



A meeting of the **CORPORATE GOVERNANCE COMMITTEE** will be held as a **REMOTE MEETING VIA ZOOM** on **WEDNESDAY, 27 JANUARY 2021** at **6:00 PM** and you are requested to attend for the transaction of the following business:-

AGENDA

APOLOGIES

1. MINUTES (Pages 5 - 8)

To approve as a correct record the Minutes of the meeting of the Committee held on 30th September 2020.

Contact Officer: H Peacey - (01223) 752548

2. MEMBERS' INTERESTS

To receive from Members declarations as to disclosable pecuniary and other interests in relation to any Agenda Item.

Contact Officer: Democratic Services - (01223) 752548

3. CODE OF CONDUCT COMPLAINTS - UPDATE (Pages 9 - 12)

To provide a summary and update of completed or ongoing complaints received regarding alleged breaches of the Code of Conduct under the Localism Act 2011 since the start of the year.

Contact Officer: L Jablonska - (01480) 388004

4. UPDATE ON CODE OF CONDUCT AND REGISTER OF DISCLOSABLE PECUNIARY INTERESTS (Pages 13 - 20)

To consider a report by the Elections and Democratic Services Manager on the Code of Conduct and Register of Disclosable Pecuniary Interests.

Contact Officer: A Green - (01223) 752549

5. ANNUAL REPORT ON HDC COMPLIANCE WITH THE FREEDOM OF INFORMATION (FOI) & ENVIRONMENTAL INFORMATION REGULATIONS (EIR) ACTS (Pages 21 - 34)

To consider a report on requests for information received by the Council under the Freedom of Information and Environmental Information Regulations Acts and to highlight any issues encountered and actions to be taken to improve performance.

Contact Officer: M Govier - Infogov@3csharedservices.org

6. IMPLEMENTATION OF INTERNAL AUDIT ACTIONS (Pages 35 - 42)

To receive a report from the Acting Audit Manager on the implementation of audit actions.

Contact Officer: D Moss - 01480 388475

7. APPROVAL FOR PUBLICATION OF THE 2019/20 ANNUAL FINANCIAL REPORT

To consider the Auditor's Report, the Letter of Representation and the Annual Financial Report. **[REPORT AND APPENDICES TO FOLLOW].**

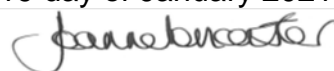
Contact Officer: C Edwards - (01480) 388822

8. CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT (Pages 43 - 44)

To receive the Corporate Governance Committee Progress Report.

Contact Officer: H Peacey - (01223) 752548

19 day of January 2021



Head of Paid Service

Disclosable Pecuniary Interests and Non-Statutory Disclosable Interests

Further information on [Disclosable Pecuniary Interests and Non - Statutory Disclosable Interests is available in the Council's Constitution](#)

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Arrangements for these activities should operate in accordance with [guidelines](#) agreed by the Council.

Please contact Habbiba Peacey, Democratic Services Officer, Tel: (01223) 752548 / email: Habbiba.Peacey@huntingdonshire.gov.uk if you have a general query on any Agenda Item, wish to tender your apologies for absence from the meeting, or would like information on any decision taken by the Committee.

Specific enquiries with regard to items on the Agenda should be directed towards the Contact Officer.

Agenda and enclosures can be viewed on the [District Council's website](#), together with a link to the Broadcast of the meeting.

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HUNTINGDONSHIRE DISTRICT COUNCIL

MINUTES of the meeting of the CORPORATE GOVERNANCE COMMITTEE held as a Remote Meeting via Zoom on Wednesday, 30 September 2020.

PRESENT: Councillor G J Bull – Chairman.

Councillors S M Burton, E R Butler, Dr P L R Gaskin,
D A Giles, K P Gulson, P Kadewere, H V Masson,
L W McGuire, R J West and Mrs S R Wilson.

APOLOGY: An Apology for absence from the meeting was submitted on behalf of Councillor J P Morris.

14 MINUTES

The Minutes of the meeting of the Committee held on 23rd July 2020 were approved as a correct record and signed by the Chairman.

15 MEMBERS' INTERESTS

Councillor Mrs S Wilson declared a non-disclosable pecuniary interest in Minute No 20/20 as Ward Member for Godmanchester and Hemingford Abbots.

16 CODE OF CONDUCT COMPLAINTS - UPDATE

By means of a report by the Elections and Democratic Services Manager & Deputy Monitoring Officer (a copy of which is appended in the Minute Book), the Committee were provided with a summary and update of completed and ongoing complaints received regarding alleged breaches of the Code of Conduct under the Localism Act 2011 since the start of the year.

The Elections and Democratic Services Manager advised that a report would be submitted to a future meeting on the new model Member Code of Conduct which would be considered at the LGA Assembly in the Autumn. In noting details of the allegations/complaints received, Councillor D A Giles requested for details of the paragraphs within the Code where breaches had been reported to be circulated around to the Committee. With reference to case number 20/40, it was confirmed that the complaint had been dismissed for investigation as it was out of time meaning that it related to conduct over six months before. Whereupon, it was

RESOLVED

that the progress of outstanding complaints and the conclusion of cases resolved since the meeting in January 2020 be noted.

17 UPDATE ON CODE OF CONDUCT AND REGISTER OF DISCLOSABLE PECUNIARY INTERESTS

With the aid of a report prepared by the Member Support Assistant (a copy of which is appended in the Minute Book) the Committee were updated on the adoption of Codes of Conduct by Town and Parish Councils and the receipt and publication of register of interests forms on behalf of District, Town and Parish Councillors.

RESOLVED

that the contents of the report now submitted be noted.

18 REVIEW OF FRAUD INVESTIGATION ACTIVITY 2019/20

Consideration was given to a report by the Corporate Fraud Manager (a copy of which is appended in the Minute Book) detailing the work undertaken by the Corporate Fraud Team in 2019/20 which included the number of investigations undertaken, types of investigation and the value of the fraud identified. Members were required to review the work of the Team as part of the Council's Anti-Fraud and Corruption Strategy.

Members were encouraged to note that during 2019/20, the Team had:

- Received 546 referrals;
- Investigated and closed 348 cases, identifying a fraud value of £671,310;
- Recovered 6 social housing properties with two more pending;
- Carried out 5 prosecutions;
- Administered 147 Council Tax penalties giving an income of £10,000; and
- Administered 4 administrative penalties giving an income of £3,500.

Additionally, it was reported that the Council had made three applications for Directed Surveillance under the powers of the Regulatory Investigatory Powers Act (RIPA) regarding fly tipping matters and the deployment of covert cameras.

Having raised a number of questions relating to how the District Council's fraud levels compared nationally, whether COVID-19 would result in an increase in fraud cases, the cross agency work being undertaken with the National Fraud Initiative, the need for Member Training on RIPA and the level of publicity undertaken by the Council on successful prosecutions, the Committee commended the Corporate Fraud Manager and her team for the production of a comprehensive report and the performance levels achieved.

Whereupon, it was

RESOLVED

that the contents of the report now submitted, which outlines the work undertaken by the Corporate Fraud Team during 2019/20, be received and noted.

19 WHISTLEBLOWING (POLICY, GUIDANCE AND CONCERNS RECEIVED)

The Committee gave consideration to a report by the Acting Audit Manager (a copy of which is appended in the Minute Book) on the outcome of a review of the Whistleblowing Policy and Guidance. The review found that only minor changes were required.

Members' attention was drawn to the whistleblowing allegations received in the year ending March 2020. Seven internal allegations had been received over the year which related predominantly to health and safety matters.

In noting that a publicity campaign on the policy and guidance would be undertaken with staff via the Council's intranet, particularly at a time with increased home working due to the COVID-19 pandemic, the Committee

RESOLVED

- (a) that the results of the annual review of the whistleblowing policy be noted; and
- (b) that the updated Whistleblowing Policy and Guidance, as attached as appendices to the report now submitted, be approved.

20 SINGLE TENDER AWARDS

With the aid of a report prepared by the Assistant Directors for Corporate Services and Transformation (a copy of which is appended in the Minute Book) the Committee were notified of single tenders/quotes approved by Heads of Service/Assistant Directors since the January 2020 meeting. Having been informed of the requirement within the Council's Constitution, under the Code of Procurement, to report such matters to the Committee and in receiving a response from the Assistant Director, Corporate Services on the Council's joint ownership of Bridge Place Car Park with RGE, it was

RESOLVED

that the content of the report now submitted be noted.

21 CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT

The Committee received and noted a report (a copy of which is appended in the Minute Book) on progress of actions in response to any decisions taken at previous meetings.

22 CORPORATE GOVERNANCE COMMITTEE - SPECIAL MEETING

It was noted that a special meeting of the Committee would be held on Wednesday, 25th November 2020 at 7:00pm. The meeting would consider the approval of the 2019/20 final accounts.

Chairman

Public
Key Decision - No

HUNTINGDONSHIRE DISTRICT COUNCIL

Title/Subject Matter: Code of Conduct Complaints – Update

Meeting/Date: Corporate Governance Committee – 27th January 2021

Executive Portfolio: Councillor R Fuller, Executive Leader

Report by: Elections and Democratic Services Manager & Deputy Monitoring Officer

Ward(s) affected: All

Executive Summary:

This report provides Members with an update on complaints cases regarding alleged breaches of the Code of Conduct. The Committee is responsible for maintaining high standards of conduct by Members of the District and Town and Parish Councils, for monitoring operation of the Code of Conduct and for considering the outcome of investigations in the event of breaches of the Code.

Recommendation:

The Committee is requested to note the progress of any outstanding complaints and the conclusion of cases resolved since the meeting in September 2020.

1. PURPOSE OF THE REPORT

- 1.1 The purpose of this report is to provide a summary and update of completed or ongoing complaints received regarding alleged breaches of the Code of Conduct under the Localism Act 2011 since the start of the year.

2. WHY IS THIS REPORT NECESSARY/BACKGROUND

- 2.1 In accordance with the functions of the Committee, this report seeks to provide a summary of the current position in relation to the Code of Conduct complaints since the last meeting.
- 2.2 At the meeting of the Committee on 13th September 2017, Members requested that this report be submitted on a quarterly basis and to include categories of the Code of Conduct cases to enable feedback to be given to Town and Parish Councils should similar themes emerge on the nature of the complaints to enable further training to be arranged.

3. ANALYSIS

- 3.1 Details of allegations/complaints in relation to the Code of Conduct have been outlined in the table below. Specific detailed information regarding the complaint has not been provided as this may be prejudicial to the conduct of the ongoing complaints process and to protect the identity of councillors who may not have breached the Code of Conduct.

Case Number	District/Town/ Parish Council	Allegation/complaint	Outcome
20/42	Huntingdonshire District Council	Complaint against a District Councillor alleging he breached 3.4 (disrepute) of the Code	Matter investigated and, in consultation with the Independent Person, response provided to complainant and complaint dismissed.
20/43	Ellington Parish Council	Complaint against Parish Councillors alleging they breached 3.2 (respect), 3.4 (disrepute), 3.5 (position), 3.7 (judgement) and 3.8 (unlawful) of the Code	Further detail sought on the complaint and how the detail of how the councillors have breached the Code.
20/44	Huntingdonshire District Council	Complaint against a District Councillor alleging he breached 3.4 (disrepute) of the Code	Matter investigated and, in consultation with the Independent

Case Number	District/Town/ Parish Council	Allegation/complaint	Outcome
			Person, response provided to complainant and complaint dismissed.

4. LEGAL IMPLICATIONS

4.1 There are no significant implications to report.

5. REASONS FOR THE RECOMMENDED DECISIONS

5.1 This is an opportunity for Members of the Committee to be appraised of details of completed complaints and any outstanding complaints alleged against the Code of Conduct. This is in accordance with the functions of the Committee and its duty to discharge functions in relation to the promotion and maintenance of high standards of conduct within the Council and amongst Town and Parish Councils within the District.

6. BACKGROUND PAPERS

None.

CONTACT OFFICER

Name/Job Title: Lisa Jablonska, Elections and Democratic Services Manager & Deputy Monitoring Officer
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 Email: lisa.jablonska@huntingdonshire.gov.uk

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Public
Key Decision - No

HUNTINGDONSHIRE DISTRICT COUNCIL

Title/Subject Matter: Update on Code of Conduct and Register of Disclosable Pecuniary Interests

Meeting/Date: Corporate Governance Committee – 27th January 2021

Report by: Elections and Democratic Services Manager

Wards affected: All Wards

Executive Summary:

The Monitoring Officer has a duty to establish and maintain a register of Disclosable Pecuniary Interests (DPIs). This report provides the Committee with details of the current level of returns by Town and Parish Councillors and by District Councillors. It also contains a breakdown of the adoption by Town and Parish Councils of Codes of Conduct.

Recommendation(s):

The Committee is

RECOMMENDED

to consider and comment on the report.

1. PURPOSE OF THE REPORT

- 1.1 Chapter 7 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of disclosable pecuniary or other interests of Members of the District Council. In addition, the District Council is responsible for maintaining the Register for Town and Parish Councils. The register is open for inspection at the District Council's offices and published on the District Council's website. Where a Town or Parish Council has a website, the District Council is required to provide that Council with the information necessary to enable it to publish their current register on its own website. Information in respect of the DPIs of each Town and Parish Council is presented in Appendix 1.
- 1.2 Each Town and Parish Council also has a duty to adopt a Code of Conduct. All Town and Parish Councils were requested to advise the Monitoring Officer when their Council had adopted a new Code and to confirm whether it was identical to that adopted and promoted by the District Council or alternatively the version produced by the National Association of Local Councils (NALC) or any other.

2. WHY IS THIS REPORT NECESSARY/BACKGROUND

- 2.1 The Committee is responsible for maintaining high standards of conduct by Members of the District and Town and Parish Councils, for monitoring operation of the Code of Conduct and for considering the outcome of investigations in the event of breaches of the Code. The District Council has a duty to maintain and publish the Registers of Pecuniary Interests of the District and Town and Parish Councils. Those Members who fail to comply with the 2011 Act are guilty of an offence and liable to a maximum fine of £5,000 and disqualification for up to five years.
- 2.2 This report describes the current position in relation to both matters.

3. ANALYSIS

- 3.1 All DPI forms that have been received have been published. Any changes made to pecuniary interests have also been published.
- 3.2 Of 71 Town and Parish Councils, 35 have had their full Register published on the District Council's website, 28 Parishes have published their Register with vacancies and 8 Parish Councils currently have a form outstanding.
- 3.3 In terms of individual DPIs, 583 out of a total of 650 have been received from Parish Councillors; with 57 vacant and 10 outstanding. The up to date position on each Council is noted in Appendix 1. It is unlikely that there will ever be a complete return at any one time because of the ever-changing Parish Council membership.
- 3.4 All District Councillors' DPI forms are uploaded onto the Council's website.

4. KEY IMPACTS

- 4.1 The Corporate Team regularly requests updates from those Parish Councils where DPIs are outstanding. Similarly, incomplete or inaccurate forms are returned to Parish Councils with a request to revise and return. All Parish Councils are asked twice a year to verify details held by the District Council regarding DPIs and the Code of Conduct adopted by each Parish Council.

5. WHAT ACTIONS WILL BE TAKEN/TIMETABLE FOR IMPLEMENTATION

- 5.1 Parish Clerks are regularly reminded by email to submit DPI forms as soon as possible following any changes.

6. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND/OR CORPORATE OBJECTIVES

- 6.1 The Council's strategic priorities include collaboration with partners to enhance community resilience. By ensuring that DPIs are published, the Council is supporting local accountability and transparency in decision making which contributes to the objective to develop stronger and more resilient communities to enable people to help themselves.

7. CONSULTATION

- 7.1 Not applicable.

8. LEGAL IMPLICATIONS

- 8.1 There is no legal obligation upon a Town or Parish Council to notify the Monitoring Officer that it has adopted a Code of Conduct. Records indicate, however, that all Town and Parish Councils have adopted a Code. 57 of those Parish Councils have adopted one based on that adopted by the District Council. 12 Town and Parish Councils have opted for the Code promoted by NALC, and two have adopted their own version of the Code. The up to date position on each Council is noted in Appendix 2.

9. REASONS FOR THE RECOMMENDED DECISIONS

- 9.1 The Committee take a role in maintaining high standards of conduct by elected Members and monitoring the Code of Conduct.

10. LIST OF APPENDICES INCLUDED

Appendix 1 - Town and Parish Councils Disclosable Pecuniary Interests (DPI) forms.

Appendix 2 - Town and Parish Council New Standards Regime and Code of Conduct.

11. BACKGROUND PAPERS

None.

CONTACT OFFICER

Name/Job Title: Adam Green, Democratic Services Officer (Scrutiny)
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Email: Adam.Green@huntingdonshire.gov.uk

Town and Parish Councils' Disclosable Pecuniary Interests (DPI) forms

No	Town/Parish Council	No of Cllrs	DPIs Received	Vacancies	DPIs Outstanding
1	Abbots Ripton	6	6		
2	Abbotsley	7	7		
3	Alconbury	11	7	3	1
4	Alconbury Weston	7	5	2	
5	Alwalton	5	4	1	
6	Barham & Woolley	5	5		
7	Bluntisham	11	10	1	
8	Brampton	15	14	1	
9	Brington & Molesworth	5	4	1	
10	Broughton	7	6	1	
11	Buckden & Diddington	15	15		
12	Buckworth	5	5		
13	Bury	9	9		
14	Bythorn & Keyston	5	5		
15	Catworth	7	7		
16	Colne	9	9		
17	Conington	5	5		
18	Earith	11	11		
19	Easton	5	5		
20	Ellington	7	7		
21	Elton	9	8	1	
22	Farcet	11	3	5	3
23	Fenstanton	13	12	1	
24	Folksworth & Washingley	9	8		1
25	Glatton	5	5		
26	Godmanchester	17	17		
27	Grafham	7	5	2	
28	Great & Little Gidding	7	5	2	
29	Great Gransden	9	9		
30	Great Paxton	9	8	1	
31	Great Staughton	9	8		1
32	Hail Weston	7	7		
33	Hemingford Abbots	7	5	2	
34	Hemingford Grey	13	10	3	
35	Hilton	9	8	1	
36	Holme	7	7		
37	Holywell cum Needingworth	13	13		
38	Houghton & Wyton	9	7	2	
39	Huntingdon	19	17	1	1
40	Kimbolton & Stonely	11	10	1	
41	Kings Ripton	5	4	1	
42	Leighton Bromswold	7	6	1	
43	Little Paxton	15	12	3	

44	Offord Cluny & Offord Darcy	11	8	3	
45	Old Hurst	7	7		
46	Old Weston	7	6		1
47	Perry	9	6	3	
48	Pidley cum Fenton	7	6	1	
49	Ramsey	17	17		
50	Sawtry	15	15		
51	Sibson cum Stibbington	7	7		
52	Somersham	15	12	3	
53	Southoe & Midloe	7	7		
54	Spaldwick	7	7		
55	St Ives	17	15	2	
56	St Neots	21	20	1	
57	Stilton	11	9	2	
58	Stow Longa	5	5		
59	The Stukeleys	9	9		
60	Tilbrook	5	5		
61	Toseland	5	4		1
62	Upton & Coppingford	5	5		
63	Upwood & The Raveleys	9	8	1	
64	Warboys	15	15		
65	Waresley cum Tetworth	5	5		
66	Wistow	7	7		
67	Woodhurst	7	6		1
68	Woodwalton	5	5		
69	Wyton on the Hill	7	7		
70	Yaxley	17	13	4	
71	Yelling	7	7		
	Totals	650	583	57	10

Town and Parish Council New Standards Regime and Code of Conduct

No	Town/Parish Council	HDC Code	NALC Code	Own Code
1	Abbots Ripton	X		
2	Abbotsley		X	
3	Alconbury	X		
4	Alconbury Weston		X	
5	Alwalton	X		
6	Barham & Woolley	X		
7	Bluntisham	X		
8	Brampton	X		
9	Brington & Molesworth	X		
10	Broughton	X		
11	Buckden	X		
12	Buckworth	X		
13	Bury	X		
14	Bythorn & Keyston	X		
15	Catworth	X		
16	Colne			X
17	Conington	X		
18	Earith		X	
19	Easton	X		
20	Ellington	X		
21	Elton	X		
22	Farcet		X	
23	Fenstanton	X		
24	Folksworth & Washingley		X	
25	Glatton	X		
26	Godmanchester	X		
27	Grafham	X		
28	Great & Little Gidding	X		
29	Great Gransden	X		
30	Great Paxton	X		
31	Great Staughton	X		
32	Hail Weston		X	
33	Hemingford Abbots	X		
34	Hemingford Grey	X		
35	Hilton	X		
36	Holme	X		
37	Holywell cum Needingworth	X		
38	Houghton & Wyton			X
39	Huntingdon	X		
40	Kimbolton & Stonely	X		
41	Kings Ripton	X		
42	Leighton Bromswold	X		
43	Little Paxton	X		
44	Offord Cluny & Offord Darcy		X	
45	Old Hurst		X	

Appendix 2

46	Old Weston	X		
47	Perry	X		
48	Pidley cum Fenton	X		
49	Ramsey	X		
50	Sawtry	X		
51	Sibson cum Stibbington	X		
52	Somersham	X		
53	Southoe & Midloe	X		
54	Spaldwick	X		
55	St Ives	X		
56	St Neots	X		
57	Stilton		X	
58	Stow Longa	X		
59	The Stukeleys	X		
60	Tilbrook	X		
61	Toseland	X		
62	Upton & Coppingford	X		
63	Upwood & The Raveleys	X		
64	Warboys	X		
65	Waresley cum Tetworth		X	
66	Wistow	X		
67	Woodhurst		X	
68	Woodwalton		X	
69	Wyton on the Hill	X		
70	Yaxley	X		
71	Yelling	X		
	Totals	57	12	2

HUNTINGDONSHIRE DISTRICT COUNCIL

Title/Subject Matter:	Annual report on HDC compliance with the Freedom of Information (FOIA) & Environmental Information Regulations (EIR) Acts
Meeting/Date:	January 2021
Executive Portfolio:	Executive Councilor for Digital and Customer
Report by:	Information Governance Manager & Data Protection Officer
Ward(s) affected	All Ward(s)

EXECUTIVE SUMMARY:

The Information Governance Service for Huntingdonshire District Council (HDC) is currently provided by 3C ICT Shared Service hosted by Huntingdonshire District Council. This also serves South Cambridgeshire District Council and Cambridge City Council.

The Information Governance (IG) Team lead on Information Requests, Data Protection Compliance, Data Privacy and provide additional advice around Information Management. The team is headed up by the Information Governance Manager who is also the Data Protection Officer.

This is an annual report on the Council's compliance with the Freedom of Information Act 2000 and Environmental Information Regulations 2004.

This report also includes the Councils performance with regard to protecting personal data and covers the period Jan 2020 to Dec 2020.

The number of requests received by the Council in 2020 (534) decreased from the previous year, (615).

Recommendation(s):

Corporate Governance Committee is asked to note the contents of this report.

1. PURPOSE

- 1.1 The purpose of this report is to provide an update on Information Governance activity and performance during 2020 (January – December); hereby, highlight any issues encountered and actions to be undertaken to improve performance.

2. SCOPE

- 2.1 It provides:
- An overview of the current arrangements in place to monitor the Information Governance at the Council.
 - An update on performance relating to:
 - Freedom of Information (FOI) Act / Environmental Information Regulations (EIR) Requests
 - Data Subject Access Requests
 - Personal Data Breaches

3. BACKGROUND

- 3.1 Information is a vital asset and needs to be managed securely by the council. Appropriate policies, guidance, accountability and structures must be in place to manage the council's information legally, securely and effectively in order to minimise risk to the public and staff and to protect its finances and assets.
- 3.2 Information Governance describes the holistic approach to managing information by implementing processes, roles and metrics to transform information into business assets. This includes coverage around access to information, data quality, information management, information security and information sharing, data privacy and Data Protection compliance.

4. ORGANISATIONAL ARRANGEMENTS

- 4.1 The Information Governance Service for Huntingdonshire District Council (HDC) is currently provided by 3C ICT Shared Service. This also serves South Cambs District Council and Cambridge City Council. The Information Governance (IG) Team lead on Information Requests, Data Protection Compliance, Data Privacy and provide additional advice around Information Management; whilst the 3C ICT provide support on Information Security.
- 4.2 The IG Team consists of six members, four of whom, including the current

Data Protection Officer (DPO), joined in 2020. The DPO is responsible for leading the IG team. As this is a shared service, the DPO is also the DPO for all three Authorities.

- 4.3 Updates on IG arrangements across Huntingdonshire District Council (HDC) are provided to the Information Governance Group (IGG). This Group is designed to facilitate the necessary engagement to ensure the relevant accountability of staff across the various services and to assist in driving any improvements required. It is chaired by the Senior Information Risk Owner and comprises of number of managers / heads of services across most service areas within the Council.
- 4.4 The Information Governance Group meets quarterly and last met early November 2020.

5. DATA PROTECTION COMPLIANCE

- 5.1 The IG team carried out a review of the Data Protection arrangements this year to determine the areas for priority action.
- 5.2 The main areas covered included: Lawfulness, Fairness and Transparency, Individual Rights, Accountability and Governance, Data Security, International Transfer and Breaches. Each area consisted of a number of sub-categories.

The scope for each category is provided below:

Lawfulness, fairness and transparency	Individual Rights	Accountability and Governance	Data Security, International transfers and breaches
<ul style="list-style-type: none"> • Information held • Lawful basis • Consent • Consent for children • Vital interest • Legitimate interests 	<ul style="list-style-type: none"> • Right to be informed including privacy information. • Communicate the processing of children's information • Right of access • Right to rectification and data quality • Right to erasure including retention and disposal • Right to restrict processing • Right to data portability • Right to object • Rights related to automated decision making including profiling 	<ul style="list-style-type: none"> • Policy, Compliance and Training • Processor contracts • Information Risks • Data Protection by Design • Data Protection Assessments • Data Protection Officers(DPO) • Management Responsibility 	<ul style="list-style-type: none"> • Security policy • Breach Notification • International transfers

The overall finding from the review was that, whilst appropriate procedures were generally in place, these were generally informal, incomplete, and/or inconsistently applied.

5.3 Improvements were required in the following areas:

Area	High Level Finding	Risk	Actions needed
Information Asset Registers / Flows	<p>Although some Information Asset records were held by Service areas; we do not hold a central repository.</p> <p>These should be reviewed regularly to ensure information is accurate and held centrally.</p>	<p>The risk here is that there is no overview of our processes / systems which could result in delays to information requests; inappropriate controls being in place; no clear view on dependencies in terms of ICT systems when a change is made; etc.</p>	<p>Review of existing information to ensure this is up to date; and collate this centrally.</p>
Records of Processing (Article 30)	<p>Although the Information Asset Register does collect most of the information required for Article 30; this is not held centrally; in addition to this, more information would be required on disclosures and transfers.</p>	<p>There is a risk that information is inappropriately being transferred (i.e. there may not be appropriate adequacy arrangements or appropriate technical safeguards in place)</p>	<p>Review existing information to ensure transfers are documented.</p>
Policies	<p>Although there are some policies accessible on the Council's intranet pages, a number of these are out of date.</p> <p>To add to this, there are also additional IT Policies located within a repository (Protocol Policy) which is not accessible to all staff as they are not published on the Intranet.</p>	<p>The risk is that staff are not aware of their obligations and therefore put the Council resources at risk.</p>	<p>Policies need to be reviewed and published as appropriate.</p>
Training Arrangements	<p>The requirement by the ICO is that training is undertaken at least every two years.</p> <p>New starters are required to undertake e-</p>	<p>Although not in breach of the Act, by undertaking training every 2 years, this frequency is not in line with other partners in the public</p>	<p>Need to review Information Governance training provision including content; reporting and frequency for</p>

Area	High Level Finding	Risk	Actions needed
	<p>learning as part of their induction process.</p> <p>For many existing staff, e-learning was undertaken in preparation for GDPR in 2018. This therefore means a number of staff will be coming up to the 2-year threshold for retraining.</p> <p>To date, there has been limited communication to enforce the requirement for refresher training for existing staff.</p>	<p>sector (e.g. NHS). This therefore creates a hurdle when signing up to Information Sharing Agreements.</p>	<p>undertaking training.</p> <p>The requirement for refresher training will need to be reinforced.</p>
<p>Information Sharing Arrangements</p>	<p>Although there are Information Sharing Agreements in place across the Council, there is no central register for this.</p> <p>There is no clear visibility if there are appropriate contracts / sharing agreements in place.</p>	<p>If a contract is not in place where data is being processed on behalf of the Council by a Data Processor; this is likely to be a breach of GDPR.</p>	<p>An Information Sharing Log needs to be created.</p> <p>The Information Asset Register work (identified above) is also likely to identify where Contracts are needed.</p>
<p>Incorporation of Privacy by Design in Projects</p>	<p>Data Privacy Impact Assessment (DPIAs) are completed; but it is unclear if this is always the case.</p> <p>DPIAs are currently treated as standalone documents to be completed at project initiation.</p> <p>Not all changes, go through a standard project process.</p>	<p>DPIAs may not be completed and therefore privacy risks may either not be identified / identified in a timely manner.</p>	<p>The DPIA process and document to be reviewed and communicated.</p> <p>Its requirement needs to be better communicated and/or integrated with Project / Change processes.</p>

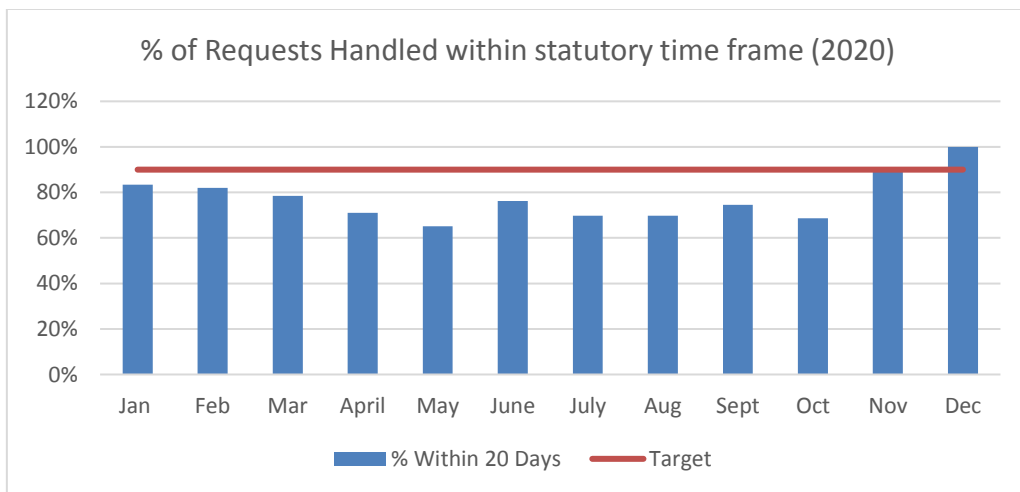
- 5.4 The actions to address the above have been factored into the ongoing IG forward plan 2020/21.
- 5.5 Updates to monitor the status and progress on this will be provided to the Council’s Information Governance Group (IGG).

6. PERFORMANCE UPDATE

6.1 FREEDOM OF INFORMATION / ENVIRONMENTAL REQUESTS

The public has the right of access to information held by the Council under the Freedom of Information Act. The Freedom of Information Act (FOI) works alongside the Environmental Information Regulations (EIR).

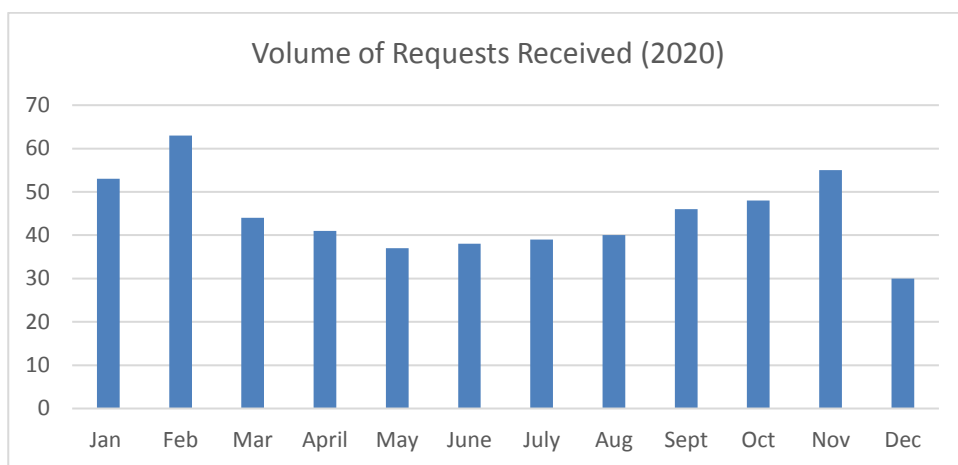
- 6.2 Freedom of Information requests relate to requests for information that are not dealt with as part of the day-to-day business processes.
- 6.3 The 3C ICT Information Governance has implemented a shared request management system for handling information requests. Ownership of the response to these requests is placed on Services areas by means of key responders and champions being designated and responsible for ensuring their Service responds within the timeframe. An Information Governance Officer coordinates all formal requests and allocates specialist support from the Information Governance team where Officers require this.
- 6.4 The Council works to a target of 90% response compliance within 20 days (statutory requirement) as advised by the Information Commissioner. We achieved 77%. Breakdown for each month in 2020 is provided below.



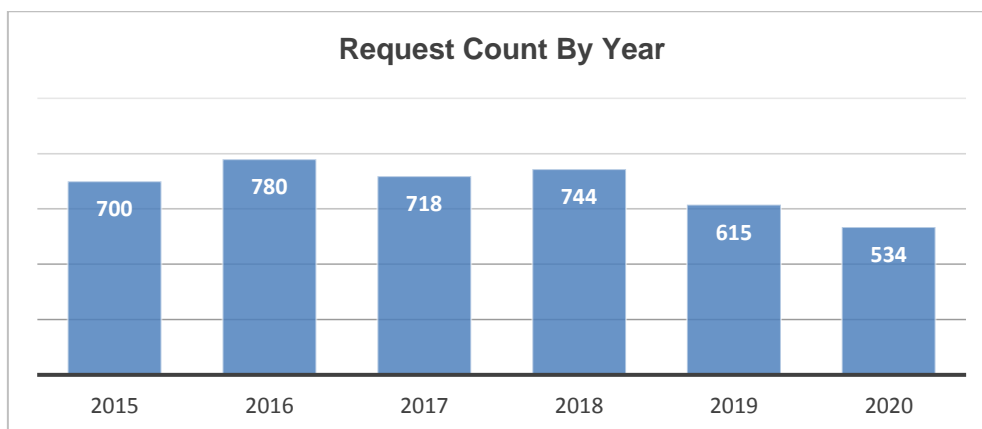
- 6.5 Reasons for this included resource shortages within the Information

Governance Team within the first half of the year and Service Areas not being able to respond to requests for data on time due to priorities being diverted as a result of COVID-19.

- 6.6 An Information Officer has since been recruited in June 2020.
- 6.7 The importance of responding to these on time and correctly is also being reinforced through the Information Governance Group Meetings.
- 6.8 For 2020 (Jan – Dec) the council received a total of 534 requests under FOI and EIR.

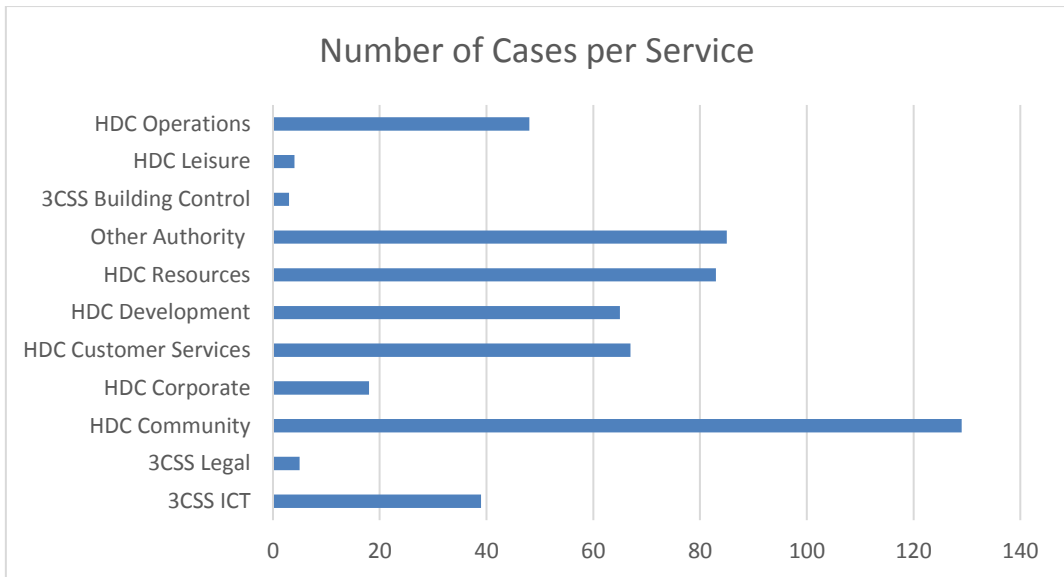


- 6.9 This represents a 13.1% decrease in the number of requests received in 2019. The graph below demonstrates the year on year trend in the number of FOI requests received since 2015.

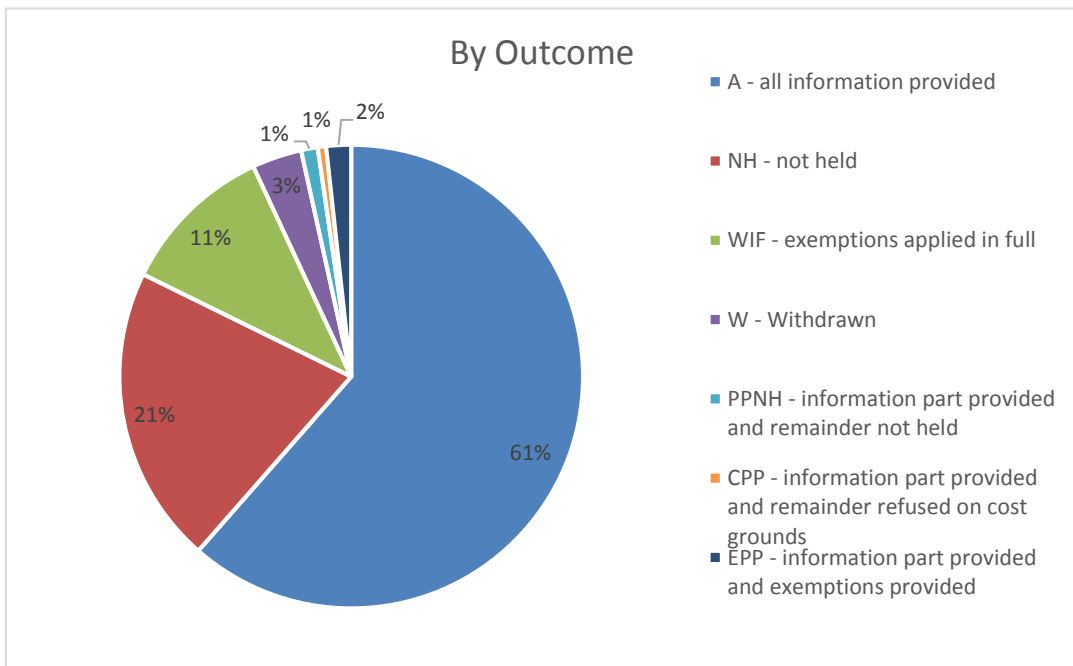


- 6.10 Community Services have received the most cases and reasons may vary depending on what is happening during period of interest.

There were also a number of requests that were relating to services that other Authorities provided.



6.11 All the information was provided for the majority of requests. See breakdown of outcomes below.



6.12 A great proportion of the information of regular interest is now proactively

published and updated on a monthly basis. The IG team will continue efforts to support Services to increase this transparency offering via an Open Data Strategy.

- 6.13 The IG team have also recently developed reports, which are shared with the Information Governance Group on a quarterly basis, to understand trends, and to help departments focus on what should be uploaded onto their publication scheme.
- 6.14 Requestors have the right to an ‘internal review’ of their case if they are not satisfied with the outcome or how the request was handled, before taking further action to the Information Commissioner’s Office.

	Received
Internal Reviews / Complaints	9
ICO Investigations	4

Whilst these have been investigated by the regulator (ICO) these have resulted in no further action.

7. INDIVIDUAL DATA REQUESTS

- 7.1 The Data Protection Act 2018 is the UK’s implementation of the General Data Protection Regulations (GDPR). Data protection is primarily concerned with personal data about individuals rather than general information.
- 7.2 The Information Governance Team coordinate requests relating to individuals rights such as right to request access to the personal data the Council holds, right to erasure, right to rectification as well as third party requests for personal data such as from the Police or to prevent or detect fraud.
- 7.3 Individual requests made during the year were as follows:

Other Requests	Received	Compliance with time frame
Subject Access Requests (SAR) (including Erasure Requests, etc.)	16	5 (2 still open as of 6/1/2021)
SAR Complaints	0	-

7.4 Reasons for delays included:

- lack of Information Management resource being in place for the first half of the year
- lack of awareness by officers to put requests on hold whilst awaiting identification or clarification;
- resources being diverted due to COVID.

A new Information Officer was recruited within the IG team in June this year.

The importance of prompt response and the need for training of all staff is also being reiterated through IGG, as well as additional training for Information Champions being given as appropriate.

8. PERSONAL DATA BREACHES

8.1 The guidance on notification of data breaches under the Data Protection Act / GDPR is that where a breach incident is likely to result in risk to the rights and freedoms of individuals, the Council must inform the ICO within 72 hours and if it's likely to result in high risk to rights and freedoms of individuals, the Council has a lawful duty to inform the individuals without undue delay.

8.2 As result, the IG team have established a framework to ensure that each reported incident is assessed for:

- The potential detriment and adverse effect to the data subject. This includes emotional distress and information about the private aspects of a person's life becoming known to others.
- The extent of detriment. Which could depend on the volume of the data and its sensitivity.

This is performed by the IG team when an incident is logged by a Service Area.

8.3 The IG Team have also developed a register to log incidents / near misses relating to personal data. This allows trends to be identified, with the view to establish if any specific training needs are required or if any actions are needed to enhance the current measures to prevent the likely reoccurrence.

8.4 Performance Data – Data Breaches

Although 11 incidents were reported in 2020 (Jan – Dec). None of these met the threshold for reporting to the ICO. A breakdown of these is as follows:

Type of Incident (Category)	Number	Reported to ICO
Personal details inappropriately disclosed (e.g. via email/ shared/published on website)	9	Not reportable to ICO
Lost or stolen hardware	1	Not reportable to ICO
Technical Security failing	1	Not reportable to ICO
Total	11	

- 8.5 In all instances, immediate steps were taken by officers to mitigate the incident, once known. Examples included contacting incorrect receiver of emails from the recipients of the email and those affected and removing documents from the Council’s website.
- 8.6 A quarterly update on incidents is now provided to the IGG to ensure visibility and ensure any improvements needed are discussed and followed through as appropriate.

9. TRAINING

- 9.1 To ensure organisational compliance with the law and relevant guidance relating to Information Governance (IG), staff must receive appropriate training.
- 9.2 In 2018, when the GDPR legislation was implemented, staff underwent compulsory training via the e-learning module.
- 9.3 In addition to this, all new starters who manage confidential information are expected to undertake training on handling confidential information.
- 9.4 In 2021, the HR team are looking to implement a new Learning Management System. The understanding is that this should facilitate easier reporting. The IG Team intend to provide updates on training uptake to the IGG once this done.

10. LOOKING FORWARD

- 10.1 Ensuring ongoing compliance with Data Protection Legislation (DPA 2018 and GDPR) has been the focus of the Information Governance team.
- 10.2 The Information Governance team will continue to work with Service areas to address gaps identified as part of the Gap Analysis undertaken (on Data

Protection Compliance) and provide updates during the Information Governance Group meetings.

11. KEY IMPACTS/RISKS

- 11.1 The key impact of non-compliance with FOIA/EIR and the Data Protection Act along with GDPR is public scrutiny from the regulator.
- 11.2 Poor service or inadequate information management will lead to loss of trust from our customers. Inability to act in accordance with the Act and the Governments accountability and transparency directive will lead to reputational damage.
- 11.3 Furthermore, the right of access is bound with the Human Rights Act in respect of the right to privacy. Unlawful disclosure of personal information may lead to publicly enforced audit, warning, reprimand, corrective order and fine by the regulator.

12. WHAT ACTIONS WILL BE TAKEN

- 12.1 Compliance with Data Protection Legislation will continue to be monitored. Actions as identified in Section 5.3 will be undertaken. Updates will be provided via the Information Governance Group.

13. LINK TO THE LEADERSHIP DIRECTION

- 13.1 Supports the objective to become a customer focused organisation under the strategic priority of becoming a more efficient and effective Council.

14. CONSULTATION

- 14.1 None

15. LEGAL IMPLICATIONS

- 15.1 HDC must comply with the law concerning FOIA/EIR and Data Protection Act

16. RESOURCE IMPLICATIONS

- 16.1 There are no direct resource implications arising from this report.

17. OTHER IMPLICATIONS

- 17.1 None

18. REASONS FOR THE RECOMMENDED DECISIONS

- 18.1 This paper updates Members on how requests under FOIA/EIR have been dealt with by HDC.
- 18.2 This report is for information purposes only, unless otherwise.

19. LIST OF APPENDICES INCLUDED

- 19.1 None

20. BACKGROUND PAPERS

- 20.1 None

CONTACT OFFICER

Madelaine Govier
Information Governance Manager & Data Protection Officer (3C ICT)
Infogov@3csharedservices.org

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Public
Key Decision - No

HUNTINGDONSHIRE DISTRICT COUNCIL

Title/Subject Matter: Implementation of Internal Audit Actions

Meeting/Date: Corporate Governance Committee – 27th January 2021

Executive Portfolio: Executive Member for Strategic Resources
Councillor Jonathan Gray

Report by: Acting Audit Manager

Ward(s) affected: All Wards

Executive Summary:

In 2013 management approved a key performance indicator that requires 100% of audit actions to be implemented by an agreed deadline; the deadline having been agreed between the service and the Internal Audit Manager. However, 100% compliance has not been achieved.

Performance in the last 12 months has seen 31 actions introduced, 40% on time, increasing to 66% when late implementation is taken into account.

Sometimes non-implementation is due to operational circumstances and to reflect this, in 2017 a new process for assessing audit action implementation was agreed; even after the introduction of this new process the 100% indicator is still not being achieved.

As at the end of December 2020, 19 audit actions remained outstanding; 12 actions were within a year of the originally agreed implementation deadline but the remaining 7 were more than one-year-old. Relevant actions may have already had the deadline for implementation extended. Consequently, the Committee is asked to consider this and ask questions of management as they consider necessary.

Recommendation:

It is recommended that the Committee consider the report and comment as they consider necessary.

1. PURPOSE OF THE REPORT

1.1 To update members on the implementation of audit actions.

2. WHY IS THIS REPORT NECESSARY?

2.1 At past meetings of the Corporate Governance Committee (CGC), the committee has expressed concerns at the underachievement of the management set target of implementing 100% of agreed internal audit actions on time. This report provides an update for members based on audit actions that are outstanding as at the end of December 2020.

3. BACKGROUND

3.1 Following each audit review, audit conclusions, associated actions and implementation dates are agreed between the audit client and the audit team. Services can disagree with any action and the audit report is a record of what has been agreed by way of actions and their target dates.

3.2 In 2013, Corporate Management agreed an increase in the target for the implementation of 'agreed internal audit actions to be introduced on time' from 60% to 100%, best practice would also suggest that all recommendations are implemented by the agreed deadline. For the 12 months ending 31 December 2020, 47 audit actions were due to be implemented. The following shows the performance against due dates:

- 40% (19) were "implemented on time"; this increases to
- 66% (31) when late implementation is also included
- 16 actions have not been implemented.

4. NON-IMPLEMENTATION OF AUDIT ACTIONS

4.1 There are occasions due to operational circumstances that agreed implementation dates have to be extended; all such extensions are agreed between the audit client and the Internal Audit Manager. Such audit actions are then not considered as "not implemented" and are excluded from any exemption reporting (as the measurement is taken against the new variable target date).

4.2 However, circumstances sometimes prevail such that extended deadlines are missed and the current practice is that non-implementation at this stage is reported to management and CGC.

4.3 As at the end of December 2020 19 audit actions remained outstanding (overdue) and not implemented. Previously only those due in the last 12 months were reported but this has been altered to include all outstanding actions to give a more accurate reflection. A detailed analysis of these actions is shown in the **Appendix**, including an update, where provided, to Audit from each Manager responsible for implementation to get the latest position.

Of the 19 actions:

- 2 actions are 2 years or older (10.5%)
- 5 actions are between 1 and 2 years overdue (26%)
- 10 actions are between 6 months and 1 year overdue (53%)
- 2 actions are less than 6 months overdue (10.5%)

** From the 'original implementation date' to the end of December 2020.*

5. KEY IMPACTS

- 5.1 It is important that the Council maintains a sound internal control environment. Actions that the Internal Audit Service propose to address risk and control weaknesses are discussed with Heads of Service and, if appropriate, Directors and agreement is reached as to any corrective action that needs to be taken. Internal audit actions are not imposed on management.
- 5.2 An action that is not implemented means that the weakness or risk originally identified in the audit report, and which the action was designed to address, will remain as a risk to the organisation.

6. LINK TO THE CORPORATE PLAN

- 6.1 The Internal Audit Service provides independent, objective assurance to the Council by evaluating the effectiveness of risk management, control, and governance processes. It identifies areas for improvement across these three areas such that Managers can deliver the Corporate Plan objectives as efficiently, effectively and economically as possible.

7. RESOURCE IMPLICATIONS

- 7.1 There are no direct resource implications arising from this report.

8. REASONS FOR THE RECOMMENDED DECISIONS

- 8.1 The report has been requested by the Committee and as such, they need to decide what further action they wish to take.

9. LIST OF APPENDICES INCLUDED

Appendix – Outstanding Audit Actions Not Implemented as at 31 December 2020

BACKGROUND PAPERS

Audit actions contained within the 4action system

CONTACT OFFICER

Deborah Moss – Acting Audit Manager

Tel No: 01480 388475

Email: deborah.moss@huntingdonshire.gov.uk

Reference	Audit Name and Action Number	Assignee	Detail	Evidence to be Provided	Current Due Target	Original Due Target	Status	Timing	MANAGER UPDATE AT JANUARY 2021	Time lapse since original date
1521	Hardware & Software	Alex.Young@3cs	Procedures should be documented for the secure wiping of information when managing lost/stolen IT assets and prior to the disposal of IT assets.	Procedure to be developed for secure wipe/protection of data at rest for lost/stolen. supporting evidence - produce written documentation relating to Certificate revocation, bitlocker, intune remote wipe for phones, restrictions non re-introduction of devices on to the domain.	31/12/20	01/07/20	NotStarted	Late	AY: I have just not had the time to complete this but will commit to have it completed by end of Jan. TIME EXTENSION REQUESTED TO END Jan.21	6 months
1532	Network System Resili	Alex.Young@3cs	Management should establish planned schedule for testing of data centre failover. Testing should be undertaken on at least an annual basis.	Data centre testing schedule.	31/10/20	31/10/20	NotStarted	Late	AY: This was due to be completed over the weekend of November 14th but had to be postponed. This is now scheduled for weekend of January 29th. Can this action be extended until end of Feb to allow for evidence to be written up and added. TIME EXTENSION REQUESTED TO END Jan.21	under 6 months
1137	Data Protection and In	Oliver.morley@	The Senior Information Risk Officer (SIRO) shall decide how long information and emails etc shall be kept within Anite, and the process for purging or archiving.	Decision taken and copy of instruction informing managers.	31/07/18	30/09/16	NotStarted	Late	No reply	4 years +
1170	Management of Health	john.taylor@hur	The following arrangements should be embedded into the Health and Safety policy: 1. Gas Safety 2. Infection Control 3. Respiratory Protective Equipment 4. Security Threats 5. Smoke Free Workplace 6. Transport Safety 7. Vibration	Updated Health & Safety policy.	30/09/19	31/03/19	NotStarted	Late	JT: "this action has be reallocated following organisational restructure, and an update is being sought from the new owner" (Justin Andrews)	21 months
1080	Social Media - 3a	gregg.sullivan@	The Social Media Policy to include detail as to the types of posting that need to be formally reported as defamation or libellous to individuals or the Council. (in addition training to officers about the type of posting which fall into these categories should be provided).	The updated Social Media Policy that reflects the recommendations above.	31/03/20	31/01/19	NotStarted	Late	No reply	21 months
1526	Protocol Policy Manag	madelaine.govie	Management will put a plan in place to seek staff awareness of IT policies by including a rolling awareness programme for extant policies within the protocol policy management system.	High level plan.	30/11/20	01/06/20	NotStarted	Late	MG discussed with IAM that this is being considered through a MetaCompliance tool to store and monitor. IT Policies need to be updated before this can progress and this is currently being looked at.	6 months
1496	Grounds Maintenance	Neil.Sloper@hur	In the period before the new cab system is implemented, the Street Cleansing and Grounds Maintenance manager will review a sample of maintenance sheets, this will be formally built into the new in cab solution in the future.	Reviewed beat sheets.	31/12/19	31/10/18	InProgress	Late	No reply	2 years+
1535	FMS Post-implemen	manjit.pope@hu	Going forwards for joint projects key stakeholders (system users) from the Council should commit to the system specification phase and detail variances business needs to ensure they are controlled and overseen.	System specifications	31/10/20	01/04/20	In progress	Late	Project management framework in place and signed off by WP SLT SLT. Project ManagementGateway process has been developed for HDC with National IPA stipulated requirements awaiting HDC SLT Sign off.	9 months

1536	FMS Post-implementation	manjit.pope@hu	Going forwards decision points such as UAT sign-off should be supported by contingency plans when partial roll out is approved. this should involve holding the vendor to account and /or providing additional resource to support processes.	Contingency plans.	31/10/20	01/04/20	In Progress	Late	Project management Gateway process developed and proposed for all new projects and programmes - awaiting C- SLT sign off.	9 months
1537	FMS Post-implementation	manjit.pope@hu	Going forwards all new contracts should stipulate an exit clause to ensure timely extraction and transformation of data from the legacy database to the new database.	Contractual agreements.	31/10/20	01/04/20	In Progress	Late	This should be a standard default for all products and projects, Project management framework for HDC developed and include PM ToR's & responsibilities to ensure contractual assurance is sought.	9 months
1538	FMS Post-implementation	manjit.pope@hu	Going forwards risk assessments as part of the initiation phase (project initiation document and project plan) should include an assessment of resource needs and corresponding resource risks.	Risk assessment	31/10/20	01/04/20	In Progress	Late	HDC project management framework tested and completed, his include risk management processes. Further more the HDC PM Gateway process assess RM at every gateway approval, and the governance will be overlapped by release of budget approval and allocation only on successfully gateway approval. The Governance for this later part has been agreed by Corporate Finance and Corporate PMD. C SLT approval remaining.	9 months
1133	Repairs & Maintenance	mark.houston@	Once the plan of schedules repairs and maintenance has been compiled the service will agree key performance indicators to allow for performance to be monitored. (Appendix 1 in the report provides examples).	The agreed key performance indicators.	31/10/20	31/03/19	InProgress	Late	No reply	21 months
1311	Repairs & Maintenance	mark.houston@	If and when the Facilities Management team provide FM services for another team within the Council, service delivery expectations will be clearly defined, agreed and approved between the relevant Heads of Service.		31/10/20	31/03/20	InProgress	Late	No reply	9 months
1339	Repairs & Maintenance	mark.houston@	Once the asset management software has been purchased and populated with operational property details, the Facilities Management team will explore the use of the software with other managers who have responsibility for asset management.		31/03/20	31/03/19	InProgress	Late	No reply	21 months
1363	Repairs & Maintenance	mark.houston@	Once annual and cyclical plans have been compiled, a resourcing plan to evidence how these plans will be delivered - including financial budgets - will be prepared and approved by the Head of Operations and used to support the 2019/20 budget setting process.	The resourcing plan.	31/10/20	31/03/19	NotStarted	Late	No reply	21 months
1529	PCI DSS 18.19 / 3	Oliver.morley@	A training needs assessment should be performed for all members of staff that have responsibility for PCI DSS compliance activities so as to determine their training needs.	Shared Service Management Board minutes	01/04/20	01/04/20	NotStarted	Late	No reply	9 months
1530	PCI DSS 18.19 / 4	Oliver.morley@	Compliance should be monitored and action taken when members of staff are found to have not completed the PCI DSS training or have not read the policy and procedures.	Shared Service Management Board minutes	01/04/20	01/04/20	NotStarted	Late	No reply	9 months

1531 PCI DSS 18.19 / 5	Oliver.morley@f	Actions need to be drawn together in a policy which sets out how the council will manage PCA DSS compliance activities and the policy should be reviewed on a regular basis. this should include but not be limited to: - Assignment of roles and responsibilities for ensuring that the Council is PCS DSS compliant - Procures for staff that are responsible for taking card payments - The Council's security strategy in relation to the storage, processing and transmission of credit card data - A set of instructions for detecting, responding to the storage, processing and transmission of credit card data.	Shared Service Management Board minutes	01/04/20	01/04/20 NotStarted	Late
1513 Access Management C	Sagar.Roy@3csh	Head of IT & Digital 3C Shared Services should ensure requirements for setting up new user access to the network are set out in formal policy document and is uploaded onto the intranet and the PPMS. Line managers acknowledge the formal policy set out by 3CSS which ensures 3CSS are notified of leavers in timely manner.	User access policy or requirements in an equivalent policy. Acknowledgement from line managers and employee owners.	31/08/20	31/08/20 InProgress	Late

No reply	9 months
No reply	Under 6 months

COUNT 19

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CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT

Committee	Decisions	Date for Action	Action Taken	Officer Responsible	Delete from future list
02/10/2019	<p>Annual Complaints Report 2018</p> <p>Consideration of content of future reports to include information around the compliments the Council had received.</p>	24/03/2021	Compliments will be added to the next annual report for the period April 2019 and March 2020.	Customer Services Manager	No
22/01/2020	<p>Annual Report on HDC Compliance with the Freedom of Information (FOI) & Environmental Information Regulations (EIR) Acts</p> <p>Agreed that future reports should include details of previous years' performance data to help identify trends.</p>	27/01/2021	Previous years' performance data to be added to the next annual report.	Information Governance Manager	Yes
N/A	<p>The Code of Procurement Waiver Procedure</p> <p>To receive a verbal update from the Assistant Director, Corporate Services.</p>	27/01/2021	An update will be provided at the meeting.	Assistant Director, Corporate Services	Yes

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