

**APPENDIX 1b - ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST OCTOBER 2020 – STATUS ALL ACTIONS
QUARTER 4, MARCH 2022**

1. The Council has fully accepted all recommendations made by the external auditor (R1-R20)
2. The Council has added additional recommendations LBC1-4.
3. There are 9 high priority recommendations from the external auditor for the Council to urgently address:
4. Actions marked as “GPAC/SOC” recommendation came from their input following consultation carried out in Dec 2020/Jan 2021

High Priority Actions	High Priority Actions
R1a Children’s Social Care	R12 Revolving Investment Fund
R1b Adult Social Care	R14 Treasury Management
R2 Adequacy of Council Reserves	R18 Ongoing investment in Brick by Brick
R3 Use of Transformation Funding	R20 Governance of subsidiaries
R9 Budget Challenge/Rigour	

A note has been made against actions that do not represent “one-off” measures but instead represent actions, principles and values that should be continually delivered or established as repeating tasks. These actions will be marked as Business as Usual (BAU) in the “Status/Updated Deadline” column.

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Overall accountability for the action plan rests with the Chief Executive

Recommendation 1a – HIGH PRIORITY
The Executive Director Children Families and Education needs to address the underlying causes of social care overspends in children’s social care and take effective action to manage both the demand and the resulting cost pressures.

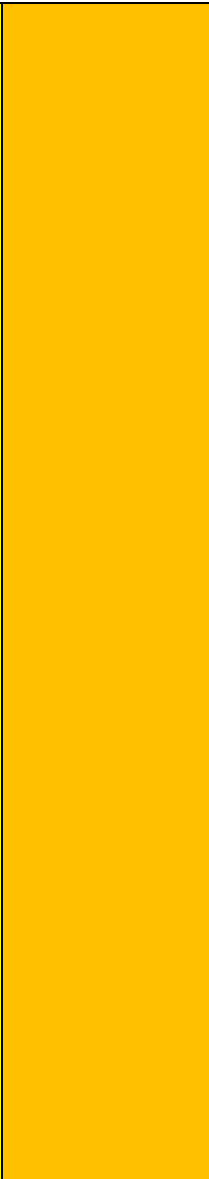
Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) Develop a strategy for managing demand and expected impact / outcome and set up panels to manage activity and cost: <ul style="list-style-type: none"> - Weekly care panel to divert children from care - Bi-weekly Children Looked After review panel to identify children who can be supported to be reunited with families from care, and to systematically review higher cost placements 	<p>The Care Panel was established in February 2021. Outcomes from the care panel & new entries to care are monitored weekly at DLT.</p> <p>To build on this work further process maps are being refreshed to formalise challenge, authorisation and decision making for children in care or at risk of care. A scoping workshop to enhance multi-agency partnership provision has also been delivered in March 2021.</p>	<p>The CFE Delivery plan was agreed in February 2021 following review and challenge at the Children’s Continuous Improvement Board (CCIB) and CYP Scrutiny Sub-Committee. Examination of CFE Delivery plan confirmed that this sets out the approach to continuing to manage demand and reduce costs to achieve the MTFs savings across the directorate.</p> <p>Examination of Continuous Improvement Plan (CCIP) established that MTFs for Early Help and Children’s Social Care had been embedded in CCIP 2021-2024. The CCIP plan was also reviewed and challenged at the CCIB and CYP Scrutiny in July 2021 before being finalised.</p> <p>Children Looked After Review Panel terms of Reference confirmed that the CARE panel was established to support children who have become looked after to be reunited with their. The CARE panel meets weekly chaired by a Head of Service. Actions are minuted and</p>	PUBLISHED COMPLETE	Interim Director, Early Help and Children’s Social Care

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		reviewed at each meeting. It was confirmed that the funding protocol process map for CARE Panel and Children Looked After (CLA) were established.		
<p>ii) Develop a monthly Corporate Finance, Performance and Risk report to progress, track and measure activity. Specifically for Children’s social care, this will monitor the effectiveness of actions to reduce the number of local children in care.</p> <p>This progress report will bring together data on the monthly movement in numbers of children in care, the achievement of care outcomes, the financial impact including full year forecast, and benchmarking against best practice.</p>	<p>The June 7th Corporate Finance, performance & Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.</p> <p>The monthly reports will develop over time as recommendations are progressed.</p>	<p>Examination of the ‘Corporate Finance, Performance & Risk’ reports to the October and November 2021 Cabinet meetings confirmed that this included data on the monthly movement in numbers of children in care, the achievement of care outcomes, the financial impact and benchmarking against best practice.</p> <p>First iteration of report now developed and shared. Updates are scheduled to come to Cabinet monthly.</p>	PUBLISHED COMPLETE	Interim Corporate Director, Children Families and Education
<p>iii) The progress report will be routinely presented to the Children’s Improvement Board, Executive Leadership Team, Cabinet, General Purposes and Audit Committee and Scrutiny & Overview Committee which will bring</p>	<p>The Corporate Finance, Performance and Risk report will provide an update on improvement actions across the Council including Children’s. (1a-ii)</p> <p>Training will be offered to members on the nature of statutory and non-statutory service (See LBC3-i)</p>	<p>Examination of the ‘Windows into Practice’ document confirms that the CSC Monthly Dashboard provided rolling monthly statistics on Key Performance Indicators (KPI), detailing that ‘the dataset includes a 12-month performance summary for key indicators and activity as well as year-on-year local authority comparative</p>	IN-PROGRESS	Interim Corporate Director, Children Families and Education

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<p>a greater level of control and transparency (see Recommendation 5 which will also be incorporated into this process). The first report to members will be accompanied by detail outlining the statutory and non-statutory areas of service and the impact of demand management across the service.</p>	<p>Updates have been provided to GPAC on 25th November 2021, Scrutiny on 18th January 2022, Childrens Continuous Improvement Board on 19th January 2022 and the Corporate Director updates CMT as part of the regular weekly updates.</p>	<p>data to map performance trends. Benchmarking data for England average and statistical neighbours are included where this information is publicly available’.</p> <p>Examination of the CSC Performance spreadsheet confirmed that 129 numeric indicators were being tracked monthly and examination of the Croydon Children’s Continuous Improvement Board (CCIB) meeting minutes and accompanying papers confirmed these indicators were reported to these meetings.</p> <p>Examination of the Executive Leadership Team (ELT) /Corporate Management Team (CMT) forward planner confirmed that the ‘Corporate Finance, Performance and Risk’ report was a monthly agenda item, being reported at the 4th meeting each month.</p> <p>Examination of the October and November 2021 Cabinet meetings minutes confirmed that ‘Corporate Finance, Performance & Risk’ reports were reported to these meetings.</p> <p>Examination of General Purpose Audit Committee (GPAC) meeting minutes and the ‘GPAC Work Programme’ established that the ‘Corporate</p>		
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		<p>Finance, Performance and Risk' report had not been reported to GPAC and was not on the 'Work Programme'. Although reported to the 15 June Overview and Scrutiny Committee, the 'Corporate Finance, Performance & Risk' was not reported to subsequent Committee meetings and was not on the Committee's 'Work Programme'.</p>		
<p>iv) Secure independent external challenge through the Partners in Practice programme to enable valid judgements to be made about the correct level of funding to meet the needs of Croydon's children in care.</p>	<p>Report from LB Camden received under Partners in Practice Programme – December 2020</p> <p>Independent Financial Adviser commissioned by the DfE to provide expert challenge and support commenced on 22/2/21 for a period of 9 months.</p> <p>Ongoing support until November 2021</p>	<p>Copies of parts 1 and 2 of the 'Review of Croydon's Children Looked After Service' by the London Borough of Camden, dated 'October/November 2020' and 'December 2020' respectively were obtained.</p> <p>Part 1 looked at proposals for the redesign of the service, while Part 2 looked at (a) commissioning arrangements, (b) the changing needs/profile of children looked after and unaccompanied asylum seeking children, (c) the availability and resourcing of good quality services, (d) transitions issues and permanency planning.</p> <p>Examination of the 'Croydon Financial Transformation Advisor Spec 221220' and the 'DfE Advisor Report May 2021' confirmed that a DfE advisor commenced their 'role on 22 February 2021 on a 9 month contract to look at improvements and</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director, Children Families and Education</p>

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		transformation within Croydon's Children's Services Finance'. The 'DfE Advisor Report May 2021' being an 'Initial Progress Report' detailing actions and recommendations to date, as well as future tasks.		
v) Data set used to inform progress report to be collated, updated and shared with GPAC to allow members to monitor progress on managing demand within social care.	Dataset developed and being progressed further. The Corporate Finance, Performance and Risk report draws upon this data and provides GPAC with the relevant information per this action.	Examination of General Purpose Audit Committee (GPAC) meeting minutes and the 'GPAC Work Programme' was unable to locate any instances of the 'Corporate Finance, Performance and Risk' report being reported to GPAC. It is acknowledged, as detailed in 1(a) (iv) above, that this data was initially provided to the Overview and Scrutiny Committee and regularly to Cabinet.	IN-PROGRESS	Interim Corporate Director, Children Families and Education

Recommendation 1b – HIGH PRIORITY

The Executive Director Health, Wellbeing and Adults needs to address the underlying causes of social care overspends in adults social care and take effective action to manage both the demand and the resulting cost pressures.

Cabinet Member Accountability: Councillor Campbell, Cabinet Member for Families, Health and Social Care

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) Commission a diagnostic of spend and opportunities to be carried out by the Local Government Association (LGA) National Care & Health Improvement Adviser Finance and	This was carried out and used during November 2020 to inform development of the Adult Social Care Improvement Plan	It was confirmed that the 'Observations of Croydon Adult Social Care' by the Local Government Association (dated 5 November 2020) were presented as part of the 'ACS Budget Workshop' in November 2021.	PUBLISHED COMPLETE	Corporate Director Adult Social Care and Health

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<p>Risks to inform future shape of transformation opportunities.</p>		<p>The 'Adults Social Care Improvement Plan 2021 – 2024' confirms in paragraph 1.3 that, 'Working closely with a Local Government Association (LGA) Adults and Finance expert, we have reviewed every aspect of our budget. We have modelled plans to deliver significant savings over three years, based on LGA recommendations.'</p>		
<p>ii) Review the current service delivery models of adult social care and gateway services to right size the budget and delivery model to benchmark with comparator Councils in relation to population and service outcomes.</p>	<p>Data has been collected which provides benchmarking of Croydon ASC care spend vs other Councils, this was factored in to the Adult Social Care Improvement Plan.</p> <p>Budget modelling has been agreed for ASC for 21/22 budget. Service modelling forms part of adult's improvement plan.</p>	<p>The 'Adult Social Care Benchmarking 2019-20' report dated 31 December 2020 demonstrates that the Council had benchmarked against the 152 Councils with Adult Social Care Services Responsibilities in England for the period 1 April 2019 to 31 March 2020.</p> <p>The 'Health, Wellbeing and Adults Budget Development Session' dated 1 October 2020, the 'ACS Budget Workshop' in November 2021 and the Adults Social Care Improvement Plan 2021–2024' and the presentation of the Executive Director of Health, Wellbeing and Adults to the Scrutiny Health & Social Care Sub-Committee on 26 January 2021 all included benchmarking data.</p> <p>The Care Cubed tool (detailed in 1b(iii) below) is being trialled to provide the ability to benchmark placements costs with other councils.</p>	<p>PUBLISHED COMPLETE</p>	<p>Corporate Director Adult Social Care and Health</p>

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		<p>As detailed in 1B(iv) below, examination of the Croydon Adults Improvement Plan and the Adult Social Care Budget presented to the Scrutiny Health & Social Care Sub-Committee on 26 January 2021 confirmed that budget modelling was agreed in the 2021/22 budget and that service modelling forms part of the Adults Improvement Plan.</p>		
<p>iii) To create a placements board to challenge the Council on current cost of placements, managing demand for new placements and ensuring value for money in procurement of placements</p>	<p>Placements boards have been implemented in the Council to challenge placements and reduce expenditure.</p> <p>Daily challenge panel has been in place since S114 Notice. All spend is then promoted to the Spend Control Panel, as agreed with then S151 Officer.</p> <p>Placements programme is in place with an agreed scope. Funding also agreed for Care Cubed placements tool agreed at ELT on 8 March 21.</p>	<p>The 'Placements and packages of care across Children's and Adult's Social Care 2020/21' presentation dated 19 October 2020, as well as the subsequent 'Placements Programme Work-streams – Systems Processes and Payments' dated 26 November 2020 both detailed that:</p> <p><input type="checkbox"/> A 'Daily Panel – Director / Exec Director to sign off new placements (Res/Nursing)' was actioned and in place. Enquiry clarified that Adult Social Care has a challenge panel at 9am Monday to Friday where cases are presented for approval.</p> <p>The panel consists of the Interim Executive Director (usually) plus a selection of Adult Social Care Heads of Service and a Finance Manager. The case workers have to complete a template which is submitted prior to challenge panel. Each case is reviewed, challenged and a decision on the care is</p>	<p>PUBLISHED COMPLETE</p>	<p>Corporate Director Adult Social Care and Health</p>

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		<p>made, (sometimes this will be for a limited time with a requirement for the case worker to re-present, so it is not always a simple yes or no.) The decisions are recorded each day and a summary circulated at the end of each week.</p> <p><input type="checkbox"/> A 'placements programme' was in place. Review of the 'Placements and contracts Programme' task pages on Teams showing the progress of the various projects also confirmed the programme to be in place and actively being progressed.</p> <p>The 'Overview Of The 2021-22 Adult Social Care Financial Performance' report provided to the Scrutiny Health & Social Care Sub-Committee at the meeting held on 29 June 2021 confirms that, 'A further £0.026m transformation investment was agreed in Feb 21 for the purchase of a tool called Care Cubed. This allows the service to benchmark placements costs with other councils, enabling stronger provider negotiations.' The copy of the Care Cubed contract provided, confirms that, 'iESE will provide Licensee with access to CareCubed for one year from 1st April 2021 and ending on 31st March 2022' with the option to extend this.</p>		
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		<p>An update on Care Cubed by the Head Of Innovation And Change further confirmed that:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A series of training was scheduled and had been completed. <input type="checkbox"/> Progress was focussed on testing the tool within the Reviews Progression project team. <input type="checkbox"/> Analysis is due by end of September 2021 on the cases reviewed using Care Cubed. 		
<p>iv) Use the output from the diagnostic review to remodel financial implications to help shape the Medium Term Financial Strategy (MTFS)</p>	<p>Diagnostic review and benchmarking data has been used to shape the Adult Social Care Improvement plan.</p> <p>Croydon Adults Improvement plan has been fully developed and aligned to budget as signed off at March Cabinet. LBC delivery tracker being updated fortnightly.</p>	<p>Documents seen for 1b(i), (ii), (iii) above confirm that diagnostic review and benchmarking data has been used to shape the Adult Social Care Improvement plan.</p> <p>Parts 6 and 7 of the Croydon Adults Improvement plan detail the 'Current budget development' and 'Year one and medium term financial strategy proposals' clearly aligning the Plan to the 2021/22 Budget. Likewise the Adult Social Care Budget presented to the Scrutiny Health & Social Care Sub-Committee on 26 January 2021 summarised that, 'Adult social care continues to be under pressure nationally and locally. The outturn for 2016/17, 2017/18, 2018/19 and 2019/20 demonstrated both an increase in costs and increased use of transformation monies to meet current demand and</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>

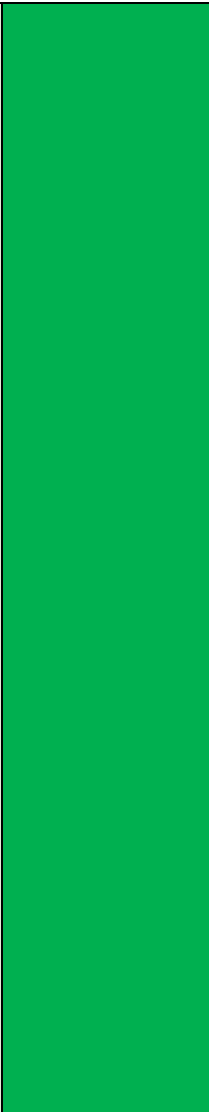
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		increased complexities. Increasingly we are seeing residents who fund their own care running out of money, often referred to as 'wealth depleters'. A change in the way we deliver social care in order to reduce spend and live within our available resources is underway.'		
v)	Develop a monthly Corporate Finance, Performance and Risk report to progress, track and measure activity. This will include monitoring of the new service delivery model to track progress and challenge effectiveness of the plan.	<p>The June 7th Corporate Finance, performance & Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.</p> <p>The monthly reports will develop over time as recommendations are progressed.</p>	<p>Initially reported to the June 2021 Overview and Scrutiny Committee and Cabinet meetings, the development of the 'Corporate Finance, Performance & Risk' has been an iterative progress. Examination of the 'Corporate Finance, Performance & Risk' reports to the October and November 2021 Cabinet meetings confirmed that full reports had been presented at these meetings.</p> <p>First iteration of report now developed and shared. Updates are scheduled to come to Cabinet monthly.</p>	<p>PUBLISHED COMPLETE</p> <p>Corporate Director Adult Social Care and Health</p>
vi)	Progress will be governed by reporting to the Executive Leadership Team, Cabinet, General Purposes and Audit Committee and Scrutiny & Overview Committee which will bring a greater level of control and transparency. The first report to members will be	<p>The Corporate Finance, Performance and Risk report will provide an update on improvement actions across the Council including HWA's (1b-v).</p> <p>Training will be offered to members on the nature of statutory and non-statutory service (See LBC3 – i)</p> <p>Budget and demand papers have been to Health and Social Care Scrutiny Sub-</p>	<p>Examination of the October 2021 'Corporate Performance and Finance Report confirmed that this included the improvement actions for Health Wellbeing and Adult (HWA). Examination of the Executive Leadership Team (ELT) /Corporate Management Team (CMT) forward planner confirmed that the 'Corporate Finance, Performance and Risk' report</p>	<p>SUBSTANTIALLY COMPLETE</p> <p>Corporate Director Adult Social Care and Health</p>

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<p>accompanied by detail outlining the statutory and non-statutory areas of service and the impact of demand management across the service.</p>	<p>Committee:- Budget proposals 21/22 (Jan 21); Autism Strategy (Mar 21); Overview of 21/22 Adults Budget (May 21); Overview of ASC 21/22 Finance Performance (June 21); Overview of the Transitions Service (Sep 21); ASC budget and savings briefing (Nov 21); and, ASC Budget Deep Dive (Jan 22). The last report specifically focussed on (1) impact of reviews; (2) managing demand; and (3) the ASCH Strategy, which the committee gave broad support to, and noted its role in tracking and requiring progress updates moving forward. The ASCH Strategy was approved at Cabinet on 7th February 2022.</p> <p>To date, there have been no requests to take anything to GPAC, besides from the CareCubed report (placements negotiations tool), which will be presented on 16 February GPAC.</p> <p>S.151 officer commented on the significant progress made and has requested ASC&H take progress to GPAC to allow this task to be marked as complete.</p>	<p>was a monthly agenda item, being reported at the 4th meeting each month. Examination of the October and November 2021 Cabinet meetings minutes confirmed that 'Corporate Finance, Performance & Risk' reports were reported to these meetings. Examination of General Purpose Audit Committee (GPAC) meeting minutes and the 'GPAC Work Programme' established that the 'Corporate Finance, Performance and Risk' report had not been reported to GPAC and was not on the 'Work Programme'.</p> <p>Although reported to the 15 June Overview and Scrutiny Committee, the 'Corporate Finance, Performance & Risk' was not reported to subsequent Committee meetings and was not on the Committee's 'Work Programme'.</p> <p>First iteration of report now developed and shared. Updates are scheduled to come to Cabinet monthly.</p>	<p></p>	<p></p>
<p>vii) Ensure that cost of care tool is used effectively to track all case expenditure to improve financial control, identify areas of focus for further</p>	<p>The Cost of Care tool referred to in has been utilised to help accurately forecast its spend to support budget setting, improve financial management and identify opportunities for further savings.</p>	<p>The '2021/22 Adult Social Care Budget Proposals' report to the Health and Social Care Sub-Committee in January 2021 confirmed that a 'cost of Care' tool had 'been developed to build a zero based adult social care budget and set a</p>	<p>PUBLISHED COMPLETE</p>	<p>Corporate Director Adult Social Care and Health</p>

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<p>improvement and to enable better decision making.</p>	<p>A separate tool called CareCubed is in the process of being acquired. It is a benchmarking tool that allows adult social care to acquire an indicative cost of placing an individual aligned with their assessed care and support needs. This indicative amount is then used to aid contract negotiations with providers.</p> <p>The tool has successfully enabled savings in other Council's and will be tested in Croydon over the next 12 months. Training for staff to use tool is in planning.</p>	<p>baseline for current activity and cost from which then to reduce to bring in line with the average level of spending in London or England as appropriate.' The 'Overview Of The 2021-22 Adult Social Care Financial Performance' report provided to the Scrutiny Health & Social Care Sub-Committee at the meeting held on 29 June 2021 confirms that, 'A further £0.026m transformation investment was agreed in Feb 21 for the purchase of a tool called Care Cubed. This allows the service to benchmark placements costs with other councils, enabling stronger provider negotiations.' The copy of the Care Cubed contract provided, confirms that, 'iESE will provide Licensee with access to CareCubed for one year from 1st April 2021 and ending on 31st March 2022' with the option to extend this. As evidenced by the Care Cubed Implementation Plan, the CareCubed tool was implemented as of 18th June 2021. A training plan for use of the tool has been established and distributed to social workers and brokerage staff. Examination of the CareCubed Project Board Meeting Report, dated 17th November 2021, demonstrated that outcomes from the testing of the CareCubed tool were being reported.</p>		
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<p>viii) Training to be provided to members to understand the budget for Adult Social Care and share rationale for persistent overspend in service. Training to also inform members on the complex health and care landscape in the borough.</p>	<p>A Training offer has been developed for all members including where appropriate, specific training for committee members. This was approved by the Members Learning & Development Panel on July 13th 2021. It has been aligned with the actions in the RIPI action plan to ensure all aspects covered.</p> <p>Training on the Adult Social Care Budget was completed via a briefing to members of the Health & Social Care Sub-committee in June 2021.</p> <p>Training for members will continue to be offered on annual basis as BAU. Consideration will be taken in the future about how and when best to inform on matters relevant to ASC.</p>		<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p>
<p>ix) Data set used to inform progress report to be collated, updated and shared with GPAC to allow members to monitor progress on managing demand within social care</p>	<p>A finance and performance work-stream has been established and meets fortnightly. The key objectives for this work-stream are to ensure dashboards are developed to enable the senior management team to track activity against the benchmarking forecasts set out in the adults improvement plan; and against the move towards both London (younger adults) and England (older adults) averages.</p> <p>Bettergov have been commissioned to help finalise dashboard and benchmarking modelling. 2 dashboards are to be utilised one focused on activity</p>	<p>It was confirmed that a Finance, Performance and Risk report has been developed to inform on the progress of Services against identified measures. The report is provided to the CMT monthly. It is also provided to Cabinet monthly but is expected to be received by Cabinet on a bi-monthly basis from January 2022.</p> <p>However, as detailed in previous actions, this has not been provided to the General Purpose and Audit Committee (GPAC). – Not been requested by GPAC (agenda set by GPAC. Care Cubed to GPAC on 16th.</p>	<p>SUBSTANTIALLY COMPLETE</p>	<p>Corporate Director Adult Social Care and Health</p>

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	<p>which is complete and another on finances which is in development.</p> <p>The MTFS tracker is currently updated weekly.</p> <p>The Corporate Finance, Performance and Risk report draws upon this data and provides GPAC with the relevant information per this action.</p> <p>To date, there have been no adults only Finance, Performance and Risk requests to take anything to GPAC, Directorate understanding is that GPAC sets its own agenda and invites reporting; and that the Corporate KPIs report that ASCH contributes to, is what has been taken to GPAC.</p> <p>The CareCubed report (placements negotiations tool), will be presented on 16 February GPAC following a request in December 2021.</p> <p>S.151 officer commented on the significant progress made and has requested ASC&H take progress to GPAC to allow this task to be marked as complete.</p>			
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Recommendation 2 – HIGH PRIORITY

The Council (including Cabinet and Scrutiny and Overview Committee) should challenge the adequacy of the reserves assessment which should include a risk assessment before approving the budget.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
<p>i) Develop a reserves strategy as part of the Medium Term Financial Strategy (MTFS) and present it for approval with the Budget reports to Cabinet and Full Council. This needs to incorporate a clear assessment of risks and liabilities that demonstrate all current and future exposure has been thought through and factored into the recommendations. Strategy to map the financial governance process around agreeing additions to reserves to be included to reduce risk of duplication and that there were no gaps in approach.</p>	<p>The MTFS and 21/22 Budget agreed on 8th March contains a clear strategy for growing the reserves base up to a level which by 23/24 would give a general fund reserve in excess of £60 million.</p> <p>The challenge to the adequacy of the reserve position should be done annually when budgets are set for the forthcoming year. This Council's position to the reserves has been provided as separate section within the Council's Budget Report for 2022/23 and the Council's officers and Cabinet Members were challenged during the General Purposes and Audit Committee.</p> <p>It is best that this requirement now moves into the Council's risk register as a standing item and that it is an agenda item for Scrutiny and GPAC to ensure this is tested on an annual basis when future budget setting reports are presented.</p>	<p>Examination of the 'Budget Report 2021/22' presented to Cabinet on 8 March 2021 confirmed plans that '£20m is being earmarked as part of the 20/21 planned capitalisation directive for contribution to the General Balance. With a further increase of £10m 21/22.' (i.e. to increase reserves by £50m).</p> <p>The updated MTFS presented to Cabinet 12 July 2021 confirmed that, 'Part of the approved capitalisation direction request in 2020/21 contained provision to bolster general reserves by a further £15.0m in order to provide sufficient resilience to meet future risks and challenges. The 2021/22 base budget has £10m of contributions to reserves and the MTFS provides for a further £5m of reserves contribution in 2022/23 and a further £5m in 2023/24. This will result in a total of additional £45m in reserves by the end of 2023/24 which should leave a General Fund Reserve balance of £72.5m.'</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>

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<p>ii) In considering future budget reports, Cabinet will assure itself that all risks and liabilities have been properly considered by requesting that the Scrutiny & Overview Committee and the General Purposes and Audit Committee review the adequacy of the strategy and its relationship to the MTFs prior to Cabinet taking a decision.</p>	<p>From April 2021 Financial Monitoring reports will be provided to Cabinet on a monthly basis to ensure Members have increased oversight on any emerging pressures or movements.</p> <p>The 21/22 Budget was reported to Scrutiny on 16th February 2021 and comments were verbally reported to cabinet on 8th March 2021.</p> <p>Future year's timescales will need to include time for both this and reference to GPAC and Scrutiny</p>	<p>It was confirmed that 'Financial Monitoring' reports were provided to Cabinet from April 2021, with the:</p> <ul style="list-style-type: none"> □ 'Financial Performance Report – Period 11' report provided on 4 May 2021, □ 'Financial Performance Report – Month 1' on 7 June 2021, □ 'Financial Performance Report – Outturn 2020/21' on 12 July 2021, □ 'Financial Performance Report – Month 2' on 26 July, and the □ 'Financial Performance Report – Month 3' scheduled for the meeting to be held on 13 September 2021. <p>Examination of the Scrutiny Committee minutes of the meeting held on 16 February 2021 confirmed that the draft 2021/22 budget was reported to this meeting. Examination of the 'Budget Report 2021/22' presented to Cabinet on 8 March 2021 confirmed that item 21 reported that the 21/22 draft budget had been reported to the Scrutiny Committee. Dates for Scrutiny and GPAC are on the Corporate Forward Plan for the 2023/23 Draft Budget.</p>	<p align="center">PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>
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<p>iii) Training to be delivered to relevant members to raise understanding of reserves</p>	<p>The Local Government Association delivered training to Scrutiny and Overview Committee on 27th October 2021 and to General Purposes and Audit Committee on 22 November 2021.</p> <p>The training offer will be refreshed annually and continually offered to members as BAU going forward. A member induction programme planned for May 2022 will be informed by the RIPI recommendations.</p>		<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p>
<p>iv) Council to identify the most appropriate mechanism for the Scrutiny & Overview Committee to monitor and assess progress made against delivering the budget throughout the year. As a part of this any update would need to provide reassurance that effective budget controls are in place to mitigate against potential pressures.</p> <p>Furthermore, the Council is to consider approach to providing reassurance to Members that effective budget controls were in place to mitigate against potential risks to the delivery of the budget</p>	<p>Monthly reports are taken to Cabinet and to Scrutiny and Overview Committee. Officers will continue to take monthly in year financial reporting monitor to each meeting of Scrutiny and Overview Committee.</p>		<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>

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Recommendation 3 – HIGH PRIORITY

The Chief Executive should oversee a review of the outcomes achieved from the use of transformation funding to demonstrate that the funding has been applied in accordance with the aim of the scheme.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) A review of all schemes previously funded from transformation capital receipts be undertaken and a report produced that assesses whether the funding has been applied in accordance with the scheme.	<p>This work is completed following discussions with the external auditor.</p> <p>Grant Thorntons external audit update report which refers to transformation monies in 19/20, went to GPAC in October 2021.</p> <p>An update will be made to GPAC as part of the report on the 2019/20 accounts.</p>	This action has not been reported publicly and nor has Internal Audit been provided with evidence of this being completed.	IN-PROGRESS	Interim Director of Finance (Deputy S151)
ii) Training to be delivered to relevant members on transformation funding to raise understanding.	<p>Training on transformation funding is covered in the overall training referenced in recommendation 2(iii)</p> <p>The Medium Term Financial Strategy (MTFS) reporting / February 22 included a section on transformation funding to ensure members have a full understanding.</p> <p>Informal briefings have been held with members.</p>		IN-PROGRESS	Interim Director of Finance (Deputy S151)

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	There will be training in May for new members.			
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Recommendation 4

The s151 officer should set out the strategy for applying capital receipts for transformation annually as part of the budget setting process.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) A strategy for funding transformation to be incorporated into the budget setting process using the current Ministry of Housing, Communities and Local Government (MHCLG) Flexible Use of Capital Receipts Scheme.	<p>Following extension of the Flexible Use of capital receipts scheme. Proposals for the use of up to £5 million of capital receipts, subject to availability of receipts will be drafted and agreed by ELT. This should be received in w/c 7th June.</p> <p>Incorporated into budget setting going forward.</p>	<p>The 'Transformation Funding Strategy & 2021/22 Usage' report to full Council on 5th July 2021 detailed that, 'The Council's MTFS assumed up to £5 million of capital receipts could be utilised for transformation funding. The Council's strategy for use of flexible capital receipts is to ensure that such use remains affordable to the revenue account, taking into account the opportunity cost of otherwise funding the capital programme; ensuring such usage conforms to the requirements set out in the regulations; and delivers a positive and rapid rate of return in the level of savings delivered.'</p> <p>Examination of the report established that a total of 12 proposals were included.</p>	PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)

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<p>ii) In the absence of any national capital receipts for transformation scheme, the strategy for funding transformation will set out how future schemes will be funded using invest to save principles using rolling investment that is set aside and supported by business cases that demonstrate return. Any business case will have to demonstrate governance of the programme to assure the section 151 officer and Cabinet that the deliverables are being met.</p> <p>All schemes approved for funding under this strategy will be assessed individually and against the overarching risk exposure and affordability for the Council.</p>	<p>See 4i above.</p>	<p>See (4) i above. The ‘Transformation Funding Strategy & 2021/22 Usage’ report to full Council on 5th July 2021 required that full Council: ‘1.2 Approve the strategy as outlined in Section 3 to use capital receipts to support the delivery of ongoing savings where such proposals meet the requirements of the Flexible Capital Receipts Regulations, deliver positive payback, and are affordable; 1.3 Approve the specific list of transformation funding schemes as set out in the body of this report and summarised in Table 1; each proposed scheme be individually approved.’</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>
<p>iii) There will be an annual report to the Scrutiny & Overview Committee and GPAC on the use of transformation funding and the delivery of schemes.</p>	<p>A report was taken to Council in July 21 detailing a list of transformation projects with intended savings to the Council. The July 2021 Council paper indicated that the Council’s capital receipts may be used to fund the Transformation schemes, as allowed under the Flexible Use of Capital Receipts legislation.</p>		<p>COMPLETE Q4</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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<p>A corporate strategy needs to be developed to assess future transformation projects prior to funding. This should include a requirement to identify the intended outcomes, risk exposure, ongoing affordability, how success will be measured, how progress will be tracked, and any interdependencies with other projects and any wider benefits.</p>	<p>Based on the capital receipts the Council will receive in 21/22 further bids for transformation funding is being considered and information gathered to test the need for this funding to deliver further savings. Capital Direction information is going in Budget report which is being taking to Scrutiny between despatch to Cabinet and the actual meeting.</p> <p>An established process is now in place for transformation funding to be considered, approved and reviewed. The finance team will continue to provide annual reports in this basis.</p> <p>The Transformation Funding proposals for 2022/23 will be a section in the MTFs report that will go to GPAC on the 16th Feb. [check]</p> <p>Transformation funding used in 2021/22 will be part of the closure of accounts report in the summer.</p> <p>Report will be done on an annual basis with the first one due in June 2022.</p> <p>Report needs to be taken back to Scrutiny and GPAC in July 2022.</p>			
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Recommendation 5				
The General Purposes and Audit Committee should receive reports on the actions being taken to address the Dedicated Schools Grant deficit and challenge whether sufficient progress is being made.				
Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning				
Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) The Dedicated Schools Grant recovery plan should be presented to General Purposes and Audit Committee and Scrutiny and Overview Committee for review and agreement to ensure that it is adequate to meet objectives and timelines that have been set.	Reviewed at GPAC 4 March 2021	The minutes of the General Purposes and Audit Committee meeting held on 4 March 2021 are not yet available. Examination of the agenda for the meeting confirms that item 6 was a paper on the 'Dedicated Schools Grant', but that this was an item for the Committee to 'Note' and not to agree or to challenge. However, the 'podcast' of the meeting clearly evidences that members sought clarification and challenged this item	PUBLISHED COMPLETE	Director of Education
ii) Special Educational Needs Finance Board to be established and chaired by the interim Director of Education to oversee the delivery of the Dedicated Schools Grant recovery plan.	Initial meetings held with further meetings to be scheduled to update on the progress of the DSG recovery plan.	Examination of the 'SEND Finance Board: Terms of Reference' confirms that the objectives of the Board includes to, 'Ensure that milestones in relation to the SEND DfE recovery plan and management plan are being met through regular monitoring of this.' Examination of the Executive Director of Children, Families and Education's Outlook calendar confirmed that the SEND Finance Board met on 19 July 2021, with monthly meetings being	PUBLISHED COMPLETE	Director of Education

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		diarised until the end of the calendar year.		
iii) Training to be provided to members to ensure the committee possess a working understand of education funding and budgets	DSG training has been delivered to members of Scrutiny Committee, Labour Group and Conservative Group	<p>E A copy of the PowerPoint slides 'Dedicated Schools Grant (DSG) funding for Croydon' has been provided. The Chair of the Children's & Young People SubCommittee confirmed that they had a briefing at 2pm on 12 January 2021.</p> <p>As noted in LBC Rec. 3 (ii) below, the 'Member Learning and Development Needs 2021-22' includes 'Education Funding and Budgets' which was 'Delivered to CYP Scrutiny and members of both Cons and Lab Groups' in January 2021.</p>	PUBLISHED COMPLETE	Director of Education

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<p>iv) Implement the 'New Approach to Special Educational Needs delivery' strategy working with schools to ensure that more of our Special Educational Needs pupils are educated in mainstream provision to include:</p> <ul style="list-style-type: none"> • Developing more capacity within the post-16 provision • Opening of new Special Educational Needs free schools 	<p>Project widened to include further two locality areas.</p> <p>Model being incorporated into SEND Governance Model</p> <p>Further modelling on this being a borough wide model is and will always be in progress.</p>		<p align="center">IN- PROGRESS</p>	<p>Director of Education</p>
<p>v) Progress against the recovery plan to be included in the monthly budget monitoring report to Children's, Families and Education Department Leadership Team, the Executive Leadership Team, the Children's Improvement Board and the quarterly Cabinet, General Purposes and Audit Committee and Scrutiny & Overview Committee which will bring</p>	<p>Progress update included in the monthly budget monitoring to Education SLT and CFE DLT.</p>	<p>Examination of the '2021-22 -P02 CFE Directorate' spreadsheet confirms that monthly budget monitoring occurs. This includes the Dedicated Schools Grant (DSG), High Needs and Education Monitoring, where the financial position is recorded alongside an explanation of items such as anticipated overspend, financial pressures and underspends. Examination of the meeting minutes dated 19th May 2021 confirmed that the budget position was being reported to the High Needs Working Group. It was also confirmed that the meeting in July involved a review of the Quarter 2</p>	<p align="center">PUBLISHED COMPLETE</p>	<p>Interim Corporate Director, Children Families and Education</p>

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<p>a greater level of control and transparency.</p>		<p>outturn, but the minutes of this meeting were not yet available.</p> <p>Examination of the Cabinet meeting minutes since March 2021 did not identify any specific presentations on the DSG recovery plan, although regular 'financial performance reports' were provided.</p> <p>Examination of the meeting minutes of the General Purposes and Audit Committee confirmed that an update on the DSG recovery plan was presented to the 4 March and 25 November 2021 meetings. A further update was also noted to be scheduled for the January 2022 meeting.</p> <p>Examination of the Children & Young People Sub-Committee minutes since March 2021 did not identify any specific presentations on the DSG recovery plan, although regular 'Service Impact and Budget update' reports were provided.</p>		
<p>vi) Progress on Dedicated Schools Grant recovery plan to be reported to the Schools' Forum on a termly basis</p>	<p>Included in the forward plan of agenda items for Schools' Forum</p>	<p>Examination of the minutes of Schools' Forum meetings held in 2020/21 confirmed that Dedicated Schools Grant (DSG) Recovery Plan was presented to the meeting held on 26 April 2021 and examination of the forward plan (appended to the minutes of the meeting held on 8 November 2021) for the</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Head of Finance, Children, Families and Education</p>

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		schools forum noted that this is next due to be presented at the meeting to be held on 6 December 2021, 17 January 2022 and 7 March 2022.		
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Recommendation 6

The Executive Director Children, Families and Education needs to review the services provided to UASC and to identify options to meet their needs within the grant funding provided by the Home Office.

Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) Complete a forensic review of grant income against the total expenditure for unaccompanied asylum seeking children and care leavers over the past 3 years, including the co-ordination of pan-London arrangements	Review completed and is informing Council's approach to UASC support offer.	<p>The forensic review was undertaken by the Executive Director of Children, Families and Education, and the Interim Head of Quality Improvement for that department, with modelling by the Independent Financial Adviser commissioned by the DfE (refer to 1a(vi) above).</p> <p>This included both unaccompanied asylum seeking children and care leavers. The subsequent report to Cabinet on 7 June 2021 also confirms that detailed modelling took place for unaccompanied asylum seeking children.</p>	PUBLISHED COMPLETE	Interim Head of Finance, Children, Families and Education
ii) Negotiate with the Home Office and Department for Education to secure the	Confirmation of grant funding of £2.35 million received from the Home Office and DfE at the end of August for the current		COMPLETE Q4	Interim Corporate Director,

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<p>same financial support provided to other port of entry authorities such as Kent and Portsmouth to cover the exceptional overhead costs caused by the volume of unaccompanied asylum seeking children received in the Borough.</p> <ul style="list-style-type: none"> • Full cost recovery for exceptional overheads provided by Croydon such as age assessments, the social care duty service at Lunar House and legal fees. Due to volumes in the Borough from its port of entry position, these cannot be absorbed within normal overhead cost as per all other local authorities. • Increased funding for children cared for over and above the voluntary national rate to match the funding of Croydon’s children in care. 	<p>financial year in recognition of the exceptional additional costs to Croydon.</p> <p>Further representations planned to address the projected shortfall in 2022/23 and 2023/24.</p> <p>A report went to cabinet in June 2021 and a further report is going to cabinet on 21 February 2022.</p> <p>This now sits inside normal service planning as part of BAU.</p>			<p>Children Families and Education</p>
<p>iii) Work with London local authorities to safely transfer responsibility for an agreed number of children in</p>	<p>Since the previous quarter update there have been no further transfers of children placed out of borough agreed.</p>		<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director, Children</p>

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Croydon's care to reduce disproportionate burden on Croydon.	24 have been confirmed and work is underway between Croydon and the relevant boroughs to complete the transfers.			Families and Education
iv) Introduce a needs based approach to withdrawing services to young people whose appeal rights are exhausted alongside earlier, robust triple planning as part of their pathway at 16 plus. This will assist and support a planned, safe voluntary return when all legal routes to remain have been exhausted and avoid a forced detention and removal when young people have no recourse to public funds, limited access to NHS and education and cannot work legally in UK.	A planned programme of Human Rights Assessments (HRAs) to inform the decision to safely withdraw services is underway. There are currently 15 young people whose appeal rights are exhausted. All will have an HRA by mid-August.		PUBLISHED COMPLETE	Director Early Help and Children's Social Care

Recommendation 7

The Executive Director Children, Families and Education needs to identify the capacity threshold for the numbers of UASC that it has the capacity to deliver safe UASC services to.

Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
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<p>i) Draw on the analysis and review at 6 (i) to develop options to establish a capacity threshold for Croydon for unaccompanied asylum seeking children that is commensurate with other Local Authorities and in line with the nationally agreed standards and funding.</p>	<p>The voluntary national rate is the equivalent of 0.07% of the child population. In Croydon that equates to 66 children. This underpins the forensic review and modelling completed in 6i</p>	<p>The report to Cabinet on 7 June 2021 explains that if the Borough no longer accepts new unaccompanied asylum-seeking children into care, then the number of such children under 18 in the Borough will fall to 66 by 2023/24.</p> <p>The report also acknowledges that this will not substantially reduce the number of asylum seeking care leavers in the Council's care over that same period.</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director, Children Families and Education</p>
<p>ii) Present options for the Council to deliver safe services within the capacity threshold to the Children's Improvement Board, Cabinet and General Purposes and Audit Committee and Scrutiny & Overview Committee to increase levels of control and improve transparency.</p>	<p>A Cabinet paper on the Council's approach to caring for UASC will be presented on June 7th 2021.</p> <p>More substantive comment required from officer.</p>	<p>Correspondence with the Executive Officer for Children, Families and Education confirmed that the Council's approach to caring for UASC were presented to Cabinet on June 7th 2021. Examination of the report presented confirmed that this detailed the options for the Council to deliver safe services to UASC within the capacity threshold and confirms that the capacity threshold for numbers of UASC is 66 but that Croydon was caring for 205 UASCs. The report further detailed that if the Council were to accept no new UASCs for two years whilst reducing 40 current UASCs, the number of UASC would be within capacity threshold by 2023/24. It was identified that this would result in a budget shortfall of £13m over the next three years.</p> <p>An 'Accompanied Asylum Seeking Children Update' was subsequently</p>	<p>SUBSTANTIALLY COMPLETE</p>	<p>Interim Corporate Director, Children Families and Education</p>

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		<p>provided to the 13 September 2021 Cabinet meeting. A paper 'Update on support for Asylum Seekers in Croydon' was presented to the 17 November 2021 Croydon Children's Continuous Improvement Board. No papers on UASC were noted as being presented to the Overview and Scrutiny Committee or the Children & Young People Sub-Committee during 2021. Although a presentation on UASC and the corresponding risk register entry was made in February 2021, no papers on UASC were noted as being presented to the General Purposes and Audit Committee during 2021.</p>		
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Recommendation 8

The Cabinet reports on the financial position need to improve the transparency of reporting of any remedial action taken to address in year overspends.

Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance and Councillor King, Cabinet Member for Croydon Renewal

Action	Officer comment		Status	Officer accountability
i) A review of financial reporting best practice is to be undertaken and the results used to design reports and a system of reporting that will improve	A process for monthly reporting is being developed with the period 1 report to come to Cabinet June 7 th 2021. These reports will develop iteratively over the coming months.	The 'Croydon Renewal and Improvement Plan - Performance Reporting Framework & Measures; report initially on 12th April 2021 and then the subsequent updates to Cabinet	PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)

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<p>its approach to managing finance, performance and risk to introduce a greater level of transparency and better grip of expenditure. All departments will be required to report against their budgets to the Departmental and Executive Leadership Teams on a monthly basis.</p>	<p>See recommendation 8 – ii for further information on performance monitoring.</p>	<p>on 7th June and 26 July 2021 provided, ‘an update on the implementation of the Council’s Corporate Performance Action Plan and development of the associated performance reports as agreed at Cabinet on the 12 April 2021. The performance, finance and risk report (appendix A) will improve the corporate performance offer by providing timely and accurate performance data on programme / project status, performance against Corporate Renewal Plan KPI’s, and progress against the delivery of financial savings.’ It is noted that the development of the report is an iterative process, with a report detailing the four areas of programmes, finance and risk expected to become available in September 2021. This was in addition to the regular ‘Financial Performance Report’ being provided to Cabinet.</p>	<p>PUBLISHED COMPLETE</p>	<p>Chief Executive</p>
<p>ii) The Council will develop a new corporate framework for monthly reporting that includes finance, performance and risk. This will report to the Executive Leadership Team, Cabinet, General Purposes and Audit Committee and</p>	<p>The Council has developed a new Corporate framework to deliver monthly Corporate Finance, Performance and Risk update reports. These monitor implementation of improvement actions across the Council (including those contained in the RIPI and as part of the CRP) and set out KPIs and accountable officers.</p>	<p>Examination of the Executive Leadership Team (ELT) /Corporate Management Team (CMT) forward planner confirmed that the ‘Corporate Finance, Performance and Risk’ report was a monthly agenda item, being reported at the 4th meeting each month.</p>		

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<p>Scrutiny and Overview Committee as appropriate.</p> <p>The new framework will include progress against service delivery, departmental actions plans, savings opportunities and actions contained within the Croydon Renewal Plan. All actions will be assigned to accountable people (including relevant cabinet member) and will be tracked through a central reporting team to ensure that the process is joined up, consistent and timely. This will be a recognised Programme Management Office function using savings and actions trackers</p>	<p>The PMO presented an approach to monthly Corporate, Finance, Performance Risk Reporting to Cabinet on April 12th.</p> <p>The June 7th Corporate Finance, performance & Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.</p> <p>The monthly reports will develop over time as recommendations are progressed.</p>	<p>In addition to the updates to the 12th April, 7th June and 26 July 2021 Cabinet meetings, 'Corporate Finance, Performance & Risk' reports were confirmed to be reported to the October and November 2021 Cabinet meetings.</p> <p>First iteration of report now developed and shared. Updates are scheduled to come to Cabinet monthly.</p>		
<p>iii) A review of the capacity within the Finance Team to ensure there is adequate support for departmental cost centre managers to fulfil their responsibilities as budget holders.</p>	<p>Additional capacity provided through £1m budget increase approved in March budget – currently funding extra capacity using agency staff</p> <p>Role of Executive Director has been advertised and is now closed</p> <p>Restructure proposals being put together for consultation for January advertising campaign</p>		PUBLISHED COMPLETE	<p>Interim Director of Finance (Deputy S151)</p>

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Recommendation 9 – HIGH PRIORITY

The Council (including Cabinet and Scrutiny and Overview Committee) need to show greater rigor in challenging underlying assumptions before approving the budget including understanding the track record of savings delivery.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal/ Callton Young, Cabinet Member for Resources and Financial Governance

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
<p>i) To support the Annual Budget setting process Budget Development Meetings will be held for each department and will be attended by Executive Directors, Corporate Leadership Team and Members with accountability for their service area and staff who are responsible for service delivery that understand what impact growth and savings plans will have on the services. To support this process Members will be provided with a clear set of proposals that demonstrate cost pressures (growth) and savings opportunities with narrative and comparators</p>	<p>Proposals were provided to members with a formal decision in November Cabinet. Saving opportunities for 21/22 were set out across all services and have been incorporated into delivery of Croydon Renewal Plan.</p> <p>The Council recognises further savings will be necessary to achieve a sustainable budget in the long term. Discussions for further savings next year will be scheduled starting from April 2021.</p>	<p>Item 87/20b to the Cabinet meeting held on 25 November 2021 was to:</p> <ul style="list-style-type: none"> □ ‘Consider the additional in-year savings for 2020/21 that will be presented to the extraordinary meeting of Full Council on 1 December 2020 to respond to the S.114 notice. □ Consider and recommend to Full Council the savings proposals for consultation as set out in this report for the Medium Term Financial Strategy and 2021/24 and note that consultation will begin on 9 December 2020.’ Appendix B of the paper, the ‘Schedule of Proposals for Savings & Investment in 2021/22’ provided narrative explaining each savings proposal. <p>The MTFS update report to the Cabinet meeting on 12 July 2021 detailed that, ‘Further detailed work around Budget</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>

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<p>on budget and outcomes delivered to describe the impact of the decisions that are required to be taken.</p>		<p>Development is ongoing within the Council and it is too early at this stage to reflect any specific details as such plans have not been fully validated. It was also confirmed that a 'Budget Development Group' had been set up, with updates on the work of the Group being provided to the ELT meetings held on 4 and 10 August 2021.</p>		
<p>ii) To support the budget exercise the Council will seek external support to test the draft budget proposals, seek ideas and good practice and will take the same approach by seeking support for the scrutiny process.</p>	<p>Various support from external sources has been utilised to date to offer capacity and advice. This includes the LGA, Centre for Governance and Scrutiny, Council peers and CIPFA. The Council will continue to use such opportunities moving forward.</p>	<p>It is evident that the Council has received support and advice from a variety of external sources, including the LGA, the MCHLG and CIPFA, leading up to and subsequent to the S114 notice being issued in 2020. This has also included temporary appointment of experts, such as Financial Consultants, the Governance Improvement Adviser and the Improvement Plan Support Officer, each of whom also have networks to draw from.</p> <p>An example would be, as detailed in 1A(iv) above, the appointment of a DfE advisor, who commenced their 'role on 22 February 2021 on a 9 month contract month contract to look at improvements and transformation within Croydon's Children's Services Finance'. Another example would be that each of the ELT Away Day Cost Comparison exercises in January 2021 clearly drew on MCHLG data to help benchmark costs.</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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<p>iii) Develop a budget savings tracker that profiles savings by month to enable Members to track that savings are on target. This will need to correlate with the finance, performance and risk reporting that Council will introduce.</p>	<p>An in year savings tracker has been developed to monitor identified savings and escalate any delivery challenges. In year savings are rag rated based on confidence in delivery.</p>	<p>It was confirmed that a 'LBC Delivery Tracker' Power BI tool has been internally developed by the Council to monitor each of the agreed savings. Screen prints from the tool demonstrate that monthly progress is detailed for each saving, along with a RAG rating on progress and likelihood of achievement. It was also confirmed that 'Financial Monitoring' reports were provided to Cabinet for months 1 and 2 of 2021/22, which provided a summary of Extract from April 2021 update report Summary of Internal Audit work – Evidence Ref Recommendation Action Progress made to date Updated obtained and seen Deadline the 'MTFS Savings risk' (i.e. the savings at risk for each month).</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>
<p>iv) To increase understanding of the choices Cabinet Members are making with regards to the emerging budget and to effectively challenge budget assumptions, Scrutiny and Overview Committee Members to receive regular briefings on the progress of budget setting.</p>	<p>Budget Discussions were conducted across January and February 2021. This included focused discussion on the 21/22 budget for specific directorates. Discussion took place at Children and Young People Sub-Committee, Health & Social Care Sub-Committee, at Scrutiny, Streets, Environment & Homes sub-committee and finally the Scrutiny & Overview Committee.</p> <p>The Council will continue to brief Scrutiny committees on budget matters. Work is ongoing to further develop the process for budget scrutiny with conversations ongoing with Scrutiny Chairs. A date is</p>	<p>Discussion confirmed that budget discussions were held. Information obtained in support of 1b(ii) above helped substantiate this, for example the 'Health, Wellbeing and Adults Budget Development Session' dated 1 October 2020 and the 'ACS Budget Workshop' in November 2021. It was confirmed that budget reports were taken to the :</p> <ul style="list-style-type: none"> <input type="checkbox"/> The Scrutiny Children & Young People SubCommittee meeting held on 19 January 2021 <input type="checkbox"/> The Scrutiny Streets, Environment & Homes Sub-Committee meeting held on 2 February 2021 	<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>

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	<p>held in the Forward Plan to ensure SOC has the chance to challenge the proposed budget for 2022/23.</p>	<p><input type="checkbox"/> The Scrutiny and Overview Committee meeting held on 16 February 2021</p> <p><input type="checkbox"/> The Scrutiny Health & Social Care SubCommittee meeting held on 26 January 2021</p> <p>The Council's Forward Plan includes an item for 'Budget Scrutiny, including questions to the Leader and Cabinet Members' for the Scrutiny and Overview Committee in February 2022.</p>		
<p>v) To review the budget setting-timetable to ensure that the Scrutiny & Overview Committee has the time to digest and review the budget proposals and underlying assumptions and for Cabinet to respond fully to any challenge or comments and for Cabinet to be able to consider changing its proposals.</p>	<p>The Council is taking action to ensure budget discussions happen at an earlier date and more opportunities are offered to members to offer input into the budget and review its management. These actions include finalisation of Council meetings forward plan up until April 2022 with dates marked for policy discussions and monthly financial performance updates at Cabinet.</p> <p>Additionally, budget developments meetings will begin in Spring 2021 as opposed to Autumn meaning savings will be identified and shared with members earlier in year. An MTFS update is scheduled for Cabinet in October.</p> <p>The Council will continue to brief Scrutiny committees on budget matters. Work is ongoing to further develop the process for budget scrutiny with conversations</p>	<p>The copy of the forward plan provided is up to the 31 March 2022 and includes monthly financial performance updates at Cabinet as well as dates for budget review and approval in January and February 2022.</p> <p>As noted in LBC Rec. 3 (ii) below, the 'Member Learning and Development Needs 2021-22' includes:</p> <p>1) 'Series of Finance Training' of which Treasury Management was delivered in March 2021, with sessions on 'Financial management /Budget setting', 'Financial Strategy and Monitoring', 'Commercial Investment', Council's funding sources / reserves', 'Transformation funding' and 'Commissioning and Procurement being planned.</p> <p>2) 'Education Funding and Budgets' which was 'Delivered to CYP Scrutiny</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>

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	<p>ongoing with Scrutiny Chairs. A date is held in the Forward Plan to ensure SOC has the chance to challenge the proposed budget for 2022/23.</p>	<p>and members of both Cons and Lab Groups' in January 2021.</p> <p>3) Adult Social Care Budget' which was a 'Briefing held for members of the Health and Social Care Sub-Committee' in June 2021.</p> <p>The MTFS update report to the Cabinet meeting on 12 July 2021 detailed that, 'Further detailed work around Budget Development is ongoing within the Council and it is too early at this stage to reflect any specific details as such plans have not been fully validated.' It was also confirmed that a 'Budget Development Group' had been set up, with updates on the work of the Group being provided to the ELT meetings held on 4 and 10 August 2021.</p>		
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Recommendation 10

The General Purposes and Audit Committee must challenge officers on the progress in implementing the Financial Consultant's recommendations to improve the budget setting, monitoring and reporting process and actions to address the Head of Internal Audit's concerns on internal controls.

Member Accountability: Councillor Karen Jewitt, Chair of General Purposes and Audit Committee

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) Delivery of the Financial Consultant's recommendations and the Head of Internal Audit's	As Reported to General Purposes and Audit Committee (16 th Sep 2021), 48 of the recommendations have been embedded into business as usual or		IN-PROGRESS	Interim Corporate Director of

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<p>concerns will be reported to the General Purposes and Audit Committee and to the Improvement Board as part of the Croydon Renewal Plan.</p>	<p>completed as required one-off tasks. This includes all the priority 1 to 3 tasks</p> <p>27 tasks remain to be fully completed or embedded and are designated as amber risk as they remain to be completed</p> <p>These remaining tasks largely relate to activities that take place once a year as part of budget setting or year-end work and are thus pending.</p> <p>There will be an update to GPAC in April [incl. date]</p>			<p>Resources (Section 151)</p>
<p>ii) That a piece of work be undertaken to clarify the roles of GPAC and Scrutiny to reduce duplication and ensure right things are being reviewed at the right time</p>	<p>Updates on phase 1 of the Finance Review are currently scheduled on the GPAC work plan up until September including updates on phase 1. It is suggested that it remain this way but Scrutiny call in as they feel appropriate to ensure correct level of challenge. The next update will be received at GPAC in September 2021 with a further update provisionally scheduled for February 2022.</p> <p>Phase 2 and 3 of the finance review have been paused to prioritise other pieces of work.</p> <p>The respective roles of GPAC and Scrutiny will be clarified as part of the wider review of the Constitution. (see LBC Recommendation 1)</p>		<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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Recommendation 11
The s151 officer needs to revisit the Growth Zone assumptions following the pandemic and make recommendations to Cabinet and Council for the continued investment in the scheme.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
<p>i) The Council have commissioned PwC to undertake a strategic review of the Growth Zone with completion expected November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.</p>	<p>PwC report to cabinet made recommendations on future of Growth Zone. These are now being implemented</p>	<p>It was confirmed that the PwC report was produced and was reported to the Cabinet meeting held on 25 November 2020, which included a review of the Growth Zone. This report detailed that, 'Given the current economic uncertainty, the steps the Council have taken to review and revise down the ambitious investment plan for Growth Zone are sensible' and that, 'Any Subsequent increase in planned investment should be supported by a business case and taken through robust governance and sign off processes for full scrutiny.'</p> <p>A subsequent paper specifically on the Growth Zone was approved at the Cabinet meeting held on 22 March 2021. The paper sought approval to continue to fund key priority projects and activities in the short term, while a further report would be brought back to Cabinet later in the year setting out</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>

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		future years' capital expenditure requests for the Growth Zone programme. The Council's forward planner details that a 'Growth Zone Update' be presented to Cabinet in December 2021.		
ii) Revised financial model profile to be presented alongside budget review in February 2021 to Cabinet, General Purposes and Audit Committee and the Scrutiny and Overview Committee.	<p>Budget report for 6th December sets out the current progress in bridging the £38m gap for 2022/23 and set out many of the risks the Council faces.</p> <p>Further reports on the budget in January and February will build on that position and fully address points raised in this item.</p> <p>Tracker on budget proposals adopted and is tracking progress with an audit log to identify changes to proposals and remaining gap.</p> <p>Monthly monitoring report full details of risks and opportunities alongside forecast in-year position.</p>		PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)
iii) Cabinet paper with revised profile and recommendations to be issued March 2021.	See 11ii	It was confirmed that the PWC report was produced and was reported to the Cabinet meeting held on 25 November 2020, which included a review of the Growth Zone. This report detailed that, 'Given the current economic uncertainty, the steps the Council have taken to review and revise down the ambitious investment plan for Growth	PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)

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		<p>Zone are sensible’ and that, ‘Any subsequent increase in planned investment should be supported by a business case and taken through robust governance and sign off processes for full scrutiny.’</p> <p>A subsequent paper specifically on the Growth Zone was approved at the Cabinet meeting held on 22 March 2021. The paper sought approval to continue to fund key priority projects and activities in the short term, while a further report would be brought back to Cabinet later in the year setting out future years’ capital expenditure requests for the Growth Zone programme. The Council’s forward planner details that a ‘Growth Zone Update’ be presented to Cabinet in December 2021.</p>		
<p>iv) The Council needs a mechanism in place to review projects to use the learning to inform any future work. This should be extended across all areas of the Council, with learning retained centrally as a corporate resources</p>	<p>The Programme Management Framework has been developed and published on the intranet and shared with the Community of Practice. Further work is needed to embed the process across the organisation.</p> <p>Internal Audit have flagged the process put in place as not fully embedded.</p>		<p>IN- PROGRESS</p>	<p>Director of Policy, Programmes and Performance</p>

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Recommendation 12 – HIGH PRIORITY				
The s151 officer should review the financial rationale and associated risks and make recommendations to Cabinet and Council on whether the Revolving Investment Fund should continue.				
Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal				
Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) The Council have commissioned PwC to undertake a strategic review of the Revolving Investment Fund with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	<p>Report by PwC on governance & strategic review delivered in November 2020 to Cabinet.</p> <p>Treasury Management strategy updated 1st March 2021 limits new lending under the RIF to BBB working capital loans only</p>	<p>It was confirmed that the PwC report was produced and was reported to the Cabinet meeting held on 25 November 2020, which included a review of the Revolving Investment Fund.</p> <p>The paper detailed that, 'The RIF has not been revolving, because very few of the loans have repaid with £208.8m* tied up in BBB loans with no interest received to date.' The Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022 approved by Cabinet at the meeting held on 1 March 2021 detailed that, 'No new investments other than a loan for working capital to Brick by Brick will be made in 2021/22.'</p> <p>This was also presented to Council on 8 March 2021, but minutes of this meeting are not yet available.</p>	PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)

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<p>ii) Recommendations to be presented alongside budget review in Feb 2021 to Cabinet, General Purposes and Audit Committee and Scrutiny and Overview</p>	<p>As requested, budget position and proposals / risks will be presented to GPAC.</p> <p>Internal Audit have flagged the process put in place as not fully embedded. Status has been moved from complete to in-progress.</p> <p>Whilst reports have not been provided to all the committees listed, the fund is closed and therefore this action is considered to be complete.</p> <p>A report will be submitted to Cabinet in May.</p>		<p>COMPLETE Q4</p>	<p>Interim Director of Finance (Deputy S.151)</p>
<p>iii) Cabinet paper with recommendations to be issued March 2021.</p>	<p>See recommendation 12i</p>	<p>It was confirmed that the PWC report was produced and was reported to the Cabinet meeting held on 25 November 2020, which included a review of the Revolving Investment Fund. The paper detailed that, 'The RIF has not been revolving, because very few of the loans have repaid with £208.8m* tied up in BBB loans with no interest received to date.'</p> <p>The Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022 approved by Cabinet at the meeting held on 1 March 2021 detailed that, 'No new investments other than a</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Director of Finance (Deputy S151)</p>

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		loan for working capital to Brick by Brick will be made in 2021/22.' This was also presented to Council on 8 March 2021, but minutes of this meeting are not yet available.		
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Recommendation 13

The s151 officer should review the purchase of Croydon Park Hotel to identify lessons learned to strengthen future due diligence arrangements.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) The Council have commissioned PWC to undertake a strategic review of assets that have been purchased with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	On February 18 th Cabinet agreed the approach set out in the Interim Assets Strategy. This included, in the appendices, options for an approach on the future of Croydon Park Hotel. An update with a decision on the future of Croydon Park Hotel is provisionally scheduled for September 2021.	It was confirmed that the PWC report was produced and was reported to the Cabinet meeting held on 25 November 2020, which included a review of the Asset Investment Fund, including the purchase of the Croydon Park Hotel. Appendix 2 and part 8 of the Interim Assets Disposal Strategy report approved by Cabinet at the meeting held on 18 February 2021 was a 'Summary of Options considered for Croydon Park Hotel.' The agreed action/s was to: 1) Appoint real estate advisors to prepare the marketing strategy for approval by the Council to be procured under the Council's Tender and Contract Regulations.	PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)

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		2) Subject to approval of the strategy, the Council will then seek to appoint the firm to manage the sales process and present bids/offers for the Council to approve also to be procured under the Council’s Tender and Contract Regulations		
ii) Recommendations, including lessons learned, will inform changes required to governance arrangements and training/development that might be required. These recommendations to be presented alongside budget review in February 2021 to Cabinet, General Purposes and Audit Committee and Scrutiny and Overview.	<p>A paper is being presented to the Cabinet Member for Croydon Renewal and the Cabinet Member lead for Resources on 21 December 2021. The objective is that this paper is progressed to General Purposes and Audit Committee at the earliest opportunity. The focus of the paper is:</p> <ul style="list-style-type: none"> Review of lessons learned from the acquisition of Croydon Park Hotel with a view to strengthen due diligence and governance arrangements going forward. This has been reviewed by IAP, with useful commentary and provided to Corp Dir Resources & Deputy s151 for comments, which area awaited. This draft is with Cabinet Member Croydon Renewal & Cabinet Member for resources whom are meeting on this 14/02 in order that it can then move to GPAC to complete the 		IN- PROGRESS	Interim Director of Commercial Investment

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	<p>process, as Part B due to commercial sensitivities.</p> <ul style="list-style-type: none"> • Property Investment Performance - in particular focussing on the performance of Colonades, Vulcan Way & Imperial Way, as well as reflection on why L.B. Croydon investment performance might differ from private sector investment performance. This will include matters such as the imposition on our operators of London Living Wage, selection of occupiers aligned to corporate objectives and administration. • Update on emerging Asset Strategy, which shall update and continue the work from the Interim Asset Disposal Strategy (Feb 2021). • Commercial Performance / Lessons learnt from Croydon Park Hotel. 			
<p>iii) Review and re-write the asset investment strategy that was approved by Cabinet in October 2018 incorporating advice from each of the Strategic Reviews. The review will</p>	<p>A consultant has been appointed and progress is being made. However there will be an 8 week delay in taking the strategy to Cabinet. The strategy is now scheduled to go to March 22 Cabinet.</p>		<p>IN- PROGRESS</p>	<p>Interim Director of Commercial Investment</p>

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explicitly consider best practice from the sector and lessons learned from other local authorities, the external auditor and the National Audit Office on effective investment practice.	An external consultant has been appointed to produce the asset investment strategy which remains in progress and in line with the revised timetable.			
iv) Cabinet paper with recommendations to be issued March 2021. Update to be provided at Scrutiny on 9 th February	The Interim Assets Disposal Strategy, was discussed at both Cabinet and Scrutiny & Overview Committee in February.	The Interim Assets Disposal Strategy report was approved by Cabinet at the meeting held on 18 February 2021.	PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)

Recommendation 14 – HIGH PRIORITY

The Cabinet and Council needs to re-consider the Treasury Management Strategy for ongoing affordability of the borrowing strategy, the associated risks and identify whether alternative options can reduce the financial burden.

Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance and Councillor King, Cabinet Member for Croydon Renewal

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) The Treasury Management Strategy will be reviewed as part of the budget setting for 2021/22 and will take into consideration the outcome of the strategic reviews to factor in the overall financial position and best practice from other local	Treasury Management strategy updated and agreed by Council on 8 th March 2021	The Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022 was approved by Cabinet at the meeting held on 1 March 2021. The above document along with 'Council Tax and Budget' was also presented to Council at the meeting held on 8 March 2021. The minutes of	PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)

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authorities. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.		this Council meeting are not yet available		
ii) The outcome of the strategic reviews that the Council have commissioned will inform the Treasury Management Strategy for 21/22 onwards and any changes in governance that may be required.	See recommendation 14i	The Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022 was approved by Cabinet at the meeting held on 1 March 2021. The above document along with 'Council Tax and Budget' was also presented to Council at the meeting held on 8 March 2021. The minutes of this Council meeting are not yet available.	PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)

Recommendation 15

The Chief Executive should arrange detailed Treasury Management training to assist Members to better understand and challenge the long-term financial implications of matters reported within the Treasury Management Strategy.

Cabinet Member Accountability: Councillor Young Cabinet Member for Resources and Financial Governance

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) Members to attend training sessions facilitated by the Local Government Association to cover treasury	Treasury management training was offered to all members on the 3 rd March 2021.	The 'Member Learning and Development Needs 2021-22' includes a 'Series of Finance Training' of which Treasury Management was delivered on in March 2021. A copy of	PUBLISHED COMPLETE	Chief Executive

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<p>management to enable better and effective financial leadership.</p>	<p>Session was recorded and will be distributed to all Members and all budget managers.</p>	<p>the diary entry of the training held on 3 March 2021 for 'Treasury Management Training' was obtained that confirmed that all members of the Council had been invited.</p> <p>It was confirmed that a copy of the recorded training session – 'Treasury Management Training-0210303_170739-Meeting Recording.mp4' had been retained on SharePoint.</p>		
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Recommendation 16

The s151 officer should revisit the Minimum Revenue Provision policy to demonstrate that a prudent approach is being taken.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
<p>i) Link Asset Management has been commissioned to carry out a review of the Minimum Revenue Position policy. The report with recommendations will be discussed with General Purposes and Audit Committee and then on to Cabinet.</p>	<p>Minimum Revenue Provision being re-calculated and forecast based on capital proposals and likely capital receipts and is being determined in accordance with regulations pertaining to MRP and policy.</p> <p>Work in progress (MRP policy) – Update to Cabinet is scheduled for February 22.</p> <p>This is covered in the MTFs and Treasury Strategy that are being submitted to Cabinet in February and then full Council.</p>		<p>COMPLETE Q4</p>	<p>Interim Director of Finance (Deputy S.151)</p>

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Recommendation 17				
The Cabinet and Council should reconsider the financial business case for continuing to invest in Brick by Brick before agreeing any further borrowing.				
Cabinet Member Accountability: Councillor Hamida Ali, Leader of the Council				
Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) PwC has been commissioned to undertake a strategic review of Brick by Brick with completion expected in November 2020. The report with recommendations regarding the financial business case will be reviewed by the Scrutiny and Overview Committee prior to being presented to Cabinet.	The decision to wind the company down but complete key sites between now and 2023/24. The PwC report was taken to Scrutiny...xx		COMPLETE Q4	Interim Director of Commercial Investment
ii) Council to review the risks relating to Brick by Brick to ensure they are appropriately listed on the risk register	The Risks for Brick by Brick have been reviewed and are as follows per the Corporate Risk Register: 1. Investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC).	It was confirmed that risk RCS0027 'There is no effective challenge, review, investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC)' was added to the was added to the Council's risk management system on 19 May 2021.	PUBLISHED COMPLETE	Interim Director of Finance (Deputy S151)

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	<p>2. There is no effective challenge, review, investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC).</p> <p>**These risks specifically relate to financial strategy, treasury management strategy (including borrowing), capital investment strategies and appropriateness of continuing investment and association with BBB**</p> <p>The Corporate Red Risk Register is reviewed monthly at ELT to review and update risks where necessary.</p>	<p>The following risks, relating specifically to Bick by Brick and other subsidiaries were also noted, namely:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Risk FIR051 'Risk of financial loss and reputational damage due to the poor performance of Brick By Brick including the Fairfield Halls refurbishment project. <input type="checkbox"/> Risk FIR036 'Robust governance & risk management procedures / frameworks are not activated to safeguard the interests (financial & reputational) of the Council and it's taxpayers within all subsidiary organisations where the Council has an interest.' 		
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Recommendation 18 – HIGH PRIORITY
The Cabinet and Council should review and reconsider the ongoing financial rationale for the Council in the equity investment arrangement with Brick by Brick.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
<p>i) PwC has been commissioned to undertake a strategic review of Brick by Brick. The report and recommendations will</p>	<p>This paper went to Scrutiny & Overview Committee and Cabinet in February 2021.</p> <p>The Cabinet paper noted that the Council has never made any equity payments, as planned, and is not in the financial</p>	<p>It was confirmed that the PWC report was produced and was reported to the Cabinet meeting held on 25 November 2020, which included a review of Brick by Brick and also the Revolving</p>	<p>PUBLISHED COMPLETE</p>	<p>Chief Executive</p>

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<p>consider the ongoing financial rationale and equity invested and will detail options for the Council that will be considered by the Scrutiny & Overview Committee Cabinet prior to being presented to Cabinet.</p>	<p>position to do so. It was noted BBB sales proceeds were meant to be placed in an account for the Council to apply interest repayment and, if excess, to substantive loan repayment. Unfortunately, this process has not occurred and instead sale proceeds were retained by BBB effectively replacing the Council's equity share.</p> <p>The Council needs to review existing arrangement, change the current agreements or replace it with fresh loans.</p> <p>It is recommended that the current arrangements continue but in a modified way to give Brick by Brick capacity to have working capital to ensure that funds are available to build out units on site</p>	<p>Investment Fund. The paper detailed that, 'The RIF has not been revolving, because very few of the loans have repaid with £208.8m* tied up in BBB loans with no interest received to date.'</p> <p>A report on the 'Review of Brick by Brick Croydon Ltd' was approved by Cabinet on 18 February 201 that 'revised funding arrangements be entered into with Brick by Brick to reflect the current loan positions and proposals for the future, including, where relevant, moving to a 100% debt funding position (as opposed to 25% equity and 75% debt); extending relevant loans and repayment periods; allowing delays with repayments of existing loans; agreeing to further funding of no more than £9.99 million in relation to sites proposed for Brick by Brick to continue developing ...'</p> <p>This was also presented to Council on 29 March 2021, but the minutes of this meeting are not yet available. The Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022 approved by Cabinet at the meeting held on 1 March 2021 detailed that, 'No new investments other than a loan for working capital to Brick by Brick will be made in 2021/22.' This</p>		
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		was also presented to Council on 8 March 2021, but minutes of this meeting are not yet available.	
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Recommendation 19

The s151 officer and monitoring officer should monitor compliance with loan covenants with Brick by Brick and report any breaches to Members.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
<p>i) Loan covenants are within scope of the PwC strategic review and will be considered as part of the overall recommendations.</p> <p>A review of the existing loan covenants and their governance is to be undertaken. Learning from this review, a new system of control for all loan agreements entered into by the Council will be presented to Members and this will form part of the new Corporate Finance, Performance and Risk reporting system.</p>	<p>Loan agreements to be redrafted to provide a comprehensive single agreement</p> <p>The February Cabinet report agreed that detail of the revised loan scheme be delegated to the Chief Executive after consultation with the leader and appropriate lead members.</p> <p>Taken to cabinet in November.</p> <p>Presented to GPAC & Scrutiny and Overview Committee in xxx</p>	<p>The 'Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022' presented to the February 2021 Cabinet meeting detailed that, 'The RIF [Revolving Investment Fund] also acted as a funder to the Council's Housing Development Company Brick by Brick, enabling the development of homes in the Borough. The Council has commissioned a review of the RIF which was reported to the Cabinet in November 2020. No new investments other than a loan for working capital to Brick by Brick will be made in 2021/22.' There is no evidence of the review and proposed new system for loan covenants being presented to GPAC & Overview Committee prior to being presented to Cabinet for approval.</p>	<p>COMPLETE Q4</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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<p>The review and the proposed new system for loan covenants will be presented to GPAC & Scrutiny and Overview Committee prior to being presented to Cabinet for approval.</p>		<p>No clear metrics have been provided for the proposed system governing loan covenants as forming part of the new Corporate, Finance, Performance and Risk reporting system.</p>		
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Recommendation 20 – HIGH PRIORITY

The Cabinet and Council should review its arrangements to govern its interest in subsidiaries, how the subsidiaries are linked, and the long-term impact of the subsidiaries on the Council's financial position and how the Council's and taxpayers' interest is safeguarded.

Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
<p>i) An audit of the Council's approach to membership of each subsidiary board will be undertaken. The audit will involve officers of the Council and any Chairs/Members of company boards.</p>	<p>A working group was established to work through the existing list of companies that the Council has an interest in. Relevant officers and Directors of company boards were invited to present a paper at each of the working group meetings to discuss the company/companies they are involved with.</p> <p>These informed renewed governance arrangements which were approved by Cabinet on 26th July 2021, establishing the Croydon Companies' Supervision and Monitoring Panel (CCSMP) and approving its terms of reference.</p>		<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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	As part of a refreshed approach to membership the S151 Officer in consultation with the Chief Executive, has delegated authority to appoint and remove nominated Directors from the board of Group entities.			
ii) As part of this review the membership balance of the boards will be considered in aggregate in regard to best practice for achieving diversity, skill set, sectoral knowledge and Croydon Council representation.	<p>The terms of reference for CCSMP includes the following: <i>“In fulfilling its responsibilities the CCSMP will: Evaluate effectiveness of Group entity board governance structure and processes and recommend changes as required, including with a view to achieving diversity, skill set, sectoral knowledge and appropriate representation.”</i></p> <p>This measure will help ensure diversity, equality and inclusion aspects will be considered in all future decisions on membership.</p>		PUBLISHED COMPLETE	<p>Interim Corporate Director of Resources (Section 151)</p> <p>Interim Director of Finance (Deputy S151)</p>
iii) External guidance on best practice will be sought. Roles, responsibilities and legal requirements for local authority company directors and guidance on skill set will be sought and this will include the best way to assess the competence of Members and Chief Officers for these roles.	<p>Principles of Good Governance have been embedded within the terms of reference for CCSMP. These principles consider best practice at other local authorities including Nottingham City Council, Birmingham City Council, Ealing Council and Wirral Council.</p> <p>Furthermore, the terms of reference include the following:</p>		PUBLISHED COMPLETE	Interim Corporate Director of Resources (Section 151)

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	<p><i>“In fulfilling its responsibilities the CCSMP will: Receive updates and training in respect of best practice for company governance and associated matters”</i></p> <p>External guidance will be continually sought as BAU.</p>			
<p>iv) Process for identifying gaps in knowledge and or experience will be brought forward to include training considerations. If necessary interim arrangements will be made to remove risks and ensure effective governance.</p>	<p>The Principles of Good Governance, which are embedded within the terms of reference for CCSMP, include the following:</p> <ul style="list-style-type: none"> • <i>“Directors of the Group entity must act for the entity, declaring and avoiding any actual or apparent conflict of interest. The Group entity should have skills appropriate to the sector and roles. To ensure this is achieved the Board should have mandatory training including induction, an annual training programme and guidance notes. An annual skills audit and triennial independent review should be used to support the entity Board and identify appropriate external expertise</i> • <i>Council nominated directors and member representatives to receive mandatory training on an annual basis and appropriate indemnity arrangements to be ensured”</i> 		<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p> <p>Interim Director of Finance (Deputy S151)</p>

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	As explained above (20i), the ability to appoint and remove Directors has also been delegated			
v) Essential mandatory training will be undertaken on an annual basis and the retention of the director role for each Councillor and Council official will rely on completion of the recommended training.	<p>Company Director training with the Council’s external legal partners was delivered on 1 February 2022.</p> <p>Responsibility to continue as BAU.</p> <p>The first CCSMP report is expected to be presented to Cabinet in March 2022.</p>		IN-PROGRESS	Interim Corporate Director of Resources (Section 151)
vi) The impact of these changes will need to be reflected in the Council’s Constitution and relevant protocols.	<p>Changes to the constitution will be considered as part of the wider changes to be implemented for the constitution.</p> <p>CCSMP will liaise with the relevant working group dealing with the Council’s constitution changes.</p> <p>The first CCSMP report is expected to be presented to Cabinet in March 2022.</p> <p>Get update from Heather Wills</p>		IN-PROGRESS	Interim Corporate Director of Resources (Section 151)
vii) Support for the effective governance of the Council’s subsidiaries and retaining a corporate overview of activity of individual companies and the whole group of companies is to be developed.	<p>Responsibility to continue as BAU.</p> <p>The first CCSMP report is expected to be presented to Cabinet in March 2022.</p> <p>CCSMP will meet monthly to retain overview over subsidiaries.</p> <p>These recommendations were addressed via the establishment of a working group</p>		IN-PROGRESS	Interim Corporate Director of Resources (Section 151)

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	<p>to address the recommendations in the PwC review of Companies. This review focused on the following areas:</p> <ul style="list-style-type: none"> • BxB • AIF • RIF • Growth Zone <p>The first order of business for the group was a decision to expand the remit to all council companies.</p> <p>This group presented a report to Cabinet in September last year, establishing themselves as an internal control board (Croydon Companies Supervision and Monitoring Panel – CCSMP).</p> <p>CCSMP is chaired by the s151 and meet monthly. The Panel provides formal updates to both Cabinet & GPAC/Scrutiny. I have attached the actions and minutes from the last meeting (the next meeting is on 14th February 2022).</p>			
<p>viii) Raise awareness of the timing of the Annual General Meetings of subsidiaries amongst Members.</p>	<p>Responsibility to continue as BAU.</p> <p>The first CCSMP report is expected to be presented to Cabinet in March 2022.</p> <p>These recommendations were addressed via the establishment of a working group to address the</p>		<p align="center">IN- PROGRESS</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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	<p>recommendations in the PwC review of Companies. This review focused on the following areas:</p> <ul style="list-style-type: none"> • BxB • AIF • RIF • Growth Zone <p>The first order of business for the group was a decision to expand the remit to all council companies.</p> <p>This group presented a report to Cabinet in September last year, establishing themselves as an internal control board (Croydon Companies Supervision and Monitoring Panel – CCSMP).</p> <p>CCSMP is chaired by the s151 and meet monthly. The Panel provides formal updates to both Cabinet & GPAC/Scrutiny. I have attached the actions and minutes from the last meeting (the next meeting is on 14th February 2022).</p>			
<p>ix) Cost effective mechanism to publish Board membership of Council subsidiaries to be investigated</p>	<p>Responsibility to continue as BAU.</p> <p>The first CCSMP report is expected to be presented to Cabinet in March 2022.</p> <p>These recommendations were addressed via the establishment of a working group to address the recommendations in the</p>		<p align="center">IN- PROGRESS</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

**APPENDIX 1b - ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST OCTOBER 2020 – STATUS ALL ACTIONS
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	<p>PwC review of Companies. This review focused on the following areas:</p> <ul style="list-style-type: none"> • BxB • AIF • RIF • Growth Zone <p>The first order of business for the group was a decision to expand the remit to all council companies.</p> <p>This group presented a report to Cabinet in September last year, establishing themselves as an internal control board (Croydon Companies Supervision and Monitoring Panel – CCSMP).</p> <p>CCSMP is chaired by the s151 and meet monthly. The Panel provides formal updates to both Cabinet & GPAC/Scrutiny. I have attached the actions and minutes from the last meeting (the next meeting is on 14th February 2022).</p>			
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LBC Recommendation 1

Given the challenges ahead there will need to be improvement of the Council’s approach to risk management to enable a satisfactory turnaround of the financial position.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

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Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
<p>i) An externally led review of the Council's appetite for risk needs to be undertaken with Members and Officers to ensure that the council's financial capacity for managing risk is fully understood.</p>	<p>The Council has undertaken benchmarking in relation to ear-marked and General Fund reserves and our general reserves compare favourably to outer London Boroughs.</p> <p>An external review will be undertaken at a future date once we've fully completed internal reviews.</p> <p>Risk factors are being incorporated into monthly monitoring reports and throughout budget setting process.</p> <p>Level of risk and appetite is being assessed and is being incorporated into the strategy of rebuilding general and earmarked reserves accordingly.</p>		<p align="center">IN- PROGRESS</p>	<p>Interim Director of Finance (Deputy Section 151)</p>
<p>ii) Corporate Finance, Performance and Risk management to be combined into one reporting function to remove silo thinking and increase the rigour to enable delivery of services, savings plans and the overarching Improvement Plan. This will require one new unified system of corporate reporting.</p>	<p>PMO developing initial Corporate Finance, Performance and Risk report.</p> <p>These reports will be developed monthly and will provide updates from across the Council on key KPIs. A Cabinet report on the process of reporting was provided on April 12th 2021.</p> <p>The June 7th Corporate Finance, performance & Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to</p>	<p>Please also refer to 8(i) above. The 'Croydon Renewal and Improvement Plan - Performance Reporting Framework & Measures; report initially on 12th April 2021 and then the subsequent updates to Cabinet on 7th June and 26 July 2021 provided, 'an update on the implementation of the Council's Corporate Performance Action Plan and development of the associated performance reports as agreed at Cabinet on the 12 April 2021. The performance, finance and risk report</p>	<p align="center">PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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	<p>produce a full set of corporate performance reports by September 2021 Cabinet.</p> <p>The monthly reports will develop over time as recommendations are progressed.</p>	<p>(appendix A) will improve the corporate performance offer by providing timely and accurate performance data on programme / project status, performance against Corporate Renewal Plan KPI's, and progress against the delivery of financial savings.'</p> <p>It is noted that the development of the report is an iterative process, with a report detailing the four areas of programmes, finance and risk expected to become available in September 2021.</p> <p>This was in addition to the regular 'Financial Performance Report' being provided to Cabinet. The progress of developing Corporate Finance, Performance and Risk report (FPR) and a draft copy of FPR is reported in the Cabinet meeting on 12th April 2021 and 7th June 2021.</p> <p>Complete 'Corporate Finance, Performance & Risk' reports were confirmed to be reported to the October and November 2021 Cabinet meetings.</p>		
<p>iii) Risk considerations to be made at the outset of all new decisions will ensure the Council has capacity, capability and financial resources needed to deliver. The assessment</p>	<p>Corporate Risk register has been further developed with monthly review of all corporately rated red risks/financial risks taking place at CMT to ensure top level leadership.</p>		<p>COMPLETE Q4</p>	<p>Interim Director of Finance (Deputy Section 151)</p>

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<p>of risk is on the individual decision and its impact on the whole of the Council.</p>	<p>All new projects will take into account level of all risks and appetite.</p> <p>All financial risks associated with budget changes are scrutinised via Star Chamber budget setting process. Financial and other risks are outlined in Cabinet reports.</p> <p>This now sits as part as standard service planning in BAU.</p>			
<p>iv) Develop training for Members and Officers to understand effective risk management.</p>	<p>Further LGA lead training for Members of GPAC committee took place on 22 November 2021.</p> <p>The Member training and development plan has been prepared but there are significant risks in ensuring its ownership and delivery.</p> <p>One to one risk management refreshers and access to the JCAD risk management system are being provided to every Director and Corporate Director.</p>		<p>COMPLETE Q4</p>	<p>Interim Corporate Director of Resources (Section 151)</p>
<p>v) The Council to review the terms of reference in regards the General Purposes and Audit Committee and Scrutiny & Overview Committee with regards to risk management to ensure there are no gaps in governance, to remove</p>	<p>Terms of reference of General Purposes and Audit Committee will be reviewed as part of constitutional changes brought to GPAC prior to full Council in March: a separate Audit Committee is proposed with terms of reference based on the CIPFA model.</p> <p>The Member training and development plan has been prepared on the respective</p>		<p>COMPLETE Q4</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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<p>silo thinking and that both committees have a clear understanding of their responsibilities. This will include new guidance and joint training</p>	<p>roles of Audit and Scrutiny and will be delivered in the member induction programme from May 2022 onwards (including joint training) but there are significant risks in ensuring its ownership and delivery.</p> <p>Review of terms of reference will be complete in March, training/ guidance to follow in May/ June</p> <p>This now forms part of the BAU.</p>			
<p>vi) Councillors to be provided overview of Council risk function and how risks are constantly monitored and updated in the organisation</p>	<p>Cabinet training workshop took place in January 2021.</p> <p>Officers will look at opportunities to provide key learning to members through refreshed work programme for 2022. (see LBC 3- i)</p>	<p>The Head of Fraud, Risk & Insurance confirmed that a risk management training session was provided for joint political Cabinet and ELT on the evening of 20 of January 2021. He explained that this session gave an overview of the risk management framework at Croydon and the risk register itself.</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

LBC Recommendation 2

Clarifying member and officer roles to support good governance arrangements

Cabinet Member Accountability: Councillor Young Cabinet Member for Resources and Financial Governance

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
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<p>i) The Council will need to undertake a review to consider its operating model to ensure it has capacity and specialist skills required to deliver the financial and operational improvements that are needed to deliver.</p>	<p>The restructure proposals approved by Full Council on 5th July 2021 went live on 2nd November 2021. This organisational redesign is fundamental to the council and will help us to improve how we do things, operate within our budget and to create an inclusive culture that supports delivery of the best possible affordable service we can provide to our residents.</p> <p>Senior recruitment drive is well underway with interview dates set.</p>		<p>PUBLISHED COMPLETE</p>	<p>Chief Executive Officer</p> <p>Interim Assistant Chief Executive</p>
<p>ii) The Member/Officer protocol is to be reviewed to ensure that it gives clarity on the respective roles and responsibilities for both Members and officers. The protocol should also explicitly place the seven principles of public life, known as the Nolan principles, at its heart.</p> <p>https://www.gov.uk/government/publications/the-7-principles-of-public-life.</p> <p>Training will be held for all Councillors and senior officers to develop good practice.</p>	<p>A Member / Officer Task & Finish Group has prepared a revised protocol for consideration by Ethics Committee on 9th February, prior to the preparation of proposals for constitution changes by GPAC and full Council in March.</p> <p>The Protocol references the Nolan principles and builds on the member and officer codes of conduct, which have the Nolan principles at their heart.</p> <p>The Member and officer training and development plan has been prepared and will be provided to members as part of the member induction from May 2022 onwards but there are significant risks in ensuring its ownership and delivery.</p> <p>As part of the senior restructure, job descriptions for CMT and Directors have directly incorporated the Nolan principles.</p>		<p>COMPLETE Q4</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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	<p>This now forms part of the BAU.</p> <p>Review of protocol will be complete after Ethics Committee 9th February. Training to follow in March - June 2022.</p>			
<p>iii) A review of the member and officer Codes of Conduct will be undertaken to incorporate any learning from recent events and to ensure that they explicitly include the seven principles of public life, known as the Nolan principles, as the basis of the ethical standards expected of elected and appointed public office holders.</p>	<p>A new member code of conduct based upon the LGA model code was adopted at a meeting of Council on 09 December 21. Training sessions on the implications of the new code was delivered to members on 4 October.</p> <p>This is linked to LBC2 - ii.</p> <p>Following the Council meeting, all Members were invited to raise queries or comments on the guidance and were offered the opportunity to attend a further training session on the subject. At the time of writing the minutes, no responses had been received. It is proposed, in line with the approach recommended by the LGA, that the Ethics Committee review the Code of Conduct annually ongoing.</p>	<p>Examination of the minutes of the Ethics Committee meeting held on 11th February 2021 confirmed that LGA's new model Code of Conduct was presented at the meeting and that members asked for a gap analysis to come back to the committee in April to inform any potential future changes. Examination of the minutes of the subsequent Ethics Committee meeting held on 26th May 2021 confirmed that the completed gap analysis was reported.</p> <p>The member Code of Conduct was then approved at the 11 October 2021 full Council meeting. The officer Code of Conduct is yet to be approved.</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p>
<p>iv) Development sessions for Members and officers to better understand each other's respective roles.</p>	<p>The Member and officer training and development plan has been prepared and will be provided to members as part of the member induction from May 2022 onwards but there are significant risks in ensuring its ownership and delivery.</p>		<p>COMPLETE Q4</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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	<p>As part of the move to the Mayoral model of governance, staff briefings have been held and additional training is being considered.</p> <p>This now forms part of the BAU.</p>			
<p>v) Review the level of support and advice Scrutiny & Overview Committee and the General Purposes and Audit Committee receives from the Head of Paid Services, Section 151 Officer and Monitoring Officer to ensure that the advice is in line with their statutory responsibilities. With this include clarification on the ability and process for members to request information.</p>	<p>The role of statutory chief officers attending Scrutiny and General Purposes and Audit Committee meetings has been clarified and there is now clearer water between the roles of officers and members advising those meetings.</p> <p>A training programme has been agreed by the Member Learning & Development Panel that includes additional sessions for members of both committees.</p> <p>The work programmes for both committees has also been embedded in the new corporate forward planning processes and officers are currently working with members with the aspiration of the corporate forward plan being routinely presented to the Scrutiny Committee.</p> <p>The draft access to information protocol has been presented to members for comment and is due to be formally considered by the Ethics Committee at its December meeting.</p>		<p>COMPLETE Q4</p>	<p>Monitoring Officer</p>

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	<p>The draft access to information protocol has been presented to members for comment and is due to be formally considered by the Ethics Committee at its December meeting. The Access to Information Protocol was agreed by Ethics Committee in December and GPAC in January and will be presented to full Council for incorporation into the Constitution in March.</p>			
<p>vi) Review the capacity of the organisation to support the Scrutiny & Overview Committee and the General Purposes and Audit Committee so that activity is prioritised within the financial resources for these functions.</p>	<p>The need for additional resources has been identified, though funding for those resources has not yet been obtained.</p> <p>Partners from the LGA are due to support the Council from January 2022 in reviewing and developing proposals to enhance the Council's decision making governance, including support to these two committees.</p> <p>Budget proposals for 2022/23 include growth of £140k for Democratic Services to help it bridge the current capacity gap. An LGA led peer review is underway to review and develop proposals to enhance the Council's decision making governance, including support to these two committees.</p>		<p>IN- PROGRESS</p>	<p>Monitoring Officer</p>

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LBC Recommendation 3				
Ensuring that Members are appropriately trained across all aspects of the Council’s financial duties and responsibilities				
Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance				
Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
i) A detailed training and development programme is being designed to enable all Members to fulfil their roles in regard to their role with sufficient rigour. The programme being developed will cover: <ul style="list-style-type: none"> • Financial management to include the importance of effective budget setting, a robust Medium Term Financial Strategy and rigorous budget monitoring (Add reserves) • Understanding funding sources, eg general fund, housing revenue account and direct schools grant • The role of Audit and the external auditor 	<p>Some training on Finance, Treasury Management and Risk was delivered in the latter part of 2020/early 2021.</p> <p>A training programme aligned with the actions in the RIPI action plan has been developed, costed and approved by Members Learning and Development Panel and Ethics Committee. Delivery commenced in October 2021.</p> <p>A member’s induction programme for May 2022 will be informed by the RIPI recommendations.</p> <p>The training offer will be refreshed annually and continually offered to members as BAU going forward.</p> <p>Member attendance at training is now recorded on the Council’s Modgov system.</p>		COMPLETE Q4	Head of Democratic Services & Scrutiny

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<ul style="list-style-type: none"> • Treasury management and capital strategies and the Council's approach to subsidiaries • Risk assessment • Commercial Investment • Mentoring • Commissioning and Procurement Process • ASC Budget • Transformation Funding • Statutory and non-statutory services 				
<p>ii) Further work on Cabinet development will be undertaken to support members to explore priorities for the new Cabinet, agree how the Members will work together to make the most of shared skills and consider individual and collective leadership styles and ways of working.</p>	<p>LGA have carried out a facilitated session for Cabinet members</p>	<p>The 'Member Learning and Development Needs 2021-22' includes as item 7 'LGA Training for Cabinet' which is ongoing. The notes for this course detail that 'LGA have carried out a facilitated session for Cabinet – in progress.' The 'Member Learning and Development Needs 2021-22' also included: 1) A 'Series of Finance Training' of which Treasury Management was delivered in March 2021, with sessions on 'Financial management / Budget setting', 'Financial Strategy and Monitoring', Commercial Investment',</p>	<p>PUBLISHED COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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		Council's funding sources/reserves', 'Transformation funding' and 'Commissioning and Procurement being planned. 2) 'Education Funding and Budgets' which was 'Delivered to CYP Scrutiny and members of both Cons and Lab Groups' in January 2021.		
iii) Target support to be provided for Cabinet Members, Scrutiny & Overview Committee Members and General Purposes and Audit Committee Members to strengthen the approach to reviewing the emerging plans, actions and risks that are being developed as part of the Croydon Renewal Plan, Financial recovery and progress against the Report in the Public Interest October 2020. In particular the training will include: <ul style="list-style-type: none"> • The role of Scrutiny and Overview in relation to finance and General Purposes and Audit Committee • Developing an effective culture of 	<p>This needs to be considered in conjunction with LBC Recommendations 2(v) and 3(i).</p> <p>Training has been provided to Scrutiny during 2022/3 to support the committee to scrutinise the Croydon Renewal Plan and develop an effective culture of scrutiny.</p> <p>The member induction programme for May 2022 onwards, including training for Audit and Scrutiny Committees has been presented to both the Member Learning and Development Panel and the Ethics Committee.</p> <p>The Access to Information Protocol was agreed by Ethics Committee in December and GPAC in January and will be presented to full Council for incorporation into the Constitution in March.</p> <p>Training complete in this administration, to be delivered afresh from May as part of BAU, so this is completed</p>		COMPLETE Q4	Monitoring Officer

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<p>scrutiny and key questioning skills</p> <ul style="list-style-type: none"> • Maintaining a 'big picture' view of the financial pressures affecting the council • Assessing effectively budget and financial plans, budget monitoring, reserves approach • Challenging how resources are allocated • Scrutinising partnership arrangements • Key finance issues for Scrutiny and Overview Committee to consider 				
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LBC Recommendation 4

The Council develops an improvement programme that has the necessary elements for it to function effectively and within its financial resource.

Cabinet Member Accountability: Councillor Hamida Ali, Leader of the Council

Action	Officer comment	Summary of Internal Audit work	Status	Officer accountability
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<p>i) Implement new Council management arrangements that ensure:</p> <ul style="list-style-type: none"> • the delivery of high quality statutory services • finances are appropriately managed and controlled • a sound understanding of risk management is at the heart of the organisation 	<p>The restructure proposals approved by Full Council on 5th July 2021 went live on 2nd November. Senior recruitment drive is well underway and ongoing.</p> <p>Interim Assets Strategy in implementation stage with a number of assets targeted to be disposed by end of financial year.</p> <p>Corporate Risk register has been further developed with monthly review of all corporately rated red risks/financial risks taking place at CMT to ensure top level leadership.</p> <p>All new projects will take into account level of all risks and appetite.</p> <p>All financial risks associated with budget changes are scrutinised via Star Chamber budget setting process. Financial and other risks are outlined in Cabinet reports.</p> <p>Monthly monitoring is now embedded and is reported to DMTs, CMTs and Cabinet. Monitoring includes analysis of forecast position, risks and opportunities as well as progress in savings delivery. In addition challenge sessions chaired by the Chief Executive Officer review financial forecasts and risk on a regular cycle.</p> <p>Monthly performance report taken to Cabinet and other Committee meetings.</p>		<p>COMPLETE Q4</p>	<p>Chief Executive Officer</p>
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<p>ii) Working with local residents, rebuild the trust with their local Council by focussing on effective delivery of core services, responding promptly and appropriately to queries and complaints and learning from good practice as well as failures and from each other.</p>	<p>The Council is utilising feedback, gained via ad-hoc and planned engagement activities with residents to inform development of a range of solutions to better meet current and future needs. This include looking at skills gaps that exists and ways to involve residents in the training of our staff to ensure their voice is reflected in our actions.</p> <p>Sessions with residents have taken place in relation to Regina Road to open up direct communication links between officers and people impacted.</p> <p>Rebuilding trust with residents will be an ongoing process as we improve our culture and systems in order to be the Council our residents need. An update will continue to be provided against this action for the foreseeable future.</p> <p>Sits in standard service planning as part of BAU.</p>		<p>COMPLETE Q4</p>	<p>Director of Policy, Programmes and Performance</p>
<p>iii) Introduce a new system of internal control focussed on finance, performance and risk to manage financial expenditure, risk management, service performance and the delivery of Council priorities. This will follow a</p>	<p>Monthly monitoring is now embedded and is reported to DMTs, CMTs and Cabinet.</p> <p>Monitoring includes analysis of forecast position, risks and opportunities as well as progress in savings delivery.</p> <p>In addition challenge sessions chaired by the Chief Executive Officer review</p>		<p>COMPLETE Q4</p>	<p>Interim Corporate Director of Resources (Section 151)</p>

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<p>monthly cycle of Departmental Leadership Teams, Executive Leadership Team, Cabinet and Scrutiny & Overview as appropriate.</p>	<p>financial forecasts and risk on a regular cycle.</p>			
<p>iv) Building on the work done to date and listening to staff concerns about equality and diversity in the workplace, co-create a working environment that respects and values all our staff and take positive action to ensure that this is the case.</p>	<p>We continue tea talk conversations and by the end of December all staff networks would have had an opportunity to challenge CMT with their top issues. We are currently responding to each of the issues that staff have asked that we attend to and formal responses, solutions are being shared with the respective networks and where appropriate all staff.</p> <p>The staff survey results will also be ready for review by the 2nd week of December and will provide some more vital information on actions we need to take as a council to create a more equitable and diverse workforce.</p> <p>Sits in standard service planning as part of BAU.</p>		<p align="center">COMPLETE Q4</p>	<p>Interim Assistant Chief Executive</p>
<p>v) Create a new system of staff performance appraisal, co-created with staff and agreed with the trade unions.</p>	<p>The appraisal system has been revised and updated to:</p> <ol style="list-style-type: none"> 1) Make it a more user friendly online system with updated e-learning guidance for completing appraisal 2) Make it more focussed on 1 to 1 and performance conversations throughout the year, rather than ratings. The process 		<p align="center">IN- PROGRESS</p>	<p>Interim Assistant Chief Executive</p>

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	<p>considers the health and wellbeing of the appraise as well as their performance 3) Incorporate into managers appraisal a requirement that all staff be given opportunities for development 4) Include Nolan principles 5) Require all heads of service and above to complete a 360 degree feedback as part of performance appraisal.</p>			
vi) By working with Council staff, co-create an environment that is open to listening, free from fear, built on trust and openness and reflects the diverse borough that we serve.	<p>A provider for Culture Change Programme has been selected and appointed via competitive process. The successful provider is BBS who met with the Chief Executive and the Improvement Panel week commencing 22 November. The provider is due to facilitate a CMT Away-day on 10 December to initiate a programme of work.</p> <p>Development and implementation of the Culture Change programme will potentially take 12 months.</p> <p>Sits in standard service planning as part of BAU.</p>		COMPLETE Q4	Interim Assistant Chief Executive
vii) Agree a training programme for Council staff that includes finance for non-financial managers, Business Case Development, understanding risk, project management and the	<p>Training programme to be developed based on assessment of training required. Target is to deliver training in Quarter 4, 2021/22 and/or Quarter 1, 2022/23.</p>		IN-PROGRESS	Interim Assistant Chief Executive

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Council's own governance processes.				
viii) Ensure the actions contained in this plan are supported by a corporate programme office that can provide assurance to Members.	A PMO office has been established dedicated to coordinating and supporting the delivery of key improvement actions across the Council. This includes recommendations in the MHCLG Rapid Review, the RIPI and the Croydon Renewal Plan.	It was confirmed that a Project Management Office (PMO) has been established. The Council's intranet details that, 'The PMO was set up in April 2020 to ensure the Council approach to delivering programmes and projects is both consistent and thorough.' It was also confirmed, (in completing this internal audit work to confirm the completed RIPI actions), that a Business Improvement Officer from the PMO had been specifically assigned to help coordinate and support the delivery of the RIPI actions.	PUBLISHED COMPLETE	Interim Corporate Director of Resources (Section 151)
ix) Corporate level sponsorship to be allocated to all projects to ensure clarity of responsibility for delivery.	ELT members already allocated across all actions. Further project managers to be identified to deliver the recommendations.	Examination of the RIPI action plan confirms that each action has been assigned to an ELT member.	PUBLISHED COMPLETE	Chief Executive
x) Work needs to be undertaken as a priority to understand the future model of the Council, which would inform the direction of travel in the improvement journey.	The restructure proposals approved by Full Council on 5 th July 2021 went live on 2 nd November 2021.		PUBLISHED COMPLETE	Chief Executive Officer Interim Assistant Chief Executive

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<p>xi) Council is to provide appropriate officer support is given to Scrutiny in order that it can fulfil its role.</p>	<p>Please note the actions in response to recommendation 2(v).</p> <p>While it is recognised that additional resource is required, it has not as yet been possible to obtain the necessary funding.</p> <p>Budget proposals for 2022/23 include growth of £140k for Democratic Services to help it bridge the current capacity gap. An LGA led peer review is underway to review and develop proposals to enhance the Council’s decision making governance, including support to these two committees.</p>		<p align="center">IN- PROGRESS</p>	<p>Monitoring Officer</p>
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