

Isle of Anglesey County Council	
Report to:	Audit and Governance Committee
Date:	3 September 2019
Title:	Policy Acceptance – Year 2 Compliance Data
Report by:	Lynn Ball, Head of Function (Council Business / Monitoring Officer)
Purpose of Report:	To inform the Audit and Governance Committee of compliance levels across the Council.

1.0 Background

The Council's policy management system - the Policy Portal - was made available to staff as an electronic library in November 2016. Policy acceptance requirements began on 24 April 2017.

A report was submitted to this Committee at its meeting on 19 September 2018 on compliance levels across the Council with regard to the following seven policies. These policies were made available for acceptance between 24 April 2017 and 30 April 2018, as determined by the Council's Senior Leadership Team (SLT):

1. Clear Desk Policy
2. Records Management Policy
3. Data Classification Policy
4. Managing Absence Policy
5. Display Screen Equipment Policy
6. Corporate Health and Safety Policy
7. Welsh Language Standards

The data presented last year did not include the Learning service. A decision was taken in April 2017 not to include the service as, at the time, its IT group contained school-based staff for which the process was not relevant. The Committee was informed that the issue had subsequently been addressed and that the Learning service was included in the process as from July 2018. The outstanding policies were assigned gradually, with all of the above policies assigned to the service by November 2018.

This report gives details of compliance for the second round of policies introduced for acceptance, as well as the Learning service's compliance levels for the first round of policies. The data presented is based on the information available as at 16/17 and 19 July 2019.

2.0 Monitoring compliance

Compliance reports, on a service-by-service basis, are submitted to the SLT at the end of the 6-week acceptance periods assigned for each policy. All policies remain available for acceptance after the closing dates so that users who have not completed a policy on time, for whatever reason, are able to catch up. Weekly email reminders generated by the Policy Portal automatically list all outstanding policies for each user. In addition, as the Portal synchronises with the Council's Active Directory (AD) overnight, any new users added to service groups are included automatically within 24 hours.

All Heads of Service also have direct access to the Portal to monitor compliance within their own services.

3.0 Compliance Levels

The following eight policies were made available for acceptance between 2 July 2018 and 3 June 2019, as determined by the SLT:

1. Data Protection Policy
2. IT Security Policy
3. Financial Procedure Rules
4. IT Acceptable Usage Policy
5. Safeguarding Policy
6. Officers' Code of Conduct
7. Email and Instant Messaging Usage Policy
8. Whistleblowing Policy

The final policy in the current series – Equality and Diversity Policy – was introduced for acceptance on 29 July and the six-week acceptance period will close on 9 September.

Appendix 1 sets out compliance levels for the above policies, both across the Council and by service, as at 16/17 July 2019. Average compliance for all policies across the Council is 95% which is the same as last year. This is compared with an average of 87% at the end of the six-week acceptance period set for each policy, which is an improvement on last year (79%).

It was reported last year that compliance in Children's Services had improved significantly, with an average compliance rate of 99% as at 24 July 2018, compared with an average of 57% at the end of the six-week acceptance periods. The service has continued to improve and has achieved a compliance rate of 100% for all eight policies and having achieved 100% at the end of the six-week acceptance period for the last four policies.

It was also reported last year that compliance in Adults Services had improved but was still lagging behind. A significant improvement can be seen as at July this year with the service achieving a 92% compliance average, compared with 78% as at July 2018.

A downward trend can be seen for Housing Services, ranging from 96% for the first policy to 69% for the latest policy (Whistleblowing Policy). The service's average compliance level as at July 2019 is 86%, compared with an average of 76% for the six-week acceptance period. It should be noted that the data presented for the Whistleblowing Policy is for the six-week acceptance period and is therefore expected to improve in due course.

As noted in 1.0, the Learning service staff have been part of the corporate process since July 2018 and were required to catch up by accepting the first seven policies in addition to accepting the second round of policies as they are released for acceptance. **Appendix 2** sets out the service's compliance levels for those first seven policies, showing an average compliance rate of 99%.

4.0 The Next Steps

As over two years had passed since users were first required to accept policies, a report was submitted to the SLT on 10 June to agree the next steps. The decisions made by the SLT as to what happens next are outlined below:

4.1 Core set of corporate policies

The number of policies in the core set will be reduced from sixteen to the following nine policies, with the first policy being introduced for re-acceptance as from 1 October 2019:

1. Display Screen Equipment Policy
2. Corporate Health and Safety Policy
3. Welsh Language Standards
4. Data Protection Policy
5. IT Security Policy
6. Corporate Safeguarding Policy
7. Officers' Code of Conduct
8. Whistleblowing Policy
9. Equality and Diversity Policy

These nine policies will be subject to acceptance only once in every two-year period, but will be available throughout that time for new staff.

Current arrangements for each click-to-accept policy will continue, ie:

- One policy at a time to be introduced for acceptance, asking staff to complete within six weeks, but policies to remain available for acceptance
- Compliance reports submitted to the SLT after the end of the 6-week acceptance periods assigned for each policy and annual compliance reports submitted to the Audit and Governance Committee

The following seven policies will therefore be removed from the core set and will revert to ‘information only’ policies in the Portal:

1. Clear Desk Policy
2. Records Management Policy
3. Data Classification Policy
4. Managing Absence Policy
5. Financial Procedure Rules
6. IT Acceptable Usage Policy
7. Email and Instant Messaging Policy

4.2 Policy acceptance requirements for targeted staff

A pilot is to be introduced, requiring middle managers to accept certain policies that are not applicable under the “click to accept” arrangements to other members of staff. The views of Heads of Service have been sought and the following three policies are being suggested for the pilot:

- Guidance for designating language skills for internal and external posts
- Managing Absence Policy
- Recruitment and Selection Policy

It is proposed that the pilot will begin in **January 2020**.

4.3 Staff without access to the Policy Portal

The Policy Portal relies on the Council’s Active Directory (AD), and includes around 1000 active users. The Portal’s reliance on the AD was recognised as a weakness from the outset and this Committee has previously raised concerns that staff who are not AD users – estimated at around 700 employees - are not included in the process, including:

Adults Services	Home Carers; Re-ablement; Care Homes; Day Services; Canolfan Byron, Supported Living	350
Children’s Services	Specialist Support Workers	21
Learning	Libraries, Youth Workers, Relief Staff, Seasonal Assistants, Cleaner	94

Highways, Waste and Property	Cleaners (including schools), Môn Community Transport, Recycling Centres, Cycling Trainers, School Crossing Patrols	204
Regulation and Economic Development	Cleaners, café staff, coaching staff	40

Some options were outlined in last year's report but it was concluded that, whilst widening the scope of the Portal to include non-AD connected staff was possible, the rollout would require significant resource and planning that went beyond the original remit of the system.

It has been acknowledged that different approaches may be required to reach the various categories of non-AD connected staff. Some alternatives to the Policy Portal have been suggested, including exploring the possibility of using MyView - the Council's electronic HR and payroll system. In order to progress this issue, discussions will take place with each relevant Head of Service, to identify the highest categories of risk and possible workable and proportionate solutions to address that risk.

4.4 Staff who are not technically employed by the Council

We have a number of staff who work for agencies, partnerships etc who are included in the automatic service groups used for the Portal. The issue of whether or not these individuals should be subject to click-to-accept has been discussed by SLT but no directive has yet been issued to services. Currently, most services do not require staff from agencies, consultancies, partnerships, or staff who are employed by other authorities to complete click-to-accept policies. However, whilst these categories of staff are not technically 'employees', they are still expected to work in accordance with our policies and procedures, particularly in terms of data protection, security, confidentiality and conduct. The Authority therefore needs assurance that these individuals are aware of and comply with key Council policies.

To this end, it is proposed to introduce a statement asking staff who are not technically Council employees to ensure that they are aware of and abide by certain corporate policies.

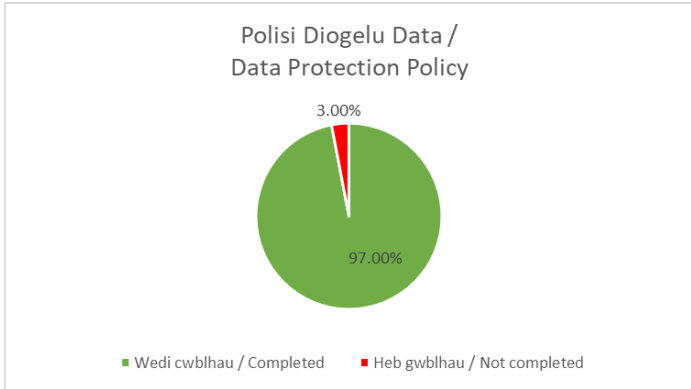
5.0 Recommendation

The Committee is requested to note:

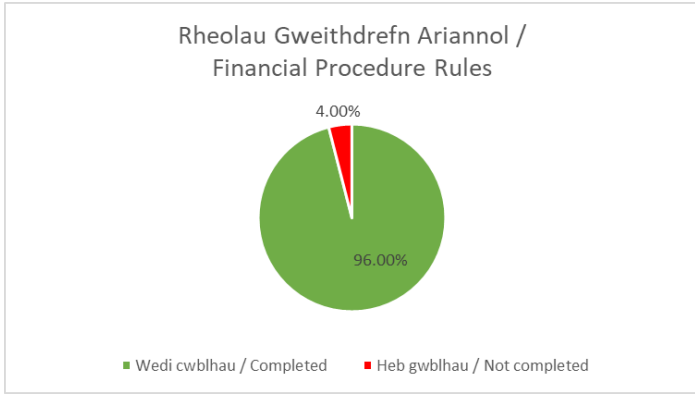
- 5.1 the current position with regard to policy acceptance across the Council.

- 5.2 that discussions will take place with each Head of Service with non-AD connected staff, to identify the highest categories of risk and possible workable and proportionate solutions to address that risk.
- 5.3 that it is proposed to introduce a statement asking staff who are not technically council employees to ensure that they are aware of and abide by certain corporate policies.

27 August 2019

1 – Data Protection Policy		
Start date:	2 July 2018	
Total as at 17 July 2019:	977	
Completed:	944	97%
Not completed:	33	3%
 <p>Polisi Diogelu Data / Data Protection Policy</p> <p>3.00%</p> <p>97.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (102)		
Completed:	102	100%
Not completed:	-	-
Council Business (34)		
Completed:	33	97%
Not completed:	1	3%
Learning (99)		
Completed:	97	98%
Not completed:	2	2%
Adults Services (159)		
Completed:	147	92%
Not completed:	12	8%
Children's Services (113)		
Completed:	113	100%
Not completed:	-	-
Chief Executive (4)		
Completed:	4	100%
Not completed:	-	-
Highways, Waste and Property (103)		
Completed:	99	96%
Not completed:	4	4%
Regulation and Economic Development (149)		
Completed:	141	95%
Not completed:	8	5%
Housing (140)		
Completed:	135	96%
Not completed:	5	4%
Corporate Transformation (74)		
Completed:	73	99%
Not completed:	1	1%

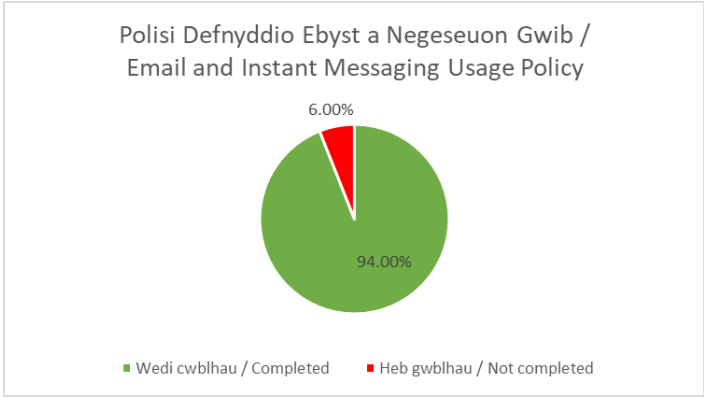
2 – IT Security Policy		
Start date:	16 July 2018	
Total as at 17 July 2019:	979	
Completed:	950	97%
Not completed:	29	3%
<p>Polisi Diogelwch TG / IT Security Policy</p> <p>3.00%</p> <p>97.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (102)		
Completed:	102	100%
Not completed:		
Council Business (34)		
Completed:	34	100%
Not completed:	-	-
Learning (99)		
Completed:	97	98%
Not completed:	2	2%
Adults Services (161)		
Completed:	151	94%
Not completed:	10	6%
Children's Services (113)		
Completed:	113	100%
Not completed:	-	-
Chief Executive (4)		
Completed:	4	100%
Not completed:	-	-
Highways, Waste and Property (103)		
Completed:	102	99%
Not completed:	1	1%
Regulation and Economic Development (149)		
Completed:	142	95%
Not completed:	7	5%
Housing (140)		
Completed:	131	94%
Not completed:	9	6%
Corporate Transformation (74)		
Completed:	74	100%
Not completed:	-	-

3 – Financial Procedure Rules		
Start date:	31 August 2018	
Total as at 17 July 2019:	977	
Completed:	937	96%
Not completed:	40	4%
 <p>Rheolau Gweithdrefn Ariannol / Financial Procedure Rules</p> <p>4.00%</p> <p>96.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (101)		
Completed:	101	100%
Not completed:	-	-
Council Business (34)		
Completed:	33	97%
Not completed:	1	3%
Learning (99)		
Completed:	96	97%
Not completed:	3	3%
Adults Services (160)		
Completed:	148	92%
Not completed:	12	8%
Children's Services (113)		
Completed:	113	100%
Not completed:	-	-
Chief Executive (4)		
Completed:	4	100%
Not completed:	-	-
Highways, Waste and Property (103)		
Completed:	100	97%
Not completed:	3	3%
Regulation and Economic Development (149)		
Completed:	141	95%
Not completed:	8	5%
Housing (140)		
Completed:	127	91%
Not completed:	13	9%
Corporate Transformation (74)		
Completed:	74	100%
Not completed:	-	-

4 – IT Acceptable Usage Policy		
Start date:	22 October 2018	
Total as at 17 July 2019:	976	
Completed:	942	97%
Not completed:	34	3%
<p>Polisi Defnydd Derbyniol o TG / IT Acceptable Usage Policy</p> <p>3.00%</p> <p>97.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (100)		
Completed:	100	100%
Not completed:	-	-
Council Business (34)		
Completed:	34	100%
Not completed:	-	-
Learning (99)		
Completed:	97	98%
Not completed:	2	2%
Adults Services (161)		
Completed:	152	94%
Not completed:	9	6%
Children's Services (113)		
Completed:	113	100%
Not completed:	-	-
Chief Executive (4)		
Completed:	4	100%
Not completed:	-	-
Highways, Waste and Property (103)		
Completed:	102	99%
Not completed:	1	1%
Regulation and Economic Development (149)		
Completed:	142	95%
Not completed:	7	5%
Housing (140)		
Completed:	125	89%
Not completed:	15	11%
Corporate Transformation (73)		
Completed:	73	100%
Not completed:	-	-

5 – Corporate Safeguarding Policy		
Start date:	18 December 2018	
Total as at 17 July 2019:	973	
Completed:	927	95%
Not completed:	46	5%
<p>Polisi Diogelu / Safeguarding Policy</p> <p>5.00%</p> <p>95.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (99)		
Completed:	99	100%
Not completed:		
Council Business (34)		
Completed:	33	97%
Not completed:	1	3%
Learning (99)		
Completed:	97	98%
Not completed:	2	2%
Adults Services (160)		
Completed:	149	93%
Not completed:	11	7%
Children's Services (113)		
Completed:	113	100%
Not completed:	-	-
Chief Executive (4)		
Completed:	4	100%
Not completed:	-	-
Highways, Waste and Property (103)		
Completed:	100	97%
Not completed:	3	3%
Regulation and Economic Development (149)		
Completed:	142	95%
Not completed:	7	5%
Housing (140)		
Completed:	118	84%
Not completed:	22	16%
Corporate Transformation (72)		
Completed:	72	100%
Not completed:	-	-

6 – Officers' Code of Conduct		
Start date:	11 February 2019	
Total as at 17 July 2019:	971	
Completed:	917	94%
Not completed:	54	6%
<p>Côd Ymddygiad i Swyddogion / Officers Code of Conduct</p> <p>6.00% 94.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (98)		
Completed:	97	99%
Not completed:	1	1%
Council Business (34)		
Completed:	33	97%
Not completed:	1	3%
Learning (99)		
Completed:	97	98%
Not completed:	2	2%
Adults Services (160)		
Completed:	148	92%
Not completed:	12	8%
Children's Services (113)		
Completed:	113	100%
Not completed:	-	-
Chief Executive (4)		
Completed:	4	100%
Not completed:	-	-
Highways, Waste and Property (102)		
Completed:	98	96%
Not completed:	4	4%
Regulation and Economic Development (149)		
Completed:	138	93%
Not completed:	11	7%
Housing (140)		
Completed:	118	84%
Not completed:	22	16%
Corporate Transformation (72)		
Completed:	71	99%
Not completed:	1	1%

7 – Email and Instant Messaging Usage Policy		
Start date:	8 April 2019	
Total as at 17 July 2019:	970	
Completed:	914	94%
Not completed:	56	6%
<p>Polisi Defnyddio Ebyst a Negeseuon Gwib / Email and Instant Messaging Usage Policy</p>  <p>6.00% 94.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (97)		
Completed:	96	99%
Not completed:	1	1%
Council Business (34)		
Completed:	34	100%
Not completed:	-	-
Learning (99)		
Completed:	95	96%
Not completed:	4	4%
Adults Services (160)		
Completed:	150	94%
Not completed:	10	6%
Children's Services (113)		
Completed:	113	100%
Not completed:	-	-
Chief Executive (4)		
Completed:	4	100%
Not completed:	-	-
Highways, Waste and Property (102)		
Completed:	101	99%
Not completed:	1	1%
Regulation and Economic Development (149)		
Completed:	137	92%
Not completed:	12	8%
Housing (140)		
Completed:	112	80%
Not completed:	28	20%
Corporate Transformation (72)		
Completed:	72	100%
Not completed:	-	-

8 – Whistleblowing Policy		
Start date:	3 June 2019	
Total as at 16 July 2019:	960	
Completed:	855	89%
Not completed:	105	11%
<p>Polisi Chwythu'r Chwiban / Whistleblowing Policy</p> <p>11.00%</p> <p>89.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (96)		
Completed:	95	99%
Not completed:	1	1%
Council Business (33)		
Completed:	33	100%
Not completed:	-	-
Learning (99)		
Completed:	86	87%
Not completed:	13	13%
Adults Services (158)		
Completed:	135	85%
Not completed:	23	15%
Children's Services (109)		
Completed:	109	100%
Not completed:	-	-
Chief Executive (4)		
Completed:	4	100%
Not completed:	-	-
Highways, Waste and Property (101)		
Completed:	97	96%
Not completed:	4	4%
Regulation and Economic Development (149)		
Completed:	129	87%
Not completed:	20	13%
Housing (140)		
Completed:	97	69%
Not completed:	43	31%
Corporate Transformation (71)		
Completed:	70	99%
Not completed:	1	1%

The Learning Service		
Start date:	Autumn 2018	
Total as at 19 July 2019:	97	
<p>Graddfa Cydymffurfiaeth ar Gyfartaledd / Average Compliance Rate</p> <p>1.00%</p> <p>99.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
1 - Clear Desk Policy		
Completed:	97	100%
Not completed:	-	-
2 - Records Management Policy		
Completed:	96	99%
Not completed:	1	1%
3 – Data Classification Policy		
Completed:	93	96%
Not completed:	4	4%
4 – Managing Absence Policy		
Completed:	97	100%
Not completed:	-	-
5 – Display Screen Equipment Policy		
Completed:	97	100%
Not completed:	-	-
6 – Corporate Health and Safety Policy		
Completed:	97	100%
Not completed:	-	-
7 – Welsh Language Standards		
Completed:	96	99%
Not completed:	1	1%