

Audit Committee – 29.04.22

Title of paper:	Equality & HR Assurance	
Director(s)/ Corporate Director(s):	Richard Henderson, Director for HR & EDI	Wards affected: All
Report author(s) and contact details:	Titu Hayre-Bennett, Head of HR & OD Titu.Hayre-Bennett@nottinghamcity.gov.uk	
Other colleagues who have provided input:	Kirsty Spencer, HR Delivery Manager Kirsty.Spencer@nottinghamcity.gov.uk Saema Mohammad, EDI Lead Saema.Mohammad@nottinghamcity.gov.uk Paul Slater, HR Business Lead Paul.Slater@nottinghamcity.gov.uk	
Recommendation(s):		
1	That the Committee note the work being done within the division to deliver on Theme 6 Organisation and Culture workstream of the Together for Nottingham Plan	
2	That the Committee note the work being done within the division to ensure the Council's statutory and non-statutory obligations relating to people management and Equality, Diversity and Inclusion are being met and/or progressed.	

1 Reasons for recommendations

- 1.1 The HR & EDI division supports the organisation in meeting its statutory and organisational obligations in relation to employee management and EDI. It plays a key role in supporting the development of organisational culture, improving employee engagement and leading on employee wellbeing and learning and development and as such has been responsible for leading on much of the activity in theme 6, the Organisation and Culture workstream of the Together for Nottingham Plan.

This report seeks to provide assurances that both statutory and organisational requirements, including the requirements of the Together for Nottingham programme, are being met or progressed and monitored through the activity in the functions/areas described below.

2 Background

2.1 Together for Nottingham

It is recognised that the Together for Nottingham plan will only be effective if it accompanied by wider changes in the organisation's structure and culture. Theme 6 addresses this work and its scope includes:

1. Simplifying the officer structure
2. Setting a clear and updated performance management review process starting at the Chief Executive and cascading down across the Council.
3. Creating and delivering an extensive culture and workforce development programme to ensure that the changes in the Recovery and Improvement Plan are embedded along with the new ways of working that are enshrined within them.

2.1.1 Simplifying the Structure

Decision Making Accountability (DMA)

More than 620 employees from across the organisation have been involved in the DMA process since this commenced in June 2021, which has allowed for individual employees to provide honest feedback about issues within their divisions, things that work well and need to be improved.

This feedback is being used to feed into the organisation design process, themed into three broad areas: aligning services to enable clear accountability with a consistent approach to spans of control and tiers of management; behaviour and culture and improved ways of working. This feedback will also be used to tailor engagement approaches and interventions based on local need. The DMA process also sets out clear expectations in relation to tiers of management and spans of control and this will be rolled out across the Council following the senior management review.

Senior Management Structure

A simplified management structure with four Corporate Directors which was approved by the Appointments and Conditions of Service committee in February of 2020. Recruitment was completed for vacant posts, with new appointees for Corporate Directors of Residents and Grown and City Development taking up post 1st September 2021.

Corporate Directors have been considering the structures they need to deliver against the priorities in the revised Council Plan and the MTFP, in line with agreed principles, and supported by bottom up feedback from the DMA process. The Council is on track for its senior management structure (Directors, Heads of Service and the functions they manage) to be considered by the Appointments and Conditions of Service Committee in Quarter 1 2022/3. Council structures at tiers of management below Head of Service will continue to be reviewed through 2022/23.

Future Plans - Transformation / Redundancy

The Transformation business cases map the anticipated impacts on workforce through the course of the Transformation Programme. The MTFP assumes future waves of transformation will deliver a further savings by 2025/26 and any associated redundancies with this will be managed alongside and in the same way as those already identified in wave 1 and 2.

The planned timescale for delivery of the transformation plans over a number of years lends itself well to a more planned approach to delivering post reductions. In essence a tiered approach following the steps below:

1. Vacancy management
2. Attrition
3. Flexible working arrangements
4. Targeted voluntary redundancy
5. Compulsory redundancy

2.1.2 Performance appraisal

Chief Executive Appraisal Process

A new formal appraisal process for the Chief Executive was introduced in 2021/22, designed to ensure that effective performance management and accountability are in place from the top of the organisation downwards. The process adopted is the standard process contained in the JNC Terms and Conditions for Local Authority Chief Executives and includes external support and challenge for the process.

Objectives set for the Chief Executive, in conjunction with the Council Leader clearly align with the revised Strategic Council Plan and appropriate objectives have been cascaded down to Corporate Directors. Mid-year reviews have been completed between the Leader and Chief Executive and between the Chief Executive and Corporate Directors, consistent with these arrangements.

New Performance Appraisal Process

A new approach for Individual Performance Appraisal has been designed which will be implemented 'top down' from the Chief Executive through the tiers of the organisation.

The new approach focuses on performance and development through good quality, regular conversations, with clear and agreed objectives, so that issues, risks and under performance can be addressed with appropriate intervention at a much earlier stage.

The new approach has been used by SLMG colleagues throughout the 2021/22 cycle and is being rolled out to all colleagues from 1 April 2022, and includes a set of new behavioural expectations under four themes: Leading People; Equality, Diversity and Inclusion; Collaboration; Change and Innovation. Support, guidance and a range of learning interventions have been designed to help embed the new approach and new behaviours. IPR objectives and conversations can now also be recorded on Oracle Fusion meaning reporting on IPR will be much improved and more insightful going forward.

2.1.3 Training and Development

To harness the positive aspects of our culture, mitigate against the negatives and to drive change and improvement, an extensive development offer has been designed and is currently being delivered.

This includes:

Leading and Managing Together programme: aimed at c800 managers to set out their leadership responsibilities and expected behaviours, commenced November 2021.

Transformational Leadership Programme: to recruit, support and train future 'transformational leaders, with a current cohort of 20 delegates

- **Accelerated Development Programme:** A specific programme for colleagues from underrepresented groups and with protected characteristics, aiming to increase representation at all levels in the council through personal development. First cohort of 16 commenced March 2022, further cohorts are planned for later in 2022.
- **Change Academy:** 20 'change agents' will initially be recruited and seconded to support the transformation programme. Supported by a planned network of change champions across the organisation.

Skills development for all colleagues: A range of generalist skills such as digital, change, business intelligence / data, basic project management, interpersonal skills, resilience, will be provided, branded as a core offer, to be packaged by July 2022.

Councillor Development Programme: Developed using the LGA Political Skills Framework and feedback from councillors themselves on need. Areas of focus mirror areas for improvement highlighted by the PIR and NSR, including; overview and scrutiny, audit and leading change.

Delivered through a blended approach of e-learning, virtual workshops and (COVID permitting) face to face learning, these programmes will bring external expertise for a number of elements (such as CIPFA for financial management). Outcomes of these development programmes will be measured and monitored to inform future activity.

Enabling New ways of working

The Future Ways of Working (FWW) programme combined with the Transformation Programme will reflect how the world of work has changed and continues to change, post Covid. The FWW programme is looking to strike a good balance between home/office working via 'hybrid' arrangements in order to reflect the need for an agile and adaptable workforce that is measured by outputs and outcomes, rather than presenteeism.

To address any risk of creating a two-tier workforce, four worker types (home, hybrid, onsite and mobile) have been developed which set out clear arrangements, support and development regardless of your worker type. Contractual changes to formalise these new working arrangements are planned, with individual consultation meetings with staff due to commence in April 2022, underpinned by engagement with managers and colleagues on the new ways of working. Monitoring of the new ways of working will also be undertaken to ensure consistency and fairness across the organisation.

Next Steps

Work is in progress to create a new workforce plan that corrals a number of workstreams that are already in train (such as leadership development and performance management) and adds emphasis to a few key areas, such as future recruitment and workforce composition. All service plans will have a section focussed on workforce.

Challenges around recruitment in some areas of the Council are evident and this will need to form a key part of the workforce plan. The Council is already planning the introduction of a new recruitment portal in Q3 of 2022/23 accompanied by a review of the council's delivery model for recruitment.

Further engagement with stakeholders including employees, managers, the Trade Unions and Councillors will also be required to ensure any workforce plan addresses the key issues the Council faces. It is planned to have a first draft of the workforce plan by the end of April.

2.2 Equality, Diversity and Inclusion

The Equality Act 2010 is the legal framework which protects people against discrimination, harassment and victimisation in employment, and as users of private and public services based on nine protected characteristics. NCC has specific obligations under the Equality Act 2010, as both an employer and as a public authority.

NCC's Equality, Diversity and Inclusion Strategy 2020-23 sets out the Council's commitment, vision and approach to tackling inequality and promoting diversity and inclusion, for both employees of the Council and citizens, with the Equality Act as the prime legislative basis under which the strategy operates. The four priority areas for NCC are;

1. A workforce that reflects the city
2. Sustained economic growth for all
3. Inclusive and accessible services
4. Leading the City in tackling discrimination and promoting equality

The four Action Plans are each led by a Director and each has a lead Councillor aligned to provide corporate and political oversight. There is a working group for each action plan.

Updates against the action plans are provided at quarterly Equality, Diversity & Inclusion Board Meetings to monitor performance against them. Two of our Equality Action Plans have reported that, they are experiencing resource issues and as such, delivery has been impacted.

We are currently preparing to evaluate our current EDI Strategy in readiness to start engagement with stakeholders on priorities for our renewed Strategy due to be delivered by Spring/Summer 2023.

2.2.1 NCC's approach to compliance with the Public Sector Equality Duty (PSED)

The Equality Act 2010 requires public authorities to have due regard to the aims of the general equality duty, in the exercise of their functions, when making decisions and setting policies.

The general equality duty does not set out a particular process for assessing impact on equality that public authorities are expected to follow and it is up to each public authority to choose the most

effective approach for doing this. NCC uses Equality Impact Assessment as a useful tool to help gather, analyse and understand the evidence and meaningfully inform decision making.

The Equality and Employability Team provide quality assurance on EIAs and publish on our website. A number of improvements were identified through the MTFP process, as such there has been greater synergy and collaborative working this year between the Equality and Employability Team and the Research, Engagement and Consultation team to ensure that meaningful consultation and engagement feed into EIA's in order to ensure that the approach is consistent with case law principles in Equalities and supports a lawful approach to decision making.

The Equality and Employability Team will deliver Equality Impact Assessments workshops in Summer 2022 to ensure that capability of managers across NCC is strengthened.

2.2.2 Duty to publish information to demonstrate compliance with the PSED

There is a specific duty under the PSED to calculate and publish our gender pay gap information. We report this information every year on the direct gov website. We also ensure there is relevant communication shared with stakeholders within NCC to instil good practice on addressing any actions for improvements.

There is also a specific duty for public authorities to annually publish information that demonstrates compliance with the general equality duty. There are no explicit stipulations about what information must be included. Currently, NCC publishes gender, ethnicity and disability pay gap data, equality impact assessments (which contain a range of evidence) on the NCC website and the workforce profile on the open data platform.

2.2.3 Council Plan Commitments

NCC's current Council Plan (2019-2023) sets out a number of EDI priorities. Regular updates against each commitment are entered into Pentana.

Workforce Profile and Representation

A workforce data pack is presented quarterly at Equalities Board meetings. (See Appendix A) This pack includes data on representation of black and minority ethnic staff, lesbian, gay and bisexual staff (LGB) and staff with a disability across the NCC workforce and broken down by each department. The pack also includes recruitment data and shows trends over time to allow close monitoring of where there are issues in terms of representation.

Inclusive Initiatives

NCC has signed up to a number of inclusive initiatives:

- Disability confident employer – aiming to achieve 'Leader' Status this year
- Race at Work Charter
- BSL Charter
- Stonewall Equality Index

For each initiative, there is an action plan which details how we are delivering against the commitments we have made and allows us to monitor progress.

2.2.4 Inclusive Workplace

Nottingham City Council, EDI Vision is: "An inclusive Council, enabling us to attract and retain the best diverse people and provide the best and most accessible services to our citizens". A core aspect of our vision is to drive culture change across Nottingham City Council to ensure that EDI principles is embedded in everything that we do. A feature in our New Leadership Framework rolled

out in November 2021, is Equality, Diversity and Inclusion behaviours, clearly articulates what the behavioural expectations are.

Employee voice is critical in shaping the work we do and driving our EDI ambitions. We have strengthened our relationship with Staff Networks. The Action Change and Equality Network attended the Senior Leadership Forum in October 2022, raising key areas of improvements required around behaviour and practice. HR Leadership Team are working with the stakeholders as necessary to address.

2.3 Absence Management

Advancing and promoting employee health, wellbeing and safety has a range of benefits for the organisation, including performance, retention and development and organisational effectiveness. It is inevitable that employees will sometimes be unfit to attend work. The HR team provide guidance and coaching to managers to enable them to manage absence effectively and to help reduce the overall level and cost of absence within the organisation.

Sickness absence levels reduced during the pandemic (2020/21) to approximately 9.9 FTE days per FTE. In 2021/22, overall rates of absence have increased to approximately 12.9 FTE days per FTE. It is important to note, however, that this figure may be inflated due to incorrect working patterns in Fusion. Work to resolve this is ongoing. The increase does reflect a return to levels of sickness in line with those pre-Covid.

Absence is regularly reviewed as part of performance data presented at Directorate Leadership Team meetings (DLTs), with quarterly statistics around absence and cases presented by HR Business Leads. (See Appendix B) This information is also provided to Trade Union representatives at 'JCNC' meetings. This ensures that both the rates and causes of absence are being regularly reviewed, with an opportunity for management and HR to implement appropriate support and measures within individual directorates.

2.4 Employee Wellbeing

Analysis of corporate sickness rates shows that in 2020-21 stress, depression and mental health related sickness was the primary cause of absence after COVID 19. In 2021-22, cough, cold and flu became the primary cause after COVID 19 (see Fig 1, 2020-21 on the left, 2021-22 on the right).

Looking at FTE days lost (see Fig 2, 2020-21 on the left, 2021-22 on the right), the picture is more consistent with stress, depression and mental health related sickness continuing to be the biggest cause of long-term absence across both years.

Fig 1 Absence causes by number of absence occasions

Absence Reason 2020-21	# Absences	%	Absence Reason 2021-22	# Absences	%
17 COVID 19	850	19.5%	Covid 19	1,391	22.7%
03 Stress/Depression, Mental Health	689	15.8%	Cough, Cold & Flu	849	13.8%
08 Gastro-Stomach, digestion	556	12.7%	Gastro-Stomach, Digestion	753	12.3%
02 Other Musculo-Skeletal Problems	470	10.8%	Stress/Depression, Mental Health	716	11.7%
04 Viral Infection-Not Cold and Flu	307	7.0%	Other Musculo-Skeletal Problems	518	8.4%
15 Cough, Cold & Flu	262	6.0%	Viral Infection-Not Cold And Flu	337	5.5%
05 Neurological	238	5.4%	Back And Neck Problems	269	4.4%
01 Back and Neck Problems	201	4.6%	Chest & Respiratory	249	4.1%
11 Eye, ear, nose and mouth/dental & throat	180	4.1%	Eye, Ear, Nose & Mouth/Dental & Throat	248	4.0%
10 Chest, Respiratory	129	3.0%	Neurological	245	4.0%
06 Genito-Urinary/Gynaecological	95	2.2%	Not Disclosed	131	2.1%
Not disclosed	83	1.9%	Genito-Urinary/Gynaecological	118	1.9%
07 Pregnancy Related	80	1.8%	Pregnancy Related	86	1.4%
13 Skin- burns, rashes, cuts, injury	70	1.6%	Heart, Blood Pressure & Circulation	82	1.3%
09 Heart, Blood Pressure, Circulation	69	1.6%	Skin-Burns, Rashes, Cuts, Injury	74	1.2%
14 Cancer- all forms	61	1.4%	Cancer – All Forms	35	0.6%
16 Liver/Kidney disorders/conditions	30	0.7%	Liver/Kidney Disorders/Conditions	30	0.5%
Grand Total	4,370	100.0%	Total	6,131	100.0%

Fig 2 Absence causes by FTE Days lost

Absence Reason 2020-21	FTE Days Lost	%	Absence Reason 2021-22	FTE Days Lost	%
03 Stress/Depression, Mental Health	15,815	32.8%	Stress/Depression, Mental Health	20,266	29.4%
02 Other Musculo-Skeletal Problems	7,452	15.5%	Other Musculo-Skeletal Problems	10,070	14.6%
17 COVID 19	6,928	14.4%	Covid 19	10,067	14.6%
01 Back and Neck Problems	2,653	5.5%	Back And Neck Problems	4,133	6.0%
08 Gastro-Stomach, digestion	2,391	5.0%	Chest & Respiratory	3,622	5.3%
05 Neurological	2,249	4.7%	Gastro-Stomach, Digestion	3,278	4.8%
04 Viral Infection-Not Cold and Flu	1,871	3.9%	Cough, Cold & Flu	2,950	4.3%
09 Heart, Blood Pressure, Circulation	1,480	3.1%	Genito-Urinary/Gynaecological	2,094	3.0%
10 Chest, Respiratory	1,315	2.7%	Neurological	2,031	2.9%
14 Cancer- all forms	1,247	2.6%	Cancer – All Forms	1,915	2.8%
15 Cough, Cold & Flu	906	1.9%	Heart, Blood Pressure & Circulation	1,848	2.7%
06 Genito-Urinary/Gynaecological	842	1.7%	Eye, Ear, Nose & Mouth/Dental & Throat	1,807	2.6%
11 Eye, ear, nose and mouth/dental & throat	729	1.5%	Viral Infection-Not Cold And Flu	1,690	2.5%
13 Skin- burns, rashes, cuts, injury	680	1.4%	Not Disclosed	1,318	1.9%
Not disclosed	644	1.3%	Pregnancy Related	761	1.1%
07 Pregnancy Related	640	1.3%	Liver/Kidney Disorders/Conditions	635	0.9%
16 Liver/Kidney disorders/conditions	318	0.7%	Skin-Burns, Rashes, Cuts, Injury	437	0.6%
Grand Total	48,160	100.0%	Total	68,923	100.0%

The Council has a corporate offer of provision in place to support colleagues' health and wellbeing including our Employee Assistance programme (EAP) and other initiatives such as Mental Health First Aiders. An OH service is provided which includes health checks and health surveillance. The Council has also become a member of the NHS Nottinghamshire Mental Health Hub through which employees can access additional support services. Feedback on many of these services is positive, although work continues to promote these as aspects of the EAP particularly, are underutilised.

Specialist support and guidance is provided to managers by the EW team on specific cases. The team will also work with managers to devise and support bespoke interventions to tackle sickness in teams. Managers are able to refer colleagues who are on long term sick (30 days plus) to our in-house Occupational Health service, where they will be assessed by an OH nurse or triaged to an OH physician, psychotherapist or physiotherapist as appropriate. Referrals are also required to support HR processes such as ill health retirement, capability and reasonable adjustments.

Early intervention is key in managing and reducing the duration of many causations of sickness. Analysis by department of referral rates vs new sickness cases (of 30 days plus) shows that referral rates are increasing, with an increase of 50% in referrals in Q3 2021/2022 from the previous quarter, in particular more complex referrals including mental health, long Covid and requests for ill health retirement. This, in part, will be attributable to an increase in long term absence. This situation will continue to be monitored and discussed at DLTs as part of wider sickness absence reporting going forward.

Medical information

The EW team, as an OH function, are responsible for the security and proper use of medical information which constitutes special category data under Article 9, GDPR and so requires a higher level of data protection. The team work closely with the Information Compliance team to ensure that the necessary systems and processes are in place to ensure the appropriate security and handling of this information; All privacy statements are in place and processes have been reviewed and agreed. Previous audits have found that appropriate measures and good practice are in place to ensure that obligations are being met. Where minor data breaches have occurred, these have been reported swiftly and managed in line with the corporate IC procedures. All team members have had enhanced training from the Information Compliance team.

2.5 HR Casework

The HR team provide technical support and guidance to managers across the organisation in relation to conduct, performance, grievance or other similar matters. The Council operates with approximately 130 'cases' per year.

HR Casework is regularly reviewed as part of performance data presented at DLTs, with quarterly statistics presented by HR Business Leads. This information is also provided to Trade Union representatives at 'JCNC' meetings. Policy decisions surrounding Casework are discussed and agreed at 'Central Panel' meetings, chaired by the Director of HR & EDI, with trade union representatives in attendance alongside senior HR colleagues.

A review of the Council's Disciplinary Procedure is underway, with discussions and negotiations taking place with recognised trade union colleagues. This process aims to improve the operation of the procedure, whilst also directly responding to the concerns raised in 2021 regarding the disproportionate impact of Casework on colleagues with protected characteristics. A decision paper is due to be presented to CLT in May 2022, with a view to implementing changes by July. Training and other associated work to help successfully deliver the changes will continue throughout the year.

Casework 'processes' were re-introduced following a pause during the initial months of the Covid pandemic, with no activity taking place between April and September 2020. Casework resumed at this point, but under a supporting framework to ensure decision making could be undertaken safely, with relevant Covid protections in place. The pausing and these interim measures did result in resolution times increasing during 2020 and 2021 and is reflected in revised KPIs of 90 day resolution targets.

2.7 Transactional HR and Payroll Services provided East Midlands Shared Services (EMSS)

East Midlands Shared Services (EMSS) was created on 1 September 2012, employing HR and Finance staff across two locations. The Employee Service Centre (ESC) is based at County Hall in Leicestershire and the Finance Service Centre (FSC) at Loxley House in Nottingham. Supported by an Oracle Enterprise Resource Planning System, the Shared Service offers a sustainable solution to deliver efficient, cost effective services and a technical platform from which new ways of working can be developed and delivered.

Governance & Oversight

EMSS is constituted under Joint Committee arrangements, to process payroll/HR and accounts payable and accounts receivable transactions for Leicestershire County Council and Nottingham City Council. Nottingham City Council Internal Audit (NCCIA) is the designated Internal Audit provider for EMSS. The Council and Head of Internal Audit (HoIA) has ensured that the service has adopted and complies with the principles contained in the Public Sector Internal Audit Standards (PSIAS) and has met the requirements of the Account and Audit Regulations 2015 and associated regulations. This includes compliance with the governance requirements set down in the CIPFA Statement on the role

of the Head of Internal Audit. On the basis of audit work undertaken during the 2019-20 financial year, covering financial systems, risk and governance, the Head of Internal Audit (HoIA) at Nottingham City Council concluded that a “**significant**” level of assurance could be given that internal control systems are operating effectively within EMSS and that no significant issues had been discovered. Audit work for 2020-21 is still ongoing and is expected to be completed by June 2022.

EMSS are also obliged to produce an Annual Report to Joint Committee covers all of the above arrangements in addition to a review of their performance, achievements, financial acuity and growth.

2.8 Pay Governance

The Pay Governance Board monitors the operation of the City Council’s Pay Policy and ensure that the principles of the pay model are adhered to.

Board members include:

- Director of Human Resources and EDI
- Head of Human Resources and OD
- Organisational HR Manager
- Corporate Director of Resident Services
- Corporate Director of People
- Equality, Diversity and Inclusion Lead
- Head of Corporate Finance and Deputy Section 151 Officer

Pay Governance Board meetings are normally convened quarterly, however, these were suspended during the pandemic with data instead being shared with DLTs via HR Business Leads until September 2021. Consideration is being given to reinstating the quarterly meetings back, in line with the return to the office, post pandemic.

Pay Governance Board data sets include an overview of basic pay, market supplements, additional payments, discretionary payments, allowances, overtime and agency spend. However, the move to Oracle Fusion has meant that reports needed to support the production of this data are not yet functional. Reporting will recommence when this data becomes available.

It is worth noting that, in accordance with regulations, the Council’s Annual Pay Policy Statement 2022-23 has been published by the 31 March deadline.

2.9 Pensions

The HR Pensions team undertake pensions administration for the Local Government (LGPS), Teachers Pensions (TP) and NHS schemes for Nottingham City Council, Nottingham City Homes, Nottingham City Homes telecare, Nottingham Revenues & Benefits, East Midlands Councils, maintained schools and two academies. They perform a range of statutory duties including year-end reporting, monthly and tri-annual auto-enrolment, starters and leavers reporting and recording of contractual changes, activities which are subject to potential fines from the Regulator (of up to £10,000 per case for starters or leaves, for example), in cases of non-compliance. The team also undertake some of the functions normally performed by the Administering Authority including producing estimates and assisting on transfers, amalgamations, additional contributions, information on retirements, Annual Allowances and Lifetime allowance.

In 2020-21, compliance in relation to the above was fully achieved. The implementation of Oracle Fusion in September 2021 has, however, had a significant impact on the team being able to process statutory work for starters, leavers and now End of Year reporting for NCC and all associated employers. This is the result of limited or no functionality in key standard reports from the system which are used to complete this work. Workarounds have been put in place which mean that the council is meeting statutory timescales in relation to the processing of starters and leavers. Issues

remain outstanding in relation to the End of Year report, in particular, which is affecting work on end of year submissions. Work is ongoing to resolve this, and this has been escalated to senior management within the Programme as a priority.

The work of the Pensions team is subject to internal and external audit, with the last full audit concluded in June 2017. The team will respond to questions from Finance to support internal and external audits as required.

Pensions team performance data is reported on a monthly basis to the HR management team to provide assurances or red flags around compliance so that these can be addressed. The team manager plays an integral role in ensuring that any changes to pensions legislation and/or pensions regulations are acted on and adhered to.

3 Background papers other than published works or those disclosing exempt or confidential information

- 3.1 Equalities Report Q3 (Appendix A)
NCC Data Pack Q3 (Appendix B)

4 Published documents referred to in compiling this report

- 4.1 [NCC's Equality, Diversity and Inclusion Strategy 2020-23](#)