

Risk and Audit Service: Performance

Audit and Governance Committee
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1. Executive Summary

- 1.1 This report summarises the performance and activity of the Risk and Audit Service for the period 7 March 2021 to 7 June 2021.
- 1.2 The report covers each of the areas of the service:
- Internal Audit
 - Health and Safety
 - Insurance
 - Risk and Resilience.
 - Counter Fraud
- 1.3 The report highlights the following key points:
- This has continued to be a busy period for the Service, with the completion of a number of key pieces of work. The performance indicators and key data in this report reflect this positive progress.
 - The service continues to seek to support the effective management of risk, which is especially pertinent as the Council transforms.
 - The development of the service continues, with a number of improvements having been completed in the period.

2. Introduction

- 2.1 The Risk and Audit Service is managed by the Chief Internal Auditor.
- 2.2 The mission of the Service is *“to deliver a first-class risk and audit service that is highly respected and valued by Sefton and is the envy of our peers”* and the Service has the following objectives:
- To lead the Council in embedding a system of internal control and risk management that facilitates the achievement of the organisation’s objectives
 - To be a valued corporate influence in promoting the due consideration of risk in Council decisions, strategies and plans
 - To align the service with the Council’s changing needs.
- 2.3 In delivering this mission and objectives, the Service encapsulates the following teams:
- **Internal Audit** – this statutory service provides the internal audit function for all areas of the Council, including maintained schools. Internal Audit can be defined as: “an independent, objective assurance and consulting activity designed to add value and improve an organisation’s operations. Internal Audit helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.” (Public Sector Internal Audit Standards)
 - **Health and Safety** – supports Council officers and members in providing an effective health and safety management system that meets the Council’s statutory health and safety duties; thereby controlling the risks of injury and ill health to staff and others affected by the Council’s activities.
 - **Insurance** – fulfils the duty to provide an appropriate insurance service for the Council, including claims management, advice on insurance issues and the management of insurable risk.
 - **Risk and Resilience** – develops risk management and mitigation strategies for the Council on emergency planning (ensuring that the Council meets its statutory responsibilities as a Category 1 responder under the Civil Contingencies Act 2004), public safety and business continuity issues.
 - **Assurance Team** – will develop a Counter Fraud strategy and co-ordinate the development of counter fraud services across the Council.

2.4 This report summarises the main aspects of the performance of the Service for the period 7 March 2021 to 7 June 2021, covering the following areas:

- Internal Audit:
- work undertaken in the period, including a summary of work completed and an outline of the high priority recommendations made.
- performance against Key Performance Indicators
- anti-fraud update
- developments relating to this part of the Service.
- Health and Safety, Insurance, Risk and Resilience and Assurance and Counter Fraud:
- work undertaken in the period, with key data provided where applicable
- developments relating to these parts of the Service.

2.5 The report concludes by looking ahead to the challenges which will be addressed in the forthcoming period.

3. Internal Audit: Performance Update

3.1 Work Completed 1 March 2021 to 31 May 2021

During the period 17 audit assignments were completed and a further two substantially complete at 31 May 2021. The table below outline the audits that have been completed, the audit opinion and the recommendations identified:

| Audit Title | Audit Opinion | Recommendations | | |
|--|--|-----------------|--------|-----|
| | | High | Medium | Low |
| 1 March 2021 – 31 May 2021 | | | | |
| Highways Maintenance Self-Assessment | Assurance provided to facilitate certification | | | |
| COVID-19 Business Discretionary Grants (Draft) | Moderate | 2 | 4 | 0 |
| Framework for Change 2023 – Estates and Assets Disposals (Final) | Minor | 0 | 4 | 3 |
| Procurement 2019/20 Review (Final) | Moderate | 0 | 5 | 6 |
| Great Crosby School Audit (Draft) | Minimal | 0 | 1 | 3 |
| Farnborough Road Infants School Audit (Draft) | Moderate | 0 | 4 | 1 |
| Norwood School Audit (Draft) | Moderate | 0 | 3 | 4 |
| Presfield School Audit (Draft) | Moderate | 0 | 2 | 5 |
| A59 2020/21 Grant Certification Q4 | Assurance provided to facilitate certification | | | |
| Key Route Network - Urban Traffic Control 2020/21 Q3 Grant Certification | Assurance provided to facilitate certification | | | |
| Key Route Network - Urban Traffic Control 2020/21 Q4 Grant Certification | Assurance provided to facilitate certification | | | |
| Sefton Town Centres Grant Certification 2020/21 Q3 | Assurance provided to facilitate certification | | | |
| Sefton Town Centres Grant Certification 2020/21 Q4 | Assurance provided to facilitate certification | | | |
| Bootle Town Centre Grant Certification 2020/21 Q3 | Assurance provided to facilitate certification | | | |
| Crosby Lakeside Grant Certification 2020/21 Q3 | Assurance provided to facilitate certification | | | |
| Southport Eastern Access Grant Certification 2020/21 Q4 | Assurance provided to facilitate certification | | | |
| Maritime Corridor Grant Certification 2020/21 Q4 | Assurance provided to facilitate certification | | | |

| Audit Title | Audit Opinion | Recommendations | | |
|--|---|-----------------|--------|-----|
| | | High | Medium | Low |
| Work substantially complete as at 31 May 2021 | | | | |
| ICT-Security Review (Exit meeting client pending) | Report drafted, exit meetings arranged with the ICT Client Unit and with Agilisys ahead of issue of the draft report. Findings will be reported in the next scheduled update. | | | |
| In House Fleet Costing Review | Work to support Financial Management and Travel Support Team in cost analysis. Awaiting final figures from Travel Support before Memo can be issued. | | | |

The high priority recommendations outlined in the audit reports issued in the period 1 March 2021 to 31 May 2021 are summarised as:

COVID-19 Business Discretionary Grants (draft)

- The Revenues Manager and Business Development Manager should review the recovery status of a potentially overpaid of grant. For future grants, management should obtain limited company bank accounts rather than individual or director's bank accounts.
- The Business Development Manager should review and follow up National Fraud Initiative matches if required.

3.2 Key Performance Indicators 2020/21

The following table outlines the Audit Team's performance against the Key Performance Indicators outlined in the Audit Plan agreed by the Committee in September 2020. In addition, at figure 1 there is performance information on the completion of the 2020/21 Audit Plan across all of the financial year.

| Description and Purpose | Target | Actual | Variance and Explanation |
|---|--------------------------------|---|---|
| Percentage of the Internal Audit Plan completed 2020/21 This measures the extent to which the Internal Audit Plan agreed by this Committee is being delivered. The delivery of the Plan is vital in ensuring that an appropriate level of assurance is being provided across the Council's systems. | 100% See graph below | 63% See graph below and narrative | 37% <ul style="list-style-type: none"> • See section 3.4 |

| Description and Purpose | Target | Actual | Variance and Explanation |
|--|--------|--------|--------------------------|
| <p>Percentage of Client Survey responses indicating a “very good” or “good” opinion</p> <p>This measures the feedback received on the service provided and seeks to provide assurance that Internal Auditors conduct their duties in a professional manner.</p> | 100% | 100% | No variance |
| <p>Percentage of recommendations made in the period which have been agreed to by management</p> <p>This measures the extent to which managers feel that the recommendations made are appropriate and valuable in strengthening the control environment.</p> | 100% | 100% | No variance |

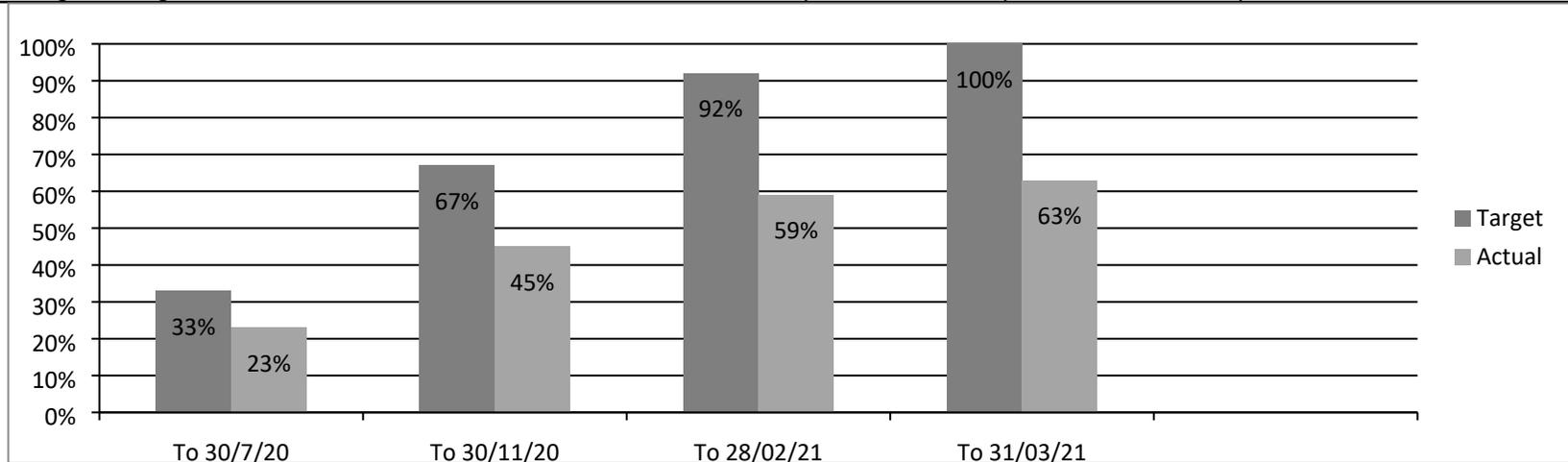


Figure 1: Percentage of the Internal Audit Plan 2020/21 Completed (profiled to coincide with the Audit and Governance Committee reporting dates)

3.4 2020/21 Performance

The significant issue facing the audit team during the period has been the continuing impact from the Covid-19 pandemic on the Council and the challenges that have faced management in delivering core services whilst most staff delivering services have been moved to home working and ensuring that social distancing is maintained. As previously highlighted the proposed audit plan due to be presented in March 2020 was essentially made redundant by the impact of Covid-19 impact

on the Council and the plan did not reflect the risks that faced the Council. A revised Audit Plan for 2020/21 financial year was presented to this Committee on 16 September 2020.

The delivery of the audit plan has been affected by resourcing issues which have arisen partly as a result of Covid-19. For the 2020/21 financial year there were plans for the recruitment for the post of Trainee ICT Auditor and CIPFA Finance Trainee on secondment which were included in the audit plan. Although we have been able to recruit for the Trainee ICT Auditor (April 2020) we have not been able to carry out some of the training and joint working we would like to do both as it would normally involve face to face discussions but also the work areas themselves are not operating in the way planned at the outset of the review. The recruitment exercise for the CIPFA Finance Trainee was suspended during Covid-19 and hasn't taken place.

In addition, two internal full-time audit staff spent significant time completing Locality Services Procurement and Employee Conduct Reviews during the financial year which detracted from completion of other planned assurance work.

A member of the Audit Team has been absent from the organisation on unplanned leave since October 2020 which has further impacted on the team's capacity to complete planned audit work. Several recruitment exercises have been undertaken to alleviate the impact of the staff absence during the last six-months but this has been unsuccessful. Further attempts to fill the vacancy will be made using external agencies during June 2021. Additionally, in terms of staffing resource, the Trainee ICT Auditor started her maternity leave in February 2021.

Covid-19 has also impacted on the delivery of audit work in reducing Officers' capacity to respond quickly during the pandemic due to the scale of the issue and additional work has been required for example in assisting the Heads' of Service and Executive Directors prepare written Governance Assurance Statements for the Annual Governance Statement which was outside of the planned work for this audit. Covid-19 has placed significant pressures on many Council services restricting the range of services able to accommodate an audit due to the pressing needs of the Service responding to the pandemic e.g. social care, revenues and benefits, schools etc.

We have taken the view that in this unprecedented set of circumstances that we would work pragmatically through the proposed plan being mindful of the new risks that face the organisation and the pressures that face the Service Teams across the Council in responding to the pandemic for example the grants provided to local businesses where there has been significant support provided on the design of the controls as well as ensuring that government guidance is followed for example the completion of fraud risk assessments and post assurance plans.

To facilitate in the Chief Internal Auditor's Annual Audit Opinion for 2020/21, the Audit team have now completed a wide-ranging assurance mapping exercise. The assurance mapping is useful intelligence to the Audit Team on other types of assurance provided across the Authority.

3.5 Public Sector Internal Audit Standards

As previously reported to the Committee, following the external assessment in March 2018 which confirmed that the service “generally complies” with the Standards the team, the Audit Team has been continuing to implement the Development Plan to ensure the continued development and improvement of the service going forward, with a particular emphasis on the service being able to meet the expectations of a modern service.

One of the recommendations from the review of service in 2018 was an assurance mapping exercise. We have completed the exercise which helped to shape the 2021/22 Audit Plan as well as assist in the development of the Chief Internal Auditor’s Annual Audit Opinion discussed below.

Progress has been made investigating the use of specialist audit software and a significantly cheaper option, which still meets our needs, has been identified compared with our earlier preferred option. The software will improve the speed and depth of audit testing and a new business plan has been developed.

An internal review of the team’s compliance with the PSIAS has been undertaken in the quarter. The results will be shared with the Committee at a future meeting.

3.6 Annual Audit Opinion

The Chief Internal Auditor is obliged, under the Public Sector Internal Audit Standards (PSIAS), to provide an annual report summarising the work undertaken by internal audit during the financial year just closed, and to provide an overall opinion of the overall adequacy and effectiveness of the organisation’s framework of governance, derived from this work. The work provide an overall opinion as well as prospects for improvement. The opinions have not been historically qualified which may occur where there is either a reduction in audit delivery breadth or as a result of audit findings.

For the financial year 2020/21 there has been a number of impacts which has impacted on the delivery of the audit plan from a resource perspective which has impacted on audit breadth, highlighted above, as well as the substantial impact on the organisation from Covid-19 which has re-orientated necessary activity towards emerging risks for example the grant funding from Central Government to local businesses and residents.

The Audit Team has recognised the potential impact this could have on the prospective Annual Audit Opinion and in light of guidance from CIPFA are proposing the following action to ensure there is a non-qualified opinion:

- The completion of the Assurance Mapping Exercise, which has been based on identifying alternative source of external validation of the Council Services across all Service area, will enable the Team to identify additional sources of assurance that can be used to supplement the audit programme.
- Formalising the holistic approach of considering assurance over a multi-year period which reflect the reality that not every specific area is looked at each year, unless there is knowledge to the contrary.
- The role of the Chief Internal Auditor is a senior manager within the organisation and as a result has visibility of the actions that the management team have responded to in particular on Covid-19 which provides positive assurance on the framework of governance.
- There will be a move towards a more narrative report that supports the approach.

Whilst the work for delivering the report has started one area of concern is likely to be considered in the report which could potentially impact on the prospects for improvement. Whilst the organisation has responded highly effectively to Covid-19 as resources and staff have been where necessarily re-deployed to the response, due to the limited bandwidth an organisation has to meet his objectives, in part its resources are not infinite and elastic to cope with all demand, there has been some reduced capacity to deliver business as usual objectives which deliver change in the way originally envisaged. This reflects the reality of the stretch there has been due to Covid-19. The Audit Team will carefully consider how this impacts on the prospects for improvement.

The proposed report will be provided alongside the draft annual accounts and Annual Governance Statement to the July Audit and Governance Committee.

3.7 Resources

- In April 2020, a staff member was recruited to a newly created Trainee ICT Auditor post. The Trainee ICT Auditor has been on maternity leave since February 2021 which means there is a shortfall in capacity.
- The Trainee ICT Auditor post was created following the deletion of the Value for Money (VFM) Auditor post, during the quarter 1 2019/20 re-structure, and will strengthen the team's capability regarding ICT reviews. Internal Auditors will ensure that that the issues surrounding value for money are considered as part of every review that is undertaken.
- An agency worker was used to backfill the vacant Principal Auditor post between June 2019 and July 2020. Following a recruitment exercise the same worker was appointed on a fixed term contract until the end May 2021. An extension to this contract until the end of May 2022 has been approved with the Principal Auditor moving from full-time to part-time (0.6 fte). This will provide team stability whilst options are considered for the future staff structure of the Audit function but this represents further reduction in capacity in 2021/22.

- The 2021/22 Audit Plan approved by the Audit and Governance Committee was based on two additional temporary FTE auditors to be recruited to provide cover for the vacancies in the team and the reduction in hours of the fixed term Principal Auditor.
- A recruitment exercise has been underway since January to find experienced Principal Auditors to provide additional capability as highlighted above. Progress has been highlighted above and we are still currently seeking to fill these positions.
- Until staff were advised to work from home at the end of March 2020, staff development continued through a mix of office-based webinar and discussion training, engagement with regional audit groups (such as for school audits, ICT audits and contract audits) and through external conferences and training events. The Trainee ICT Auditor has been able access a range of online resources as she develops.
- To enhance audit coverage and to address one area of weakness identified in the external assessment in 2018, the viability of specialist audit software, IDEA, has been considered alongside more cost-effective alternatives. A draft business plan has been developed. This is an exciting development and may have wide ranging impact on the way in which audits are undertaken in future.

3.8 Developments

Since the last Audit and Governance Report Internal Audit has:

- Reviewed and improved the Audit Report template to improve the readability and reduce the time taken to write. This is currently being trialled and further enhancements will be made.
- Staff welfare has been and remains paramount and we continue to monitor staff wellbeing during the prolonged period of home working maintaining frequent regular contact with all team members.
- Staff have completed Display Screen Equipment assessments for their home working environments. Where required staff have been able to request equipment to improve their home-working arrangements.
- Developed a challenging but achievable Audit Improvement Plan for 2021/22.
- Introduced new quick “Huddle” team meetings three-times per week where staff update and share progress on audit assignments and share any issues or blockages that they are facing.
- Completed a more comprehensive approach to obtaining alternative forms of assurance to inform the Chief Internal Auditor’s annual opinion given the reduced Internal Audit coverage in 2020/21.
- Undertook a gap analysis of the revised PSIAS and completed 2020/21 self-assessment.

In the next quarter, the planned developments for the service include:

- Recruit two Principal Auditors for fixed term periods to provide cover for staff absences and assist in the delivery of the approved Audit Plan.
- Introduce measures to reduce the backlog of audit recommendations that require following up and identify an effective way to report recommendations implemented and outstanding to this Committee.
- Further enhance and simplify internal audit reports to improve clarity and reduce time spent producing the reports.
- Review pros and cons of the new Huddle meetings and decide whether weekly meeting between Audit Manager and auditors is still needed.
- Finalise proposals on the use of specialist audit software.
- Reintroduce team webinar and discussion training.

4. Health and Safety: Performance Update

4.1 Progress

The Council continues to focus on improving the health and safety management system and support by reviewing existing arrangements and improving governance.

The Health and Safety Team consists of two health and safety professionals supporting 7379 staff (including 4045 school staff), plus agency staff, contractors and volunteers. A temporary administration support has joined the team to provide support until June 2021. Resources continue to be stretched in meeting the demands of the Council and Schools and to satisfy the requirements of the Management of Health and Safety at Work Regulations. Long term recruitment opportunities are currently being explored to minimise the Council's health and safety risks. The team continue to deliver a range of services across all Council departments including schools. These services can be divided into three main areas: Policy and communication, operational reactive response, and active monitoring.

Health and safety objectives and key performance indicators are continually reviewed. It is acknowledged that outputs have been and are affected by the COVID-19 pandemic and the team have adjusted service delivery to assist the Council in meeting its obligations and to provide managers and staff with the relevant support. Objectives and key performance indicators are being updated to reflect the reopening of services and aligned to the Councils 'Vision 2030' and 'One Council' initiatives and core values.

Consultation arrangements are working well, with the Corporate Health and Safety Committee playing a key role in conjunction with the Departmental Health and Safety Committees. The committee meetings continue to be held virtually, using the MS TEAMS system, which has proved to be very successful.

Activities arising from the risk of the transmission of coronavirus 2 (SARS-CoV-2) has been significant, as operations, work and home environments have continually been adjusted throughout the various periods of restriction.

Council building and operational risk assessments have been reviewed regularly providing assurance of COVID-Secure environments and activities for staff, agency workers, contractors, partner organisations and volunteers. Assistance, guidance and monitoring continues to be provided across all areas as part of the Governments re-opening 'Roadmap', in collaboration with Public Health colleagues.

Considerable health and safety support was provided during the setup and management of SMART (Sustained Meaningful Asymptomatic Repeat Targeted) and Surge Testing sites across Sefton. Advice and guidance on the identification, implementation and monitoring of appropriate COVID-Secure arrangements was provided. The Health and Safety Team

developed a series of general health and safety, COVID-Secure and CoSHH (Control of Substances Hazardous to Health) risk assessment templates and a combined Public Health and Occupational Health and Safety incident reporting form and process.

The re-opening of services and events has proved challenging for the Health and Safety Team, working with managers to balance COVID-Secure compliance and operational demand. Significant support has been provided for recent election activities, reconvening of face-to-face Council meetings and support services to vulnerable children and adults.

The Health and Safety Team have been working with the Chair of the Safety Advisory group to update their terms of reference, based on previous event incident investigations and lessons learnt within the Liverpool City Region.

Advice and support was provided to Schools at the introduction of testing for staff and pupils and as full re-opening plans were implemented. Onsite support visits have increased.

Although onsite delivery of school and council inspections has recommenced albeit a smaller number of visits anticipated until July 2021. The audit process has been redesigned and takes the form of desktop and onsite exercises. Audit evidence against practice is being verified during site inspections.

Corporate minimum standards have been developed and published on the intranet. Documents and forms are issued to the Workplace Learning and Development Team for inclusion in training packages. Recent revisions and additions include Fire Prevention and Protection, Personal Emergency Evacuation Plan (PEEP), Stress, Display Screen Equipment and Home Working. COVID-19 guidance is now available as a workplace longer term hazard. Methods of reaching staff who may not be digitally connected are being explored with the Communications Team.

Due to the increased working from home arrangements, the Health and Safety Team have developed a responsibilities matrix, process flows, new forms and guidance under the Display Screen Equipment Regulations 1992 and the Stress Management Standards (HSE) as part of the Home and Agile working projects. The team have been supporting managers and staff with DSE and stress risk assessments and arrangements. They have worked collaboratively with other service areas to ensure the Council's obligations are being met, whilst ensuring the physical, psychological and emotional health, safety and wellbeing of staff is maintained. An audit of service areas is testing the implementation of DSE arrangements and their effectiveness.

The Health and Safety Team have been instrumental in establishing a One Council working group to consider the wider occupational health, safety and wellbeing of staff. It consists of representatives from The Health Unit, Public Health, Workforce Learning and Development, Active Workforce, and Health and Safety, in addition to Union's representation.

The North-West networking groups, Liverpool City Region H&S Advisers Group and Outdoor Education Adviser's Panel continues to meet virtually, although dates for face-to-face meetings are being planned from July 2021. The groups have proved invaluable for sharing information and good practice during the pandemic as guidance has changed so quickly.

CLEAPSS is an advisory service providing support in science, design, technology, and art for educational settings. A sizeable proportion of Sefton schools pay for the CLEAPSS RPA (Radiation Protection Adviser) Service. The Health and Safety Team continue to operate as a link between schools and the Radiation Protection Adviser, supporting school Heads of Science in the storage and use of radioactive sources.

EVOLVE provide online services for schools, including a tool for planning and managing educational visits, after school clubs and sports fixtures. Local day trips commenced from 12th April 2021, with offsite residential visits being available from 17th May 2021. It is anticipated that overseas residential visits may be permitted from September 2021. The Health and Safety Team continue to provide support and guidance to schools as new announcements are made and refresh Educational Visit Co-ordinators (EVC) in using EVOLVE after over a twelve-month break. The EVOLVE system allows schools to upload risk assessments and other critical event information and take school staff through an authorisation process, which involves a schools internal Educational Visits Co-ordinator (EVC), Head Teacher, the Local Authority Corporate Health and Safety Team. EVOLVE have continued to provide online training.

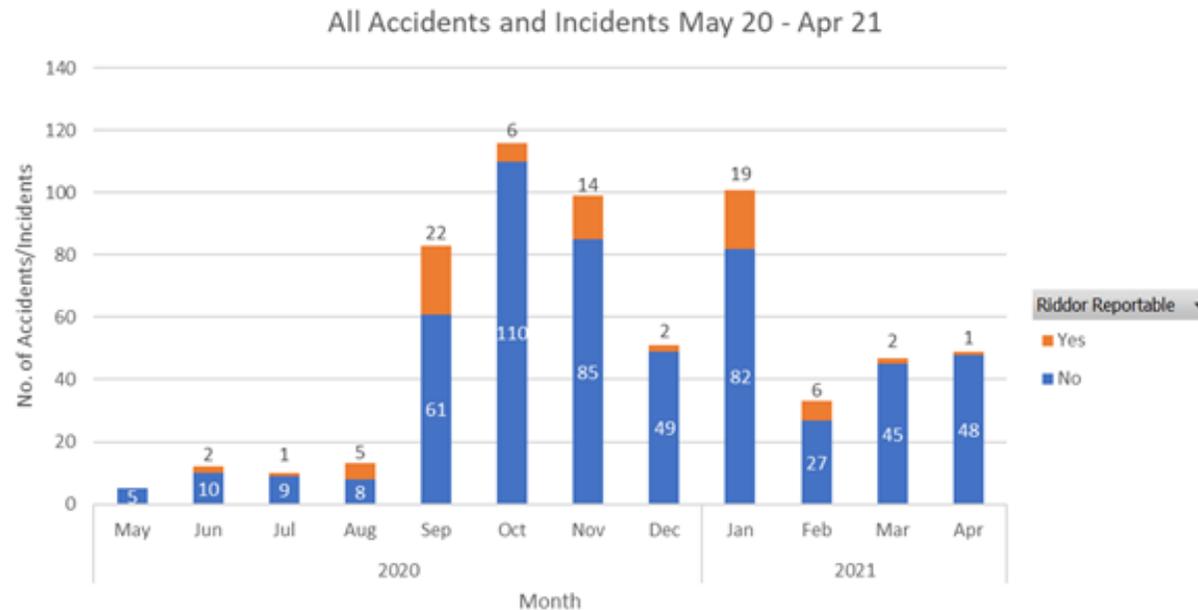
The on-line incident reporting system continues to be well utilised with managers reporting accidents and incidents, as required. COVID-19 was added to the system as a new workplace condition during 2020. Workplace and non-workplace transmission cases are recorded and monitored.

The Health and Safety Executive's (HSE) Working Safely (COVID-Secure) campaign has impacted on Sefton Council sites and schools with a several telephone calls and site visits being carried out. The visits have gone well, and no concerns have been raised. Visit outcomes are being monitored and lessons learnt will be communicated in Health and Safety updates, meetings, and briefings.

4.2 Key Incident Data

The Health and Safety Team continue to manage the Council's incident reporting system which records work-related accidents and incidents involving employees, contractors and members of the public.

Graph 1 below compares accident and incident data over the past year, highlighting the impact of moving out of the first set of restrictions to those imposed in early 2021.



Graph 1: Accident and incident data from 1st May 2020 to 30th April 2021.

The increase in reporting and therefore availability of accident and incident reporting data from May to early October is consistent with the volume of staff returning to the workplace, and the re-opening of schools and services following spring and summer 2020 restrictions.

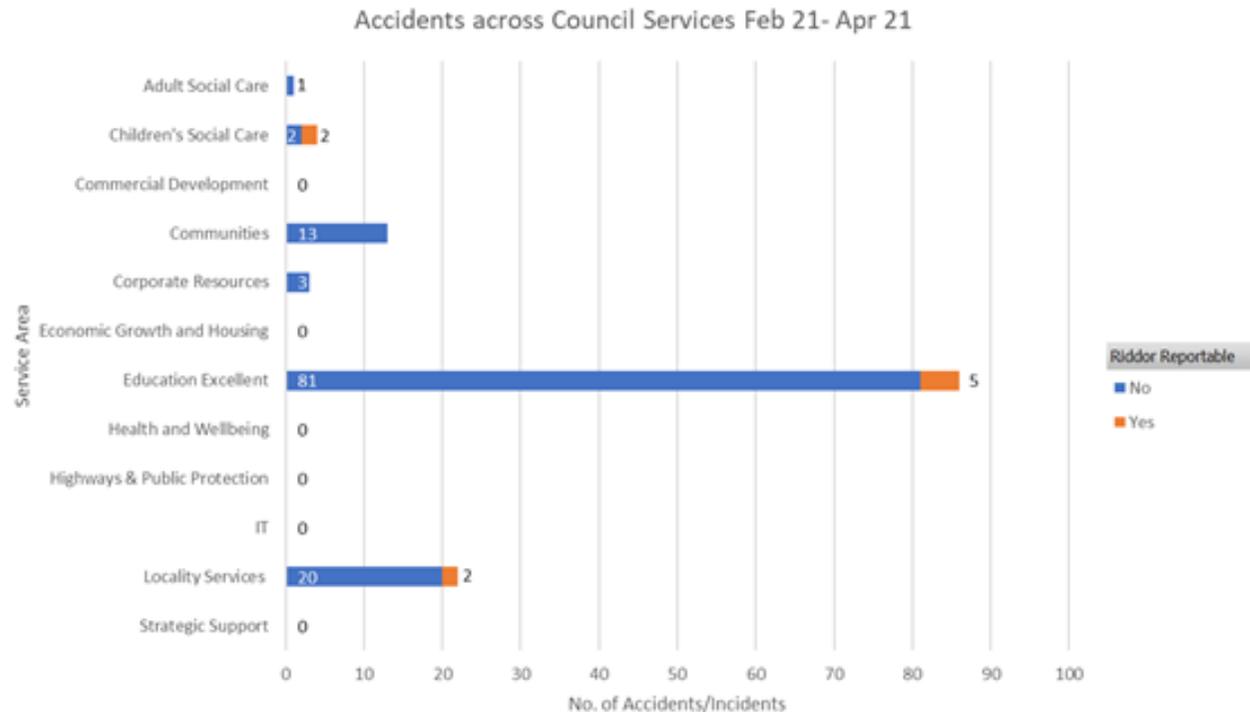
The sudden rise in reports raised from September 2020 highlights the increase in positive COVID cases due to the increased exposure coupled with access to testing (PCR). The results also reflect an increase in accidents and incidents affecting members of the public, which includes classroom and playground injuries in schools and sport injuries in leisure centres. There has been a substantial reduction in the number of incidents raised since late January 2021. Considering previous fluctuations affected by opening and closing of Council venues and restrictions within schools, it can be assumed this is due to the lockdown imposed in January and gradual reopening through the Spring.

Managers and staff continue to be encouraged to report all COVID-19 positive staff cases onto the Council health and safety accident and incident reporting system. This supports the effective review of risk assessments and monitoring of control measures. It is anticipated that non-workplace transmission reports will cease in the coming months and return to work related transmission or near miss reporting only. It can be confirmed that reporting of non-work-related cases for this new

workplace hazard has informed the risk assessments and provided data to guide the implementation of control measures and monitoring.

The Health and Safety Team continue to work closely with Public Health colleagues on COVID—related issues and have greatly appreciated their ongoing support.

Accidents and incidents reported across the Council Services between February 2021 and April 2021 are in the graph below.



Graph 2: Accident and incident data across Council Service Areas during the 3 months – 1st February 2021 to 30th April 2021.

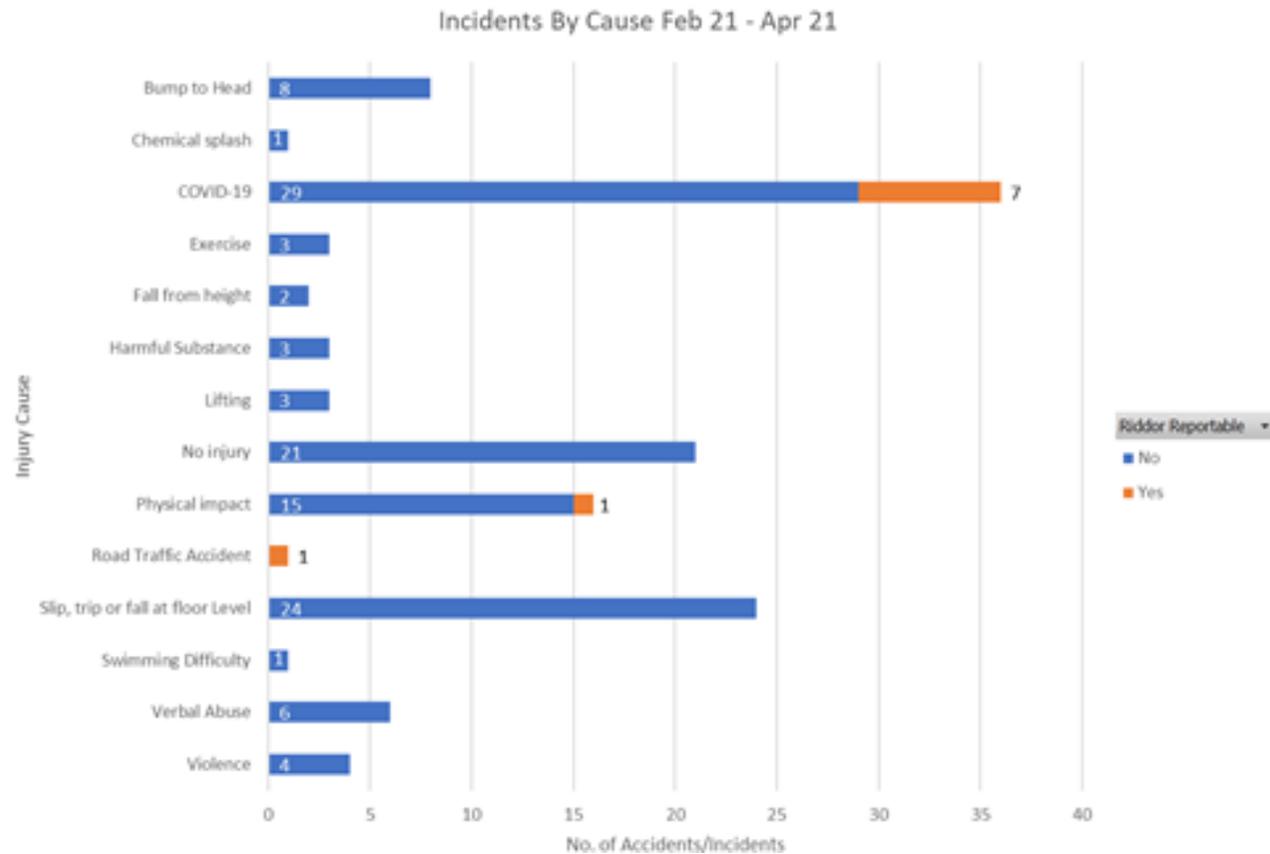
The highest level of reporting is within Education Excellent, Locality Services and Communities. This is consistent with previous years and is influenced by a positive reporting culture. Other factors include continued essential service delivery during the various pandemic restrictions. From late Summer, accidents in areas of high public footfall rose as they included school pupils and those attending sports and exercise facilities. Most of these accidents were slips and trips and contact sports / play injuries.

Services areas not listed have not raised any reports during this period. These include Public Health and Wellbeing and Commercial Services. This is due in part to staff working substantially from home. Data and trends continued to be monitored as restrictions are initiated and then lifted.

The Health and Safety Team continue to promote a good reporting culture to manage the risk of injury, ill health and other losses to the Council. The reports impact on the assessment of risk, and suitability and sufficiency of controls and monitoring required. A positive reporting culture provides greater accuracy in accidents, incidents and near misses' data and enables the Council to identify trends and opportunities to prevent reoccurrence.

The Health and Safety Team are working with Workplace Learning and Development Colleagues based at the Corporate Learning Centre to develop the training offer to staff, which will include accident / incident reporting and investigation training.

Graph 3 identifies the cause of accidents across Sefton Council from February 2021 to April 2021. As previously highlighted, the most common cause has been the transmission of Coronavirus (SARS-CoV-2). Not all cases have been as a result of 'workplace' transmission. Other common causes were due to slips and trips and contact sports / play injuries. The cases reported under RIDDOR (Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013) are discussed below.



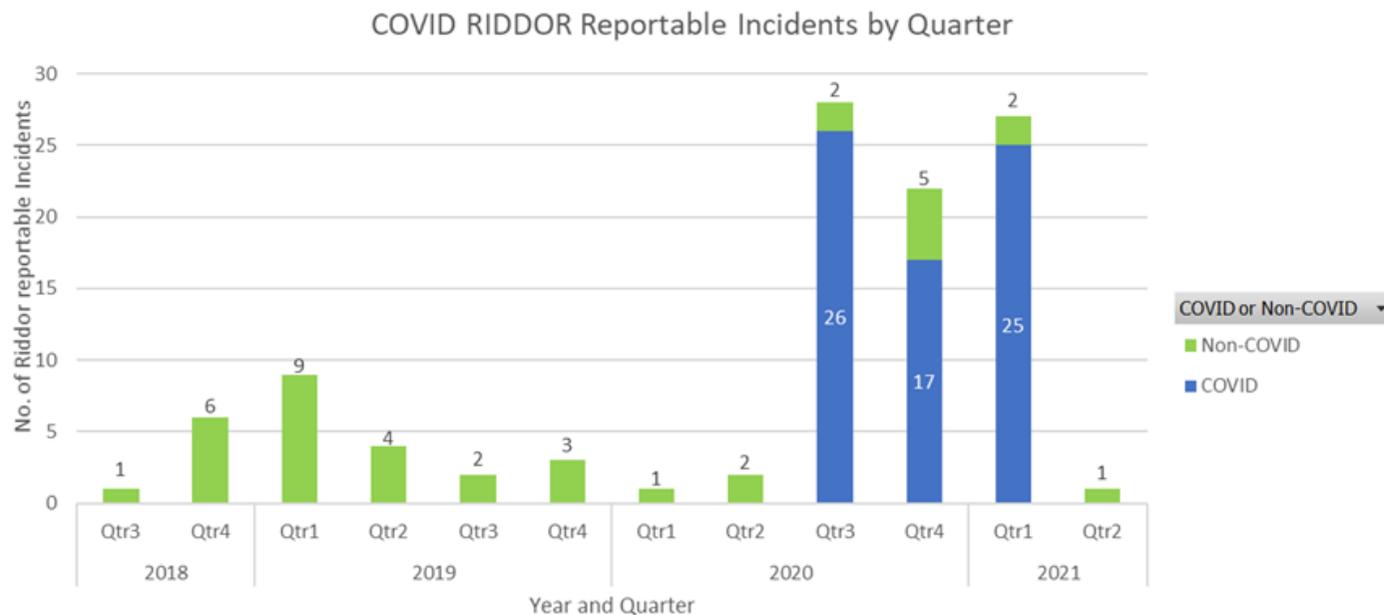
Graph 3: Accident and incident data by Cause during the 3 months – 1st February 2021 to 30th April 2021.

Through discussions with staff and at Health and Safety Committees, some incidents of threatening and abusive behaviour have remained, despite restrictions, although not always reported through the incident reporting system. Staff who have faced challenging behaviours are being encouraged by the Health and Safety Team and managers to report such cases. Managers and staff have been carrying out thorough investigations. Further work is required to understand the number of actual events and reasons for underreporting. The Health and Safety Team are working with managers to ensure value and benefits are understood.

Through staff discussion and during Departmental Health and Safety Committees, concerns have been raised regarding a potential increase in muscular skeletal disorders from working at home and poor psychological well-being. Following the

introduction of updated Display Screen Equipment / Workstation assessment forms and guidance and a Stress Risk Assessment form and guidance in November, staff and managers have received support in adapting to alternative working practices and environments, whether at home or at a Sefton location.

Graph 4 shows the number of reports raised to enforcement authorities and insurers under the Reporting RIDDOR (Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013), during recent years. The graph highlights the increase in reports due to the requirement to report positive COVID-19 cases where there is evidence of workplace transmission. The greatest affected areas are Education Excellent, Children’s Services and Communities, where front line workers have continued to provide essential services.



Graph 4: Accident and incidents reported under RIDDOR, highlighting COVID and non-COVID RIDDOR reports.

The number of RIDDOR reports arising from COVID-19 workplace transmission has significantly reduced. National restrictions, the campaign to improve reporting across the Council services and schools, the level of analysis of the suitability and sufficiency of control measures and monitoring and reinforcement of the safety behaviour message, coupled with support from the Public Health and Health and Safety Teams may have influenced this reduction.

There have been two non-COVID RIDDOR reports raised between 1st February 2021 and 30th April 2021. The first case involved a member of the public receiving hospital treatment for a serious cut to their hand. Another affected a member of staff who suffered injuries and time off work from a road traffic collision, where the vehicle they were driving was hit by another vehicle.

4.3 **Developments**

There will be a continued focus during the next quarter of delivering the Health and Safety Improvement Plan and the ongoing recovery programmes from COVID-19 with planned priorities –

Continue to support to assist Managers and Head Teachers with the recovery programmes from COVID-19. As national restrictions are relaxed, and central government guidance cases, a requirement to manage the COVID-Secure arrangements under Health and Safety law.

Continue to review, update and monitor the Health and Safety Standards and Policies, with focus on Fire Risk Assessments and building safety, Permit to Work systems, hiring of third-party premises, Dangerous Substances and Explosive Atmosphere Regulations, first aid provision and local emergency response.

Monitoring and support remain in place for schools and the Smart Testing sites.

Continue to develop the Council-wide training needs assessment which will build into the health and safety training plan and provision.

Continuing the delivery of risk assessment training for the managers who have responsibility to undertake risk assessments, in collaboration with the Corporate Learning Centre. Working with senior managers to identify staff who require risk assessment or refresher training.

Focus on improving the accuracy of incident reporting, investigation and implementation of controls and monitoring to prevent reoccurrence. Work with managers to ensure incidents of threatening and abusive behaviours towards staff are reported.

Continue to deliver a health and safety management audit and inspection regime across the Council, to schools with a Service Level Agreement with the Council and those schools where the Council retains responsibility for the health and safety as the employer. This will provide assurance that health and safety management systems are suitable and effective.

The Council has a contract with its liability insurers which includes an allocation of free training or service days to assist with implementing effective risk management across the Council. We are planning to use some of the free days to assist with school inspections.

Monitor outdoor education activities, offering advice and reviewing risk assessments for off-site visits and adventurous activities involving young people in schools. This is managed by the EVOLVE system which schools can purchase as part of the Service Level Agreement offering.

Promote the Educational Visits Co-ordinator course being held virtually in June 2021. The course is aimed at new and existing EVCs in schools and will enable them to plan and manage their school's educational visits and off-site activities in line with National Guidance, this in turn will help them fulfil their health and safety responsibilities.

The team continue to support schools in the safe storage and where necessary, destruction of their radioactive sources.

The team have started collaborating with Public Health, Workforce Development, Trade Unions and the Health Unit with a Workforce Wellbeing Initiative.

An on-line School Governor Health and Safety training course is in the process of being rolled out to schools and is due to take place on 10th July 2021.

5. Insurance: Performance Update

5.1 Work Completed

During the period, the following key pieces of work/projects have been undertaken:

- Since the last update, and following extensive negotiations, outstanding queries on the Council's Terms of Business have now been finalised to enable the revaluation exercise of a sample of Council buildings to be undertaken. The successful bidder has provided assurance that the exercise will be completed by the expected date of 30 June 2021, which will assist with the upcoming renewal of insurance cover in September 2021.
- The result of the previously reported consultation with the Schools Forum on a new attractive approach for the Council's Maintained Schools insurance arrangements provided within the existing Council's Long-Term Agreement versus the Government led Risk Protection Arrangement has been favorable. All schools are therefore expected to sign up to the new scheme for the current financial year. As at 18 May 2021, 70% of schools had purchased the insurance via a service level agreement. Progress checks will be made and reminders for those still to make the purchase will be issued, anticipating that a 100% sign up can be reported in the next update.
- Liaison with colleagues in Public Health and Health & Safety is continuing to ensure that appropriate insurance cover is in place to protect the Council in duties being carried out relating to the Covid-19 pandemic and, in particular, the recent surge testing in Formby.
- The Council continues to defend cases robustly to protect the public purse and, where necessary, will enlist the assistance of Weightmans, the Council's Solicitors.
- In the last update it was explained that Weightmans were acting on two claims where it was thought that there may be some fraudulent activity involving tripping claims on Council owned locations. Investigations are continuing and the Team will where there is fraud identified to rigorously challenge the claims as well as where possible recover our costs. Further detail will be provided in a future update.

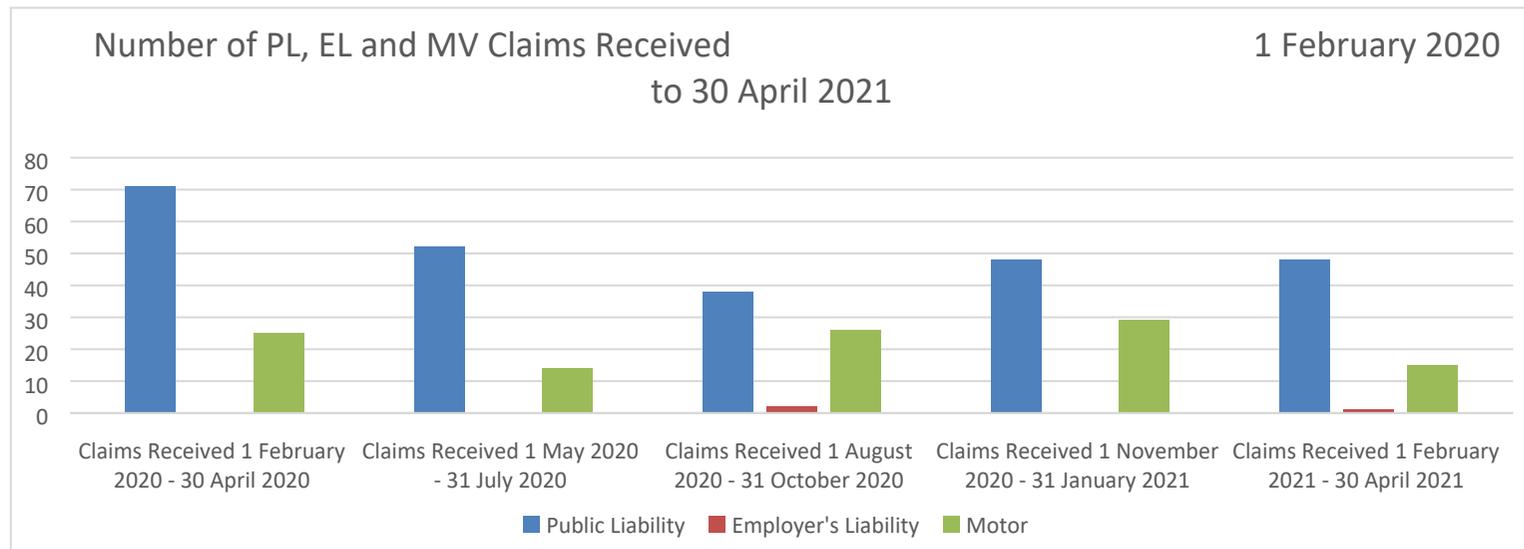
- Reimbursement of £4k towards the Council's defence costs in a claim that the Council was prepared to run to trial as a case of fraudulent dishonesty, but which was eventually discontinued by the claimant, has been received. Hopefully this will assist in sending out a strong message to those who would seek to attempt to bring fraudulent claims against the Council.
- Regular review meetings are also conducted with Weightmans to ensure compliance of the contract set up between the two parties via the North West Legal Consortium Framework. It was pleasing to note that during the May 2021 review meeting, Weightmans provided assurance that the Council's claim portfolio was considered to be above similar public sector peers in terms of relatively low claim numbers and the percentage of claims where there was a suitable defence. This is a testament of the Team's tenacity to obtain information and approach to managing risk of the claims as well as equally colleague's across relevant Service areas inspection regimes.
- The Team continues to work extensively with service areas to improve the management of insurable risk especially in areas where there are high numbers of claims or areas of concern including Highways. The Council generally has high defensibility rates and such risk management activity will assist in maintaining and potentially improving the position further.
- Although not related to claims against the Council, due to knowledge and experience, the Team have recently liaised with the Highways Team to assist in streamlining their process for directing claims to contractors where it is alleged damage has been caused to third party property whilst undertaking work on behalf of the Council.

5.2 Key Claims Data

The following charts outline the insurance performance and include:

- Numbers of claims for Public Liability (PL), Employers Liability (EL) and Motor (MV) received by Sefton Council for the period 1 February 2020 to 30 April 2021.
- Value of the reserves for PL, EL and MV claims received by Sefton Council for the period 1 February 2020 to 30 April 2021.
- The average reserve value for PL, EL and MV claims received by Sefton Council for the period 1 February 2020 to 30 April 2021.

The chart below outlines the number of claims for PL, EL and MV claims received for the period 1 February 2020 to 30 April 2021.



Continuing as reported in the last update, Public liability claims are steadily increasing and this shift, may, in part, be due to Government lockdown restrictions easing and leading to more general footfall by members of the public. However, although an increase has been seen, and claims have increased by 26% from the middle quarter, numbers remain 32% lower than at the outset of the period.

The largest area of claims remains within the Highways service area. These claims represent 90% of all claims received in the final quarter, of which 60% related to personal injury.

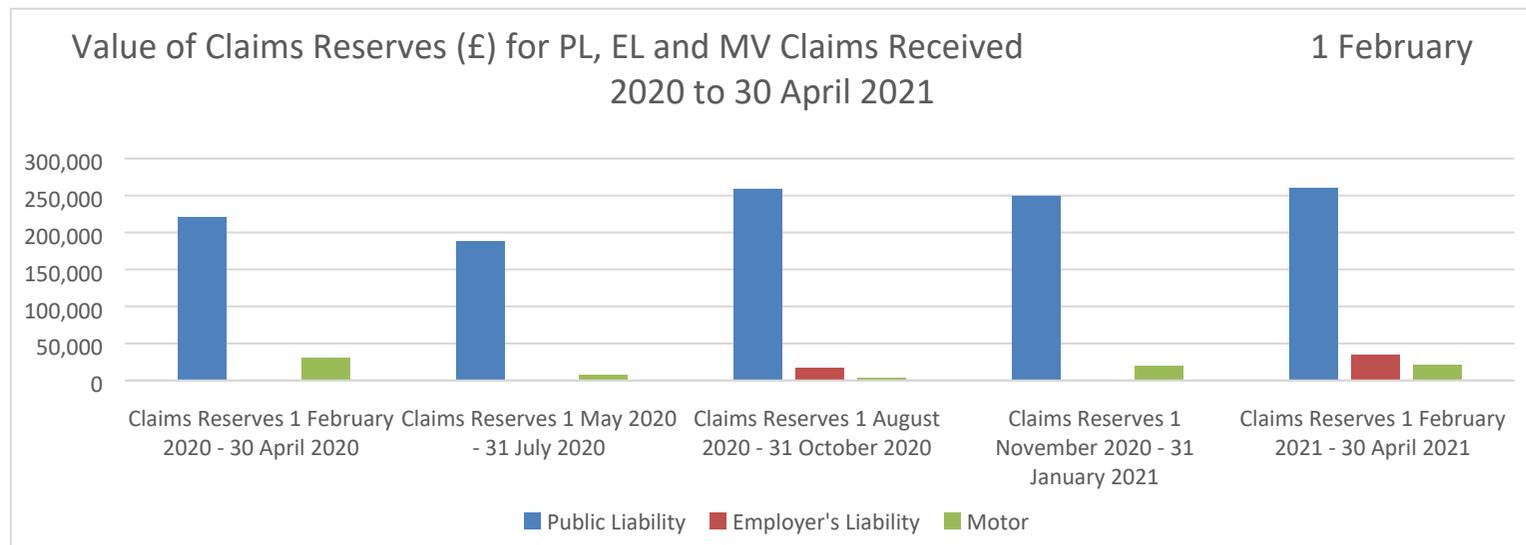
One Employer's Liability claim was received in the last quarter, however claim numbers remain low and only three such claims have been received in the overall period.

Despite a steady increase in Motor claims numbers between the second and fourth quarters, it is pleasing to see in the final quarter that numbers have decreased and are at their lowest point in the overall period, having decreased by 48% between quarters 4 and 5 and by 40% from the first quarter.

As would be expected, due to the size of the fleet, Cleansing (Refuse Collection Service) remain the service area with the highest number of claims, accounting for 53% of claims received within the last quarter and with 38% of these claims being for own damage only with no third-party involvement. For the overall period, 53% of claims processed for all service areas accounted for own damage only.

Although variance has occurred over the period, the current profile in all three areas presents no cause for concern. However, numbers will continue to be monitored for any changes in trend.

The chart below outlines the value of the reserves for PL, EL and MV claims received for the period 1 February 2020 to 30 April 2021.



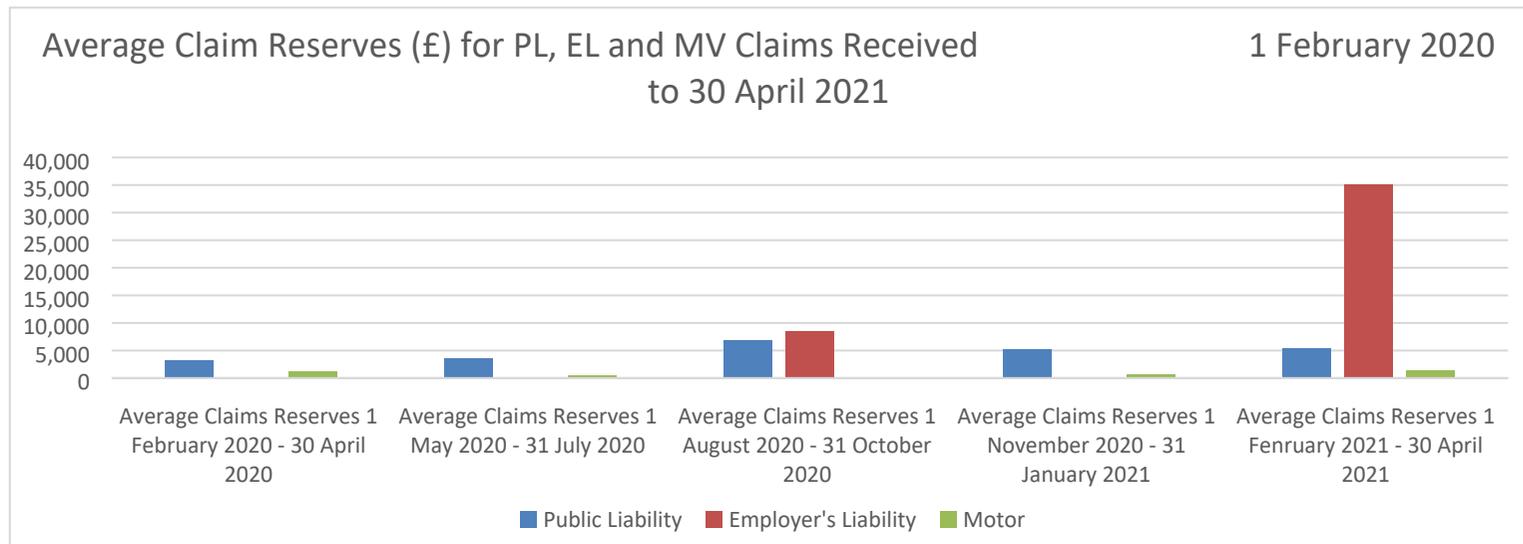
Claim reserves are allocated by the insurers and/or claims handlers independent of the Council and are determined by the type of injury sustained by the third parties and/or damage occasioned to their property.

Despite an increase in Public Liability claims numbers between the third and fifth quarter, reserves have increased by less than 1%, which in the main, is reflected in the type of injury and/or damage sustained by third parties. This is compounded between the first and last quarter where, although there was a decrease of 32% in claims numbers, an increase of 18% can be seen in claims reserves allocated.

Although Employer’s Liability claims were only received in quarters 3 and 5, there has been an increase of 107% in the claim’s reserves between these two periods. Although, if the Council is found to be negligent following investigation of claims, attempts are always made at settling claims as low as possible, the reserves are determined by the type and complexity of injury sustained.

Despite a decrease in Motor claims numbers in the final quarter, reserves for such have increased by 13%. There have been three claims of note where reserves have been set high – one for own damage and a further two involving third parties where investigations are still underway. At the end of the reporting period however, claims reserves are set at 28% lower than the start of the period.

The chart below outlines the average value of the reserves for PL, EL and MV claims received for the period 1 February 2020 to 30 April 2021.



Public Liability average claims reserves have fluctuated over the overall period which is due to the nature of the claims and severity of injury and/or damage suffered by third parties. Quarter 3 saw the highest average claims reserve and although there has been a decrease of 20%, the final quarter has seen an increase of 75% from quarter 1, despite the 32% decrease seen in claims numbers.

The low number of Employer's Liability claims has yielded an average value of £14k for each claim received for the overall reporting period. There is no cause for concern in this area.

Motor average claim reserves have also fluctuated over the overall period, ending with an increase of 20% from quarter 1 to quarter 5, although this can be explained in the narrative for the three large claims in the previous chart.

Trends in claims performance will continue to be monitored.

5.3 **Developments**

- The Team are currently heavily involved in preparing for the upcoming renewal of insurances for the Council and its associated subsidiary companies of Sefton New Directions and Sandway Homes. Collaboration is underway with all service areas to ensure that Insurers are provided with details of all current and future (where known) risks and exposures. This will allow Insurers to present their views on cover, rates and premiums prior to the renewal date of 29 September 2021. It is hoped that initial indications will shortly be available, however the ultimate outcome of renewal negotiations will be presented in a future update. The current insurance market remains challenging with insurers focused on technical pricing to ensure profitability over market share with varying appetites for risks which is leading to limited cover being available on some policy cover such as Directors and Officers.
- Preparation of communication to the Vehicle & Fleet Maintenance Section and all service areas with regard to the introduction of the Ministry of Justice Whiplash Reforms is currently underway. The Reforms, which apply to claims received on or after 31 May 2021, are part of the Civil Liability Act 2018 and have been designed by the Government to crack down on whiplash claims costs and lower motor insurance premiums. Timeframes for evidence-gathering and determining liability will be much tighter and, as part of the process, if not responded to within the required timeframe, liability will be deemed as admitted by default. Fortunately, at present, this type of claim forms the minority of claims within the Council's experience, however any effect from the introduction of the Reforms will be monitored and reported appropriately.
- The Team continue to work with service areas to improve the management of insurable risk in general (especially where there are high numbers of claims) which in turn should assist in maintaining defensibility of any claims received. Discussions are continuing with the Highways Team regarding changes required within their safety inspection systems to adopt a risk-based approach and comply with the requirements of the Highways Code of Practice 2018.

- As the Council continues to change and commercialism develops, discussions will continue with the Insurance Broker to ensure that all new risks/liabilities to the Council are identified, and, where appropriate, relevant insurance cover is sourced and procured. As an example of this, liaising with ICT colleagues, proposal forms are currently being completed to enable quotes to be sought for a review of the appetite to procure Cyber insurance cover.
- In consultation with Health & Safety colleagues, consideration will be given to making use of the remaining allocation of free of charge Risk Management Days available as part of the current liability insurance contract. In the past, these have been utilised to provide service areas with training or advice for their specific roles.

6. Risk and Resilience: Performance Update

6.1 Work Completed

The team have considered developments across the key areas of Business Continuity, Emergency Planning and Risk Management and an improvement plan has been produced for 2021/22.

In April 2021 the Council responded to the passing of the Duke of Edinburgh In line with expectations of Merseyside Lieutenancy's office and neighbouring local authorities, the Risk and Resilience Team supported the response for Sefton Council. The team ensured approved protocols were adhered to and Sefton residents were given opportunity to pay their respects.

The team were involved with reviewing plans for the Grand National event in Aintree. This was a scaled down event as attendance was limited to race officials and owners, but consideration needed to be given to local impacts of the event within the borough.

The Business Continuity and Emergency Planning Cell, as part of the Council's Covid-19 response, continues to meet each month, chaired by a member of the Risk and Resilience team. The cell was established to provide effective oversight of Business Continuity activity ensuring that priority activities and outputs continued to be delivered. Cell members discuss significant changes within their Service Areas as well as issues which require escalation to Heads of Service for consideration.

Monitoring and review of Business Continuity plans from each Service area continues to be delivered by the team. As part of the regular review, each plan is being revised to incorporate details of key IT systems used within the service, further identifying the timescales within which these systems need to be restored and the minimum number of staff requiring access. This is in recognition of the significant reliance we have on IT and the considerable changes we have experienced since the plans were initially produced. We are towards the end of this programme of activity and considering next steps which will involve facilitation of testing and exercising the plans during the remainder of the current financial year.

The team is currently reviewing the roles of the Crisis Response Team volunteers and loggists to ensure that there is on-going awareness and training opportunities are made available.

The Corporate Risk Register has been reviewed and is due to be presented to the Audit and Governance Committee for approval. An alternative, enhanced method of updating the register has been introduced to ensure improved visibility and engagement in the process is achieved. Meetings with risk owners continue to be held virtually to ensure ongoing improvement to risk management arrangements across the Council.

Developments

- Major incident plans and processes will continue to be reviewed and associated risk assessment of operational activities documented to ensure safe working for members of the team and colleagues, partners and stakeholders.
- The team are working to develop a proposal for the development of the Council's Risk Appetite which will help to inform decisions from a number of perspectives.
- The team continue to facilitate review of Business Continuity plans for each service area which will, in turn, support an update of Sefton's Corporate Business Continuity plan.

7. Assurance and Counter Fraud: Performance Update

7.1 Work Completed

In response to COVID-19, the Government is continuing to provide support for many businesses in the form of business grants through to 2021. Guidance provided by the Government in 2020 set out the role of Local Authorities in providing assurance to both themselves and to the Department for Business, Energy and Industrial Strategy (BEIS) to minimise the risk of error and fraud. To deliver this requirement, and as part of an assurance plan, Internal Audit and the Assurance Manager have been supporting the service areas in the development and implementation of post-payment assurance checking regimes, which were informed by fraud risk assessments undertaken for each of the business grant schemes, detailing the likelihood of fraud and error.

The Government's Grant Management Function and Counter Fraud Function has made their digital assurance tool, Spotlight, available to Local Authorities to support the administration of COVID-19 emergency grants. Spotlight has a number of key features namely processing initial due diligence checks, using data from Companies House and the Charity Commission, government grant awards and contracts, to help build a picture of the grant recipient and used as part of the post payment assurance programme. Spotlight has been utilised by the Council to investigate all payments made over the last twelve months under the Small Business Grant Fund, the Retail, Hospitality and Leisure Grants Fund and Local Authority Discretionary Fund Grants Fund.

In November 2020, Sefton's Council Tax and Electoral Register data was submitted to the National Fraud Initiative (NFI) as part of an official annual data matching exercise to check sole occupier discount entitlement where there is information to suggest there may be more than one person in the household. NFI matches were made available immediately after the upload of both datasets and any discrepancies investigated.

7.2 Developments

Fraudsters will seek to exploit the uncertainty created by major and unexpected events, the current COVID-19 issue is no exception. Regular COVID-19 intelligence bulletins are being received from CIFAS, a not-for-profit fraud prevention

membership organisation, which give an insight into the latest phishing techniques, cyber-enabled threats, internal risks and other fraud threats identified by the CIFAS Intelligence team.

Their bulletins are designed to help protect, prevent, mitigate and anticipate the key fraud threats that could target the Council, our residents, businesses and employees. These updates are available on the Sefton intranet <http://intranet.smbc.loc/our-council/data-protection-information-handling/covid-intelligence-bulletins.aspx>

The Assurance Team continues to provide assistance with the Council's response to the pandemic and is currently deployed to support the Council's Economic & Regeneration team (Invest Sefton) in the delivery of the Discretionary Business grant schemes. Whilst the work originally programmed for the Assurance team in 2020-21 has been significantly impacted by the shifted priorities of supporting the administration and delivery of Business Support grants, arrangements are now in place for the team to regain lost ground from 1 July 2021 to undertake the Assurance work plan, to include key risk areas and provide some extra capacity to Internal Audit, Emergency Planning, Business Continuity and the Health and Safety.

The Assurance Manager has recently provided assurance to Invest Sefton on the delivery of the Liverpool City Region (LCR) Care Providers Grant scheme in Sefton which ran from 11 May 2021 until 18 May 2021. The Covid-19 pandemic has had a significant impact on the Liverpool City Region's registered childcare and care home businesses including a fall in demand alongside an increase in cost to manage within a Covid safe environment. Grant support was specifically aimed at: -

- Registered Childminders
- Registered Out of School Clubs
- Registered Nursery / pre-school provision
- Registered Care Homes (Adults)

As a direct response to the challenges these businesses are facing the LCR Care Grant was created by the Liverpool City Region Combined Authority. The grant has been administered by each of the six local authorities that form the Combined Authority, namely Halton, Knowsley, Liverpool, Sefton, St Helens and Wirral.

As part of the Counter Fraud strategy, Heads of Service nominated Fraud Risk Owners for their individual service areas. The Council's Fraud Risk Owners have now completed fraud risk assessments for current and any new activities and submitted to the Assurance Manager for review. The risk assessment process documents roles and responsibilities for managing the fraud risks within the organisation.

The Council's Counter Fraud Strategy is currently being finalised and will be consulted on with the Strategic Leadership Board in July 2021. As part of the Counter Fraud Strategy the Council has reviewed its arrangements against the latest Fighting Fraud and Corruption Locally (FFCL) Strategy (2020) which is the Local Government blueprint for tackling fraud in Local Government.

The previous FFCL strategy focused upon pillars of activity that summarised the areas local authorities should concentrate efforts on. These were 'acknowledge', 'prevent' and 'pursue'. These pillars are still applicable. However, another two areas of activity have emerged that underpin tenets of those pillars. These are 'govern' and 'protect'. The pillar of 'govern' sits before 'acknowledge'. It is about ensuring the tone from the top and should be included in local counter fraud strategies. The second new area that has appeared during the FFCL research recognises the increased risk of harm that fraud has on its victims and protecting the community, placing an additional responsibility on the Council to protect its residents from fraud.

Business Support Grants and Business Rates datasets were mandated as part of The Cabinet Office's 2020/21 National Fraud Initiative (NFI) Work Programme data matching exercise in order to identify potential fraud. Sefton Council's Grant recipient datasets for the Small Business Grant Fund, the Retail, Hospitality and Leisure Grants Fund and Local Authority Discretionary Fund Grants Fund data were submitted in January 2021. The results of the data matching were released to the Council on Friday 14 May 2021 and the Council will be following up the data matches between now and 31 December 2021.

Data matching is undertaken based on established NFI methodologies to identify potential fraud in relation to:

- multiple grants paid to businesses within or between LA's.
- duplication between grant schemes where relevant; and
- payments made to business or individuals flagged in proven fraud 'watchlist' data, where available.

Joint audit/fraud work is being undertaken on samples of COVID-19 related payments and expenditure including the accuracy and integrity of spend and considering inherent fraud risks nationally associated with COVID-19 related payments, support and reliefs. Tangible benefits delivered by this approach have resulted in identifying some issues and highlighted the benefits of data sharing across service teams in order to deter fraudulent grant applications.

For Business Grant Fraud the Government has provided debt recovery guidance to Local Authorities in September 2020. There are three types of ineligible payments: error, non-compliance and fraud.

If reclaiming funds is not possible the debts are to be referred to the BEIS to establish the next steps and ultimately determine whether the Local Authority will be held accountable for the debt. All identified fraud regardless of whether it is local, cross boundary or organised will be referred to Action Fraud via the website www.actionfraud.police.uk

Assurance on all the various national and local business grant schemes being administered by the Council, including Fraud Risk Assessments, Post Payment Assurance Plans, NFI Data Matching exercises, and the Grants Debt Recovery programme will continue to be provided by the Assurance Manager, linking into the formal audit work programme.

An attempted fraud for COVID-19 grant funding for multiple businesses at one address in Sefton under the Liverpool City Region Grant Scheme has been prevented due to the tight controls in place. All the applications showed strong indication of fabricated information and did not meet the audit thresholds so were rejected without offering any option of appeal.

The Council continues to participate in the Merseyside Regional Fraud Group to jointly develop and share best practice in Counter Fraud through a number of approaches, including information and knowledge sharing, policy and procedure development and joint working where appropriate.

An investigation conducted by the Local Government Ombudsman (LGO) about a decision on a discretionary COVID-19 grant for a Sefton business was upheld in Sefton's favour. The complainant said that the Council had not followed Government guidance and had failed to exercise any discretion causing her business significant financial loss. However, the LGO found no evidence of fault in the Council's decision-making process.

8. Looking Ahead

8.1 The Service continues to develop, with a number of key projects being undertaken to embed the role and influence of the team over the next quarter:

- The embedding of regular risk management review across the Council to ensure that Operational and Service Risk Registers are updated on a regular basis.
- Define a draft risk management statement on appetite to be shared with Strategic Leadership Board.
- Continued delivery of the Internal Audit Plans for 2021/22, focusing attention on reviewing the key risks to the organisation, which will evolve as the Council changes particularly in light of Covid-19.
- Building up Business Continuity Plans at Service level and the starting of limited testing of existing business continuity plans.
- Delivery of the final Health and Safety Risk Assessment Training sessions for Managers and designing a health and safety training needs assessment.
- Developing the Council's Counter Fraud approach firstly through rolling out the actions from the CIPFA Fraud Risk Assessment.
- Delivering on the service improvement plans for the Risk and Audit Team.

9. Conclusions

- 9.1 Internal Audit has made promising progress in the completion of the Internal Audit Plan 2020/21. Performance in respect of the agreement of recommendations and the feedback from clients has been particularly positive and reflects the value added by the Service.
- 9.2 The Council's accident record continues to be positive and there are plans to improve the risk management further by working with colleagues across the organisation.
- 9.3 The Health and Safety team has been responding to the significant impact of Covid-19 helping to ensure that management put appropriate risk assessments are in place and provide guidance and support to colleagues as well as supporting the SMART and Surge Testing. There is ongoing work on the School Inspection regime as well as assisting the development of post Covid Agile working.
- 9.4 The Council's insurance claims performance remains good.
- 9.5 Further work is planned to improve risk management within the Council by ensuring that a risk appetite is developed and ensuring that there is an risk registers are in place in line with the Corporate Risk Management Handbook. framework.
- 9.6 Progress has been made in embedding business continuity with a clear road map for the completion of the outstanding business continuity plans shortly and a focus over the remainder of the financial year at testing and exercising the BC plans.
- 9.7 There are clear implementation plans in place across each of the service areas to deliver improvements which will result in improved services as well as an integrated risk and audit approach.