

2020/21 Annual Governance Statement Action Plan

Issue/Risk	Action	Status at March 2021	Owner	Detailed Actions for Completion	Expected completion date or date completed
<p>Internal Audit Recommendations – to ensure that all Priority 1 recommendations are dealt with expeditiously.</p>	<p>Year end position (March 2020) - There were 12 Priority 1 recommendations outstanding in respect of 7 audit areas as at the end of March 2020. Priority 1 recommendations will continue to be subject to robust follow up and monitoring arrangements.</p>	<p>Covid-19 has had an impact on the timeliness of implementation of a number of the more recent Priority 1 recommendations. As at March 2021, 13 Priority 1 recommendations were still outstanding</p>	<p>Head of Shared Audit Service</p>	<p>To update the AGS Action Plan and P1 Recommendation schedule to include lists of actions and target completion dates</p> <p>To undertake follow up work for next Committee meeting</p>	<p>Complete</p> <p>March/April 2021</p>
<p>Dedicated Schools Grant (DSG) - A major issue going forward is the financial pressures on the Dedicated Schools Grant (DSG) and other demand led budgets. This is not uncommon to AfC but is a national issue although particularly acute in Kingston. This is against a national context of significant pressure on services for children. Whilst this does not directly affect AfC's internal control framework, it does demand a very high standard of budgetary control and AfC are</p>	<p>Outturn 2020/21 - The in-year overspend outturn position for RBK was a £5.2m overspend, with a cumulative deficit of £12.409m as at 31 March 2021 (including the £12m of additional funding from the DfE as part of the agreed deficit management plan).</p> <p>The Department for Education require a DSG Deficit Management Plan to demonstrate a clear plan to bring High Needs</p>	<p>Ongoing</p> <p>Children's Services officers have updated service improvement plans and finalised the deficit management plans following discussions with the DfE and Kingston to explore further solutions.</p> <p>The DfE have been clear with the council / Children's Services that the agreed deficit management plans must bring the cost of high needs support in line with</p>	<p>Associate Director of Finance (AfC)</p>	<p>Rolling out an improved and updated monitoring and KPI suite for the DSG Deficit Management Plan to assist in progress and performance reporting. This will go live in May 2021.</p> <p>There is currently a focus in the service on Post 16 phase transfers, pathway planning, increasing</p>	<p>May 2021</p> <p>Ongoing</p>

<p>having to develop new strategies in relation to managing demand.</p> <p>In support of the Kingston schools budget for 2018/19 the Department for Education provided an additional £3m of Dedicated Schools Grant (DSG) in support of Special Education Needs (SEN). This is an advance of money provided on the basis that the Council will address the issues associated with the overspend on SEN which is outlined above. This is an advance on money but the Government has not stated when it will need to be returned. However, it is unlikely that this will be in the near future.</p> <p>The High Needs block for Kingston will be £25.897m in 2021/22 next year, an increase of 11% and the DSG as a whole will be £ 158.8m, an increase of 7.3%</p>	<p>spend in line with the annual allocation.</p> <p>This plan supersedes the current Transformation Plan which is monitored internally by Children's Services and by the Council through a Delivery Group chaired by the Executive Director of Corporate and Communities on a monthly basis, and by a bi-monthly multi-agency SEND Partnership Board.</p> <p>The Health and Wellbeing Board has strategic oversight of the delivery of the plan. The current work streams are on track to deliver transformation; however, the plan is not on track to make the savings required.</p> <p>Education, Health and Care Plans rose by 11.3% in 2019/20 and the rate of increase was 7% in 2020/21. The average cost of an EHCP reduced by 4% in 2019/20, and reduced by a further 5% in 2020/21. This is despite demand pressures in Post</p>	<p>the available budget. The initial tranche of funding has been received with £12m of increased allocation to assist with the cumulative deficit balances. Future payments towards the outstanding deficit of £12.4m will be based on the delivery and success of the deficit management plan.</p> <p>The 2021/22 provisional settlement would indicate healthy levels of increase in DSG funding. Despite this, the DSG fund will continue to experience pressure due to the in-year underfunding of high needs education in 2021/22 and increasing numbers of schools are also reporting challenges in setting balanced budgets, which has worsened during the pandemic.</p> <p>The DfE issued guidance last year to strengthen the DSG fund ringfence and has provided a three year statutory override to provide a temporary reprieve in terms of impact on wider council finances.</p>		<p>the number of ceased plans, high cost contracting and intensive commissioning. Early intervention work remains ongoing including working with schools to identify young people and offer early, targeted support.</p> <p>Redesign of SEN Commissioning expertise and support.</p> <p>Improvements to the SEN Synergy system to improve reporting and workflows for greater analysis and insight.</p>	<p>July 2021</p> <p>July 2021</p>
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	<p>16 being particularly higher when compared to the previous year. The processes of assessment and review remain strong with 90% of assessments completed on time during 2020/21 (97% in 2019/20), which is significantly better than the national average (60%) and that of our neighbours.</p>	<p>The SEND Futures Plans in Richmond and Kingston will remain a critical priority for AfC moving into next year. The updated plan for Kingston, and detailed budget setting for the wider DSG fund, were approved by the council as part of the 2021/22 DSG budget setting process. The plans focus on both continuing to improve services for children and young people with SEND as well as on continuing to improve value for money.</p> <p>The DSG Deficit Management Plan focuses on workstream and transformation delivery, as well as additional plans, to reduce the in-year deficit and lower average costs in the High Needs Block.</p>			
<p>GDPR - The challenges of delivering effective data security management require constant review especially at a time when the key data protection legislation is changing with the need to ensure that systems and processes are compliant with</p>	<p>Year end position (March 2020) - GDPR has now been enacted in the Data Protection Act (2018) and the Council is working to its regulations. Work is continuing as part of our</p>	<p>Majority completed but Ongoing</p> <p>Data mapping is not on the forward plan for this year. Our resources are prioritising other areas currently and services have</p>	<p>Assistant Director of Digital & IT</p>	<p>Data flow mapping is not a legal requirement and whilst best practice to have, logistically there are other priorities and whilst we can work towards this, for the</p>	<p>Risk accepted</p>

<p>GDPR. Whilst the Council undertook a major review of information governance, data protection and records management over the 12 months in advance of GDPR requirements, further work is required to ensure full compliance.</p> <p>The 19/20 follow up audit for GDPR identified that whilst the corporate infrastructure was in place, this was not embedded at a service level. A number of recommendations were outstanding:</p> <ul style="list-style-type: none"> • A data flow mapping exercise had not been completed. • Issuing quarterly email reminders on a timely basis to IAO's reminding them of their responsibility to ensure the Information Asset Register (IAR) and the Retention Schedule are reviewed and updated on an ongoing and timely basis. (The Retention schedule is combined into the IAR to make one record of processing activities.) 	<p>Information Governance improvement stream, e.g:</p> <p>A second audit was requested on compliance and took place in September 2019. The Follow up audit identified that whilst the corporate infrastructure is largely in place, this needs to be embedded at a service level.</p> <p>The Information Security Board has been meeting regularly to embed Information Governance Procedures.</p> <p>The Digital & IT reorganisation has created a dedicated Information Governance team of three to help support these activities.</p> <p>Subject Access Request face-to-face training has been rolled out to 45 members of staff and a new process for dealing with member SARs implemented.</p> <p>The new customer platform FOI management</p>	<p>not been asked to map out the data within their area. Whilst I agree that having this information would be beneficial to understanding how our data is processed, we have had to prioritise other IG issues.</p> <p>A records management project is underway addressing paper records held offsite and disposing of any records that are past their retention period. Whilst undergoing this work the Council's retention schedule is being updated and reviewed. Digital & IT are in the early stages of a larger Records Management project which will look at the management (including the retention) of digital and paper records across both Council's.</p> <p>74% of staff completed the training. We aim to follow up with our 2020/21 training in the next couple of months.</p> <p>Internal Audit will provide advisory support around the new FOI/SAR</p>	<p>time being we will accept the risk. We have fair processing notices in place to demonstrate transparency where collecting external data from residents and this is a key area of risk which is being managed.</p> <p>Our Information Asset Register has been updated with retention periods and the larger records management project will include the framework and more formal compliance documentation. The Information Asset Register ensures we meet our legal obligations but our records management project aims to enhance our controls.</p> <p>Training will be provided to Information Asset Owners to ensure that they are clear about their obligations and how to ensure that the Information Asset</p>	<p>Aug 2021</p>
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<ul style="list-style-type: none"> • RBK to complete exercise of working through the schedule of live contracts to ensure compliance with GDPR. • Finalisation of the Deed of Variation with LBR that will offer formal assurance of AfC's compliance with GDPR. <p>It was recommended that a further GDPR should be performed in 2020/21 to monitor progress.</p>	<p>module has been implemented and the SAR one is due to be implemented in October.</p> <p>A review of the triage process is currently being undertaken to ensure that there is robust independent oversight of responses to ensure that DPA legislation and exemptions have been properly exercised.</p> <p>Follow up work will be also undertaken on FOI and SARs in 2021/22 to test the new processes once they are properly embedded.</p>	<p>processes and undertake more detailed audit testing in 2021/22 once the new systems have embedded.</p>		<p>Register is kept up to date on an ongoing basis.</p> <p>A working group for the records management project has been set up and a paper written which will be reported to SLT. Targets and target dates to be included.</p> <p>A new module of Data protection and Cyber Security training will be rolled out by May2021.</p>	<p>Project to be up and running by June 2021.</p> <p>Rec to be closed when new training rolled out</p>
<p>Workforce planning</p> <p>There are gaps in organisational development including how we attract and retain staff. A competency framework needs to be developed and consideration given as to how HR policy supports and enables staff to do their jobs. It is acknowledged that work is already underway to develop an Organisational Development Strategy. Learning and development is being</p>	<p>Year end position (March 2020) - An initial workforce planning approach has been developed and implemented by an HR interim. This has been rolled out across RBK ASC, RBK COVID-19 hub and RBK housing. This will give the HR shared service a model to work with and ensure that other</p>	<p>The Council is still in the midst of the emergency response to Covid-19 pandemic and the focus of resources is supporting that response and the health wellbeing of our workforce. This has included looking at workforce planning to support the response and recovery.</p>	<p>Executive Director of Corporate and Communities</p>	<p>As we are preparing for a phased return to work and considering plans under the Future Workplace Programme, workforce planning needs to be rolled out alongside the new ways of working. The full scope of competencies and learning needs will be clarified as a key part</p>	<p>September 2022</p>

<p>independently reviewed as part of the wider HR model. This will include how learning needs are identified. Performance management, including the appraisal project will be a priority project in 2019/20</p>	<p>services are able to be modelled in the future once the new ways of working are established after COVID-19.</p>	<p>The impact on the workforce of the pandemic has been profound and presents opportunities that need to be grasped and challenges that need to be managed.</p> <p>The Response and Recovery Committee agreed key recommendations on the development of the workforce and OD strategy as part of review to the pandemic response- "Seizing the Moment ".</p> <p>In addition the Future Workplace Programme - is reshaping the workplace and workforce to take forward the opportunities and rebase HR policies and practices to enable staff to fulfill their roles</p>		<p>of Transformation. Detailed work carried out before this has been completed would risk spending in areas which may need to change very soon after and potentially significantly in some areas of work.</p>	
<p>Project and Programme Management</p> <p>The Council needs to establish a more corporate approach to project and programme management. The lack of PMO resource and expertise has been a significant gap in the</p>	<p>Year end position (March 2020) - PPM framework was developed and programme artefacts were rolled-out to major programmes. A programme assurance framework was developed to include a series of</p>	<p>Update March 2021 -</p> <ul style="list-style-type: none"> This work was picked up again in Q3 20/21 following a pause Q1 and Q2 when the Transformation team including the Head of 	<p>Corporate Head - Change and Improvement</p>	<p>This work will continue through the delivery of the Project Governance Action Plan overseen by a dedicated Strategic PMO Manager following an internal audit with all actions</p>	<p>Sept 2021</p>

<p>organisation. This requires improvement with more corporate rigor and infrastructure on project management for major site development projects.</p>	<p>health checks to ensure all programmes have the requisite tools, governance and processes in place. The results of the health checks are reported to SLT (in their capacity as the Transformation board on a monthly basis).</p> <p>Progress on programme delivery is also now being delivered as part of the monthly Transformation board report.</p> <p>A programme management community of practice is being set up to further support the development of organisational capability and capacity.</p> <p>Recruitment of the permanent team is largely complete.</p> <p>The initial phase has been completed with ongoing monitoring and reporting to SLT. There will be a wider corporate launch of the transformation approach and PPM</p>	<p>Service were deployed into COVID-19 response duties.</p> <ul style="list-style-type: none"> ● In Q3 a Transformation Governance review was completed and a new project and programme management framework established. ● In Q4 a Transformation, Programmes and Projects Community of Practice was launched to the organisation to support training and development across the organisation. ● In Q3 the Capital Board was established to support the objective of ensuring more corporate rigor and infrastructure on project management for major site development projects. It has been 		<p>expected to be delivered by Sept 2021.</p>	
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	framework by September 2020	meeting monthly and will quarterly in 21/22			
<p>Compliance with Corporate Policies and Procedures - ensuring policies and procedures are up to date, accessible and fit for purpose</p> <p>Work undertaken by internal audit during the year and discussions with senior officers as part of the AGS process has identified some concerns around a lack of clarity in how roles and responsibilities are defined and non compliance with policies and procedures in a number of areas.</p> <p>Whilst some policies and procedures sit on the intranet, some of the content is out of date and procedures generally need to be better communicated to staff to make sure they are properly engaged and are clear on their responsibilities. With new staff and changes to culture and operational procedures, there are risks of inconsistencies in practice and key tasks may fall between the gaps until the changes are properly embedded and understood.</p> <p>Levels of non compliance in areas such as declarations of</p>	<p>A detailed review of the Council's intranet site should be undertaken. Although not currently clear where responsibility for website content sits, this should involve officers from HR, IT and Comms with oversight from General Counsel. The review should ensure that:</p> <ul style="list-style-type: none"> ● the intranet is arranged to provide a repository of information covering key areas such as employment, IT, the workplace, news ● Search facilities are effective ● all links to documents work ● it reflects the most up to date policies and procedures with a clear programme for ongoing review; ● Any gaps are identified; ● there is a clear link to corporate induction 	<p>The Corporate Performance and Risk Board has been reinstated with refreshed Terms of Reference. As part of that Board a sub-group has been formed to consider the appropriate course of action to address this recommendation. There is a realisation that due to the ongoing pandemic situation, and the need for transformational budget setting, that a full review of the intranet may not be immediately possible. The sub-group will look at what measures can be put in place to make improvements in the interim and to set a long-term strategy.</p>	<p>General Counsel</p>	<p>May 2021</p> <ul style="list-style-type: none"> ● Map existing policies and procedures ensuring a central record is held. Identify policies for update and review. Complete communication plan for all staff highlighting the need to comply with organisational policy, where those policies can be found, and consequence for failure to do so. ● Corporate Induction requirements are easily found and highlighted. ● Review of all mandatory training, communications plan for reminders to all staff at regular intervals, consideration of KPIs to be set for compliance by all 	<p>Ongoing</p>

<p>interest and in the completion of mandatory training are still unacceptable despite improvements to systems and processes. The review of website content and structure must facilitate greater accessibility and effective communication which embodies an organisational culture of compliance. This ties in closely with the need to ensure that new staff are properly inducted and have access to key information about the business. This is particularly important in light of increased remote working. The absence of a structure chart or information on Directorate/senior officer responsibilities for example, makes it difficult for new staff to understand the organisational structure or current staff to keep up to date with changes.</p> <p>The Annual Governance review also identified a number of policies and procedures which are out of date. This includes the Whistleblowing Policy which is in the process of being updated.</p>	<p>requirements so that new staff can easily access key documents and important information about the Council and it's governance structures;</p> <ul style="list-style-type: none"> • there are clear links to on-line training including regular comms with respect to the completion of mandatory training <p>A process for managing website content on an ongoing basis must also be established so that the site is properly maintained.</p> <p>Key Performance Indicators around compliance should be established, reported to and monitored by the Corporate Performance and Risk Board. This should be linked to a Communications Plan which clearly sets out the requirement to comply with Council policies and</p>			<p>officers and that compliance to be monitored at the Corporate Performance and Risk Board.</p> <p>June 2021</p> <ul style="list-style-type: none"> • Review of current content on intranet, with outdated information to be removed. <p>Post June 2021</p> <ul style="list-style-type: none"> • Review of intranet 	
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	<p>procedures and the consequences of failing to do so.</p> <p>Mandatory training should be reflected within individual appraisal objectives.</p>				
<p>Records Management</p> <p>The emergency response to COVID-19 identified some information governance issues where information was held in paper form and not accessible remotely or staff absences meant that key documents couldn't be located. There is no clear records management policy or corporate approach to storing documents with documents held on a mix of personal drives, the Council's network and on the google cloud. Officers share documents on Google however it is not clear whether shared folders can be established as an alternative to sharing individual documents.</p>	<p>A corporate approach should be developed on how information is stored and managed. This should be encompassed within a corporate Records Management policy which includes guidance on digitising data and the establishment of an organisational filing structure to ensure that documents are stored securely. Documents should be accessible but controls need to ensure that access is restricted to relevant officers. The ability to share folders on</p>	<p>A records management project is underway addressing paper records held off-site and disposing of any records that are past their retention period. Whilst undergoing this work the Council's retention schedule is being updated and reviewed. Digital & IT are in the early stages of a larger Records Management project which will look at the management (including the retention) of digital and paper records across both Council's</p>	<p>General Counsel / AD Digital & IT</p>	<p>Records Management will be included within the Future Workplace transformation theme. By April 2021 all strands of the records management project, including the off-site storage of records and the broader project, will be mapped and a strategy in place. At that point further detail regarding key timescales will be reported. Oversight of the project will take place through the Future Workplace Board and the</p>	<p>March 2022</p>

<p>The information asset register is not kept up to date and it is difficult to get information asset owners to engage and recognise their responsibilities. Currently responsibility sits at AD level and capacity and operational knowledge of information assets at this level is an issue.</p>	<p>Google should be investigated.</p> <p>The review should consider the appropriateness of the current level at which responsibilities sit. Whilst ADs should remain accountable for their information asset registers, responsibility for maintaining these registers should sit at an operational level where the capacity and knowledge resides. To ensure that Information Asset Registers are maintained as living documents, these should be updated on a quarterly basis to ensure that information is held in accordance with an agreed Records Management policy. Information Asset Owners should be required to sign these registers off to ensure accountability.</p>			<p>Information Governance Board.</p>	
<p>Management and control of IT assets</p>	<p>A central inventory of IT equipment should be established and a process put in place for allocating</p>		<p>AD Digital & IT</p>	<p>IT Update - January 2021 :</p>	<p>Complete</p>

<p>There is no central inventory of IT assets. Responsibility for recording IT assets currently sits with Heads of Service who are responsible for maintaining their own inventories. The audit of Starters and Leavers identified that this system is not working with many officers assuming that the responsibility sits with IT. As such, the audit identified that records did not always exist, a number of leavers had not been asked to return their IT equipment or it was not clear what equipment had been issued to them. Without central oversight, there is a risk that IT equipment is not properly controlled and equipment is not returned when staff leave.</p>	<p>equipment to staff. As part of the leaver's process, checks must be undertaken to ensure that all IT equipment issued is returned.</p>			<p>An asset register has now been put in place, centrally within IT, so that equipment allocation, or return, is recorded for all new starters and leavers, giving the ability to report on usage in conjunction with the 60 day usage report. Procedures for allocation and return of equipment have been published on the Intranet. The starters/leavers forms have been enhanced to ensure the correct information is recorded to correlate new and returned equipment. Leavers forms now have prompts for IT equipment and card returns.</p>	
<p>COVID-19 Recovery plan</p> <p>During 2020/21, as lockdown eases, the Council will need to start planning for recovery. This will need to consider short,</p>	<p>A recovery plan should be established for the easing of lockdown and an</p>	<p>The Council is still in the midst of the emergency response to the pandemic</p>	<p>Executive Director, Corporate and Communit</p>		<p>Ongoing</p>

<p>medium and long term effects as an assessment is undertaken on services to restart, stop, retain or change.</p>	<p>assessment of the long term disruption and consequences arising from the coronavirus pandemic. This must include a detailed analysis of the financial impacts and how these will be managed in the medium and longer term. The Corporate Plan should also be updated to reflect any changing priorities.</p> <p>The recovery plan should be monitored by SLT on a regular basis and formally reported to Members.</p>	<p>as we manage the impact of the third lockdown. Recovery work has started and is being managed through the two task forces focussed on Economy and Community. The outcomes of the task forces are managed through the Committee Structure and reported to the Response and Recovery committee.</p> <p>In addition the Council transformation plan has embraced key changes arising from the pandemic which is overseen on a monthly basis by the Strategic leadership Group with decisions taken through the relevant committee</p> <p>The Council is projecting a balanced budget for 2020/21 and will be setting a balanced budget for 2021/22.</p>	<p>ies/ AD Finance</p>		
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