

STATES OF JERSEY



ROLE AND OPERATION OF THE STATES EMPLOYMENT BOARD (R.35/2019): EXECUTIVE RESPONSE WITH COMMENTS OF THE PUBLIC ACCOUNTS COMMITTEE

**Presented to the States on 28th May 2019
by the Public Accounts Committee**

STATES GREFFE

FOREWORD

In accordance with paragraphs 64–66 of P.56/2018, the [Code of Practice](#) for Engagement between ‘Scrutiny Panels and the Public Accounts Committee’ and ‘the Executive’ (February 2018), the Public Accounts Committee presents the Executive Response to the Comptroller and Auditor General’s (“C&AG”) Report on the ‘Role and Operation of the States Employment Board’ ([R.35/2019](#), presented to the States on 29th March 2019).

Comments of the Public Accounts Committee

1. The [Employment of States of Jersey Employees \(Jersey\) Law 2005](#) established the States Employment Board (“SEB”) as the statutory employer of all States employees. It is chaired by the Chief Minister, or their nominee, and comprises 2 Ministers or Assistant Ministers and 2 other members of the States Assembly.
2. The C&AG’s Report, which was published on 29th March 2019, recommends a fundamental review of the framework for the oversight of human resources of the States. Noting that staff costs make up over 30% of States expenditure, the PAC welcomes the Executive Response which recognises the scale of the change needed. The corporate HR function has been under-resourced, and this needs to be addressed as a matter of urgency.
3. The PAC recognises that the C&AG’s Report, whilst critical of the structures, design arrangements and governance of SEB, does not blame the Board’s shortcomings on the individual members. There has been no comprehensive review of the operation of SEB since its establishment, and the current legislation and governance arrangements are no longer fit for purpose to enable SEB to discharge its duties. The PAC understands that any new members of SEB would face the same problems and difficulties that current members have faced, due to the existing framework. It also notes that the SEB members have co-operated fully with the C&AG in working through the ramifications of the report, culminating in the comprehensive response which accepted all the recommendations.
4. The PAC concurs with the C&AG’s statement that formulation of a ‘People Strategy’ is essential to help set the direction for the future. The strategy should include the States’ future workforce requirements, the assumptions, values, beliefs and aspirations which guide SEB as an employer, and information on how SEB intends to discharge its statutory duties. This should be linked to key strategic HR policies.
5. The Executive Response indicates that most of the recommendations accepted by the Government are to be implemented by the Director of People and Corporate Services. The PAC notes that the current holder of this post has been appointed on an interim basis, and is therefore concerned that the necessary changes will be delayed when a new Director is appointed. The Director, together with the Chief Operating Officer and Director General, will need to monitor and provide assurances to the Board that improvements are not just initiated, but also sustained.

6. The SEB should focus on key strategic areas; for example, monitoring the benefits secured by organisational change, controls over the total number of people employed, and staff training and development. It should have access to up-to-date information and therefore be able to know how well people are performing, and whether policies are aligned to the overall values of the organisation. It should also concentrate on the development and maintenance of Employment Codes of Practice with supporting HR policies and guidance, and developing robust arrangements for ensuring the health, safety and well-being of employees. Focussing on these areas and developing an effective way to monitor implementation will enable the SEB to effectively discharge its duties as the employer.
7. The PAC will invite members of SEB, the Director General, and other senior officers charged with implementing the recommendations of the C&AG, to a meeting in early 2020, to update the Committee on progress.

Senator S.C. Ferguson
Chairman, Public Accounts Committee



States Employment Board

The States Employment Board response to the C&AG audit
Role and Operation of the States Employment Board

Contents

1. Executive Summary	3.
2. Findings in the Report	
2.1. What the C&AG review set out to do	5.
2.2. Why this review was important	5.
3. What the response is to the findings	5.
4. How the findings of the reivew will be considered	6.
4.1. Legislative, deisgn and governance arrangements	6.
4.2. The People Strategy	7.
4.3. Working practices – common themes.....	8.
4.4. Board Development.....	9.
4.5. Identyfying quick wins.....	9.
5. Resources	10.
6. Timelines for delivery	10.
7. Conclusion	11.

1. Executive Summary

This report and action plan is a response to the findings of the Comptroller and Auditor General (C&AG) in the report entitled 'Role and Operations of the States Employment Board' (SEB) which was published on 28 March 2019.

Due to the timing of the C&AG's review, SEB members were unable to participate however, SEB have actively engaged with the C&AG to discuss the findings and to share the draft response to the audit before publication.

As part of their ongoing dialogue with the C&AG the Board recently met with her to discuss points of clarification within her report. During the meeting the C&AG emphasised that the context of her report was not about the current members of the board, rather she confirmed that it is about structures, design arrangements and governance, and the changes to these will enable the SEB to effectively discharge its duties as the employer.

The Employment of States of Jersey Employees (Jersey) Law 2005, was enacted 14 years ago and it is this law that established both SEB and Jersey Appointments Commission (JAC). A number of amendments have been made to this law which governs the functions of the SEB, however, this is the first review by the C&AG of this law and it is this statutory instrument that has been described by her as no longer fit for purpose.

The focus of the report deals with four areas of review:

- the effectiveness of the design of arrangements for appointments and employment of States of Jersey Employees
- the effectiveness of SEB in discharging its functions
- the effectiveness of arrangements for securing compliance with the Employment Codes of Practice issued by SEB and supporting policies
- and the effectiveness of arrangements for monitoring progress in implementation of the C&AG previous recommendations of human resources management.

The ambiguity of the design arrangements which SEB is governed by and articulated by the C&AG provides an evidence base and insight for framing a root-and-branch review of legislation, governance, strategic oversight and the Board's working practices. It is clear from the review that, over time, the current legislation and governance arrangements have become no longer fit for purpose to enable SEB to discharge its duties, nor do they represent how a modern employer makes decisions in relation to its strategic human resource management.

The States Employment Board has already recognised the importance of a People Strategy to act as a reference point for decision making. The People Strategy will also act as a tool to monitor and provide assurances to the Board that improvements are sustained across a wide and diverse range of initiatives, some of which are already underway. The People Strategy will form part of the Government Plan which will deliver the Common Strategic Policy of which one of the five ongoing initiatives is

“a modern, innovative public sector that meets the needs of islanders effectively and efficiently”; the People Strategy will contribute to that initiative.

In addition to the C&AG report, Team Jersey’s partners, TDP, have published their independent Phase 1 report and recommendations, which will also inform the People Strategy. SEB, as the employer, welcomes the Team Jersey report recommendations and its continuing contribution to building a positive workplace culture across the organisation.

The SEB recognises that they must be supported by effective human resources management in order to discharge their duties and responsibilities. Accordingly they have requested that appropriate resources are provided to assist them to make the necessary changes. Without additional resources it will not be possible for officers to deliver the level of change required to respond effectively to the recommendations of both the C&AG and TDP.

SEB concluded that the report helped to shape their view in regard to the improvements they want to see as the employer. They concur with the findings in the report that this change will take time and it is not about short term fixes.

The States Employment Board welcomes the report and recommendations from the C&AG and this response acknowledges the commitment of the Board, and officers, to see through the changes to legislation, governance and working practices, all aimed to improve their ability to continue to provide strategic direction and oversight as the employer.

The States Employment Board thanks the C&AG, Karen McConnell, and her team, for their report and recommendations.

2. Findings in the report

2.1. What the C&AG review set out to do

On the 28 March 2019 the Comptroller and Auditor General (C&AG) published a report entitled “Role and Operations of the States Employment Board’. The objectives and scope of the review was to evaluate performance in four following areas:

- the effectiveness of the design of arrangements for appointment and employment of States of Jersey Employees
- the effectiveness of SEB in discharging its functions
- the effectiveness of arrangements for securing compliance with the Employment Codes of Practice issued by SEB and supporting policies
- the effectiveness of arrangements for monitoring progress in implementation of the C&AG previous recommendations on human resources management.

2.2. Why this review was important

This is the first review that has been undertaken by any C&AG in relation to the role and operations of the States Employment Board. A number of amendments have been made to the Employment of States of Jersey Employees (Jersey) Law 2005 which governs the functions of the SEB, however, this is the first review by the C&AG of this law and it is this statutory instrument that has been described by her as being no longer fit for purpose. The review found ambiguities and gaps in the structural design and governance arrangements, and no duty to monitor the human resources management compliance and effectiveness, especially in relation to the Codes of Practice.

3. What the response is to the findings

The current Board members were appointed following the election of a new Government and on taking up their appointment they recognised the need to improve current working practices. The new Board was also formed at a time when the public service was starting a significant period of change, in parallel with wide-ranging and complex pay negotiations, following the rejection by employees of the Workforce Modernisation proposals. The Board was therefore immediately dealing with a series of urgent and important issues, with little time to settle in and establish new Board working practices.

SEB recognised the criticality and complexity of the pay negotiations, and the Board’s role in providing strategic direction and making evidence-based decisions. Often responding to the need to reprioritise the agenda, attending unscheduled meetings and juggling other items on the agenda. SEB has recognised the need for a fundamental review of the governance arrangements. The legislation and governance that the current SEB inherited, and is required to comply with, are no

longer fit for purpose and these sit at the heart of what needs to change, in order for the Board to discharge its duties more effectively and efficiently.

SEB is taking the opportunity to raise the operating standards of its meetings and has given clear direction on its expectation. This covers such areas as agendas, minutes, timeliness of paperwork, reports that articulate the decisions required, and actions that are followed through.

SEB members adopt an agile, modern way of operating, making themselves available for briefings and discussions with officers, in order to improve timely decision making and ensuring that they are kept fully informed of any emerging matters that may require their attention. This style of working will need to be codified within any new governance arrangements and relationship with officers. Furthermore the Deputy Chair of SEB has been appointed as political lead for the People and Corporate Services team.

4. How the findings of the review will be considered

The C&AG recommendations, and an action plan detailing the responses, are attached to this response. The Board has categorised the findings into the following areas:

- The legislative, design and governance arrangements
- The development of a People Strategy
- Working practices – common themes
- Board development
- Identifying and implementing quick wins

The C&AG report has evidenced a number of weaknesses in legislation and governance, and the gaps in these arrangements have added to the ambiguity of how SEB operates. These are detailed in the recommendations and action plan.

The reference to the absence of oversight of Arms Length Organisations needs careful consideration, because SEB, in most cases, is not the employer of these organisations. However, the Board recognises that it is important to be involved in any reviews or changes to legislation as and where appropriate that may change the functions or duties of SEB. The Board are also aware that the C&AG is conducting a review in relation to Arms Length Organisations and are awaiting the publication.

4.1. Legislative, design and governance arrangements

The Employment of States of Jersey Employees (Jersey) Law 2005 established the States Employment Board as the 'Employer' and as a body corporate is delegated powers by the States Assembly to carry out its functions. A review of the Employment of States of Jersey Employees (Jersey) 2005 Law is being led by the Director General of Strategic Policy, Performance and Population who, along with the Director of People and Corporate Services, will work with SEB to develop an approach to this review.

This law covers the functions, governance, membership and operation of the SEB, and the functions and operating practices of the Jersey Appointments

Commission (JAC). This review is fundamental, because the law was enacted 14 years ago, and during this period a number of amendments have been made however, changes to employment matters have evolved since this time.

The ambiguities that the C&AG refers to are in part consequences of recent legislative changes, for example the establishment of a Principal Accountable Officer, the development of one government, and the fact that over the last 14 years employment law and best practice in relation to human resource management has changed considerably. Other considerations need to be factored in such as the demographics of the workforce and what the future generations will expect from their employer.

The next generation joining the workforce is known as generation 'z' (born after 1995) now representing approximately 24% of the workforce worldwide. In the Government of Jersey this represents 1.3%. It is this generation that is demanding a different relationship with their employer. They are known as 'career multi-taskers' and will move seamlessly between roles and organisations, with the expectation that learning is a social interaction and on demand.

SEB are very much alive to the fact that, as the employer, it is this generation that they need to attract and retain, and changes to culture, policies, process and systems need to exceed their expectations.

Alongside the C&AG's review, and taking into account the legislative changes, SEB will be commissioning a review of its working practices to include how the Board seeks assurance and monitors progress against the duties it has delegated to senior officers to discharge on SEB's behalf.

4.2. The People Strategy

SEB has already identified the need for, and the time is right to develop a People Strategy. This strategy will form part of the Government Plan 2020-23, and will set out the vision for a workforce for the future.

As the employer SEB will be setting the vision and strategic direction and this will be codified within the strategy that will enable the organisation to learn and continuously improve.

Some elements of the People Strategy are already being developed. This tactical approach is being driven by the emerging needs of the organisation and the evidence that many of the human resources best practices are not in place. Where they are in place they are not linked to a wider strategy or are unsustainable in the current format. This reflects the findings of the C&AG report and with which SEB agree.

Although there is currently no overarching strategy in place, there is a considerable amount of work being undertaken with knowledge of how it will contribute to the strategy. The C&AG report mentioned that a People Strategy will provide SEB with the understanding of how everything fits together, ensure the focus is on the highest priorities, and that a balanced approach is taken between proactive and reactive matters.

The tactical approach already adopted has led to progress being made in the following areas:

- A new performance appraisal system is in place – My Conversation My Goals.
- A review of the organisation's employment policies is underway, aligning them to the work that Team Jersey is doing to develop a positive workplace culture. Early evidence of this are the new Bullying and Harassment, and Whistleblowing policies, which came into effect in January 2019. These policies importantly, include how an employee can raise their concerns via a dedicated speak-up line which is available 24 hours a day, 7 days a week, 365 days a year.
- A review of pay and reward has been commissioned by SEB and is to be completed by the end of 2019.
- Beginning to develop an approach and programmes for early careers, graduates schemes, apprenticeships and internships. This supports the need already identified to grow our own talent, and proactively looks at the age profile within the organisation.
- Investing in a digital learning platform, which will provide training and development for employees. It will be agile and efficient, deploying learning at a time and place to suit the needs of the organisation and employees. An example of this has been the GDPR training, which was rolled out in 2018.
- Exploring how we will grow our own talent and identify what support our people need to reach their career aspirations. This will link to the needs of the organisation through workforce planning, which will start in the autumn.
- We are improving our induction, so new employees are welcomed to the organisation, quickly feel part of the team and are able to start making a contribution.
- The recommendations from Team Jersey's Phase 1 report which is all about culture and systems change are being incorporated into the plan for a People Strategy.
- We are establishing and developing a leadership cadre which role models the aspirations, values and behaviours of the organisation.

SEB provides strategic oversight to these initiatives and is committed to monitoring the outcomes and benefits. The work already being achieved is putting in place the building blocks which can be reported against.

4.3. Working practices – common themes

There are 20 recommendations in the report. Two of the recommendations are in relation to the design arrangements which require a root-and-branch review of

the legislation, governance and functions of SEB in order for it to operate effectively as a modern employer. The third recommendation is the establishment of a People Strategy. The majority of the recommendations are about the effectiveness of SEB in discharging its responsibilities and these can be grouped into a number of common themes that provides SEB with corporate oversight and high level assurance.

Going forward SEB will receive a quarterly report including but not exclusive to,

- Management information tracking KPIs on human resources matters
- Health and Safety and Wellbeing
- Monitor and track the progress of audits that include human resources management
- A risk register of the human resources risks and issues at a corporate level
- People Strategy progress report
- An update from Team Jersey.

All of the above and other reports that are presented to SEB will provide the Board with strategic oversight and assurances that their delegated authority is being managed appropriately and evidenced. More importantly there will be early signs of where issues and risks are emerging and these can be dealt with in a timely way.

4.4. Board development

SEB is committed to developing as a Board and as part of this review it will be working with its independent advisor and senior officers to develop a plan. In the meantime, where the Board considers they require training or development this will be provided as and when required.

The Board has already been developing its understanding of issues as they have arisen and members are diligent in their preparation for meetings and in seeking clarification when needed, and the questioning of officers in relation to their reports.

4.5. Identifying quick wins

- SEB is already raising the standards in terms of the quality of reports and evidence from officers prior to decision making.
- SEB recognises the need for a balanced agenda and has requested that officers work with the Board and the independent advisor to develop standing items, a report template, a forward plan and, where necessary, hold additional meetings to deal with one item which is a priority at the time.
- SEB has been involved in the approval of organisation change structures. SEB is seeing all the departments proposed Target Operating Models prior to the start of employee consultation. SEB's role in this matter has been to seek

assurance that employee policies and human resources management is being adhered to.

- The States Greffe has suggested there is an opportunity to improve the way that minutes and actions are recorded and will discuss a proposal with SEB at a future meeting.
- The next SEB annual report will be published in June 2019. The report format and content is being reviewed to take into consideration the recommendations of the C&AG. It is also proposed that in December 2019 an interim report is produced to represent the progress being made.
- A review of the employee policies has created 'policy families' and these are now aligned to the Codes of Practice. Policies are now developed using this framework, which provides a simpler way for SEB to discharge its duties through the Codes of Practice and employee policies.

5. Resources

The C&AG has confirmed that the corporate People Services function has been under-resourced and this needs to be addressed to help secure the changes urgently needed. The development of a comprehensive People Strategy to set the direction and drive implementation will also require funding for this to be achieved.

The States Employment Board has no allocated budget or dedicated resources to support the discharging of its duty. This is also the same position for the Jersey Appointments Commission.

Both the Board and the Jersey Appointments Commission (JAC) require a budget. The People and Corporate Service directorate has recently undertaken a comprehensive review of its budgets and is in the process of submitting a business case for additional funds. The business case includes a proposal to fund secretariat support for both SEB and JAC, funds for SEB to commission work, and funding for JAC to operate with independence.

A second business case is being prepared to fund the People Strategy and includes the resource requirements to fund C&AG recommendations.

6. Timeline for delivery

The timescales for delivery will be for the work to start in 2020. There is a significant amount of work in relation to the legislation and governance aspects and the benefits of the People Strategy will take at least 2-3 years before the real, sustainable, benefits are seen to be having a positive effect on the organisation and its employees.

7. Conclusion

The States Employment Board and officers have welcomed the C&AG's review. This response to her report and the robust action plan demonstrates the undertaking and commitment of the Board. Alongside this action plan the Board will continue to address current pressing issues and strengthen the progress already being made.

States Employment Board Response:

Review title: C&AG Review: [Role and Operations of the States Employment Board](#) - Executive Response to PAC by Monday 17th May 2019

Summary of response

See attached.

Action Plan

Recommendation	Action	Target date	Responsible Officer
<p>R1 In light of the findings of my review, fundamentally review the framework for the oversight of human resources of the States, including, in respect of both SEB and the JAC:</p> <ul style="list-style-type: none"> <input type="checkbox"/> scope <input type="checkbox"/> functions <input type="checkbox"/> membership <input type="checkbox"/> operation. 	<ol style="list-style-type: none"> 1. To scope the legislative changes to the Employment of States of Jersey Employees (Jersey) Law 2005. Bring forward a proposal in readiness to start the approval process and law drafting which will be completed by the end of 2020. 2. Obtain agreement to a project structure, funding and appropriate resources to scope and deliver a comprehensive review as a result of the proposed law change. 3. Commence a detailed review in line with this recommendation and develop proposals for approval by States Employment Board (SEB). 4. Review completed and proposals approved by SEB. 5. Once proposals are approved, actions are assigned and the appropriate resources are in place ready to start the delivery phase. 6. Delivery phase may include potential legislative changes and R2 	<p>September 2019</p> <p>October 2019</p> <p>April 2020</p> <p>October 2020 onwards</p>	<p>Director General Strategic Policy, Performance and Population</p> <p>Chief Operating Officer</p>

<p>R2 Pending any legislative changes, adopt working practices for SEB and the JAC that, in so far as possible, address the weaknesses in the framework identified in my report.</p>	<p>1. For SEB to be actively involved, as a key stakeholder, in the review of the Employment of States of Jersey Employees (Jersey) Law 2005.</p>	<p>October 2019</p>	<p>Chief Operating Office</p>
	<p>2. Include R2 in the scope of the review detailed in R1 at point (2)</p>	<p>December 2019</p>	<p>Director of People and Corporate Services</p>
	<p>3. Review the format of the SEB Annual Report to ensure it includes how the board has discharged its responsibilities. Due to timing consider an interim report in December 2019.</p>	<p>September 2019</p>	<p>Director of People and Corporate Services</p>
	<p>4. A budget to be approved for the SEB which will enable the Board to operate independently and to commission work. This budget will also fund a secretariat role to deal with correspondence and meeting management.</p>	<p>September 2019</p>	<p>Director of People and Corporate Services</p>
	<p>5. A review of how minutes and actions are recorded with a view to simplify. Actions to be reviewed as a standing item on the SEB agenda.</p>	<p>September 2019</p>	<p>Director of People and Corporate Services and States Greffe</p>
	<p>6. Reporting from JAC (Jersey Appointments Commission) to SEB, through a highlight report that is considered on a quarterly basis and builds the Annual Report</p>	<p>June 2019</p>	<p>Chair of JAC</p>
	<p>7. JAC to escalate any matters of concern through to SEB as and when required and for actions to be agreed and monitored.</p>	<p>Ongoing</p>	<p>SEB/Chair of JAC</p>
	<p>8. R1 will review the independence of JAC. In the meantime additional funding is being sought to cover the cost of JAC, including secretariat support.</p>	<p>September 2019</p>	<p>Director of People and Corporate Services</p>

<p>R3 Develop an overarching People Strategy that includes the Government's future workforce requirements; the assumptions, values, beliefs and aspirations which guide SEB as an employer; how SEB plans to discharge its statutory duties; linkages to key strategic HR policies; and the respective roles of SEB, the Principal Accounting Officer and the Council of Ministers.</p>	<ol style="list-style-type: none"> 1. Develop an inclusive approach to developing a People Strategy which will include stakeholders. 2. Work with SEB to develop the strategic direction as a modern employer over the next 3-5 years. 3. In line with the Government Plan planning, the People Strategy is approved by CSB and SEB, including an approved business case. 4. SEB receive quarterly reviews to monitor the progress of the People Strategy; including management information, analysis and actions. 	<p>August 2019</p> <p>September 2019</p> <p>December 2019</p> <p>April 2020 onwards</p>	<p>Director People and Corporate Services</p>
<p>R4 Refocus the balance of SEB's work to ensure that sufficient attention is given to all its statutory responsibilities.</p>	<ol style="list-style-type: none"> 1. SEB to agree 'standing items' and the frequency. 2. A Forward Plan is being developed and will be reviewed by SEB at the June meeting and then ongoing at all meetings. 3. Established Quarterly Health, Safety and Wellbeing report. The first to be presented in May. 	<p>June 2019</p> <p>June 2019</p> <p>May 2019</p>	<p>Chair of SEB supported by the Director of People and Corporate Services</p>
<p>R5 Ensure that SEB receives and considers a statement of the benefits of each proposed significant organisation change initiative.</p>	<ol style="list-style-type: none"> 1. SEB has already put in place changes. The new target operating models presented by Director's General have a clear rationale and benefits for change. 2. Design a new report template to support SEB in its decision making. 	<p>September 2019</p>	<p>Director of People and Corporate Services.</p> <p>All report authors.</p>

<p>R6 Actively involve SEB in the risk management process, including by review of the HR risks included in the corporate risk register, the adequacy of mitigation of those risks and the categorisation of those risks.</p>	<ol style="list-style-type: none"> 1. The People and Corporate Services will ensure that risks associated with human resources management are shared and discussed with SEB as part of a quarterly update. 	<p>September 2019</p>	<p>Director of People and Corporate Services.</p>
<p>R7 Consider the development of sub-committees of SEB to allow it to discharge its functions more effectively.</p>	<ol style="list-style-type: none"> 1. This will to be considered as part of the work detailed in R1. 		<p>SEB supported by Chief Operating Officer.</p>
<p>R8 Develop and implement a training programme for SEB members, including induction training.</p>	<ol style="list-style-type: none"> 1. Bring forward a proposal for SEB to review. 2. Raise awareness with officers of their responsibilities to engage with SEB. Using SLG and SMG forums. 	<p>To be developed as part of R1 and R2 September 2019</p>	<p>Director of People and Corporate Services.</p>
<p>R9 Introduce a structured approach to the oversight by SEB of the adoption and implementation of establishment controls and staff training and development.</p>	<ol style="list-style-type: none"> 1. Develop a set of KPIs that provide SEB with a dashboard of information relating to human resources management on a quarterly basis. 2. The focus of the dashboard will be developed with SEBs involvement through the summer and in conjunction with the emerging People Strategy. 	<p>September 2019</p>	<p>SEB supported by Director of People and Corporate Services.</p>
<p>R10 Establish a clear framework for the development, approval, communication, review and revision of Employment Codes of Practice and supporting HR policies and guidance.</p>	<ol style="list-style-type: none"> 1. Complete the review and of the Codes of Practice, align to R1 and R2. 2. Develop new or revised Codes of Practice if required – see R1. 3. Put in place an engagement plan for senior officers so they are clear on their accountabilities. 	<p>January 2020 October 2020 September 2019 and after any changes.</p>	<p>Director of People and Corporate Services.</p>

<p>R11 Prioritise completion of the work to rationalise and map existing Employment Codes of Practice to supporting HR policies and guidance, ensuring that ambiguities are addressed.</p>	<ol style="list-style-type: none"> 1. Map to be completed for the current Codes of Practice. 2. A schedule is in place to review all of the employment policies, and shared with SEB. 	<p>September 2019</p> <p>September 2019 and ongoing</p>	<p>Director of People and Corporate Services.</p>
<p>R12 Establish arrangements for effective corporate oversight of the need for and the content of supplementary departmental HR policies and guidance.</p>	<p>Clarified this recommendation with the C&AG. All employee policies and guidance content are the responsibility of People and Corporate Services. Any local variations will be addendums to a policy.</p> <ol style="list-style-type: none"> 1. The policy review will address this recommendation and is currently on-going. 	<p>On-going</p> <p>October 2020</p>	
<p>R13 Ensure that a clear role description for the People Hub is in place.</p>	<ol style="list-style-type: none"> 1. To provide SEB with an overview of the People Hub along with the process improvements currently underway and the benefits of these to the organisation. 	<p>September 2019</p>	<p>Director General Customer and Local Services and Director of People and Corporate Services.</p>
<p>R14 Monitor action to improve the effectiveness of the operation of the 'People Hub' taking into account the findings of this review.</p>	<p>Following clarification from the C&AG this recommendation is in reference to the People Hub management information.</p> <ol style="list-style-type: none"> 1. Provide the SEB with management information (MI) in relation to the People Hub performance and for this MI to form part of the quarterly report to the Board. 	<p>September 2019</p>	<p>Director General Customer and Local Services and Director of People and Corporate Services</p>

<p>R15 Ensure that the Whistleblowing Policy fully reflects and references supplementary departmental policies.</p>	<p>Since this review in June 2018, the Whistleblowing Policy has been revised.</p> <ol style="list-style-type: none"> 1. The new Whistleblowing policy reflects best practice and has been in effective since 21 January 2019. 2. A review of how this policy will take place during the autumn in readiness for a report to SEB in January 2020 to reflect one year on. 	<p>January 2020</p>	<p>Director of People and Corporate Services.</p>
<p>R16 Fundamentally review corporate arrangements for health, safety and wellbeing in light of the findings of this review and the independent review that reported in October 2018.</p>	<ol style="list-style-type: none"> 1. Head of Corporate Services, once appointed, will develop a proposal for reviewing the corporate arrangements for health, safety and wellbeing. 2. SEB have instructed all managers are written to asking them to confirm they understand their H&S responsibilities and to be recorded on the COO risk register as a mitigation 	<p>December 2019 July 2019</p>	<p>Head of Corporate Services. Director of People and Corporate Services.</p>
<p>R17 Ensure that the information requirement set out in the proforma for senior pay proposals is consistently available to SEB.</p>	<p>A review of Pay and Reward has already been requested by SEB and this recommendation will be considered as part of that review. The review is due to conclude by the end of 2019.</p>	<p>December 2019</p>	<p>Director of People and Corporate Services.</p>
<p>R18 Enhance the transparency of SEB's activities, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> through an enhanced Annual Report <input type="checkbox"/> by placing more information in the public domain about the matters that SEB has considered <input type="checkbox"/> proactively disclosing the key terms and conditions for senior staff appointments. 	<ol style="list-style-type: none"> 1. As part of the review at R2 consider what elements of human resources management the Board agree to publish. 	<p>May 2020</p>	<p>SEB supported by the Director of People and Corporate Services.</p>

<p>R19 Give priority to finalising and implementing arrangements for monitoring compliance with the requirements of Employment Codes of Practice and supporting HR policies and guidance and routinely reporting the results of monitoring, including relevant KPIs, to SEB.</p>	<ol style="list-style-type: none"> 1. Included in R1 and R10. 2. Agree with SEB the approach and process for monitoring Codes of Practice including policies and guidance. 3. SEB to receive a compliance report on the Codes of Practice as part of the SEB annual report. 4. KPIs have already been covered in previous recommendations. 	<p>October 2019</p> <p>December 2019 and on-going.</p>	<p>Director of People and Corporate Services.</p>
<p>R20 Routinely report external recommendations relating to human resources management, agreed actions and progress on their implementation to SEB.</p>	<ol style="list-style-type: none"> 1. For SEB to receive, as part of the quarterly update report, include the actions in this plan and any other actions in relation to human resources management contained in other audits. 	<p>October 2019</p>	<p>Director of People and Corporate Services.</p>

Recommendations not accepted

After clarification with the C&AG on the interpretation on the People Hub there are no rejections to the recommendations.