trace £500 - Director of Finance and Resources

Grant Verification - Sample testing was able to evidence that the terms and conditions had been met which allowed the Chief Executive and Chief Internal Auditor to sign the declaration confirming compliance.

### Contain Outbreak Management Fund (COMF) - Director of Public Health

Grant Verification - Sample testing was able to evidence that the terms and conditions had been met which allowed the Chief Executive and Chief Internal Auditor to sign the declaration confirming compliance.

## **Universal Drug Treatment - Director of Public Health**

Grant Verification - Sample testing was able to evidence that the terms and conditions had been met which allowed the Chief Executive and Chief Internal Auditor to sign the declaration confirming compliance.

## **Local Transport Capital - Director of Regeneration**

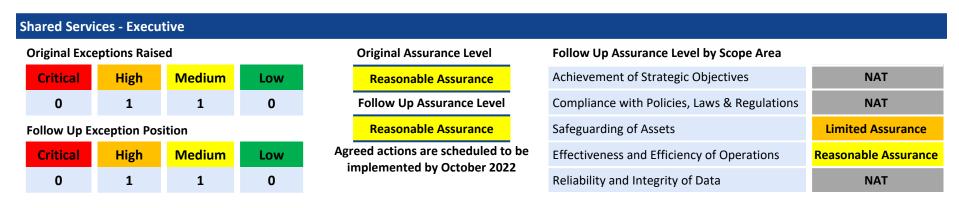
Grant Verification - Sample testing was able to evidence that the terms and conditions had been met which allowed the Chief Executive and Chief Internal Auditor to sign the declaration confirming compliance.



## 9.2022/23 Follow-up Audits to date (31st August 2022)

Accounts Payable - Director of Finance and Recourses										
Original Exceptions Raised				Original Assurance Level Follow Up Assurance Level by Scope Area						
Critical	High	Medium	Low	Limited Assurance	Achievement of Strategic Objectives	NAT				
1	1	1	0	Follow Up Assurance Level	Compliance with Policies, Laws & Regulations	Assurance				
Follow Up Ex	ception Pos	ition		Limited Assurance	Safeguarding of Assets	Limited Assurance				
Critical	High	Medium	Low	Agreed actions are scheduled to be	Effectiveness and Efficiency of Operations	NAT				
0	1	1	0	implemented by August 2022	Reliability and Integrity of Data	NAT				

The original audit highlighted one critical, one high and one medium risk exception. The high risk is closed but not verified, the medium risk is closed and verified while the critical risk is in progress. Further details can be found on section 5 of this report.



The original audit highlighted one high and one medium risk exception. Both exception remain open. This is due to the New Neighbourhood Team Leader covering the role of interim Head of Development Management and therefore due to resources and other priorities the actions have not been completed.



HIVE - Director of Culture, Leisure and Regulatory Services									
Original Exceptions Raised				Original Assurance Level	Follow Up Assurance Level by Scope Area				
Critical	High	Medium	Low	Limited Assurance	Achievement of Strategic Objectives	Limited Assurance			
0	2	1	0	Follow Up Assurance Level	Compliance with Policies, Laws & Regulations	NAT			
Follow Up Ex	ception Pos	ition		Limited Assurance	Safeguarding of Assets	NAT			
Critical	High	Medium	Low	Agreed actions are scheduled to be	Effectiveness and Efficiency of Operations	NAT			
0	2	0	0	implemented by October 2022	Reliability and Integrity of Data	NAT			

The original audit highlighted two high and one medium risk exception, follow up testing confirmed that the medium risk exception has been closed and verified and the two high risk exception are in progress. The first high risk is in relation to the Memorandum of Understanding / KPIs, follow up testing confirmed that the MoU is in draft due to changes made to portfolio holder for the Cabinet for Communities and Central Services and the Chief Executive for HIVE. The draft MoU is due to be presented at the next full cabinet meeting for approval. The second high risk is in relation to the Partnership Consultancy Group - where minutes of meetings were not being recorded. The partnership is currently in review and once meetings have re-commenced records of minutes will be conducted and stored.

Depot Services - Director of Housing, Neighbourhoods and Building Services									
Original Exceptions Raised				Original Assurance Level	Follow Up Assurance Level by Scope Area				
Critical	High	Medium	Low	Reasonable Assurance	Achievement of Strategic Objectives	NAT			
0	1	3	1	Follow Up Assurance Level	Compliance with Policies, Laws & Regulations	Reasonable Assurance			
Follow Up Ex	ception Pos	ition		Reasonable Assurance	Safeguarding of Assets	Assurance			
Critical	High	Medium	Low	Agreed actions are scheduled to be	Effectiveness and Efficiency of Operations	Reasonable Assurance			
0	0	2	0	implemented by July 2022	Reliability and Integrity of Data	NAT			

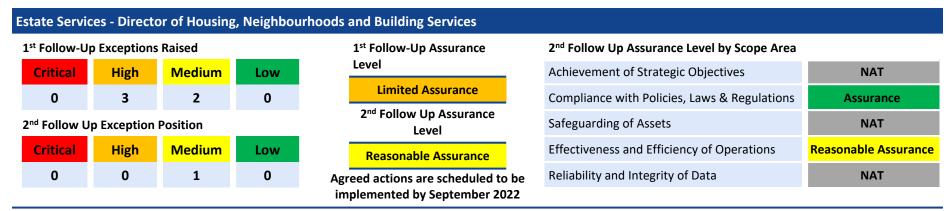


Original audit testing highlighted one high, three medium and one low risk exceptions. The follow up results show that one high and one medium risk exception have now been closed and verified. The low-risk exception has been closed and not verified while two medium risk exceptions remain open. The open exceptions relate to vehicle checks not being documented and the failure to allocate tasks within a suitable timeframe.



## 10. 2022/23 2<sup>nd</sup> Follow-up Audits to date (31<sup>st</sup> August 2022)

As raised during the July 2020 Governance & Audits & Standards meeting. Internal Audit has scheduled in 2nd follow-up reviews for all areas where a 1st review highlighted risk exposure/s still unmitigated. The audits below detail the position as at a 2nd review.



The first follow up testing confirmed that two high risk exception were in progress, and one remained open in addition to two medium risk exceptions that were in progress. The second follow up results show that the two high risk exceptions have been closed and verified while one medium risk exception is closed as it is no longer applicable, and the remaining medium risk is open. The open risk exception related to the lack of evidence of acknowledgement of the current lone working risk assessment for 16 (61%) officers.

#### **Emergency Procedures - Director of Housing Neighbourhoods and Building Services** 1st Follow-Up Exceptions Raised 1<sup>st</sup> Follow-Up Assurance 2<sup>nd</sup> Follow Up Assurance Level by Scope Area Level Critical High Medium Achievement of Strategic Objectives NAT Low **Reasonable Assurance** 0 0 Compliance with Policies, Laws & Regulations 2 0 Assurance 2<sup>nd</sup> Follow Up Assurance Safeguarding of Assets NAT 2<sup>nd</sup> Follow Up Exception Position Level Critical High Medium Effectiveness and Efficiency of Operations Reasonable Assurance Low **Assurance** 0 0 0 0 Reliability and Integrity of Data NAT



The first follow up confirmed that two high risk exceptions had actions that were in progress. The second follow up has confirmed that both these exceptions have been closed and verified.

ABP Contract - Director of Port									
1 <sup>st</sup> Follow-Up Exceptions Raised				1 <sup>st</sup> Follow-Up Assurance	2 <sup>nd</sup> Follow Up Assurance Level by Scope Area				
Critical	High	Medium	Low	Level	Achievement of Strategic Objectives	Reasonable Assurance			
0	1	0	1	Reasonable Assurance	Compliance with Policies, Laws & Regulations	NAT			
2 <sup>nd</sup> Follow Up	p Exception	Position		2 <sup>nd</sup> Follow Up Assurance Level	Safeguarding of Assets	Assurance			
Critical	High	Medium	Low	Reasonable Assurance	Effectiveness and Efficiency of Operations	NAT			
0	1	0	0		Reliability and Integrity of Data	NAT			

The first follow up confirmed that one high and one low risk exceptions remained open, Testing undertaken during this audit has determined that the low-risk exception be recorded as "Closed: Management Accepts Risk" with a provision that this is dealt with in the next contract. The high-risk exception remains outstanding pending communication between PCC Legal Team and ABP. This is in relation to the signing of the contract between Associated British Ports (ABP) and the Portsmouth International Port, the main cause for the delay is noted as ABP.



# 11. Exceptions

Of the 2022/23 full audits completed, 38 exceptions have been raised.\*

Risk	Total
Critical Risk	0
High Risk	14
Medium Risk	19
Low Risk - Improvement	5

<sup>\*</sup>These figures are excluding Portico and SLEP