

Isle of Anglesey County Council	
Report to:	Governance and Audit Committee
Date:	21 September 2021
Title:	Policy Acceptance – September 2020 to August 2021
Report by:	Lynn Ball, Director of Function (Council Business / Monitoring Officer)
Purpose of Report:	To inform the Governance and Audit Committee of the current situation with regard to policy acceptance across the Council.

1.0 Background

This is the fourth compliance report to the Governance and Audit Committee.

The corporate policies currently included in the core set are listed below:

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 are subject to acceptance every two years, but will be compulsory for new staff throughout that time.

Due to Covid-19, the process was suspended in March 2020 but was re-started on 1 September 2020.

2.0 Monitoring compliance

Compliance reports on a service-by-service basis are considered by the Senior Leadership Team (SLT) after 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

Since 1 September 2020, the following policies have been subject to re-acceptance. Compliance data per service as at 11 August can be seen in Appendix 1:

- 1 - Welsh Language Standards
- 2 - Data Protection Policy
- 3 - IT Security Policy
- 4 - Officers' Code of Conduct and Local Guidance
- 5 - Whistleblowing Policy and Guidance

The table below compares the average compliance rates as reported to this Committee over past four years:

Service	Jul 18 (7*)	Jul 19 (8*)	Jun 20 (3*)	Aug 21 (5)
Resources	96%	99%	100%	97%
Council Business	99%	98%	100%	100%
Learning	99%	96%	95%	97%
Adults Services	78%	92%	90%	96%
Children's Services	99%	100%	100%	96%
Chief Executive	100%	100%	100%	100%
Highways, Waste and Property	100%	97%	99%	97%
Regulation and Economic Development	96%	93%	94%	97%
Housing	99%	86%	78%	92%
Corporate Transformation	99%	99%	100%	97%
* - the number of policies included, as listed in Appendix 3.				

The above data which included the period up to June 2020 was reported to this Committee on 1 September 2020, when the declining compliance levels within Housing Services was questioned. This was brought to the attention of the Head of Service and members will see from the above table that the average compliance rate for Housing Services has significantly improved overall. Nevertheless, the data at Appendix 1 shows a marked decline in Housing Services' acceptance of the last policy issued (down to 76%). The data for all services indicates that the longer policies are available for acceptance the higher the compliance rate, but there appears to be more of a

time lag within the Housing Services. This is possibly due to the higher number of technical, rather than clerical/office-based, staff.

3.2 Managers' Pilot

A pilot requiring middle managers to accept three HR policies commenced on 14 September 2020 with each policy assigned to relevant officers nominated by each service.

The Managing Absence and Recruitment and Selection Policies were subject to acceptance between 14 September 2020 and 4 January 2021. In January 2021, the SLT considered a paper on the requirements of the new Socio-Economic Duty (part of the Equality Act 2010) which was due to commence on 31 March 2021. The SLT decided to take the opportunity to raise awareness by adding a briefing paper on the requirements of the Duty to the managers' pilot.

Compliance data per service for the three papers issued to date can be seen in Appendix 2.

The final paper – guidance for designating language skills for internal and external posts – will be issued for acceptance over the coming weeks.

As groups were created manually for the pilot, they will not update automatically to include managers joining the service. The system administrator will therefore need to be notified if services need to make any additions.

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	Leisure centre cleaners, café staff, coaching staff	40

As noted previously, different approaches needed to be identified to reach the various categories of non-AD connected staff but a proposal to trial a paper-based process with Adults Services staff had to be suspended due to Covid-19.

At its last meeting, this Committee recognised the compliance issue with regard to staff without access to the Policy Portal as a risk and sought assurance that the matter was being pursued at the highest level. In response, I confirmed that the matter was receiving corporate consideration with the need for clear and simple communication with staff having been brought into greater focus by the Covid-19 emergency. However, I am advised that any digital solution to the problem is prohibitively expensive and that this remains the primary impediment to an effective resolution.

This aspect of corporate policy acceptance remains on hold, and will remain so indefinitely, until a digital and cost-effective solution becomes available. In the meantime, it is important to note that many of the areas covered by the core set policies are also included within the corporate induction and training programmes. However, it is accepted that this does not provide the same degree of assurance as the Policy Portal.

3.4 Staff who are not technically employed by the Council

We have a number of staff who work for agencies, partnerships etc. They are included in the automatic service groups used by the Portal but are not included in the compliance reports as they are not technically 'employees' of the Council. However, the staff in question 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

Services have been provided with a template containing a declaration to be signed by staff who are not technically Council employees to ensure that they are aware of and abide by the above policies. The policies are available to them in the Portal to read beforehand, but completing the process in the Portal is optional.

4.0 Next steps

4.1 Core set of corporate policies

The Equality and Diversity Policy will shortly be subject to re-acceptance. This will be followed by the Corporate Safeguarding Policy which has been re-scheduled from March 2021 to ensure that it incorporates the requirements of the Wales Safeguarding Procedures 2019 before it is re-accepted.

All nine policies will then have been issued for re-acceptance. A report will now be presented to the SLT to confirm whether or not all of these core policies are to be retained as part of the compulsory acceptance process or whether some are to be replaced for the next two years.

4.2 Managers Pilot

To complete the pilot, the final paper – guidance for designating language skills for internal and external posts – will be issued for acceptance over the coming weeks.

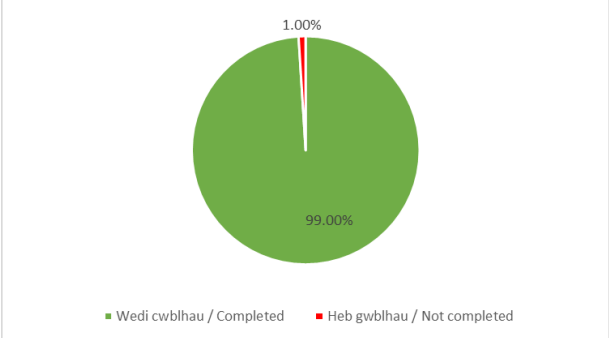
4.3 Staff without access to the Policy Portal

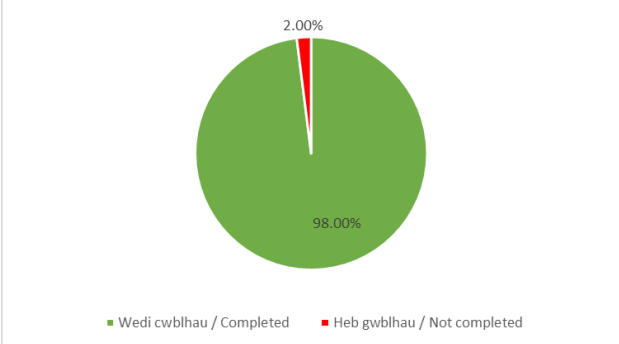
No further action is currently possible. Until the position changes, this will no longer be reported to Committee.

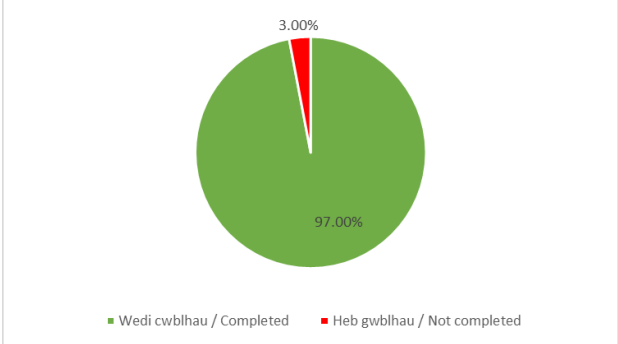
5.0 Recommendation

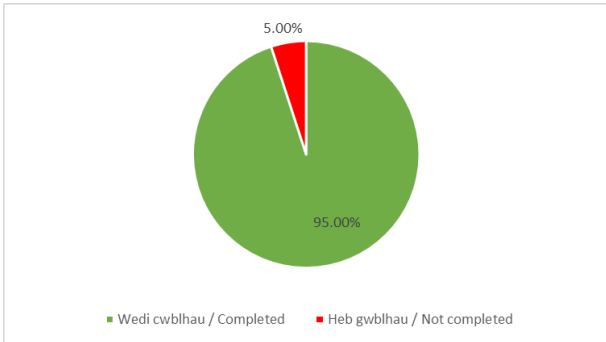
The Committee is requested to note the current position with regard to policy acceptance across the Council

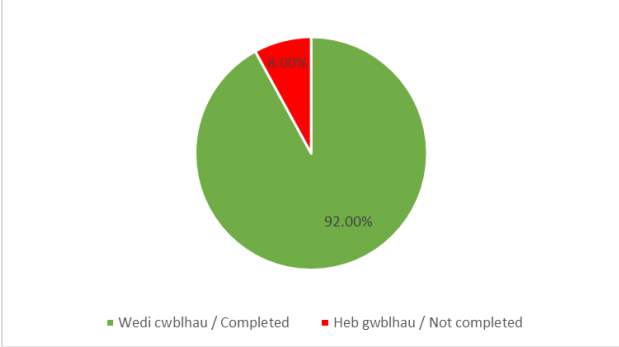
9 September 2021

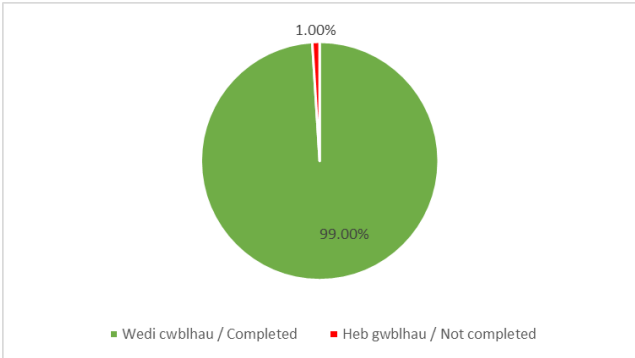
1 – Welsh Language Standards		
Start date:	1 September 2020	
Total as at 11 August 2021:	972	
Completed:	959	99%
Not completed:	13	1%
		
Resources (101)		
Completed:	99	98%
Not completed:	2	2%
Council Business (32)		
Completed:	32	100%
Not completed:	0	-
Learning (52)		
Completed:	52	100%
Not completed:	0	-
Adults Services (147)		
Completed:	142	97%
Not completed:	5	3%
Children's Services (172)		
Completed:	170	99%
Not completed:	2	1%
Chief Executive (3)		
Completed:	3	100%
Not completed:	0	-
Highways, Waste and Property (111)		
Completed:	110	99%
Not completed:	1	1%
Regulation and Economic Development (136)		
Completed:	135	99%
Not completed:	1	1%
Housing (143)		
Completed:	141	98%
Not completed:	2	2%
Corporate Transformation (75)		
Completed:	75	100%
Not completed:	0	-

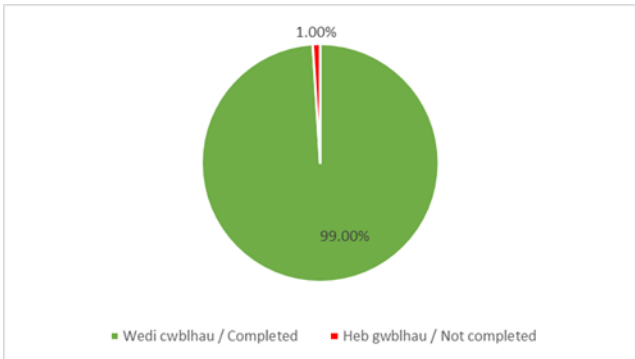
2 – Data Protection Policy		
Start date:	2 November 2020	
Total as at 11 August 2021:	972	
Completed:	954	98%
Not completed:	18	2%
 <p>A pie chart illustrating the compliance status for the Data Protection Policy. The chart is divided into two segments: a large green segment representing 'Wedi cwblhau / Completed' at 98.00%, and a very small red segment representing 'Heb gwblhau / Not completed' at 2.00%.</p>		
Resources (101)		
Completed:	98	97%
Not completed:	3	3%
Council Business (32)		
Completed:	32	100%
Not completed:	0	-
Learning (52)		
Completed:	52	100%
Not completed:	0	-
Adults Services (147)		
Completed:	141	96%
Not completed:	6	4%
Children's Services (172)		
Completed:	169	98%
Not completed:	3	2%
Chief Executive (3)		
Completed:	3	100%
Not completed:	0	-
Highways, Waste and Property (111)		
Completed:	110	99%
Not completed:	1	1%
Regulation and Economic Development (136)		
Completed:	133	98%
Not completed:	3	2%
Housing (143)		
Completed:	141	98%
Not completed:	2	2%
Corporate Transformation (75)		
Completed:	75	100%
Not completed:	0	-

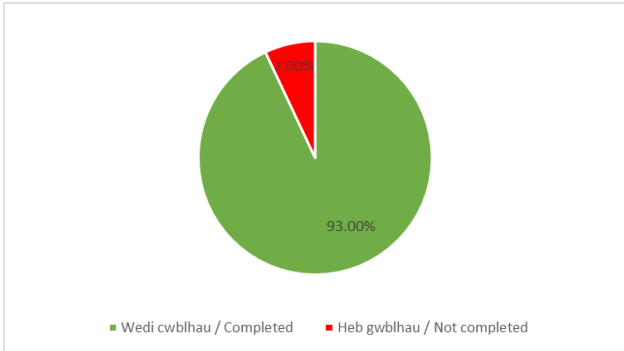
3 – IT Security Policy		
Start date:	11 January 2021	
Total as at 11 August 2021:	972	
Completed:	941	97%
Not completed:	31	3%
 <p>3.00%</p> <p>97.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (101)		
Completed:	98	97%
Not completed:	3	3%
Council Business (32)		
Completed:	32	100%
Not completed:	0	-
Learning (52)		
Completed:	50	96%
Not completed:	2	4%
Adults Services (147)		
Completed:	141	96%
Not completed:	6	4%
Children's Services (172)		
Completed:	169	98%
Not completed:	3	2%
Chief Executive (3)		
Completed:	3	100%
Not completed:	0	-
Highways, Waste and Property (111)		
Completed:	109	98%
Not completed:	2	2%
Regulation and Economic Development (136)		
Completed:	131	96%
Not completed:	5	4%
Housing (143)		
Completed:	134	94%
Not completed:	9	6%
Corporate Transformation (75)		
Completed:	74	99%
Not completed:	1	1%

4 – Officers' Code of Conduct and Local Guidance		
Start date:	15 March 2021	
Total as at 11 August 2021:	971	
Completed:	926	95%
Not completed:	45	5%
 <p>5.00%</p> <p>95.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (101)		
Completed:	98	97%
Not completed:	3	3%
Council Business (32)		
Completed:	32	100%
Not completed:	0	-
Learning (52)		
Completed:	51	98%
Not completed:	1	2%
Adults Services (146)		
Completed:	139	95%
Not completed:	7	5%
Children's Services (172)		
Completed:	161	94%
Not completed:	11	6%
Chief Executive (3)		
Completed:	3	100%
Not completed:	0	-
Highways, Waste and Property (111)		
Completed:	107	96%
Not completed:	4	4%
Regulation and Economic Development (136)		
Completed:	129	95%
Not completed:	7	5%
Housing (143)		
Completed:	134	94%
Not completed:	9	6%
Corporate Transformation (75)		
Completed:	72	96%
Not completed:	3	4%

5 – Whistleblowing Policy and Guidance		
Start date:	24 May 2021	
Total as at 11 August 2021:	968	
Completed:	887	92%
Not completed:	81	8%
 <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (101)		
Completed:	95	94%
Not completed:	6	6%
Council Business (31)		
Completed:	31	100%
Not completed:	0	-
Learning (52)		
Completed:	48	92%
Not completed:	4	8%
Adults Services (146)		
Completed:	142	97%
Not completed:	4	3%
Children's Services (172)		
Completed:	160	93%
Not completed:	12	7%
Chief Executive (3)		
Completed:	3	100%
Not completed:	0	-
Highways, Waste and Property (109)		
Completed:	102	94%
Not completed:	7	6%
Regulation and Economic Development (136)		
Completed:	129	95%
Not completed:	7	5%
Housing (143)		
Completed:	109	76%
Not completed:	34	24%
Corporate Transformation (75)		
Completed:	68	91%
Not completed:	7	9%

1 – Managing Absence Policy (Managers)		
Start date:	14 September 2020	
Total as at 13 August 2021:	150	
Completed:	149	99%
Not completed:	1	1%
 <p>1.00%</p> <p>99.00%</p> <p>■ Wedi cwblhau / Completed ■ Heb gwblhau / Not completed</p>		
Resources (11)		
Completed:	11	100%
Not completed:	0	-
Council Business (7)		
Completed:	7	100%
Not completed:	0	-
Learning (7)		
Completed:	7	100%
Not completed:	0	-
Adults Services (14)		
Completed:	14	100%
Not completed:	0	-
Children's Services (9)		
Completed:	9	100%
Not completed:	0	-
Chief Executive (2)		
Completed:	2	100%
Not completed:	0	-
Highways, Waste and Property (36)		
Completed:	36	100%
Not completed:		-
Regulation and Economic Development (38)		
Completed:	37	97%
Not completed:	1	3%
Housing (15)		
Completed:	15	100%
Not completed:	0	-
Corporate Transformation (11)		
Completed:	11	100%
Not completed:	0	-

2 – Recruitment and Selection Policy (Managers)		
Start date:	24 November 2020	
Total as at 13 August 2021:	139	
Completed:	138	99%
Not completed:	1	1%
		
Resources (11)		
Completed:	11	100%
Not completed:	0	-
Council Business (7)		
Completed:	7	100%
Not completed:	0	-
Learning (7)		
Completed:	7	100%
Not completed:	0	-
Adults Services (14)		
Completed:	14	100%
Not completed:	0	-
Children's Services (9)		
Completed:	9	100%
Not completed:	0	-
Chief Executive (2)		
Completed:	2	100%
Not completed:	0	-
Highways, Waste and Property (25)		
Completed:	25	100%
Not completed:	0	-
Regulation and Economic Development (38)		
Completed:	37	97%
Not completed:	1	3%
Housing (15)		
Completed:	15	100%
Not completed:	0	-
Corporate Transformation (11)		
Completed:	11	100%
Not completed:	0	-

3 – Guidance on the Socio-Economic Duty (Equality Act 2010) (Managers)		
Start date:	9 June 2021	
Total as at 13 August 2021:	93	
Completed:	86	93%
Not completed:	7	7%
 <p>A pie chart illustrating the compliance status. The chart is divided into two segments: a large green segment representing 93.00% (Completed) and a small red segment representing 7.00% (Not completed). A legend below the chart identifies the green color with 'Wedi cwblhau / Completed' and the red color with 'Heb gwblhau / Not completed'.</p>		
Resources (8)		
Completed:	8	100%
Not completed:	0	-
Council Business (16)		
Completed:	16	100%
Not completed:	0	-
Learning (10)		
Completed:	7	70%
Not completed:	3	30%
Adults Services (4)		
Completed:	4	100%
Not completed:	0	-
Children's Services (5)		
Completed:	5	100%
Not completed:	0	-
Chief Executive (2)		
Completed:	2	100%
Not completed:	0	-
Highways, Waste and Property (16)		
Completed:	15	94%
Not completed:	1	6%
Regulation and Economic Development (8)		
Completed:	7	88%
Not completed:	1	22%
Housing (15)		
Completed:	13	87%
Not completed:	2	13%
Corporate Transformation (9)		
Completed:	9	100%
Not completed:	0	-

Policies issued 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 issued 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**

Policies issued for acceptance between July 2019 and July 2020 as reported to the Audit and Governance Committee on 1 September 2020 (*ie* the situation as at **July 2020**):

1. **Equality and Diversity Policy**
2. **Display Screen Equipment Policy**
3. **Corporate Health and Safety Policy**

The policies highlighted in bold above 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.