

Ref: LC

Date: 23 February 2024

A meeting of the Audit Committee will be held on Tuesday 5 March 2024 at 3pm.

Members may attend the meeting in person or via remote online access. Webex joining details have been sent to Members and officers. Members are requested to notify Committee Services by 12 noon on Monday 4 March 2024 how they intend to access the meeting.

In the event of connectivity issues, Members are asked to use the *join by phone* number in the Webex invitation and as noted above.

Please note that this meeting will be live-streamed via YouTube with the exception of any business which is treated as exempt in terms of the Local Government (Scotland) Act 1973 as amended.

Further information relating to the recording and live-streaming of meetings can be found at the end of this notice.

IAIN STRACHAN Head of Legal, Democratic, Digital & Customer Services

BUSINESS

1.	Apologies, Substitutions and Declarations of Interest	Page
PER	FORMANCE MANAGEMENT	
2.	Internal Audit Progress Report – 4 December 2023 to 9 February 2024	
	Report by Head of Legal, Democratic, Digital & Customer Services	р
3.	External Audit Action Plans – Current Actions	
	Report by Head of Legal, Democratic, Digital & Customer Services	p
4.	Review of Local Code of Governance	
	Report by Head of Legal, Democratic, Digital & Customer Services	р
	The documentation relative to the following item has been treated as exempt information in terms of the Local Government (Scotland) Act 1973 as amended, the nature of the exempt information being that set out in paragraphs 4, 6 & 14 of Part I of Schedule 7(A) of the Act.	
PER	FORMANCE MANAGEMENT	
5.	Appendix relative to Item 2 providing information on special investigations.	g

The report is available publicly on the Council's website and the minute of the meeting will be submitted to the next standing meeting of the Inverclyde Council. The agenda for the meeting of the Inverclyde Council will be available publicly on the Council's website.

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Enquiries to - Lindsay Carrick - Tel 01475 712114



AGENDA ITEM NO: 2

Report To: Audit Committee Date: 5 March 2024

Report By: Head of Legal, Democratic, Digital Report No: AC/03/24/IS/APr

& Customer Services

Contact Officer: Andi Priestman Contact No: 01475 712251

Subject: INTERNAL AUDIT PROGRESS REPORT - 4 DECEMBER 2023 TO 9

FEBRUARY 2024

1.0 PURPOSE AND SUMMARY

1.1 □For Decision □For Information/Noting

- 1.2 The purpose of this report is to enable Members to monitor the performance of Internal Audit, to discharge their scrutiny and performance monitoring roles and gain an overview of the overall control environment throughout the Council.
- 1.3 The Monitoring Report from 4 December 2023 to 9 February 2024 is attached at Appendix 1 since its content is essential to the understanding of the Council's control environment.

2.0 RECOMMENDATIONS

2.1 It is recommended that Members agree to note the progress made by Internal Audit in the period from 4 December 2023 to 9 February 2024.

Iain Strachan

Head of Legal, Democratic, Digital & Customer Services

3.0 BACKGROUND AND CONTEXT

- 3.1 In April 2023, the Audit Committee approved the Internal Audit Annual Plan which detailed a programme of activity to be undertaken during 2023-24.
- 3.2 Internal Audit regularly reports findings and action plans to relevant Council Officers and the Audit Committee as part of the annual audit plan. A follow up process is in place to allow follow up of current internal audit actions to be co-ordinated and updated by Internal Audit on a monthly basis with regular reporting to CMT and the Audit Committee.
- 3.3 There was one internal audit report finalised since the last progress update to Audit Committee:
 - Non-Domestic Rates
- 3.4 This report contained 3 issues categorised as follows:

Red	Amber	Green
0	0	3

3.5 The 2023/24 audit plan is now underway and the current status is as follows:

Stage	Number of Reports
Final Report	3
Draft Report	0
Fieldwork Complete – report N/A	0
Fieldwork Complete	1
Fieldwork in Progress	5
Planning	2
Not Started	3
Deferred	2
Total	16

- 3.6 In relation to internal audit action plans there were 5 actions due for completion by 31 January 2024. Two actions are now complete and the completion date relating to three actions has been revised. The current status report is attached at Appendix 2.
- 3.7 The CMT has reviewed and agreed the current status of actions.

4.0 PROPOSALS

4.1 It is recommended that Members agree to note the progress made by Internal Audit in the period from 4 December 2023 to 9 February 2024.

5.0 IMPLICATIONS

5.1 The table below shows whether risks and implications apply if the recommendation is agreed:

SUBJECT	YES	NO
Financial		Χ
Legal/Risk	X	
Human Resources		Х
Strategic (Partnership Plan/Council Plan)	X	
Equalities, Fairer Scotland Duty & Children/Young People's Rights		Х
& Wellbeing		
Environmental & Sustainability		X
Data Protection		Х

5.2 Financial Risk

There are no financial implications arising directly from this report.

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From (If Applicable)	Other Comments
N/A					

5.3 Legal/Risk

Where delays arise in delivering the Internal Audit Plan, there is a risk that this may result in an inability to provide a reasonable level of assurance over the Council's system of internal control to those charged with governance. The main basis for providing assurance is coverage of the planned risk-based audits. Every endeavour is therefore made to ensure that no material slippage occurs in risk-based audits by concentrating resources on these audits.

5.4 Human Resources Risk

There are no human resources implications arising directly from this report.

5.5 Strategic

This report helps ensure strong governance, and its findings will help support delivery of the Council Plan adopted by Inverclyde Council on 20 April 2023, and in particular outcome theme 3: Performance, with the Council seeking to provide high quality and innovative services that deliver value for money.

6.0 CONSULTATION

6.1 Relevant officers have been consulted on the report.

7.0 BACKGROUND PAPERS

7.1 File of completed internal audit reports: Available from Andi Priestman, Chief Internal Auditor.



Audit Committee Report Report on Internal Audit Activity from 4 December 2023 to 9 February 2024

INVERCLYDE COUNCIL - REPORT ON INTERNAL AUDIT ACTIVITY FROM 4 DECEMBER 2023 TO 9 FEBRUARY 2024

APPENDIX 1	AP	Ρ	ΕI	ND	IX	1
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1 Audit work undertaken in the period

Reports issued since last update

1.1 In each audit, one of 4 overall opinions is expressed:

Strong	In our opinion there is a sound system of internal controls designed to ensure that the organisation is able to achieve its objectives.
Satisfactory	In our opinion <i>isolated</i> areas of control weakness were identified which, whilst not systemic, put some organisation objectives at risk.
Requires improvement	In our opinion systemic and/or material control weaknesses were identified such that some organisation objectives are put at significant risk.
Unsatisfactory	In our opinion the control environment was considered <i>inadequate</i> to ensure that the organisation is able to achieve its objectives.

1.2 Detailed findings and recommendations reported to management are currently graded using the following criteria:

Red	 In our opinion the control environment is insufficient to address the risk and this could impact the Council as a whole. Corrective action must be taken and should start immediately. Overseen to completion by Corporate Management Team.
Amber	 In our opinion there are areas of control weakness which we consider to be individually significant but which are unlikely to affect the Council as a whole. Corrective action must be taken (some exceptions may be agreed with IA) within reasonable timeframe. Overseen to completion by Head of Service.
Green	 In our opinion the risk area is well controlled or our audit highlighted areas for minor control improvement and/or areas of minor control weakness. Process improvements/efficiencies may be actioned at management discretion in consultation with Internal Audit (IA). Managed by service owner.

1.3 There was one audit review finalised since the progress update to Audit Committee, which is identified below, together with a summary of the gradings of the issues identified. In Section 2 we have provided a summary of the main findings from the review.

		Grading		
Reports finalised since previous Audit Committee	Red	Amber	Green	Total Number of Issues
Non-Domestic Rates	0	0	3	3
Total	0	0	3	3

Internal Audit Action Plan Follow Up

1.4 The current status of Internal Audit Action plans is set out as an attachment at Appendix 2 to this report.

2 Summary of main findings from reports issued since previous Audit Committee

2.1 We have provided below a summary of the key findings from the final reports issued after 1 December 2023.

Non-Domestic Rates (January 2024)

- 2.2 This audit was conducted between November 2023 and January 2024 in accordance with the 2023/24 Internal Audit Plan, as agreed by the Invercive Council Audit Committee.
- 2.3 As a property based tax business rates are calculated using the rateable values of non-domestic properties multiplied by a government set poundage less any eligible reliefs. Although non-domestic rates are levied and collected by Councils, rateable values are set by Scottish Assessors. During 2022/23 the total net NDR income for Inverclyde Council was £18.4m. From 1st April 2023, the Scottish Government has frozen the national poundage rate at 49.8p with the Intermediate Property rate set at 51.1p. On 1st April 2023, rateable values across Inverclyde amounted to £56.7m.
- 2.4 The objective of this audit was to provide management and the Audit Committee with an assessment of the adequacy and effectiveness of the governance, risk management and controls surrounding the key risks faced by Invercive Council in relation to non-domestic rates.
- 2.5 The review focused on the high-level processes and procedures in relation to corporate purchase cards and concentrated on identified areas of perceived higher risk, such as failing to issue accurate bills or apply reliefs correctly.
- 2.6 The overall control environment opinion for this audit review was Strong. There were 3 GREEN issues identified which would enhance the overall control environment. Areas of good practice were identified including robust arrangements are in place to ensure that all liable properties are correctly identified, valued and billed in a timely manner and the team demonstrated a strong overall commitment to providing an effective service to process reliefs and refunds on a timely basis.
- 2.7 The review identified 3 minor control issues and an action plan is in place to address all issues by 31 December 2024.

INVERCLYDE COUNCIL – REPORT ON INTERNAL AUDIT ACTIVITY FROM 4 DECEMBER 2023 TO 9 FEBRUARY 2024

3 Audit Plan for 2023/2024 - Progress to 9 February 2024

Planned Audit Coverage	Not started	Planning	TOR Issued	Fieldwork in Progress	Fieldwork Complete	Draft Report	Report Finalised	Reported to Audit Committee
Risk-Based Reviews		1	l .				•	
Supplier Management (b/f from 2022/23)	Deferred	to 2024/25 A	nnual Aud	dit Plan – repl	aced by Proc	urement Co	ompliance au	dit in 2023/24
Procurement Compliance		✓	✓	✓	√			
Succession Planning		✓						
Attendance Management		✓	✓	✓	✓	✓	✓	January 2024
Building Standards		✓	✓	✓				
ASN Transport	Fieldworl	k deferred to	2024/25 A	nnual Audit F	Plan.		-	
Commercial Waste Income (Billing and Collection)		✓	✓	✓	✓	✓	✓	October 2023
Limited Scope Financial Reviews	•				<u>. </u>			
Non-Domestic Rates		✓	✓	✓	✓	✓	✓	March 2024
Advisory Reviews	•	1	L	•			1	
Education – Cashless Catering Replacement System		✓	✓	Audit advice	e and support	will be pro	vided to the p	roject.
UK Shared Prosperity Fund Assurance Arrangements		✓					_	_
Project Assurance Reviews	•		l				1	
Swift Replacement System (Social Work IT System)	Not starte	ed - Audit sur	port will b	e provided at	testing and i	mplementa	tion phases o	f the project.
Corporate Fraud Reviews	-		•			•	•	' '
Employee Expenses	2023-24	checks are u	nderway.					
Client Accounts – Quarterly Checks	2023-24	checks are u	nderway.					
Catering – Quarterly Stock Checks	Not starte	ed.						
Education Establishment Placing Requests	Not starte	ed.						
Regularity Audits								
Education CSA	✓	✓	✓	✓	✓			
Corporate Purchase Cards – Quarterly Checks	Q3 2023	-24 checks a	re underwa	ay. Q1/Q2 re	port finalised	– see secti	on 2 for more	information.
Corporate Governance								
Annual Governance Statement 2022-23	Complete	e - Input prov	ided by CI	A.				
Other Work								
Council Tax Reduction Scheme/Discounts/Exemptions	Checks a	are carried ou	ıt to establ	lish the validit	y of discounts	and exem	ptions - see	section 4.
National Fraud Initiative	22/23 Ex	Checks are carried out to establish the validity of discounts and exemptions – see section 4. 22/23 Exercise is being progressed – see section 4 of report for more information.						
Carry forward from 2022/23 Audit Plan	Report fir	nalised: Debt	Recovery	; Corporate P	urchase Card	ds; Client A	ccounts.	
Inverclyde IJB	20 days	allocated to I	JB audit pl	lan. Two advi	sory reviews	have been	planned. Or	ne is complete.

4 Corporate Fraud Activity

4.1 The undernoted table sets out progress to date on corporate fraud activity in the period 4 December 2023 to 9 February 2024:

National Fraud Initiative Exercise

In relation to the 2022/2023 Exercise, matches relating to the relevant datasets have been received and progress is as follows:

Matches	Number				Value of
received*	investigated	No issues	Fraud	Error	Fraud/Error
1770	331	326	0	5	£6,205.87

The Council Tax Single Person Discount recheck exercise was refreshed in March 2023 and the results to date are as follows:

Matches	Number				Value of
received*	investigated	No issues	Fraud	Error	Fraud/Error
9803	1740	1685	34	21	£56,481.67

^{*} New datasets matches have been released relating to HMRC information in November 2023 which has increased the total number of matches received.

Employee Expenses – 2023-2024

Quarterly checks are underway for 2023-24.

Client Money Accounts Quarterly Checks - 2023-2024

Quarterly checks are underway for 2023-24.

Catering - Quarterly Stock Checks - 2023-2024

Not yet started.

Education Establishment Checks 2023-2024

Not yet started.

- 4.2 The team continues to investigate whistleblowing and other enquiries in relation to DWP benefit, blue badge, and Council Tax referrals. Since 1 April 2023 these enquiries have resulted in the identification of overpayments of council tax discounts and exemptions of £97,830.
- 4.3 The team is also working alongside Finance to establish the validity of Community Care Grants. At 31 January, 21 visits have been carried out for applications totalling £19,836 resulting in £6,686 being refused and £3,387 paid out but subsequently identified as unused or unable to validate.

4.4 The team is also progressing whistleblowing and other enquiries as follows:

File Ref	Description	Status					
Whistleblowin	Whistleblowing Enquiries						
23/59 Fraudulent grant applications Investigation completed as irregularities identified – se Section 6.							
Other enquirie	es						
23/81	Fraudulent placing request	Closed – findings provided to Service.					
23/84	Fraudulent CT discount	Ongoing investigation.					
23/85	Fraudulent CT discount	Ongoing investigation.					

5 Ad hoc activities undertaken since the previous Audit Committee

- 5.1 From time to time, management will request the assistance of Internal Audit in certain activities that are in addition to the annual Operational Plan. Examples of such activities include investigations of alleged irregularities, review of changes in system procedures etc.
- 5.2 Contingency has been made available in the Operational Plan for such ad hoc activities. Since the previous Audit Committee, ad hoc activity undertaken in the period is as follows:
 - Providing relevant information in relation to FOI requests.
 - Investigations and other work as set out at sections 4.2 to 4.4 of the report.
 - Provision of ongoing advice and support to services.

INVERCLYDE COUNCIL INTERNAL AUDIT

REPORT TO AUDIT COMMITTEE ON STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY) AT 31 JANUARY 2024

Summary: Section 1 Summary of Management Actions due for completion by 31/01/2024

There were 5 actions due for completion by 31 January 2024. Two actions are complete, the completion date for three actions has been revised.

Section 2 Summary of Current Management Actions Plans at 31/01/2024

At 31 January 2024 there were no audit reports delayed due to management not finalising the action plan within agreed timescales.

Section 3 Current Management Actions at 31/01/2024

At 31 January 2024 there were 17 current audit action points.

Section 4 Analysis of Missed Deadlines

At 31 January 2024 there were 4 audit action points where the original due date had been missed.

Section 5 Summary of Action Plan Points by Audit Year

INVERCLYDE COUNCIL INTERNAL AUDIT REPORT TO AUDIT COMMITTEE ON STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY) SUMMARY OF MANAGEMENT ACTION PLANS DUE FOR COMPLETION BY 31.01.2024

Directorate	No. of Actions Due	No. of Actions Completed	Deadline missed Revised date set*	No response received*
Environment and Regeneration	3	1	2	
HSCP	1		1	
Chief Executive	1	1		
Total	5	2	3	

^{*} These actions are included in the Analysis of Missed Deadlines – Section 4

SECTION 2

CURRENT ACTIONS BY DIRECTORATE

HSCP	
Due for completion March 2024	1
Due for completion April 2024	1
Total Actions	2
Environment and Regeneration	
Due for completion March 2024	2
Due for completion April 2024	1
Due for completion May 2024	1
Due for completion June 2024	1
Total Actions	5
Education Communities and Organisational Development	
Due for completion February 2024	1
Due for completion March 2024	3
Due for completion April 2024	1
Due for completion May 2024	1
Due for completion June 2024	2
Completion date to be advised	2
Total Actions	10
Total current actions:	17

SECTION 3

P

Homelessness (Report Issued August 2021)

Description	Status	Original Due Date	Due Date	Assigned To
Adequacy of policies and procedures (Amber) Management will: Update the rent management policy and procedures and obtain CMT and committee approval as appropriate; review the arrangements for implementation and reporting of the Rent Management Policy; set a date to finalise its review of Homelessness assessment, housing support and case handling procedures; and ensure that version control is consistently and fully applied to all Homelessness policies and procedures.		31-Mar- 2022	31-Mar- 2024*	Service Manager (Homelessness and Addictions)

P

Employee Expenses (Report Issued August 2022)

Description	Status	Original Due Date	Due Date	Assigned To
High Mileage Claims (Amber) The service will carry out a refreshed value for money study that takes into account the current situation and will make recommendations accordingly.		31-Mar- 2023	31-Mar- 2024*	Director Environment and Regeneration



SECTION 3

P

Climate Change – Utilities Management (Report Issued February 2023)

Description	Status	Original Due Date	Due Date	Assigned To
Adequacy of resources to progress actions from the Net Zero Strategy (Amber) Management will ensure that all scheduled work is monitored, updated and reported to Committee on a regular basis.		31-Jan- 2024	31-Jan- 2024	Head of Physical Assets
Collation and reporting of emissions results (Amber) Management will ensure that a process to evidence periodic review on a regular basis is introduced, which includes version control.		31-May- 2024	31-May- 2024	Head of Physical Assets



Commercial Waste Income – Billing and Collection (Report Issued August 2023)

Description	Status	Original Due Date	Due Date	Assigned To
Managing the Collection of Commercial Waste Income (Amber) Management will:		30-Apr- 2024	30-Apr- 2024	Service Manager (Grounds & Waste)
• following discussions with the Chief Financial Officer, seek Committee approval during January for the annual rise in commercial waste charges. If this change is agreed with Finance Services, then arrange to issue existing customers with commercial waste debtors accounts on the first working day of March and September each year;				
 co-ordinate as necessary with relevant Finance staff regarding the accrual of commercial waste income into the new financial year; 				
 ensure that the Commercial Services Officer makes regular use of the FMS historical age report to identify unpaid accounts within two weeks of second 				

Actio	on Status		
	No response received		Missed original due date
	In Progress	②	Completed

^{*} See Section 4

Description	Status	Original Due Date	Due Date	Assigned To
reminder letters having been issued by Finance staff. In turn, the Commercial Services Officer will arrange for the suspension of uplifts pending payment of unpaid accounts; and arrange for the Service Co-ordinator to contact the Finance FMS Team to explore the option of using a spreadsheet upload into FMS as a means of raising debtors accounts.				
Documenting contractual relationships with commercial waste customers (Amber) Management will:		31-Jan- 2024	31-Mar- 2024*	Service Manager (Grounds & Waste)
 consult the relevant Legal Services Manager regarding the best means of documenting the contractual relationship between the Council and commercial waste customers. In addition, this exercise will ensure that the trade waste agreement form reflects any planned changes to the timetable for billing existing customers; and confirm that the commercial waste policy is both up to date and is also suitable to represent the terms and conditions of service for customers. An updated policy will also be published on the Council's website and routinely issued to prospective customers when they request quotations from the Commercial Services Officer. 				

Actio	on Status		
	No response received		Missed original due date
	In Progress	②	Completed

SECTION 3

P

Client Accounts – Quarterly Checks 2022/23 (Report Issued September 2023)

Description	Status	Original Due Date	Due Date	Assigned To
Inaccurate Transaction Records – Amber Management have agreed that a review will be undertaken of the overall management of the corporate appointee process with a view to streamlining and modernising the functions.		30-Apr- 2024	30-Apr- 2024	Head of Finance, Planning and Resources, HSCP

P

Corporate Purchase Cards – Quarterly Checks 2023/24 (Report Issued October 2023)

Description	Status	Original Due Date	Due Date	Assigned To
VAT guidance for users of corporate purchase cards (Amber)		31-Jan- 2024	30-Jun- 2024	Corporate Procurement Manager
The Procurement Manager will develop appropriate guidance for purchase card users regarding the processing and receipting of transactions which include VAT.				
This exercise will also include obtaining appropriate VAT advice from relevant Finance staff and issuing the subsequent guidance to all cardholders and their supervisors.				



SECTION 3

P

Attendance Management (Report Issued December 2023)

Description	Status	Original Due Date	Due Date	Assigned To
 Inefficient process for the notification, recording and monitoring of absences (Red) Proposal to Digital Modernisation Board for budget to implement new system/system upgrade including ICT support. 		28-Feb- 2024	28-Feb- 2024	Head of OD, Policy and Communications
Develop a project plan to implement new/upgraded IT system with improved absence management module with opportunities for self-service		30-Jun- 2024	30-Jun- 2024	Head of OD, Policy and Communications
Attendance Management Training (Amber) HR management will review mandatory training courses for approval by Corporate Management Team to include attendance management as an area of focus.		31-May- 2024	31-May- 2024	Head of OD, Policy and Communications
Self-Referrals in place for all directorates of the Council and HSCP.		31-Mar- 2024	31-Mar- 2024	Team Leader – Health and Safety
Generating Absence Reports for follow up actions (Amber) As part of the project implementation plan review functionality for managers access to Chris21 to generate absence reports.		31-Mar- 2024	31-Mar- 2024	Head of OD, Policy and Communications
Implement a corresponding timetable for generating the reports by management.		30-Apr- 2024	30-Apr- 2024	Head of OD, Policy and Communications
Issue a reminder to Heads of Establishment to update the return to work spreadsheet with any outstanding actions from the monthly open absence report on a regular basis.		31-Mar- 2024	31-Mar- 2024	Service Manager Education Resources
Heads of Establishment will report to senior management on the current position of each action on a regular basis.		30-Jun- 2024	30-Jun- 2024	Service Manager Education Resources

Actio	on Status		
	No response received		Missed original due date
	In Progress	②	Completed

^{*} See Section 4

Description	Status	Original Due Date	Due Date	Assigned To
Security, retention and disposal of attendance management files (Amber) Review the Council's retention and disposal of documents and records (electronic/paper) Policy to ensure retention periods comply with relevant retention requirements eg SCARRS and re-issue to services.	⊘	31-Jan- 31-Jan- 2024 2024		Head of Legal, Democratic, Digital and Customer Services
All service-based electronic attendance management files will be reviewed and retained for one year and destroyed in accordance with the Council's retention and disposal of Documents and Records (electronic/paper) policy.		3 months after implementation of Chris21 self-service module 3 months after implementation of Chris21 self-service module		ECMT
Any existing duplicate paper files in relation to attendance management are destroyed.				ECMT



INVERCLYDE COUNCIL INTERNAL AUDIT REPORT TO AUDIT COMMITTEE ON STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY) ANALYSIS OF MISSED DEADLINES

Report	Action	Original Date	Revised Date	Management Comments
Homelessness (August 2021)	Adequacy of policies and procedures (Amber) Management will: Update the rent management policy and procedures and obtain CMT and committee approval as appropriate; review the arrangements for implementation and reporting of the Rent Management Policy; set a date to finalise its review of Homelessness assessment, housing support and case handling procedures; and ensure that version control is consistently and fully applied to all Homelessness policies and procedures. High Mileage Claims (Amber)		31.03.24	This has been further delayed as senior management have instructed that benchmarking with other local authorities be undertaken and further discussions with other service areas including Finance. The new policy will then be presented to E&R Committee for approval in March. Review of procedures is now complete. In relation to version control this is now complete.
Employee Expenses (August 2022)	High Mileage Claims (Amber) The service will carry out a refreshed value for money study that takes into account the current situation and will make recommendations accordingly.	31.03.23 31.08.23 30.11.23	31.03.24	A number of high mileage users are now using fleet resources to address reductions in mileage claims. A further report will be presented to CMT in early 2024 with options for consideration.

INVERCLYDE COUNCIL INTERNAL AUDIT REPORT TO AUDIT COMMITTEE ON STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY) ANALYSIS OF MISSED DEADLINES

Report	Action	Original Date	Revised Date	Management Comments
Commercial Waste Income – Billing and Collection (August 2023)	relationships with commercial waste customers (Amber) Management will: • consult the relevant Legal Services Manager regarding the best means of documenting the contractual relationship between the Council and commercial waste customers. In addition, this exercise will ensure that the trade waste agreement form reflects any planned changes to the timetable for billing existing customers; and • confirm that the commercial waste policy is both up to date and is also suitable to represent the terms and conditions of service for customers. An updated policy will also be published on the Council's website and routinely issued to prospective customers when they request quotations from the Commercial Services Officer.	31.01.24	31.03.24	The review took longer than anticipated. The Service has now revised the trade waste agreement and contract documents and the Commercial Waste Policy has been updated. All documents are now with Legal Services for finalisation of terms and conditions with a target date of 31 March to have finalised documents in place and published on the Council's website.

INVERCLYDE COUNCIL INTERNAL AUDIT REPORT TO AUDIT COMMITTEE ON STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY) ANALYSIS OF MISSED DEADLINES

Report	Action	Original Date	Revised Date	Management Comments
Corporate Purchase Cards (October 2023)	VAT guidance for users of corporate purchase cards (Amber) The Procurement Manager will develop appropriate guidance for purchase card users regarding the processing and receipting of transactions which include VAT. This exercise will also include obtaining appropriate VAT advice from relevant Finance staff and issuing the subsequent guidance to all cardholders and their supervisors.	31.01.24	30.06.24	Some additional work is required across all parties to progress and complete the action. Therefore, the target completion date of 31 st January 2024 has not been met, however there will be a sharp focus on this and it should be delivered by no later than the end of June 2024.

INVERCLYDE COUNCIL INTERNAL AUDIT REPORT TO AUDIT COMMITTEE ON STATUS OF INTERNAL AUDIT ACTION PLAN POINTS (RED AND AMBER ONLY) SUMMARY OF ACTION PLAN POINTS BY AUDIT YEAR

SECTION 5

The following table sets out the total number of agreed actions raised by audit year together with their completion status at 31 January 2024.

	Total	Total	Total Current Actions Not Yet Due*			
Audit Year	Agreed Actions	Actions Completed	Red	Amber	Green	
2017/2018	53	50	0	0	3	
2018/2019	45	44	0	0	1	
2019/2020	43	43	0	0	0	
2020/2021	36	34	0	1	1	
2021/2022	24	20	0	1	3	
2022/2023	49	42	0	0	7	
2023/2024	31	6	2	12	11	
Total	281	239	2	15	25	

^{*}This part of the table sets out the total number of current actions not yet due at the date of the follow up report. The AMBER actions are included in Section 3 of the follow up report.



AGENDA ITEM NO: 3

Report To: Audit Committee Date: 5 March 2024

Report By: Head of Legal, Democratic, Digital Report No: AC/04/24/IS/APr

and Customer Services

Contact Officer: Andi Priestman Contact No: 01475 712251

Subject: EXTERNAL AUDIT ACTION PLANS - CURRENT ACTIONS

1.0 PURPOSE AND SUMMARY

1.1 □For Decision □For Information/Noting

1.2 The purpose of this report is to advise Members of the status of current External Audit actions at 31 January 2024.

2.0 RECOMMENDATIONS

2.1 It is recommended that Members note the progress in relation to the implementation of external audit actions.

Iain Strachan

Head of Legal, Democratic, Digital and Customer Services

3.0 BACKGROUND AND CONTEXT

- 3.1 External Audit regularly report findings and action plans to relevant Council Officers and the Audit Committee as part of their annual audit plan.
- 3.2 The Chief Internal Auditor co-ordinates follow up reporting on current actions arising from External Audit Action Plans with regular reporting to CMT and the Audit Committee.
- 3.3 There were no actions due for completion by 31 January 2024. There was one action due for completion by 31 March which is now complete.
- 3.4 There are 11 current external audit actions being progressed by officers. These are set out in the status report at Appendix 1.

4.0 PROPOSALS

4.1 The Audit Committee is asked to note the progress in relation to the implementation of external audit actions.

5.0 IMPLICATIONS

5.1 The table below shows whether risks and implications apply if the recommendation(s) is(are) agreed:

SUBJECT	YES	NO
Financial		X
Legal/Risk	Χ	
Human Resources		Х
Strategic (Partnership Plan/Council Plan)	Х	
Equalities, Fairer Scotland Duty & Children/Young People's Rights		Х
& Wellbeing		
Environmental & Sustainability		X
Data Protection		X

5.2 Finance

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From (If Applicable)	Other Comments
N/A					

5.3 Legal/Risk

There is a risk that failure to implement agreed audit actions in a timely manner could result in an inability to provide a reasonable level of assurance over the Council's system of internal control to those charged with governance.

5.4 Human Resources

There are no human resources implications arising directly from this report.

5.5 Strategic

This report relates to strong corporate governance.

6.0 CONSULTATIONS

6.1 Relevant Officers were asked to provide updates to the report as appropriate.

7.0 BACKGROUND PAPERS

7.1 External Audit reports.

INVERCLYDE COUNCIL INTERNAL AUDIT

REPORT TO AUDIT COMMITTEE ON STATUS OF EXTERNAL AUDIT ACTION PLAN POINTS AT 31 JANUARY 2024

Summary: Section 1 Summary of Management Actions due for completion by 31/01/2024

There were no actions due for completion by 31 January 2024.

One action with a completion date of 31 March 2024 is now complete.

Section 2 Summary of Current Management Actions Plans at 31/01/2024

At 31 January 2024 there were no audit reports delayed due to management not finalising the action plan within agreed timescales.

Section 3 Current Management Actions at 31/01/2024

At 31 January 2024 there were 11 current audit action points.

Section 4 Analysis of Missed Deadlines

At 31 January 2024 there were no audit action points where the agreed deadline has been missed.

SUMMARY OF MANAGEMENT ACTION PLANS DUE FOR COMPLETION BY 31.01.2024

SECTION 1

Area	No. of Actions Due	No. of Actions Completed	Deadline missed Revised date set*	Deadline missed Revised date to be set*	No action proposed
Chief Executive	0				
Environment and Regeneration	0				
Health and Social Care Partnership (HSCP)	0				
Education and Communities	0				
Total	0				

^{*} These actions are included in the Analysis of Missed Deadlines – Section 4

One action with a completion date of 31 March 2024 is now complete:

Description	Due Date	Status
Central Corporate Risk Register (Priority 2 Recommendation) Recommendation: We recommend that the Council introduces a Corporate Risk Register which features any risks above a centrally-agreed threshold score, in order that the Council and its Committees are able to assure themselves regarding the sufficiency of response to risks arising.	2024	Corporate Risk Register presented to Audit Committee on 9 January and Policy & Resources Committee on 6 February.
Management Response: Whilst the thematic committees now receive risk registers which highlight risks relating to each committee's remit and strategic objectives, the refreshed Corporate Risk Register will be presented to Audit Committee then Policy & Resources Committee in January/February 2024 and will be prepared in line with the Strategy which is anticipated to be approved in November 2023. The Corporate Risk Register will then be reported to both Committees on an ongoing basis moving forward.		

SUMMARY OF CURRENT MANAGEMENT ACTIONS AS AT 31.01.2024

SECTION 2

CURRENT ACTIONS BY DIRECTORATE

Chief Executive	
Due for completion March 2024	1
Due for completion June 2024	3
Due for completion September 2024	1
Total Actions	5
Education and Communities	
Due for completion March 2024	1
Due for completion June 2024	1
Due for completion April 2027	1
Total Actions	3
Environment and Regeneration	
Due for completion April 2024	1
Due for completion June 2024	1
Due for completion April 2026	1
Total Actions	3
Total current actions:	11

CURRENT MANAGEMENT ACTIONS AS AT 31.01.2024

SECTION 3				
Description	Status	Original Due Date	Due Date	Assigned To
Annual Report to Members on the 2021	/22 Aud	dit (Novemb	er 2022)	
Local Development Plan (B/f) The preparation of the LDP will commence in February 2023 and be completed by April 2026.		30-Apr- 2026	30-Apr- 2026	Director, Environment & Regeneration
Annual Report to Members on the 2022 Statements	2/23 Au	dit (Novemb	er 2023) – F	inancial
Central Corporate Risk Register (Priority 2 Recommendation) Recommendation: We recommend that the Council introduces a Corporate Risk Register which features any risks above a centrally-agreed threshold score, in order that the Council and its Committees are able to assure themselves regarding the sufficiency of response to risks arising. Management Response: Whilst the thematic committees now receive risk registers which highlight risks relating to each committee's remit and strategic objectives, the refreshed Corporate Risk Register will be presented to Audit Committee in		31-Mar- 2024	31-Mar- 2024	Chief Executive/Head of Legal, Democratic, Digital & Customer Services
January/February 2024 and will be prepared in line with the Strategy which is anticipated to be approved in November 2023. The Corporate Risk Register will then be reported to both Committees on an ongoing basis moving forward.				

Acti	on Status		
	No response received		Missed original due date
	In Progress	②	Completed

CURRENT MANAGEMENT ACTIONS AS AT 31.01.2024

Description	Status	Original Due Date	Due Date	Assigned To
Formal process for Head of Service impairment reviews (Priority 3 recommendation) Recommendation: We recommend the impairment review process is amended to include the requirement for Heads of Service to provide a positive return confirming whether any impairment indicators have arisen during the year.		30-Jun- 2024	30-Jun- 2024	Finance Manager (Environment & Technical)
Management Response: Instruction in year end pack will be amended and Officers will ensure returns are received, including nil returns, from all Heads of Service in future.				
Continuing to improve integrity of Fixed Asset Register (Priority 2 recommendation) Recommendation We recommend that a further data integrity and cleansing exercise is undertaken in 2023/24 to ensure the integrity of entries across all fields in the FAR.		30-Jun- 2024	30-Jun- 2024	Finance Manager (Environment & Technical)
Management Response: Data integrity review of FAR will be added to the Year End timetable and carried out on an annual basis.				
Infrastructure Assets (Priority 2 recommendation) Recommendation: We recommend that should Management wish to meet this requirement they will need to carry out a retrospective review of the methodology used to account for the infrastructure assets and update the methodology accordingly to ensure compliance with		30-Jun- 2024	30-Jun- 2024	Finance Manager (Environment & Technical)

Acti	on Status		
	No response received		Missed original due date
	In Progress	②	Completed

CURRENT MANAGEMENT ACTIONS AS AT 31.01.2024

				SECTION 3
Description	Status	Original Due Date	Due Date	Assigned To
the guidance. This weakness did not impact upon our planned audit approach.				
Management Response: It is intended to continue to use both statutory overrides for the 2023/24 annual accounts. Officers will continue to review methodology to ensure compliance however this is considered a national issue. Officers will therefore keep abreast of national developments.				
Annual Report to Members on the 2022 and Best Value	2/23 Aud	dit (Novemb	er 2023) – V	Vider Dimension
Fraud, Bribery and Corruption procedures and other policies out of date (Priority 2 recommendation) Recommendation: We recommend that all out-of-date policies are prioritised for updating and review / approval by Council or appropriate Committee as soon as is practicable. Management Response: The Corporate Quality Improvement Group has approved a corporate template for all policies and CMT are currently confirming all policies and their next review dates with an update due to go to Policy & Resources Committee in February 2024. A timetable for updating all policies will be approved as part of that report, with a suitable prioritisation.		31-Mar- 2024	31-Mar- 2024	Head of Legal, Democratic, Digital & Customer Services March 2024 (for completion of timetable for updating of policies) All policies on new review timescales - March 2025

Act	ion Status		
	No response received		Missed original due date
	In Progress	②	Completed

CURRENT MANAGEMENT ACTIONS AS AT 31.01.2024

Description	Status	Original Due Date	Due Date	Assigned To
Reporting on Best Value achievement and delivery (Priority 2 recommendation) Recommendation: We recommend implementation of a process to report on overall best value achievement and delivery.		31-Mar- 2024	31-Mar- 2024	Head of OD, Policy and Communications
Management Response: An approach to reporting and evaluation of best value at a council level will be devised and incorporated into the Inverclyde Council Performance Management Framework by March 2024, with implementation of the approach in 2024-25.				
Locality plans (Priority 2 recommendation) Recommendation: We recommend that locality plans are updated in line with the new partnership and council plan.		30-Jun- 2024	30-Jun- 2024	Corporate Director (Education, Communities & Organisational Development)
Management Response: The review of Inverclyde's locality planning model which will include refreshing locality plans will follow the conclusion of the Community Council review.				
Equality group involvement in plan (Priority 2 recommendation)		01-Apr- 2027	01-Apr- 2027	Head of OD, Policy and
Recommendation: We recommend that a specific equality group within the council is identified and involved in the strategy setting process.				Communications
Management Response: Equality groups will be involved in the				

Acti	on Status		
	No response received		Missed original due date
	In Progress	②	Completed

INVERCLYDE COUNCIL INTERNAL AUDIT REPORT TO AUDIT COMMITTEE ON STATUS OF EXTERNAL AUDIT ACTION PLAN POINTS

CURRENT MANAGEMENT ACTIONS AS AT 31.01.2024

SECTION 3

				SECTION 3
Description	Status	Original Due Date	Due Date	Assigned To
development of the next Council Plan from 2027 and in the mid term review of the Partnership Plan in 2028.				
Workforce planning (Priority 3 recommendation) Recommendation: We recommend that workforce plans are refreshed on a timely basis.		30-Jun- 2024	30-Jun- 2024	Director, Environment & Regeneration
Management Response: Refreshed workforce plans within Environment and Regeneration will be produced by June 2024.				
Asset Management Strategy (Priority 3 recommendation) Recommendation: We recommend timely review and update of both strategies.				
Management Response: The Corporate Asset Management Strategy is scheduled to be updated and adopted by April 2024.		30-Apr- 2024	30-Apr- 2024	Head of Physical Assets
The ICT Strategy is due to be updated and adopted by September 2024.		30-Sep- 2024	30-Sep- 2024	Head of Legal, Democratic, Digital & Customer Services

Acti	on Status		
	No response received		Missed original due date
	In Progress	②	Completed

INVERCLYDE COUNCIL INTERNAL AUDIT REPORT TO AUDIT COMMITTEE ON STATUS OF EXTERNAL AUDIT ACTION PLAN POINTS ANALYSIS OF MISSED DEADLINES

SECTION 4

Report	Action	Original Date	Revised Date	Management Comments
There are no current a	actions where the original action date has beer	n missed.		



AGENDA ITEM NO: 4

Report To: Audit Committee Date: 5 March 2024

Report By: Head of Legal, Democratic, Digital Report No: AC/05/24/IS/APr

and Customer Services

Contact Officer: Andi Priestman Contact No: 01475 712251

Subject: Review of Local Code of Governance

1.0 PURPOSE AND SUMMARY

1.1 ⊠For Decision □For Information/Noting

1.2 The purpose of this report is to advise Members that a review of the Local Code of Governance has been undertaken and there were no significant changes identified.

RECOMMENDATIONS

2.1 It is recommended that Members approve the Local Code of Governance for 2023-24.

lain Strachan Head of Legal, Democratic, Digital and Customer Services

3.0 BACKGROUND AND CONTEXT

- 3.1 Good governance for local authorities means ensuring they are doing the right things, in the right way, for the right people in a timely, inclusive, open, honest and accountable manner. It comprises the systems and processes, and cultures and values, by which local government bodies are directed and controlled and through which they account to, engage with and, where appropriate, lead their communities.
- 3.2 The Chartered Institute of Public Finance and Accountancy (CIPFA)/Society of Local Authority Chief Executives (SOLACE) provide a framework for developing and maintaining a Local Code of Governance and for discharging accountability for the proper conduct of public business to support the publication of an Annual Governance Statement. It defines the principles that should underpin governance and suggests best practice as:
 - reviewing the Council's existing governance arrangements against the Framework.
 - developing and maintaining a Local Code of Governance, including arrangements for ensuring its ongoing application and effectiveness. The Framework outlines seven core principles of good governance and translates each one into a range of specific requirements that should be reflected in the Local Code of Governance.
 - preparing an Annual Governance Statement to report publicly on the extent to which the Council complies with its local Code, including how the effectiveness of these arrangements during the year have been monitored and on any planned changes in the coming period.
- 3.3 In addition to the Local Code of Governance, monitoring processes have also been developed whereby all chief officers are required to review the effectiveness of these arrangements within their own services/directorate during the year and highlight any gaps as appropriate.
- 3.4 The Local Code of Governance and monitoring processes will underpin the assertions made in the Annual Governance Statement and provide the evidence base for scrutiny by the external auditors.

4.0 PROPOSALS

- 4.1 The Audit Committee is asked to note the formal review in relation to the Local Code of Governance for 2023-24 and that no substantive changes are required. The updated Local Code of Governance is attached at Appendix 1.
- 4.2 The Audit Committee is asked to approve the Local Code of Governance for 2023-24.

5.0 IMPLICATIONS

5.1 The table below shows whether risks and implications apply if the recommendation(s) is(are) agreed:

SUBJECT	YES	NO
Financial		Х
Legal/Risk	Χ	
Human Resources		Х
Strategic (Partnership Plan/Council Plan)	Х	
Equalities, Fairer Scotland Duty & Children/Young People's Rights		Х
& Wellbeing		
Environmental & Sustainability		X
Data Protection		X

5.2 Finance

There are no direct financial implications arising from this report.

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From (If Applicable)	Other Comments
N/A					

5.3 Legal/Risk

The Local Code of Governance largely codifies the Council's governance arrangements against the CIPFA/SOLACE Delivering Good Governance in Local Government Framework and the review does not highlight any significant new developments or issues arising which require to be highlighted.

5.4 Human Resources

There are no direct human resources implications arising from this report.

5.5 **Strategic**

This report relates to strong corporate governance.

6.0 CONSULTATION

6.1 Relevant Officers from the Corporate Quality Improvement Group were asked to provide updates to the Local Code of Governance as appropriate.

7.0 BACKGROUND PAPERS

7.1 Delivering Good Governance in Local Government Framework (2016, CIPFA/SOLACE)

Principle A Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rules of the law	to ethical values and respecting the rules of the law
Sub Principle	
I. Beliaving with integrity LA Requirement	Evidence
1.1 Ensuring members and officers behave with integrity and	Code of Conduct for Members December 2021
lead a culture where acting in the public interest is visibly	Code of Conduct for Employees
and consistently demonstrated thereby protecting the	Member/Officer Protocol
	Member Induction
1.2 Ensuring members take the lead in establishing specific	Employee Induction
standard operating principles or values for the	 Council's political decision-making process as set out in Standing
organisation and its staff and that they are communicated	Orders and Scheme of Administration
and understood.	 Declarations of Interests made at meetings
1.3 Leading by example and using these standard operating	 Anti-Fraud, Corruption and Irregularity Policy
principles or values as a framework for decision making or	Register of Interests (Members)
	 Related Party Transaction Disclosure (Chief Officers)
1.4 Demonstrating, communicating and embedding the	Register of Gifts and Hospitality
standard operating principles of values unough	Whistleblowing Policy and Procedures
appropriate policies and processes writerial eleviewed on	Complaints Policy
a regular basis to ensure that they are operating	Applial Complaints Donort
effectively.	Minuton of Modinan
	Militates of Meetings
	• Committee Delivery and Improvement Plans
	Service Delivery and Improvement Plans
	• Communications and Engagement Strategy 2023/25
	 Colporate sell-evaluation using the Best Value Framework Historical Links to Slavery – Reparatory Plan

Pri Be	Principle A Behaving with integrity, demonstrating strong commitment to	ng commitment to ethical values and respecting the rules of the law
	LA Requirement	Evidence
Sul	Sub Principle	
5.	Demonstrating strong commitment to ethical values	
2.1	Seeking to establish, monitor and maintain the	 HR Policies and Procedures
		 Code of Conduct for Members December 2021
2.2		 Code of Conduct for Employees
	ensuring they permeate all aspects of the organisation's	 Procurement Strategy 2022/25 and Policies
(culture and operation.	 Inverclyde Alliance MOU
2.3	Developing and maintaining robust policies and procedures. Ensuring that external providers of services on behalf of the	 Inverclyde Leisure Trust Funding Agreement and Articles of Association
	organisation are required to act with integrity and in	Riverside inverclyde Members Agreement and Articles of
	compilative with high ethical standards expected by the	Association
	Olganisation.	 Glasgow City Region Deal Agreement and Assurance
		Framework
		 Equalities Mainstreaming Reports
		 Corporate Equality Outcomes 2021/25
		Education Equality Outcomes 2021/25
		 Equality Impact Assessments
		 Locality Planning Working Agreement
		 Fair Work Statement
		 Equal Pay Statements
		 Disability, Ethnicity and Gender Pay Gap information
		 Fairer Scotland Duty Statement on the Council's Budget
		 Policy Statement on the Licensing of Sexual Entertainment
		Venues
		 Inverclyde Council Criminal Finances Act 2017 Policy
		 Historical Links to Slavery – Reparatory Plan
		 EquallySateatWork Bronze Accreditation
		 Scheme of Delegation

Principle A Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rules of the law	ethical values and respecting the rules of the law
LA Requirement	Evidence
Sub Principle	
3. Respecting the rules of the law	
3.1 Ensuring members and staff demonstrate a strong	 Key Constitutional Documents – Standing Orders and Scheme of
commitment to the rule of the law as well as adhering to	Administration, Scheme of Delegation and Standing Orders
relevant laws and regulations.	relating to Contracts
3.2 Creating the conditions to ensure that the statutory officers,	 Chief Financial Officer has been appointed as s95 Officer
other key post holders and members are able to fulfil their	 The Head of Legal, Democratic, Digital and Customer Services
responsibilities in accordance with legislative and regulatory	has been appointed as Monitoring Öfficer
requirements.	 Financial Regulations February 2022
3.3 Striving to optimise the use of the full powers available for	 Anti-Fraud. Corruption and Irregularity Policy June 2017
the benefit of citizens, communities and other stakeholders.	Whistleblowing Policy and Procedures
3.4 Dealing with breaches of legal and regulatory provisions	Implementation of The Community Emnowerment (Scotland) Act
effectively.	2015 through the Invertible Allipace Dataership Dian 2023/33
3.5 Ensuring corruption and misuse of power are dealt with	2010 tillough tile illverdydd Alliance'r artifeising mai 2020/00, Iocalify planning and Iocalify action plans
effectively.	Township From the Council Criminal Cinaman A of 2017 Dollar
	IIIVEICIJAE COULICII CIIIIIIIIII FIIIAIICES ACL ZO I 7 FOIICO

Principle B Ensuring openness and comprehensive stakeholder engagement	dement
Sub Principle 1. Openness	
LA Requirement	Evidence
1.1 Ensuring an open culture through demonstrating,	• Council Plan 2023/28
documenting and communicating the organisation's	 Committee Delivery and Improvement Plans 2023/26
	 Committee Delivery and Improvement Plans Performance Reports
1.2 Making decisions that are open about actions, plans,	 Service Delivery and Improvement Plans
resource use, forecasts, outputs and outcomes. The	 Refreshed Strategic Planning and Performance Management
	Framework
justification for the reasoning for keeping a decision	 Pentana
	 Annual Report and Accounts
1.3 Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders	 (Corporate) Equality Mainstreaming Report, Progress on Equality
and heing explicit about the criterial rationale and	Outcomes and Equal Pay Statement
Considerations used In due course ensuring that the	 Education Equality Mainstreaming Report and Progress on
impact and consequences of those decisions are clear	Education Equality Outcomes
1.4 Using formal and informal consultation and engagement	 Annual Performance Report
	 Biannual progress report on Council Plan 2023/28
interventions/courses of action	 Annual LGBF report
	 Dedicated public performance reporting web pages
	 Budget Consultation and Engagement
	 Inspection reports reviewed by relevant Service Committees
	 Committee reporting format
	 Committee meetings calendar
	 Community Engagement Strategy
	 Inverclyde Council website
	 Media and Social Media Protocol
	 Council Standing Orders ensure that all meetings of the Council and
	Committees are open to the public unless there are specific items
	exempt in terms of the Local Government (Scotland) Act 1973
	 Community Engagement Strategy
	 Citizens' Panel
	 Consultation element of Equality Impact Assessments
	 Community Council engagement
	 Live streaming and recordings of Council Committee meetings on
	You Tube
	 Complaint Handling Annual Report
	 Freedom of Information Annual Report
	 Data Protection Officer's Annual Report
	 Chief Social Work Officer Report

Principle B Ensuring openness and comprehensive stakeholder engagement	ement
Sub Principle	
Engaging comprehensively with Institutional stakeholders LA Requirement	Evidence
 2.1 Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably. 2.2 Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively. 1.3 Ensuring that partnerships are based on: Trust; A shared commitment to change; A culture that promotes and accepts challenge among partners; and that The added value of partnership working is explicit 	 Community Engagement Strategy Citizens' Panel Virtual Listening Events Consultation element of Equality Impact Assessments Budget consultation and engagement Employee Surveys Inverclyde Council website HSCP Strategic Plann HSCP Strategic Planning Group Community Council Engagement Inverclyde Alliance Agendas and Minutes Riverside Inverclyde MOU and SLA Pupil and Parent Councils Community Group Forums HSCP Advisory Network Locality Action Plans Communication and Engagement Groups Communication and Engagement events with local young people Clyde Conversations - engagement events with local young people

ዋ	Principle B	
ш	Ensuring openness and comprehensive stakeholder engagement	ement
S	Sub Principle	
3.	Engaging stakeholders effectively, including individual citize	ig individual citizens and service users
	LA Requirement	Evidence
3.1		 Community Engagement Strategy
	organisation will meaningfully consult with or involve	 Virtual Listening Events
	citizens, service users and other stakeholders to ensure	Budget Engagement Process
	that service/other provision is contributing towards the	 Consultation element of Equality Impact Assessments
	achievement of intended outcomes.	 Joint Budget Group with Trade Unions
3.7	3.2 Ensuring that communication methods are effective and	Employee Surveys
	that members and officers are clear about their roles with	Community Council Engagement
Ċ	regard to community engagement.	 HSCP Stakeholders Database (Your Voice, Carers' Centre and
ი. ი		CVJ)
	experiences of communities, curzens, service users and	 Pupil and Parent Councils
	reference to future needs	Community Group Forums
3.4		HSCP Advisory Network
5	with other stakeholder groups to ensure inclusivity	Citizens' Panel
3.5	Taking account of the interests of future generations of	Employee Surveys
	tax payers and service users.	 Local Outcome Improvement Plan
		 Inverclyde Alliance Partnership Plan 2023/33
		 Locality Action Plans
		 Communication and Engagement Groups Terms of Reference
		 'Celebrate the Present, Shape the Future' events
		 Clyde Conversations - engagement events with local young people

Principle C Defining outcomes in terms of sustainable economic, soci	economic, social and environmental benefits
Sub Principle 1. Defining outcomes	
LA Requirement	Evidence
 1.1 Having a clear vision which is an agreed formal statement of the organisation's purpose and intended outcomes containing appropriate performance indicators, which provide the basis for the organisation's overall strategy, planning and other decisions. 1.2 Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer. 1.3 Delivering defined outcomes on a sustainable basis within the resources that will be available. 1.4 Identifying and managing risks to the achievement of outcomes. 1.5 Managing service users' expectations effectively with regard to determining priorities and making the best use of the resources available. 	 Invercivde Alliance Partnership Plan 2023/33 Locality Action Plans Locality Planning Locality Planning Locality Planning Council Plan 2023/28 Committee Delivery and Improvement Plans 2023/26 and Risk Register HSCP Strategic Plan Corporate self-evaluation (annually from 2023 onwards) Self-evaluation Framework Committee Reports (updated template June 2022) HSCP Quarterly Service Reviews Committee Reports (updated template June 2022) HSCP Quarterly Service Reviews Community Planning arrangements Annual report and accounts Financial Strategy Risk Management Strategy Public Performance Reporting (Corporate) Equality Outcomes 2021/25 Education Equality Outcomes 2021/25 Budget consultation exercise Fairer Scotland Duty Net Zero Action Plan 2022/27

Principle C Defining outcomes in terms of sustainable economic, social	economic, social and environmental benefits
Sub Principle 2 Sustainable economic social and environmental benefits	
	Evidence
2.1 Considering and balancing the combined economic, social and environmental impact of policies, plans and decisions when taking decisions about service provision. 2.2 Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints. 2.3 Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs. 2.4 Ensuring fair access to services.	Capital Programme Procurement Strategy 2022/25 and Procedures HSCP Market Facilitation and Commissioning Strategy Budget process Glasgow City Region Deal Agendas and Minutes of Meetings Financial Strategy Budget process Local Development Plan Council Website Budget consultation exercise Adherence to statutory guidance Equality Impact Assessments (Corporate) Equality Mainstreaming Report, Progress on Equality Outcomes and Equal Pay Statement Education Equality Outcomes Fairer Scotland Duty Net Zero Strategy Net Zero Action Plan 2022/27

Principle D Determining the interventions necessary to optimise the a	to optimise the achievement of the intended outcomes	nded outcomes
LA Requirement		Evidence
1.1 Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended	Options Appraisals Agendas and Minutes of Meetings	tes of Meetings
outcomes would be achieved and including the risks associated with those options. Therefore ensuring best value is achieved however services are provided.	Corporate Template – Service Budget Consultation Process Citizens' Panel	Corporate Template – Service Review Guidance Budget Consultation Process Citizens' Panel
1.2 Considering feedback from citizens and service users when making decisions about service improvements or	Financial Strategy Members Budget Working Group	Vorking Group
where services are no longer required in order to prioritise competing demands within limited resource available including people, skills, land and assets and	Communication and Engagen Equality Impact Assessments	Communication and Engagement Groups Equality Impact Assessments
Sub Principle		
2. Planning interventions		
2.1 Establishing and implementing robust planning and control cycles that cover strategic and operational plans,	Performance Mana Committee Deliver	Performance Management Framework Committee Delivery and Improvement Plans
priorities and targets. 2.2 Engaging with internal and external stakeholders in	Committee Deliver	Committee Delivery and Improvement Plans Annual Refresh
	Financial Strategy	מווים ולווים ווים
should be planned and delivered. 2.3 Considering and monitoring risks facing each partner	Regular Performance Reporting	ice Reporting
when working collaboratively including shared risks. 2.4 Ensuring arrangements are flexible and agile so that the	Council Website	
mechanisms for delivering outputs can be	Self-Evaluation Fra Risk Management	Self-Evaluation Framework/self-evaluation improvement plans Risk Management Strategy/Risk Registers
changing circumstances. 2.5 Establishing appropriate key performance indicators	Council Standing C	Council Standing Orders- & Scheme of Administration
(KPIs) as part of the planning process in order to identify how the performance of services and projects is to be	Financial Strategy Scenario Planning Employee Surveys	Scenario Planning
	Communication an	Communication and Engagement Groups
2.6 Ensuring capacity exists to generate the information required to review service quality regularly	Equality Impact Assessments Strategic Planning and Perfor	Equality Impact Assessments Strategic Planning and Performance Management Framework
2.7 Preparing budgets in accordance with organizational	Annual Performance Report	se Report
objectives, strategies and the medium-term financial plan.	Self-Evaluation Framewor Partnership Plan 2023/28	Self-Evaluation Framework 3 year rolling programme Partnership Plan 2023/28
2.8 Informing by drawing up realistic estimates of revenue	Inverclyde Alliance	Inverciyde Alliance LOIP Partnership Groups
sustainable funding strategy.	Pentana BRAG Status inclu	Pentana BRAG Status included in Committee performance reports

Sub Principle 2. Planning interventions	
LA Requirement	Evidence
	Regular CD&IP reporting to Committee Local Scrutiny Plan Members Budget Working Group Financial Strategy Reserves Strategy
	Asset Management Plans
Sub Principle 3. Optimising achievement of intended outcomes	
LA Requirement	Evidence
3.1 Ensuring that the medium-term financial strategy integrates and balances service priorities, affordability and other resource constraints. 3.2 Ensuring the budgeting process is all-inclusive, taking account the full cost of operations over the medium and longer term. 3.3 Ensuring the medium-term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage. 3.4 Ensuring the achievement of 'social value' through service planning and commissioning.	Financial Strategy Members Budget Working Group Reserves Policy Capital Programme Asset Management Plans Budget Consultation Process Equality Impact Assessments Budget Savings Proformas Change Board Arrangements Corporate Procurement Strategy 2022/25 Alternative models of service delivery – HSCP HSCP Market Facilitation and Commissioning Strategy/Plan MAPPA Annual Report Equally Safe Plan Childrens Services Plan HSCP Strategic Plan Community Justice Outcomes Improvement Plan Annual Child Protection Improvement Plan Annual Child Protection Improvement Plan Biannual Report Adult Support and Protection

Drincinle E	
e entity's capacity, including	the capability of its leadership and the individuals within it
Sub Principle	
1. Developing the entity's capacity	
LA Requirement	Evidence
1.1 Reviewing operations, performance and use of assets on	 Refreshed Strategic Planning and Performance Management
a regular basis to ensure their continuing effectiveness.	Framework
1.2 Improving resource use through appropriate application	 Corporate self-evaluation (annually from 2023 onwards) using BV
of techniques such as benchmarking and other options	framework
in order to determine how the authority's resources are	 Capital Asset Management Group
allocated so that outcomes are achieved effectively and	 APSE Benchmarking Reports
	 Local Government Benchmarking Framework reports to CMT and
1.3 Recognising the benefits of partnerships and	Committee
collaborative working where added value can be	 Participation in a range of benchmarking groups
	Options Appraisal
1.4 Developing and maintaining an effective workforce plan	Service Review Guidance
to enhance the strategic allocation of resources	Drougomont Ctratony 2002/26
	Floculent Strategy 2022/23
	 Community Planning Partnership
	• HSCP
	Glasgow City Region Deal
	Shared Services
	 People and Organisational Development Strategy
	Service Workforce Plans
	HSCP People Plan
	 Inverclyde Alliance Partnership Plan 2023/33
	 Locality Action Plans
	 LOIP_Inverclyde Alliance Partnership Plan Delivery Plans
	 Recovery Plans
	 Hybrid Working Strategy

Developing	Developing the entity's capacity, including the capability of its leadership and the individuals within it	ts leadership and the individuals within it
S u 2.	Sub Principle 2. Developing the capability of the entity's leadership and other individuals	individuals
	LA Requirement	Evidence
2.1		Induction Programme for Members
	appointed leaders negotiate with each other regarding	E-learning and face to face Corporate Induction for Employees
	their respective roles early on in the relationship and that	Induction Guidelines for Managers
	a snared understanding of foles and objectives is	Leadership courses for teachers
2.2		Standing Orders and Scheme of Administration
i		Scheme of Delegation Momber/Officer Protecti
		Member/Officel Flotocol
2.3		Main Melliber Wards
	defined and distinctive leadership roles within a	Personal Development Plans for Members
	structure, whereby the chief executive leads the authority	Docitive Conversations and Dersonal Development Dlans for
	in implementing strategy and managing the delivery of	Employees
	services and other outputs set by members and each	Montaine Desertion
	provides a check and a balance for each other's	Mentoring Programme
		Inverciyde Learns E-learning
2.4		WIAK Keporting on Iraining Matrix for senior managers
	management to achieve effective shared leadership and	Citizens' Panel
	to enable the organisation to respond successfully to	Community Councils
	changing legal and policy demands as well as economic,	Equality Impact Assessments
•		Members Budget Working Group
2.5		HR policies
Ò	public participation.	Health and Safety Policy
7.0		Occupational Health Provision
	enectiveness and ensuming leaders are open to	Occupational Risk Assessment Process
7 0	Constituctive feedback flottinger feview and filspections.	Healthy Working Lives initiative
i		Disability Confident Scheme
		Locality Planning Model
2.8	8 Ensuring arrangements are in place to maintain the	Health and Wellbeing Surveys
	individuals in maintaining their own physical and mental	
	wellbeing.	

P. Ma	Principle F Managing Risks and performance through robust internal o	robust internal control and strong public financial management
no •	risk	
	LA Requirement	Evidence
<u></u>	Recognising that all activities and n	 Standing Orders & Scheme of Administration Scheme of Delegation
-		 Risk Management Strategy 2023
7.2		 Corporate Risk Management Group Risk Management Monitoring and Reporting Process January
رن دن	effectively. First responsibilities for managing individual	2022
<u>;</u>		 Strategic Planning and Performance Management Framework Audit Committee
		 Service, Directorate and Corporate Risk Registers Introduction of Pentana
Su	Sub Principle	
•	Managing performance	
	LA Requirement	Evidence
2.1	Monitoring service delivery effectively incl	 Refreshed Strategic Planning and Performance Management
	specification, execution and independent post-	Arrangements
(Performance Management Framework
2.2		 Corporate self-evaluation (annually from 2023 onwards) using BV
	analysis and advice pointing out the implications and	framework
	lisks illiferent ill the Olyanisation's illianotal, social and environmental position and outlook	Self-evaluation Framework
2.3		Capital Programme Monitoring
		Committee Deport Template
	debate on policies and objectives before, during and	Confinition (Confinition of Assessments)
	after decisions are made thereby enhancing the	Minutes and Committee Reports
	organisations periorinance and that or any organisation for which it is responsible (OR, for a committee system)	Annual Performance Report
	Encouraging effective and constructive challenge and	 Committee Delivery & Improvement Plans Performance Reporting
	debate on policies and objectives to support balanced	Service Delivery & Improvement Plans Local Government Benchmarking Framework Performance Report
2.4	and effective decision making. Providing members and senior management with regular	Dedicated Elected Member Briefings on performance
		 Scheme of Delegation
(•	Code of Conduct for Members
7.5	 Ensuring there is consistency between specification stades (such as budgets) and post-implementation 	 Council Standing Orders & Scheme of Administration Agendas and Minutes
	reporting (e.g. financial statements).	 Members' Induction/Training Programme
		 Positive Conversations

Sub Principle Managing Performance	
LA Requirement	Evidence
	 Committee Timetable Contract Standing Orders Financial Regulations Locality Planning Working Agreement Fair Work Statement Elected Members' briefings
Sub Principle	
Robust Internal Control	
LA Requirement	Evidence
 3.1 Aligning the risk management strategy and policies on internal control with achieving objectives. 3.2 Evaluating and monitoring risk management and internal control on a regular basis. 3.3 Ensuring effective counter fraud and anti-corruption arrangements are in place. 3.4 Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor. 3.5 Ensuring an audit committee or equivalent group or function which is independent of the executive and accountable to the governing body: provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment, that its recommendations are listened to and acted upon. 	 Risk Management Strategy 2023 Risk Management Monitoring and Reporting Process January 2022 Corporate Risk Management Group Internal Audit Annual Audit and Assurance Report Internal Audit Progress Reports to Audit Committee at each cycle Budget Monitoring Arrangements Anti-Fraud, Corruption and Irregularity Policy 2017 Annual Governance Statement Annual Report and Accounts Internal Audit Annual Audit Strategy and Plan Audit Committee Membership and Terms of Reference Members' Induction/Training Programme Business Continuity Plans and Impact Assessment documentation

קַ צֵ	ks and performance through	robust internal control and strong public financial management
ร์ •	Sub Principle	
	LA Requirement	Evidence
4 4 4 - 2 6.	Ensuring effective collection, storage processes to safe Ensuring effective operating effective bodies. Reviewing and au accuracy of data uperformance mon	Code of Conduct for Members Code of Conduct for Employees Information Governance Framework Acceptable Use of Information Systems Policy Retention and Disposal of Records Policy Information Asset Register Business Classification Scheme Information Classification Policy Designated Data Protection Officer Data Protection Policies and Procedures Data Protection Policies and Procedures Data Processing Agreements Data Sharing Register Data Processing Agreements Data Processing Agreements Data Protection Impact Assessments Data Breach Management Protocol Refreshed Strategic Planning and Performance Management Framework Data Quality and Sign off Procedures eg LGBF analysis Record Management Plan Pentana Information Governance Steering Group Privacy Notices Data Protection Officer's Annual Report
S	Sub Principle	
•	Strong Public Financial Controls	
	LA Requirement	Evidence
2.1		 Financial Strategy Treasury Management Strategy Statement and Annual Investment
5.2	operational performance. 2 Ensuring well-developed financial management is integrated at all levels of planning and control, including	 Strategy 2023/24 to 2026/27 Capital Strategy Reserves Strategy
	management of financial risks and controls.	 Budget Monitoring Reports Annual report and accounts Financial Regulations February 2022

good practices in transpare	ncy, reporting and audit to deliver effective accountability
Sub Frinciple 1. Implementing good practice in transparency	
LA Requirement	Evidence
1.1 Writing and communicating reports for the public and other stakeholders in an understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate.	 Council website Corporate reporting format Annual Performance Report Biannual performance report on Council Plan 2023/28
1.2 Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand	 Public Performance web pages Annual report and accounts Annual Efficiency Statement
	 Local Government Benchmarking Framework Report (Corporate) Equality Mainstreaming Report, Progress on Equality Outcomes and Equal Pay Statement
	 Education Equality Mainstreaming Report and Progress on Education Equality Outcomes
	 Live streaming and recordings of Council Committee meetings on You Tube
Sub Principle 2. Implementing good practices in reporting	
LA Requirement	Evidence
2.1 Reporting at least annually on performance, value for	Annual Performance report
money and the stewardship of its resources.	Biannual performance report on Council Plan 2023/28 Division Defendance Personalized With Processing 1988 The Processing Management of the Processing 1989 The Processing Processing 1989 The Processing Processing 1989 The Processin
	Public Performance Reporting Web Pages Council waterite
2.3 Ensuring robust arrangements for assessing the extent	Annual report and accounts
to which the principles contained in the Framework have been applied and publishing the results on this	Annual Efficiency Statement
assessment including an action plan for improvement	 Local Government Benchmarking Framework Report and Elected Member briefing
and evidence to demonstrate good governance (annual governance statement).	Committee Agendas and Minutes
	 Committee Delivery & Improvement Plans performance reports Service Delivery & Improvement Plans
	Improvement Actions and Monitoring
	 Annual Governance Statement assurance process (Corporate) Equality Mainstreaming Report, Progress on Equality
timely basis and the statements allow for comparison with other similar organisations.	 Education Equality Mainstreaming Report and Progress on Education Equality Outcomes
	Education Equality Outcomes

Principle G		
Implementing good practices in transparency, reporting and audit to deliver effective accountability. Sub Principle	2 2	audit to deliver effective accountability
3. Assurance and effective accountability		
LA Requirement		Evidence
3.1 Ensuring that recommendations for corrective action	•	External Audit Follow Up Report to Audit Committee at every
made by external audit are acted upon.		cycle
3.2 Ensuring an effective internal audit service with direct	•	Internal Audit Charter
access to members is in place which provides assurance	•	Internal Audit Progress Reports to Audit Committee at every
with regard to governance arrangements and		cycle
recommendations are acted upon.	•	Internal Audit Follow Up Report to Audit Committee at every
3.3 Welcoming peer challenge, reviews and inspections from		cycle
regulatory bodies and implementing recommendations.	•	Internal Audit Annual Report and Assurance Statement
3.4 Gaining assurance on risks associated with delivering	•	Reviews and Inspections from external bodies are reported to
services through third parties and that this is evidenced		relevant Service Committee.
in the annual governance statement.	•	Improvement Actions are agreed and monitored.
3.5 Ensuring that when working in partnership,	•	AGS Head of Service Checklist
arrangements for accountability are clear and that the	•	Community Planning Partnership Governance Arrangements
need for wider public accountability has been recognised	•	Community Engagement Arrangements
מוט ווסנ.	•	Best Value Updates to P&R Committee
	•	Inverclyde Alliance Memorandum of understanding
	•	Inverclyde Alliance Partnership Plan 2023/33
	•	Locality Action Plans