

Isle of Anglesey County Council	
Report to:	Audit and Governance Committee
Date:	1 September 2020
Title:	Policy Acceptance – Year 3 Compliance Report
Report by:	Lynn Ball, Director of Function (Council Business / Monitoring Officer)
Purpose of Report:	To inform the Audit and Governance Committee of the current situation with regard to policy acceptance 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. This is the third compliance report to the Audit and Governance Committee.

On 10 June 2019, the Senior Leadership Team (SLT) decided to reduce the number of policies in the core set from sixteen to the following nine policies. The first of these policies was introduced for re-acceptance on 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 compulsory for new staff throughout that time.

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 Directors/Heads of Service and their nominated staff also have direct access to the Portal to monitor compliance within their own services.

3.0 The current situation

3.1 The core set of corporate policies

The re-introduction of policies for acceptance began on 1 October 2019 as scheduled. However, it was decided to suspend the process on 23 March 2020, due to the need to re-prioritise the Council's work to respond to the Covid-19 emergency. Staff were informed that any outstanding policies should be completed in the meantime and that the Policy Portal was still available for access to policies for information. As a result of the decision to suspend the process, only the following two policies have been re-introduced for acceptance to date:

- Display Screen Equipment Policy
- Corporate Health and Safety Policy

This report also includes compliance data for the final policy in the previous series – the Equality and Diversity Policy – which was introduced for acceptance on 29 July 2019. It was not possible to include this policy in last year's report as the six-week acceptance period had not ended.

The system continues to send weekly reminder emails to staff who have not completed policies and to ask any new members of staff to accept the core policies for the first time. However, it became apparent recently that the Corporate Health and Safety Policy was inadvertently made inactive shortly after the end of its six-week acceptance period in early March. As a result, staff who had not completed within the required timescale and any new or returning staff would not have received notifications from the Portal to complete the policy during this time. The policy was reactivated and made available for acceptance as soon as the error was identified on 8 July.

Compliance data as at 28 July 2020 for the three policies noted above can be seen in Appendix 1.

The table below compares the average compliance rates for each service for the past three years (the policies reported upon in 2018 and 2019 are listed in Appendix 2) :

Service	July 2018 (7 policies)	July 2019 (8 policies)	June 2020 (3 policies)
Resources	96%	99%	100%
Council Business	99%	98%	100%
Learning	99%	96%	95%
Adults Services	78%	92%	90%
Children's Services	99%	100%	100%
Chief Executive	100%	100%	100%
Highways, Waste and Property	100%	97%	99%
Regulation and Economic Development	96%	93%	94%
Housing	99%	86%	78%
Corporate Transformation	99%	99%	100%

The data shows that the majority of services have maintained high compliance levels but Housing is on a downward trend.

3.2 Policy acceptance requirements for targeted staff

It was reported last year that there was an intention to introduce a pilot requiring middle managers to accept certain policies that are not applicable under the “click to accept” arrangements to other members of staff, namely:

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

The pilot had been scheduled to begin in January 2020 but it was re-scheduled to the end of March 2020 due to other priorities at the time. As a result of the Covid-19 emergency, the pilot has not yet started, but the preparatory work has been completed.

3.3 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

As noted previously, it has been 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. Different approaches therefore needed to be identified to reach the various categories of non-AD connected staff.

It was reported last year that discussions would take place to identify the highest categories of risk and possible workable and proportionate solutions to address that risk. As part of those discussions, it was agreed that a paper-based process should be adopted, using summaries of the relevant core policies, together with a statement that staff would be required to sign to testify that they have read and understood the summary policies. Individual service managers would then be responsible for ensuring that each of their staff members had read and understood each summary and had signed the statement.

Summaries of seven of the nine core policies have been drafted. By definition, the remaining two policies – Display Screen Equipment Policy and IT Security Policy – are not considered to be relevant to this category of staff.

The intention was to begin by trialling the process with Adults' Services staff. However, due to Covid-19, this proposed paper-based solution where staff would be sharing paperwork is no longer considered to be appropriate. This aspect of corporate policy acceptance will therefore remain on hold until a more workable solution can be found.

3.4 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. 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 the following corporate policies:

- Health and Safety Policy
- Welsh Language Standards / Policy
- Data Protection Policy
- IT Security Policy
- Corporate Safeguarding Policy
- Whistleblowing Policy
- Equality and Diversity Policy
- The principles within the Officers' Code of Conduct

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 the above policies.

4.0 Re-starting the corporate policy acceptance requirements

The SLT has determined that the corporate policy acceptance requirements should re-start in September 2020. The requirement to re-accept the core set policies will therefore resume as from 1 September 2020, followed by the introduction of policy acceptance requirements for managers (3.2) as from 14 September – the relevant policies and timescales are listed in Appendix 3.

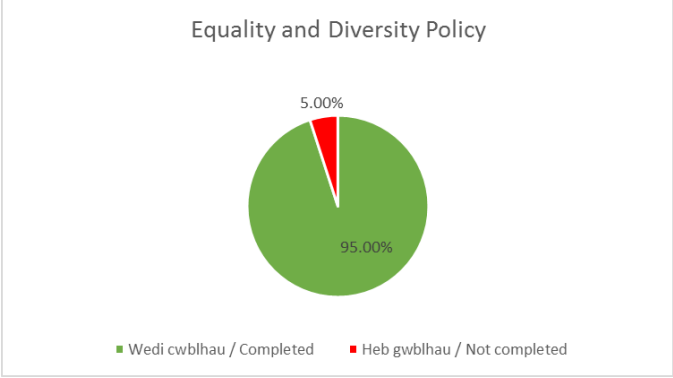
As noted in section 3.3, policy acceptance requirements for staff without access to the Policy Portal will be on hold until a more workable solution is found.

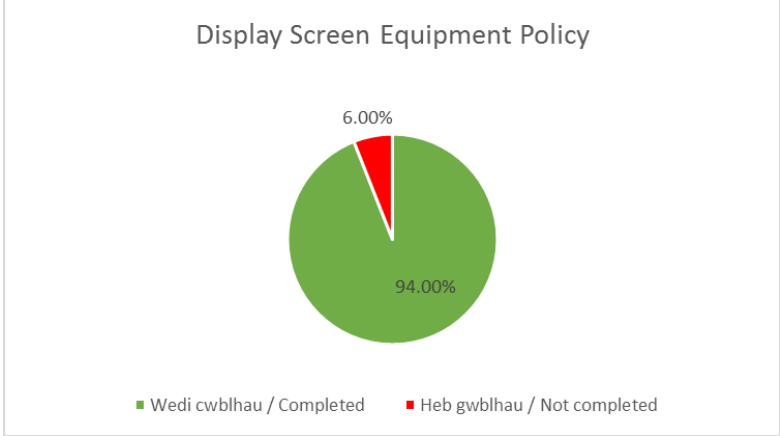
Further work will be required to finalise procedures for those not directly employed by the Council (3.4). It is therefore proposed to start this requirement in October 2020.

5.0 Recommendation

The Committee is requested to note the current position with regard to policy acceptance across the Council and the proposal to re-start the requirements as from 1 September 2020.

19 August 2020

1 – Equality and Diversity Policy		
Start date:	29 July 2019	
Total as at 28 July 2020 :	984	
Completed:	939	95%
Not completed:	45	5%
 <p>Equality and Diversity Policy</p> <p>5.00%</p> <p>95.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (95)		
Completed:	95	100%
Not completed:	0	0%
Council Business (34)		
Completed:	34	100%
Not completed:	0	0%
Learning (91)		
Completed:	85	93%
Not completed:	6	7%
Adults Services (163)		
Completed:	154	94%
Not completed:	9	6%
Children's Services (131)		
Completed:	131	100%
Not completed:	0	0%
Chief Executive (4)		
Completed:	4	100%
Not completed:	0	0%
Highways, Waste and Property (106)		
Completed:	106	100%
Not completed:	0	0%
Regulation and Economic Development (147)		
Completed:	141	96%
Not completed:	6	4%
Housing (141)		
Completed:	117	83%
Not completed:	24	17%
Corporate Transformation (72)		
Completed:	72	100%
Not completed:	0	0%

2 – Display Screen Equipment Policy		
Start date:	1 October 2019	
Total as at 28 July 2020 :	977	
Completed:	919	94%
Not completed:	58	6%
 <p>Display Screen Equipment Policy</p> <p>6.00%</p> <p>94.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (95)		
Completed:	95	100%
Not completed:	0	0%
Council Business (34)		
Completed:	34	100%
Not completed:	0	0%
Learning (84)		
Completed:	81	96%
Not completed:	3	4%
Adults Services (163)		
Completed:	148	91%
Not completed:	15	9%
Children's Services (131)		
Completed:	131	100%
Not completed:	0	0%
Chief Executive (4)		
Completed:	4	100%
Not completed:	0	0%
Highways, Waste and Property (106)		
Completed:	105	99%
Not completed:	1	1%
Regulation and Economic Development (147)		
Completed:	138	94%
Not completed:	9	6%
Housing (141)		
Completed:	111	79%
Not completed:	30	21%
Corporate Transformation (72)		
Completed:	72	100%
Not completed:	0	0%

3 – Corporate Health and Safety Policy		
Start date:	22 January 2020	
Total as at 28 July 2020 :	975	
Completed:	890	91%
Not completed:	85	9%
<p>Corporate Health and Safety Policy</p> <p>9.00%</p> <p>91.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (95)		
Completed:	95	100%
Not completed:	0	0%
Council Business (34)		
Completed:	34	100%
Not completed:	0	0%
Learning (82)		
Completed:	78	95%
Not completed:	4	5%
Adults Services (163)		
Completed:	137	84%
Not completed:	26	16%
Children's Services (131)		
Completed:	131	100%
Not completed:	0	0%
Chief Executive (4)		
Completed:	4	100%
Not completed:	0	0%
Highways, Waste and Property (106)		
Completed:	103	97%
Not completed:	3	3%
Regulation and Economic Development (147)		
Completed:	134	91%
Not completed:	13	9%
Housing (141)		
Completed:	102	72%
Not completed:	39	28%
Corporate Transformation (72)		
Completed:	72	100%
Not completed:	0	0%

Policies available for acceptance between April 2017 and June 2018 as reported to the Audit and Governance Committee on 19 September 2018 (*ie* the situation as at **July 2018**):

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**

Policies available for acceptance between July 2018 and June 2019 as reported to the Audit and Governance Committee on 3 September 2019 (*ie* the situation as at **July 2019**):

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

The policies highlighted in bold above, together with the **Equality and Diversity Policy** (which is included in this report) now form the core set of nine policies, as determined by the SLT on 10 June 2019. The remaining seven policies have reverted to 'information only' policies in the Portal.

Re-acceptance of core set policies by all staff with access to the Policy Portal:			
Policy		Acceptance period	Report to SLT
1	Display Screen Equipment Policy	30 Sep – 11 Nov 2019	6 Jan 2020
2	Corporate Health and Safety Policy	22 Jan – 2 Mar 2020	20 Mar 2020*
*Compliance report e-mailed to SLT members			
Requirements suspended due to Covid-19: 23 Mar – 31 Aug 2020			
3	Welsh Language Standards	1 Sep – 12 Oct 2020	Nov 2020
4	Data Protection Policy	2 Nov – 14 Dec 2020	Jan 2021
5	IT Security Policy	4 Jan – 15 Feb 2021	Mar 2021
6	Corporate Safeguarding Policy	8 Mar – 19 Apr 2021	May 2021
7	Officers' Code of Conduct	10 May – 21 Jun 2021	Aug 2021
8	Whistleblowing Policy	12 Jul – 23 Aug 2021	Sep 2021
9	Equality and Diversity Policy	13 Sep – 25 Oct 2021	Nov 2021

Acceptance of policies by managers only:			
Policy		Acceptance period	Report to SLT
1	Managing Absence Policy	14 Sep – 26 Oct 2020	Nov 2020
2	Recruitment and Selection Policy	23 Nov – 4 Jan 2021	Jan 2021
3	Guidance for designating language skills for internal and external posts	1 Feb – 15 Mar 2021	Apr 2021