

NOTICE OF MEETING

CORPORATE COMMITTEE

Thursday, 15 September, 2022, 7pm – Woodside Room, George Meehan House, 294 High Road, Wood Green, N22 8JZ (watch the live meeting [here](#), watch the recording [here](#))

Members: Councillors Amin, Mark Blake, Rossetti, Abela, Adje, Culverwell, Diakides (Chair), Dogan (Vice-Chair), Jameson, Mahbub, Mason and Simmons-Safo.

Quorum: three

1. FILMING AT MEETINGS

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the 'meeting room', you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual, or may lead to the breach of a legal obligation by the Council.

2. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

3. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items will be considered under the agenda item where they appear. New items will be dealt with under item 15 below).

4. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- a. Must disclose the interest at the start of the meeting or when the interest becomes apparent; and

- b. May not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct.

5. DEPUTATIONS / PETITIONS / PRESENTATIONS / QUESTIONS

To consider any requests received in accordance with Part 4, section B, Paragraph 29 of the Council's Constitution.

6. MINUTES (PAGES 1 - 10)

To confirm and sign the minutes of the Corporate Committee meeting held on 21 July 2022 as a correct record.

7. PROCUREMENT INTERNAL AUDIT UPDATE 2020/21 (PAGES 11 - 20)

To note the updates on the action items from the 2020/2021 internal audits shown in Appendix 1.

8. INTERNAL AUDIT PROGRESS REPORT (PAGES 21 - 30)

To note the audit coverage and follow up work completed.

9. INTERNAL AUDIT PLAN (PAGES 31 - 48)

To approve the updated Annual Internal Audit Plan for 2022/23 (Appendix B) and the proposed changes to the plan (Appendix A).

10. QUARTERLY FRAUD UPDATE (APRIL - JUNE 2022) (PAGES 49 - 56)

To note the activities of the team during quarter one of 2022/23.

11. ANTI-FRAUD AND CORRUPTION STRATEGY (PAGES 57 - 92)

To agree the Corporate Anti-Fraud and Corruption Strategy and the following policies:

- Fraud Response Plan;
- Whistle-blowing Policy;
- Sanctions Policy;
- Anti-money Laundering Policy; and
- Anti-bribery Policy.

12. TREASURY MANAGEMENT QUARTER 1 2022-23 UPDATE (PAGES 93 - 106)

- a. To note the Treasury Management activity undertaken during the three months to 30 June 2022 and the performance achieved which is attached as Appendix 1 to this report.
- b. To note that all treasury activities were undertaken in line with the approved Treasury Management Strategy.

13. DRAFT STATEMENT OF ACCOUNTS 2021-22 AND PROVISIONAL PLAN FOR AUDIT 2021-22

To note the verbal update.

14. UPDATE ON THE RENAMING OF BLACK BOY LANE (PAGES 107 - 128)

To note plans for the implementation of the name change.

15. NEW ITEMS OF URGENT BUSINESS

To consider any items of urgent business as identified at item 3.

16. DATES OF FUTURE MEETINGS

To note the dates of future meetings:

Tuesday, 15 November 2022

This meeting will consider the following agenda items:

- Polling districts and Polling Places Review (Lesley Rennie)
- External Audit Plan 2021-22 (Kaycee Ikegwu)
- Audit & Risk Service Update for Quarter Two [July - September 2022] (Minesh Jani, Vanessa Bateman)
- Internal Audit Progress Report (Minesh Jani, Vanessa Bateman)
- Treasury Management Update Mid-Year Report 2022-23 (Tim Mpofu)

Thursday, 2 February 2022

This meeting will consider the following agenda items:

- Treasury Strategy Training (Tim Mpofu)
- Treasury Strategy (Tim Mpofu)

Tuesday, 28 March 2022

This meeting will consider the following agenda items:

- Treasury Management Update for Quarter Three (Tim Mpofu)
- Audit & Risk Quarter Three Progress Report (Minesh Jani, Vanessa Bateman)
- Annual Internal Audit Plan, Strategy, & Charter 2022-23 (Minesh Jani, Vanessa Bateman)
- Verbal Update on 2021-22 Audit Progress (Minesh Jani, Vanessa Bateman)

All meetings to commence at 7pm.

Jack Booth, Principal Committee Co-ordinator

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Fiona Alderman

Head of Legal & Governance (Monitoring Officer)

George Meehan House, 294 High Road, Wood Green, N22 8JZ

Wednesday, 07 September 2022

MINUTES OF THE CORPORATE COMMITTEE MEETING HELD ON THURSDAY, 21 JULY 2022, 7–9PM

PRESENT: Amin, Mark Blake, Rossetti, Abela, Adje, Culverwell, Diakides (chair), Dogan (vice-chair), Jameson, Mason and Simmons-Safo

Also attending: Kaycee Ikegwu (Head of Finance & Housing), Minesh Jani (Head of Audit & Risk Management), Tim Mpofu (Head of Pensions & Treasury), Andrew Meek (Head of Organisational Resilience), Alexis Correa (Deputy Head of Service for Health & Safety, Capital Projects & Property), Benita Edwards (Assistant Head of Legal Services), David Eagles (BDO external auditor), Ray Gard (external assessor), and Jack Booth (Principal Committee Co-ordinator).

1. FILMING AT MEETINGS

The Chair referred to the notice of filming at meetings and this information was noted.

2. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor Mahbub. Apologies for lateness were received from Councillor Dogan, Councillor Amin, and Councillor Mason.

3. URGENT BUSINESS

There was no urgent business.

4. DECLARATIONS OF INTEREST

There were no declarations of interest.

5. DEPUTATIONS / PETITIONS / PRESENTATIONS / QUESTIONS

There were no deputations.

6. MINUTES

The chair asked the Head of Audit & Risk Management if there was a discrepancy between two lines on page 3 of the minutes. The first stated: '[t]he acquisition and disposal of assets audit was scheduled to be presented to the committee at the next meeting.' The second line said: '[t]he auditing of the acquisitions and disposal of assets would be a piece of work that the Head of Audit & Risk Management proposed to look at in the upcoming municipal year.'

The Head of Audit & Risk Management said that there was a discussion at the last meeting about the governance around the disposal of assets. What was agreed was that the Audit & Risk team would carry out a follow up piece of work in relation to previous audits. The committee asked for the Head of Audit & Risk

Management to carry out a new audit in lieu of concerns around governance that had been highlighted. **(Action: Minesh Jani)**

RESOLVED

That the minutes of the Corporate Committee meeting held on 10 March 2022 be confirmed and signed as a correct record.

7. STATEMENT OF ACCOUNTS 2021-22

The Head of Finance & Housing gave a verbal update regarding the Statement of Accounts, highlighting the following:

- This meeting was the time of the year when a draft statement of accounts for the previous financial year was given to the committee. The draft statement of accounts was not ready that was why this was a verbal update. The reason why the accounts were not ready was due to a nationwide issue relating to an alteration in the method of accounting, as well as factors relating to the pandemic. Only 9% of local authorities had completed their statement of accounts; and
- It was emphasised that this was the first time that the council had been in the position of not having the statement of accounts ready.

David Eagles the council's external auditor provided a verbal update on the progress of the completion of the statement of accounts:

- That nationwide issues were caused by the discrepancy in the valuation of infrastructure assets. The Chartered Institute of Public Finance and Accountancy (CIPFA) had been attempting to deal with this issue;
- In February 2022 it was determined that it was not possible for proper accounting processes to take place when an infrastructure asset was removed from use;
- What had happened when an infrastructural asset was removed from use was that the cost, the accumulative depreciation, and the net impact of that were accounted for. The new code had an additional element that meant that cost needed to be accounted for on a geographical basis. It was not possible to comply with this requirement; and
- CIPFA were attempting to change the code to address the method of accounting outlined above. External auditors were not able to issue an opinion until this issue has been clarified.

In response to questions, the external auditor and the Head of Finance & Housing provided the following answers:

- In terms of what Haringey Council could have done to foresee this issue, there was little that could be done. The council found themselves in a nationwide problem. The external auditor advised to the committee that the council were following the same processes as the majority of local authorities, it was a case of waiting for the situation to resolve itself nationally;
- There were not local authorities in a more advanced position for accounting for their infrastructure assets than Haringey Council. This was because all local authorities had to account for these assets in the same way. The

external auditors were not making any criticism of the way the council had dealt with this issue; and

- The Head of Finance & Housing relayed that the council would make their best endeavours to meet the deadline for the 2022-23 accounts; however, external factors would have to be considered. For example, if the existing infrastructure asset valuation issue persisted. The local authority was liaising with other boroughs, partners and independent bodies to find a solution to the issue.

RESOLVED

To note the Head of Finance & Housing's verbal update.

8. TREASURY MANAGEMENT OUTTURN 2021-22

The Head of Pensions & Treasury provided an update to the Committee on the council's treasury management activities and performance in the year to 31 March 2022 in accordance with the CIPFA Treasury Management Code of Practice.

In response to questions, the Head of Pensions & Treasury provided the following answers:

- The long-term borrowing portfolio had fixed interest rates, there were no variable rates. The existing loan portfolio would not be impacted by an increase in interest rates. However, any new loans that the council took out would be affected by the rise in interest rates; and
- When the last strategy was set it was assumed that rates would be at 3.5% for Public Works Loan Board (PLWB) loans. The rate was currently at 3.2% meaning that if this loan were taken up it would come in below budget.

RESOLVED

- a. To note the Treasury Management activity undertaken during the year to 31 March 2022 and the performance achieved which is attached as Appendix 1 to this report.
- b. To note that all treasury activities were undertaken in line with the approved Treasury Management Strategy.

9. HEAD OF AUDIT & RISK MANAGEMENT UPDATE

The Head of Audit & Risk Management provided an update on the overall adequacy and effectiveness of the system of internal control and risk management operating throughout 2021/22. Presenting a summary of the audit work undertaken to formulate the opinion, including reliance placed on work by other bodies.

In response to questions, the Head of Audit & Risk Management provided the following answers:

- Limited assurances had been given around cyber security for two consecutive years. The council's external auditors who have carried out the internal audit, have stressed the need for the council to be prepared should a cyber-attack happen. There was a forthcoming report that included cyber security recommendations. It was emphasised that management would be strongly encouraged to carry out these recommendations;
- The role of the Audit & Risk Team was to independently appraise operations of the council, reporting these back to management. Where a system was assigned a limited assurance, this needed to be rectified. The areas that were given limited assurance, such as mental health assessments, elective home education, and deprivation of liberty, had been given recommendations, when the Audit & Risk Team were happy that these risks had been closed off the status of these risks could be reassessed and potentially changed;
- Emerging risks throughout the year were assessed based on risk assessment;
- Actions arising from audit reports were set out in an action plan within the audits that were given to the heads of service. It was important for management to act on these matters, through closing off identified risks;
- There was a method of reporting on audits at the statutory officers group meetings. This allowed these officers an opportunity to have an overview of risks across the council;
- Child Protection Plan and Education, Health, and Care Plan audits had been deferred. It was anticipated that they would be completed soon, they were currently at draft report stage. The findings of these two reports would be brought to the next meeting **(Action: Minesh Jani)**;
- It was important that the overall audit plan was visible, to this end he would circulate the overall audit plan to members and bring an updated overall audit plan to the next meeting. The overall audit plan identifies audits by department, so it was clear to see where responsibility for an audit was allocated **(Action: Minesh Jani)**;
- It was suggested that the Head of Procurement be invited to the next meeting to give an update on the status of the procurement recommendations **(Action: Minesh Jani)**; and
- The assurances that have been given to schools in the last two years had significantly improved. Risks that emerged at schools were around DBS clearances for school governors. This issue had also been flagged at Schools Forum, a meeting between stakeholders in schools and officers of the council.

RESOLVED

To note the content of the Head of Audit and Risk Management's annual audit report and assurance statement for 2021/22.

10. ANNUAL GOVERNANCE STATEMENT 2021-22

The Head of Audit & Risk Management relayed the purpose of the Annual Governance Statement, which was to satisfy statutory requirements and to provide a draft statement relating to the 2021/22 financial year for review and approval.

In response to questions, the following answers were provided:

- The council had taken numerous steps to ensure adequate controls were in place around the decision making for property acquisitions. This has created a clear audit trail of how decisions were being taken in this matter. The Head of Audit & Risk Management highlighted that it was not for him to give a breakdown of how the controls were implemented. He suggested that the relevant head of service could be invited to a particular meeting where the committee required a more detailed response on an issue; and
- An update on the six significant risks would be provided at the meeting on 15 November 2022 (**Action: Minesh Jani**). A councillor asked if it was possible to have a report about the risk that the insourcing of Homes for Haringey posed to the council by the meeting on 15 September 2022. (**Action: Minesh Jani**).

RESOLVED

- a. To review and approve the draft 2021/22 AGS attached at Appendix A.
- b. To note the approval timescale and processes for the draft 2021/22 AGS.

11. EXTERNAL ASSESSMENT OF INTERNAL AUDIT

The Head of Audit & Risk Management outlined that the committee had a strategic role to ensure the council's assurances were robust. To this end, the work of internal audit was a key component of the assurance framework. The outcome of the external assessment provided evidence as to whether the internal audit service was operating in accordance with the Public Sector Internal Audit Standards (PSIAS).

The Head of Audit & Risk Management introduced Ray Gard who has assessed the internal audit functions of the council. This was completed on a five-year cycle to provide external assurance to the approach of internal audit. Ray Gard introduced his report.

In response to questions, the external assessor and the Head of Audit & Risk Management gave the following answers:

- Public Sector Internal Audit Standards specify that a quality assurance plan must be in place to ensure compliance. The purpose of the document was to identify areas where the internal audit function could be improved. The document sets out the direction of travel for improvement, which was then assessed by the external assessor; and
- Most internal audits at local authorities had improved significantly since the Public Sector Internal Audit Standards were introduced in 2013. There were a couple internal audit processes at different local authorities around the country, that in the external assessor's opinion, were particularly good. He was happy to pass on the names of these local authorities to the Head of Audit & Risk Management. It should be noted that these local authorities operated with in-house teams, whereas Haringey operated a completely outsourced service. In this respect it was difficult to make comparisons;

- Regarding best practice to how an audit service should function, this was dependent on outcomes. If the outcome were to have assurance on controls and risk management, the current model that Haringey operated was sufficient. If the committee wanted a more proactive and insightful internal audit service, then having an in-house team would achieve this. In-house services gain detailed knowledge of their organisation; therefore, when developing certain processes and mechanisms they can work productively with management to achieve this **(Action: Minesh Jani)**.

RESOLVED

To note the positive outcome of the External Quality Assessment for Assurance and are assured over the quality and effectiveness of the Council's Internal Audit Function.

12. INSURANCE ARRANGEMENTS

The Head of Audit & Risk Management highlighted that the report laid out arrangements to manage the council's insurable financial risks following the transfer of functions previously carried out by Homes for Haringey to the Council. The council's insurance service is responsible for managing the council's insurance policies and the management of any insurance claims.

In response to questions, the Head of Audit & Risk Management provided the following answers:

- Through insourcing Homes for Haringey, the council had conducted a cost-benefit analysis to reduce insurance costs; and
- Insurance claims that were not catered for within the Housing Revenue Account (HRA), a ring-fenced account for certain defined transactions, would be channelled through existing processes.

RESOLVED

To note the arrangements put in place to manage the insurable financial risks using insurance arrangements for functions previously managed by Homes for Haringey.

13. SKILLS TRAINING MATRIX

The Head of Audit & Risk Management said that the Skills Training Matrix report sought feedback from members of the committee and its training needs. This information would be used to specify the training needs of the members of the committee to allow the committee to fulfil its remit.

The chair commented that it was important for committee members to fill out the skills audit. He also suggested that, after the skills audit was complete, that the committee look at co-opting independent members to fill any skills gaps that had been identified **(Action: Minesh Jani/ Jack Booth)**

RESOLVED

- a. To note the contents of this report.
- b. That members of the committee complete the skills matrix online using a link that will be sent separately by Democratic Services. The link will mirror the areas set out on the skills matrix attached to this report. Members are asked to complete the skills matrix by 31 August 2022.

14. HEALTH, SAFETY, AND WELLBEING POLICY

The Deputy Head of Service for Health & Safety, Capital Projects & Property relayed that there was a requirement to review the Corporate Health, Safety and Wellbeing Policy so that it reflected the latest changes in the council's structure, while ensuring it remains fit for purpose. The policy review includes changes on the health, safety and wellbeing governance structure. It also accommodates the insourcing of Homes for Haringey. The responsibility to review the policy lay with this committee and the Staffing and Remuneration Committee, each committee with a responsibility for sections specific to its area.

In response to questions, the Head of Organisational Resilience and the Deputy Head of Service for Health & Safety, Capital Projects & Property gave the following answers:

- Physical, emotional, social and economic wellbeing of staff were covered in the section of the policy that the Staffing and Remuneration Committee considered. It was suggested that the report regarding the section of the policy relating to wellbeing and equalities, which were considered at the Staffing and Remuneration, be forwarded to committee members (**Action: Alexis Correa/ Andrew Meek**);
- The policy was revised in line with Health and Safety at Work Act 1974 and accounted for the impact on equalities outcomes through consulting with unions and colleagues in HR;

RESOLVED

- a. To approve the draft Corporate Health, Safety and Wellbeing Statement Policy, attached at Appendix A.
- b. To authorise the Chief Executive Officer, in consultation with the Chair of the Committee, with the Corporate Health, Safety and Wellbeing Board and with the Corporate Leadership Team, to make such amendments to the policy as considered to be minor. These amendments are to be reported at the next Committee meeting.

15. NEW ITEMS OF URGENT BUSINESS

There were no items of urgent business.

16. DATES OF FUTURE MEETINGS

To note the dates of future meetings:

Thursday, 15 September 2022
Tuesday, 15 November 2022
Thursday, 2 February 2023
Tuesday, 28 March 2023

All meetings to commence at 7pm.

CHAIR: Councillor Diakides

Signed by Chair

Date

Corporate Committee Action Tracker				
Meeting date	Action	Response	Who by	Status
21 July 2022	To conduct a new audit about the governance issues around the disposal of assets. Once this had been done to bring this new audit to the committee.	An audit of the acquisition and disposal of assets has been added to the audit plan and its findings will be reported to the Committee at its next meeting.	Minesh Jani	Completed
21 July 2022	Bring back the findings from the Child Protection Plan and Education, Health, and Care Plan audits.	Both audit areas are on the audit plan and will be reported to the Corporate Committee following completion of the audits.	Minesh Jani	Completed
21 July 2022	Circulate the overall audit plan to members and bring this to the next meeting.	The updated internal audit plan is on the agenda for the Corporate Committee on 15 Sept 2022.	Minesh Jani	Completed
21 July 2022	Invite the Head of Procurement to the next meeting to give an update on the status of the procurement recommendations. The relevant cabinet member should also be invited.	The Head of Procurement has been invited to attend the Corporate Committee meeting.	Minesh Jani	Completed
21 July 2022	Provide an update on the six significant risks at the meeting on 15 November 2022.	This update relates to the significant governance issues identified on the Draft Annual Governance Statement. The Committee will be updated in November 2022.	Minesh Jani	Completed
21 July 2022	Provide an update on the risk posed by the insourcing of Homes for Haringey for the meeting on the 15 September 2022.	The updated internal audit plan has been updated to focus on areas on risks and will be presented to the Corporate Committee on 15 September 2022.	Minesh Jani	Completed
21 July 2022	Look at options for building an in-house audit and risk team.	This action has been captured by the recommendation in the QAIP report.	Minesh Jani	Completed
21 July 2022	After the skills matrix for councillors was complete, the committee to consider looking at co-opting independent members to fill any skills gaps that had been identified.	An audit of the acquisition and disposal of assets has been added to the audit plan and its findings will be reported to the Committee at its next meeting.	Minesh Jani Jack Booth	Completed
21 July 2022	Forward to all committee members the report regarding the Health, Safety, and Wellbeing Policy that went to the Staffing and Remuneration Committee.	Actioned in early August.	Andrew Meek Alexis Correa	Completed

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Report for: Corporate Committee – 15 September 2022

Title: 2020/21 Procurement Internal Audit Update

Report authorised by: Jon Warlow, Director of Finance

Lead Officer: Barry Phelps, Head of Strategic Procurement

Ward(s) affected: N/A

**Report for Key/
Non Key Decision:** Non-Key Decision

1. Describe the issue under consideration

This report provides an update on the actions in relation to audits undertaken as part of the 2020/21 audit plan which included three audits focused on risk areas directly related to contracts and procurement. The areas audited were: -

- Arrangements for Letting Contracts.
- Contract Management; and
- Management and Use of Waivers.

All three audit areas reviewed as part of the 2020/21 audit plan have been assigned “Limited” Assurance.

2. Cabinet Member Introduction

Not applicable.

3. Recommendations

To note the updates on the action items from the 2020/2021 internal audits shown in Appendix 1.

4. Reasons for decision

At the last Corporate Committee meeting on the 21 July 2022, it was suggested that the Head of Procurement be invited to the next meeting to give an update on the status of procurement recommendations.

5. Alternative options considered

Not applicable.

6. Background information

- 6.1** Many of the issues raised by the audit will looked to be addressed with the implementation of the new procurement technology and adoption of a new Procurement operating model.

6.2 Procurement technology

The findings of the audit report are integrated into the system requirements with the intention of the new technology to provide the necessary controls and notifications.

The solution is to be fully compliant with the legislative processes and notifications with a comprehensive contract management and performance management capability with continuing management/monitoring of awarded commitment.

The implementation of the new technology is scheduled to be make it available for use from December 2023

6.3 Procurement operating model

A new operating model for Procurement will be developed, which will respond to issues raised in audit reports and, importantly, will over a planned period ensure that the Council's procurement practices represent best practice and give best value for money. For example, amongst the considerations for the operating model are changes to the threshold at which Strategic Procurement will lead procurements eliminating some of the risks identified by the audit.

7. Contribution to strategic outcomes

Not applicable.

8. Statutory Officer Comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

8.1 Finance

The cost of implementing the new procurement technology solution has been budgeted for within the existing ERP Improvement capital scheme.

The financial implications of implementing a new operating model for Procurement are still to be worked through and any request for additional resources will be presented to the relevant Cabinet meeting at that time.

8.2 Strategic Procurement

Strategic Procurement prepared this report and are working with all services undertaking procurements to ensure the issues raised are not repeated pending the introduction of changes referred to in section 6.

8.3 Legal

The Head of Legal and Governance has been consulted in the preparation of this report and advises that there are no direct legal implications arising from the report.

8.4 Equality

Not applicable.

9 Use of Appendices

Appendix 1 provides an update on the action items

10. Local Government (Access to Information) Act 1985

Not applicable.

Arrangements for Letting Contracts

Risk	Priority	Response	Update
There are no internal contracts register of all contracts held by the Council and hence, does not have effective oversight of all procurement activity.	1	To be captured as part of the ERP review. To implement any interim arrangements would take a significant amount of time and resources.	ERP programme slipped not likely to be implemented until late 2023
Where contracts are not procured through HPCS, there is an increased risk of inconsistencies and bias in the procurement process. Additionally, this represents non-compliance with CSOs.	2	The Financial Administration team are now rejecting requests to set up contracts that should have gone through HPCS, unless approved by Strategic Procurement. The contracts will now be set up through HPCS.	Complete
Procurement Initiation Forms are not always completed to request for assistance from Strategic Procurement.	2	Strategic Procurement Officers have been reminded of the requirement for a PIF prior to undertaking a procurement.	Complete
Financial or credit checks are not always completed on the preferred bidder, and this is an essential requirement for contracts valued at £160k or above	1	Recommendations accepted. We are currently looking at automated credit checks as part of the new procurement solution.	Partially complete, will be completed as part of the procurement technology due to be implemented in late 2023

Signed contract not in place for all contracts	2	<p>The intention going forward is to have a contract management solution that will facilitate electronic signatures and retain all contracts in a central repository.</p> <p>The service areas are currently responsible for managing and storing their own contracts; therefore, this would need to re-enforce with officers and Directors.</p>	<p>Partially complete.</p> <p>Strategic Procurement have advised all commissioners and emphasised the requirement as part of the HPCS user training.</p> <p>ERP programme will pick up provision of a central repository for contracts</p>
Where contract awards over £25k are not published on Contract Finder, there is non-compliance with Public Contracts Regulations (PCR) 2015. These regulations are in place to protect public money and non-compliance may result in financial penalties imposed on the Council leading to reputational damage.	2	<p>Automatically posting new contracts to Contracts Finder will be a requirement of the new procurement solution.</p> <p>Posting to Contracts Finder is part of the current HPCS user training to reinforce the requirement.</p>	<p>Strategic Procurement is emphasising the need to update Contracts Finder as part of the HPCS and Procurement training.</p> <p>Functionality in the new procurement technology which scheduled to be implemented in late 2023 under the ERP programme will automate this.</p> <p>Consideration is also being given to a new Procurement operating model with new responsibility for over £25k spend</p>

Contact Management

Risk	Priority	Response	Update
There is a lack of consistency in how contracts were managed and reported on. This included performance and budget monitoring.	2	Whilst Strategic Procurement have led on producing a contract management toolkit, we are not currently resourced to provide training across the Council. Funding would be required to bring in the resources to undertake this activity. There is a lack of technology that enables effective contract management, this will be addressed in the ERP review project.	Strategic Procurement are undertaking ad-hoc support of contract management to the services Technology should be introduced in late 2023 to support the contracts management function
Despite the Code of Practice stating HPCS was the dedicated contract management portal, it was highlighted the contract management module was not available. Hence, there was not a structured approach to management and no central location for storing documentation.	2	Whilst it is not the responsibility of Strategic procurement to monitor contracts, this sits with the Director/service area, Strategic Procurement has recognised there is a gap in the technology we have and has requested functionality of retaining a central database for service reviews and contract performance.	The ERP and contract management technology review is ongoing and a solution capable of supporting audit recommendation anticipated for late 2023

Whilst the Code of Practice states that contracts must contain a contract management clause, this was not always included.	1	Strategic Procurement does not have sight of procurement or contracts below £160k, this is undertaken by the Service Areas. Strategic Procurement has provided standard contract templates to be used for below £160k. To review contracts valued between £10k and £160k would require a change in the operating model to review over 600 contracts per year in this range.	A review of the Strategic Procurement operating model
Purchase orders are not always raised in advance and there is a history of issues with retrospective purchase orders.	2	This activity is within the remit of the compliance manager in the Finance Administration team. Strategic Procurement does not have the capacity to undertake this activity and would be moving away from the operating model agreed in 2017	

Contract Waivers

Risk	Priority	Response	Update
<p>Whilst there is a clear rationale for granting waivers in the Code of Practice, we identified waivers in the audit sample which were non-compliant with the Code.</p>	1	<p>The two waivers identified as non-compliant would have been reviewed by the SSC who typically comment on reports below £160K and provide the necessary education.</p> <p>Waiver training will be added to the HPCS training programme and the SPPs will be reminded of the need to ensure understanding and compliance of the criteria to justify use of for waivers.</p> <p>Waivers over £160K or those with a value less than £160k which are reviewed by SP are challenged to ensure compliance either due to the circumstances or that the appropriate justification is contained within the written report.</p>	<p>Complete: Waiver training has been added to the HPCS training programme and SPPs have been reminded of the need to justify waivers in accordance with CSO.</p>

There is no central register of waivers and hence, no ability for the Council to know the value of spend where the Contract Standing Orders have been waived. As a result, there is no reporting on total spend or any waivers which are inappropriate.	1	Strategic Procurement will review the possibility of maintaining a central shared file based on the current files used by the two SPPs. We will also discuss with SCC to determine whether they can access the shared file.	Partially completed: A shared document will be used as a central register of waivers. Functionality has been requested of the procurement technology being implemented in late 2023
Out of the waivers sampled, we found that two did not have signed contracts and hence, there is a risk that contract formalities may not have been agreed.	1	Strategic Procurement does not maintain oversight as to whether contracts have been signed, this is undertaken by the service areas. To provide monitoring, an additional resource would be required, as the waiver process is manual and separate from the contract creation which is controlled by the service.	Monitoring functionality will be considered as part of the procurement technology being implemented in late 2023
There has been no specific training on waiving the CSOs.	1	Waiver training will be added to the HPCS training programme and the SPPs will be reminded of the need to ensure understanding and compliance of the criteria to justify use of for waivers.	Complete: Specific training is provided as part of the HPCS user training.

Report for: Corporate Committee – 15 September 2022

Title: Internal Audit Progress Report 2022/23 – Quarter 1

Report authorised by: Director of Finance

Lead Officer: Minesh Jani, Head of Audit and Risk Management

Ward(s) affected: N/A

**Report for Key/
Non-Key Decision:** Information

1. Describe the issue under consideration

- 1.1 This report details the work undertaken by Internal Audit in the quarter ending 30 June 2022 and focuses on progress on internal audit coverage relative to the approved internal audit plan, including the number of audit reports issued and finalised – work undertaken by the external provider (Mazars).

2. Cabinet Member Introduction

- 2.1 Not applicable.

3. Recommendations

- 3.1 To note the audit coverage and follow up work completed.

4. Reasons for decision

- 4.1 The Corporate Committee is responsible for monitoring the completion of the annual internal audit plan and the implementation of agreed recommendations as part of its Terms of Reference.
- 4.2 In order to facilitate this, progress reports are provided on a quarterly basis for review and consideration by the Corporate Committee on the work undertaken by the Internal Audit Service in completing the annual audit plan. Where further action is required or recommended, this is highlighted with appropriate recommendations for the Corporate Committee.

5. Alternative options considered

- 5.1 Not applicable.

6. Background information

- 6.1 The information in this report has been compiled from information held within Audit & Risk Management and from records held by Mazars.

7. Contribution to strategic outcomes

- 7.1 The internal audit work makes a significant contribution to ensuring the adequacy and effectiveness of internal control throughout the Council, which covers all key Priority areas.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

8.1 Finance and Procurement

There are no direct financial implications arising from this report. The work completed by Mazars is part of the framework contract which was awarded to the London Borough of Croydon to 31 March 2024, in accordance with EU regulations. The costs of this contract are contained and managed within the Audit and Risk Management revenue budget. The maintenance of a strong internal audit function and a proactive and reaction fraud investigation team is a key element of the Council's system of Governance.

8.2 Legal

The Head of Legal and Governance has been consulted in the preparation of this report and advises that there are no direct legal implications arising from the report.

8.3 Equality

The Council has a public sector equality duty under the Equality Act (2010) to have due regard to:

- tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- advance equality of opportunity between people who share those protected characteristics and people who do not;
- foster good relations between people who share those characteristics and people who do not.

As contracted providers of Haringey Council, the internal audit contractor is required to demonstrate a strong commitment to equality and fairness in their actions and work practices, and adherence to the Equality Act 2010. Ensuring that the Council has effective internal audit and assurance arrangements in place will also assist the Council to use its available resources more effectively.

9. Use of Appendices

Appendix A – Mazars Progress report – Internal audit

10. Local Government (Access to Information) Act 1985

- 10.1 Not applicable.

11. Performance Management Information

- 11.1 Although there are no national or Best Value Performance Indicators, local performance targets have been agreed for Audit and Risk Management. Table 1 below shows the targets for each key area monitored and gives a breakdown between the quarterly and cumulative performance.

Table 1 – Performance Indicators

Ref.	Performance Indicator	1 st Quarter	Year to date	Year end Target
1	Internal Audit work (Mazars) – Days Completed vs. Planned programme	10%	10%	95%
2	Priority 1 recommendations implemented at follow up	N/A	N/A	95%

12. Internal Audit work – Mazars

- 12.1 The activity of Mazars for the first quarter of 2022/23 is detailed at Appendix A. Mazars planned to deliver 90 days of the annual audit plan (840 days) during the quarter (to 30 June 2022) and delivered 85 days audit work during the quarter. This is about the same number of days delivered in the first quarter last year. Factors such as the need to undertake some schools and key finance systems audits in the year mean a lower proportion of work is started in Quarter 1. We have agreed a target of 30% with Mazars to be delivered by the end of quarter 2.
- 12.2 Members of the Corporate Committee receive detailed summaries of all projects for which a final report has been issued to allow for any concerns which members may have to be considered in a timely manner. Appendix A provides a list of all final reports which have been issued during the quarter.
- 12.3 **Significant issues arising in Quarter 1**
There are no reports issued with inadequate level of assurance (Limited or Nil) in this quarter.

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APPENDIX 1

Introduction

This report for the 2022/23 financial year includes audit progress between April 2022 and August 2022 covering the 2022/23 Internal Audit Plan. The report provides information on assurance opinions on areas we have reviewed and gives an indication of the direction of travel for key systems work which will provide information on how risks are being managed over time. Full copies of our audit reports will be provided upon request. The fieldwork and testing for these reviews have been performed remotely.

All recommendations are agreed with Council officers, and any disputes are discussed prior to the final report being issued. All recommendations to address any control weaknesses highlighted within this report have been agreed. Officers' actions to address the recommendations, including the responsible officer and the deadline for completion, are fully detailed in the individual final audit reports. The attached tables reflect the status of the systems at the time of the audit, and recommendations may already have been implemented by Council officers by the time the final report is issued and reported.

Date: August 2022

Key Highlights/Summary:

2022/23 Final Internal Audit Reports issued (further detail on next page)

- Admissions and School Plan Planning
- Council Tax (21/22)
- Business Rates (21/22)

2022/23 Draft Internal Audit Reports issued

- Housing Benefits (21/22)
- Use and Control of CCTV (21/22)
- IT Procurement

2022/23 Audits at Fieldwork Stage

- | | | |
|--|------------------------------|-------------------------|
| • Child Protection | • Payroll | • South Haringey School |
| • Management of Trees | • Missing Children Service | |
| • Arrangements of dealing with Domestic Violence | • St Francis de Sales School | |
| • Treasury Management | • Tiverton Primary School | |
| | • Earlham Primary School | |

2022/23 Audits at Terms of Reference issued

- Recruitment, Retention and Leavers
- Delivery of Capital Projects
- Fostering
- Delivery of the Climate Change Action Plan

Final Internal Audit Reports issued

The following table sets out the 2022/23 audits finalised and the status of the systems at the time of the audit. It must be noted that the recommendations may already have been implemented by Council officers by the time the final report is issued and reported.




Audit Title	Date of Audit	Date of Final Report	Assurance Level	Direction of Travel	Number of Recommendations (Priority)		
					1	2	3
Admissions and School Place Planning	June 2022	August 2022	Substantial	N/A	-	-	1
Council Tax (21/22)	May 2022	August 2022	Adequate	↔	-	2	-
Business Rates (21/22)	May 2022	August 2022	Adequate	↔	-	1	2

Definitions of assurance levels, recommendations priorities and direction of travel are included below.

As a reminder, our recommendations are prioritised according to the following categories:

Definitions of Assurance Levels	
Level	Description
Substantial Assurance:	Our audit finds no significant weaknesses and we feel that overall risks are being effectively managed. The issues raised tend to be minor issues or areas for improvement within an adequate control framework.
Adequate Assurance:	There is generally a sound control framework in place, but there are significant issues of compliance or efficiency or some specific gaps in the control framework which need to be addressed. Adequate assurance indicates that despite this, there is no indication that risks are crystallising at present.
Limited Assurance:	Weaknesses in the system and/or application of controls are such that the system objectives are put at risk. Significant improvements are required to the control environment.
Nil Assurance:	There is no framework of key controls in place to manage risks. This substantially increases the likelihood that the service will not achieve its objectives. Where key controls do exist, they are not applied.

Definitions of Recommendations	
Priority	Description
Priority 1 (Fundamental)	Recommendations represent fundamental control weaknesses, which expose the organisation to a high degree of unnecessary risk.
Priority 2 (Significant)	Recommendations represent significant control weaknesses which expose the organisation to a moderate degree of unnecessary risk.
Priority 3 (Housekeeping)	Recommendations show areas where we have highlighted opportunities to implement a good or better practice, to improve efficiency or further reduce exposure to risk.

Direction	
Direction	Description
	Improved since the last audit visit.
	Deteriorated since the last audit visit.
	Unchanged since the last audit report.
No arrow	Not previously visited by Internal Audit.

Statement of Responsibility

We take responsibility to the London Borough of Haringey for this report which is prepared on the basis of the limitations set out below.

The responsibility for designing and maintaining a sound system of internal control and the prevention and detection of fraud and other irregularities rests with management, with internal audit providing a service to management to enable them to achieve this objective. Specifically, we assess the adequacy and effectiveness of the system of internal control arrangements implemented by management and perform sample testing on those controls in the period under review with a view to providing an opinion on the extent to which risks in this area are managed.

We plan our work in order to ensure that we have a reasonable expectation of detecting significant control weaknesses. However, our procedures alone should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify any circumstances of fraud or irregularity. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud. The matters raised in this report are only those which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of our work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices.

This report is confidential and must not be disclosed to any third party or reproduced in whole or in part without our prior written consent. To the fullest extent permitted by law Mazars LLP accepts no responsibility and disclaims all liability to any third party who purports to use or rely for any reason whatsoever on the Report, its contents, conclusions, any extract, reinterpretation amendment and/or modification by any third party is entirely at their own risk.

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Report for: Corporate Committee – 15 September 2022

Title: Updated Annual Internal Audit Plan - 2022/23

Report authorised by: Director of Finance

Lead Officer: Minesh Jani, Head of Audit and Risk Management

Ward(s) affected: N/A

**Report for Key/
Non-Key Decision:** Non-key decision

1. Describe the issue under consideration

- 1.1 The Corporate Committee is responsible for reviewing and approving the internal audit plan including any changes as part of its Terms of Reference.

2. Cabinet Member Introduction

- 2.1 Not applicable.

3. Recommendations

- 3.1 To approve the updated Annual Internal Audit Plan for 2022/23 (Appendix B) and the proposed changes to the plan (Appendix A).

4. Reasons for decision

- 4.1 Local authorities are required by law to maintain an internal audit function. In addition, The Accounts and Audit Regulations 2015 reinforce the statutory requirement and re-state the need for the Council to maintain an adequate and effective system of internal audit.
- 4.2 The annual internal audit plan is a key element in delivering the Council's statutory requirements. The Corporate Committee is responsible for ensuring that this is in place and approving the Council's Annual Internal Audit Plan.

5. Alternative options considered

- 5.1 Not applicable.

6. Background information

- 6.1 The internal audit plan for 2022/23 was presented to the Corporate Committee on 10 March 2022 detailing the areas planned for audit in the financial year 2022/23. At that meeting, the Head of Audit and Risk Management explained that in light of the impact of Home for Haringey (HfH) being back into the authority on 1 June 2022, the internal audit plan will be reviewed to ensure the work on audit continued to focus on and provide assurance to those areas that presented the highest risks, including areas which were previously the responsibility of HfH. This was endorsed by the committee who asked for an updated internal audit plan at its future meeting. This paper sets out the changes proposed to the plan and an updated internal audit plan for 2022/23. The Head of Audit has also reviewed other risk areas since the plan was presented to the Committee and suggested minor changes to the current plan.

- 6.2 In carrying out a risk assessment of functions transferring into the Council, numerous meetings and discussions have taken place and audit areas identified for this financial year. These areas have been reported to the Housing Board. A number of significant risks that were noted by the HfH Audit and Risk Committee have come been considered. The audit areas are set out in Appendix A attached to this report.
- 6.3 Appendix B sets out the updated internal audit plan for 2022/23. The proposed annual audit plan is risk based and has been derived following consideration of: the Borough Plan; organisational changes; risk registers; corporate programmes and projects; the Annual Audit and Inspection Letter and fraud investigation work completed in 2021/22.
- 6.4 The in-house corporate anti-fraud team is responsible for investigations into allegations of financial irregularity, pro-active and reactive corporate anti-fraud work, provision of advice on risk and controls and some grant certification work.

7. Contribution to strategic outcomes

- 7.1 Internal audit is an important element of the Council's assurance processes. The internal audit and counter-fraud teams make a significant contribution to ensuring the adequacy and effectiveness of internal control throughout the Council, which covers all Priority areas. The annual audit plan is a key element in ensuring the Council complies with its statutory responsibilities.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

8.1 Finance and Procurement

There are no direct financial implications arising from this report. The work which will be completed by Mazars to undertake the annual audit plan in 2022/23 is part of the contract, which was re-let following Cabinet approval in January 2018 in accordance with EU regulations. The costs of this contract are contained and managed within the Audit and Risk Management revenue budgets, which are monitored on a monthly basis.

The proposed amendment to the Audit Plan agreed in March is noted and aims to respond to the integration of HfH into the Council.

The presentation of the attached draft annual internal audit plan for approval by this Committee meets the Council's statutory requirement under the 2015 Accounts and Audit Regulations.

8.2 Legal

The Head of Legal and Governance has been consulted in the preparation of this report, and in noting that the plan and strategy follow best practice and industry standards respectively, confirms that there are no direct implications arising out of the report.

8.3 Equality

The Council has a public sector equality duty under the Equality Act (2010) to have due regard to:

- tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- advance equality of opportunity between people who share those protected characteristics and people who do not;
- foster good relations between people who share those characteristics and people who do not.

As contracted providers of Haringey Council, the internal audit contractor is required to demonstrate a strong commitment to equality and fairness in their actions and work practices, and adherence to the Equality Act 2010. Ensuring that the Council has effective internal audit and assurance arrangements in place will also assist the Council to use its available resources more effectively.

9. Use of Appendices

Appendix A – Changes proposed to the Annual Internal Audit Plan 2022/23;
and

Appendix B – Updated Internal Audit Plan 2022/23.

10. Local Government (Access to Information) Act 1985

Not applicable.

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Proposed Changes to the Internal Audit Plan 2022/23

Ref	New Audit Area and nature of risk	Audit area	Audit days
	<p>Risk Assessment of functions transferred from Homes for Haringey: -</p> <p>(3a) - The Audit and Risk Management Service undertook a high-level review of the six mandatory areas of compliance in 2021/22 and assigned the area "Limited Assurance". To obtain assurances over the compliance of each of the six areas, it is proposed to review the areas individually to give focus in the next 2-3 years.</p> <p>(3b) - This area has not been audited for a significant period of time and represents a significant are of risk. The audit will focus on Decent Homes performance.</p> <p>(3c) - This area was audited two years ago and assigned "Limited Assurance". Following consultation, senior management have requested a fresh audit within the pre-insourced Council Housing Service to gain new assurance as opposed to just following up actions.</p> <p>(3d) - The performance of voids was an ongoing area of concern for senior management within the pre-insourced Council Housing Service in 2021/22 and represent a significant financial and reputational risk.</p> <p>(3e) – A "Nil Assurance" report was previously issued (in 2020/21). Though there is some evidence of progress, a full audit is proposed to evidence progress. This area remains inherently high.</p>	<p>Gas Safety</p> <p>Strategic Asset Management and Improvement</p> <p>Disrepair claims</p> <p>Management of voids</p> <p>Stocks and stores</p>	<p>+10</p> <p>+10</p> <p>+10</p> <p>+10</p> <p>+8</p>

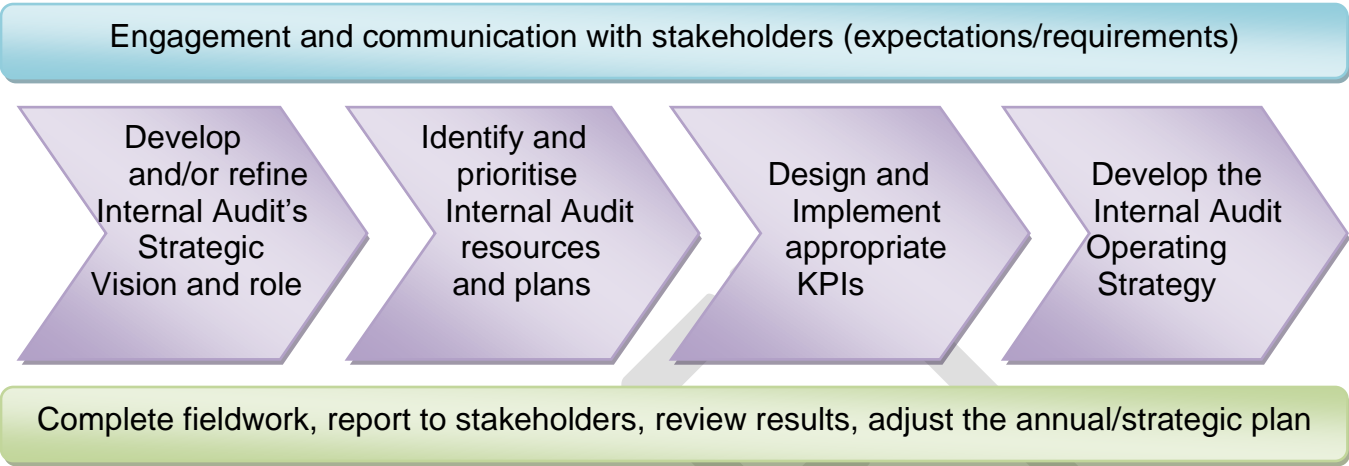
	<p>(3f) – This area was assigned “Limited Assurance” when previously audited. There are some continuing concerns of senior management within the pre-insourced Council Housing Service.</p> <p>To have a focus on the cleanliness of estates and buildings/blocks.</p>	Estate Management	+8
	<p>(3g) - There are concerns over the robustness of how quickly properties are let once they become available (existing and new build stock). Delays in letting arrangements exposes the Council to significant financial and reputational risks.</p> <p>It is proposed to review the lettings process but with an emphasis on the letting of new build properties that become available to the Council.</p>	Lettings	+10
	<p>(3) - Transition of HfH - Risk Assessment At the start of the financial year, it was recognised a risk assessment will be carried out for functions transferring into the Council from HfH. The Head of Audit and Risk Management put aside 70 days, to be allocated to specific audit areas following the transfer. This has been allocated against audits set out above.</p>	Chief Executive	-70
	<p>Audits deferred from 2021/22 internal audit plan to 2022/23: -</p> <ul style="list-style-type: none"> - Business Continuity Planning - Residential Placements - Child Protection Places - Management and Inspection of Trees 		+10 +10 +10 +10
	<p>New Audit areas identified in 2022/23</p> <ul style="list-style-type: none"> - New Rivers Leisure Centre – Follow up - New Parking System implementation, parking permit and system’s controls 		+5 +15

	Areas to be audited in 2023/24 (next year's audit plan). <ul style="list-style-type: none"> - Cyber security - Accounting and General Ledger 		-15 -10
	Net change in audit days		+31

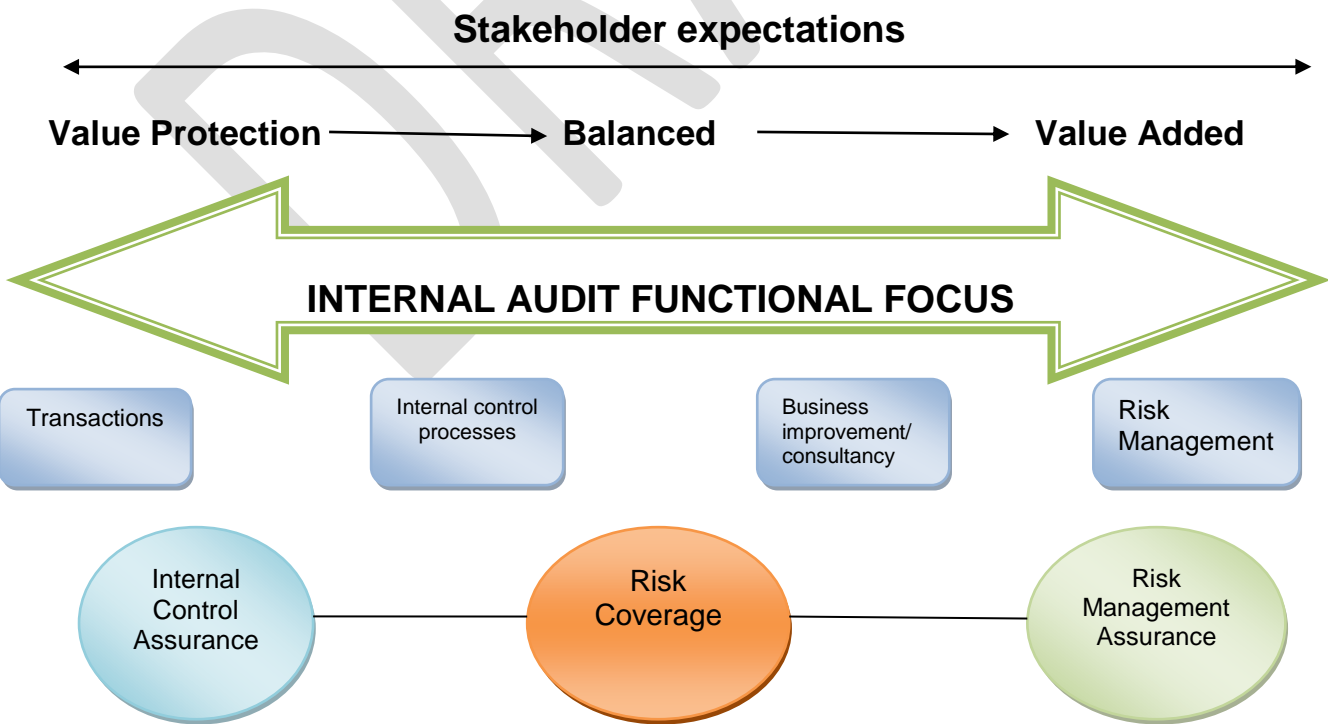
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Internal Audit Strategy – Introduction

Haringey’s internal audit function is driven by an appropriate strategy, rather than as a tactical response to operational issues, to minimise the risks that key strategic issues could be overlooked. Haringey’s framework has been developed to cover both strategic and tactical considerations and ensures that internal audit resources are used to provide the appropriate assurances for the organisation at any one time, as follows:



To create an effective internal audit function, internal audit’s key stakeholders will determine how the audit function delivers the desired value by focusing on e.g. risk management and control assurance; assessment of internal control effectiveness and efficiency; regulatory and corporate compliance assurance; developing awareness of risk and control across the organisation. Internal audit’s resources and plans are then aligned to the Council’s key business risks and operational and financial priorities as follows:



Internal Audit Objectives

Haringey's approach is designed to enable internal audit's remit to evolve and develop as the organisation's needs change over time. As stakeholder needs evolve, internal audit can focus on creating value through assisting with improvements in operational processes. As Haringey's risk appetite changes, internal audit's strategy and functional focus can move from internal control, to risk management, assurance.

The internal audit strategy sets out how the Council's Internal Audit service will be delivered, in accordance with the Internal Audit Charter. Internal Audit will provide independent and objective assurance to the Council, its members, the Chief Executive and Senior Leadership Team and to the Chief Financial Officer to support them in discharging their responsibilities under S151 of the Local Government Act 1972, relating to the proper administration of the Council's financial affairs. It is the Council's intention to provide a best practice, cost efficient internal audit service which fulfils the requirements of the statutory 2017 UK Public Sector Internal Audit Standards (PSIAS) and the CIPFA Local Government Application Note (LGAN).

Internal Audit's Remit

Internal Audit will:

- Provide management and members with an independent, objective assurance and advisory activity designed to add value and improve the Council's operations;
- Assist the Corporate Committee to reinforce the importance of effective corporate governance and ensure internal control improvements are delivered;
- Drive organisational change to improve processes and service performance;
- Work with other internal stakeholders and customers to review and recommend improvements to internal control and governance arrangements in accordance with regulatory and statutory requirements;
- Work closely with other assurance providers to share information and provide a value for money assurance service. Where appropriate the work of other assurance providers may be taken into consideration and contribute to the Head of Audits annual opinion; and
- Participate in local and national bodies and working groups to influence agendas and developments within the profession.

Internal Audit will ensure that it is not involved in the design, installation and operation of controls so as to compromise its independence and objectivity. Internal Audit will however offer advice on the design of new internal controls in accordance with best practice.

Service Delivery 2022/23

The internal audit service will be delivered by a 'mixed economy' of externally procured services under the direction of the Council's Head of Audit and Risk Management, supported by an in-house Corporate Anti-Fraud Team. A Deputy Head of Audit and Risk Management post has been established and the new post holder started in February 2020. This role was established to strengthen the in-house senior resources focused on Fraud, Risk, Audit and Governance to ensure the services plans for continuous improvement can be efficiently implemented with less reliance on the private sector. A key area for development is the Council's Risk Management

Framework by strengthening the formal mechanisms that support management it will be easier to gain insight and provide assurance, to all stakeholders, in future. The creation of this post has provided additional capacity to manage the work of the internal audit service.

The delivery of the internal audit strategy required reappraisal following the in sourcing of Homes for Haringey, the Council's ALMO in June 2022. A risk assessment has been carried out and key areas for audits identified. These have been added to the internal audit plan below.

The resources available in 2022/23 to deliver the internal audit and counter-fraud function have been assessed as adequate to fulfil the requirements of the PSIAS and ensure that the key risks of the Council are subject to an appropriate level of independent audit review.

Internal Audit Planning

Audit planning will be undertaken on an annual basis and audit coverage will be based on the following:

- The Borough Plan and Corporate / Directorate Risk Registers;
- Risk identified by Directorate Management Teams;
- Discussions regarding assurance needs with the Council's senior management, statutory officers;
- Outputs already available from other independent assurance providers.

The annual Internal Audit Plan is composed of the following:

- **Borough Plan/Priority and Business Area Risk Based Audits:** Audits of systems, processes or tasks where the internal controls are identified, evaluated and confirmed through risk assessment process. The internal controls depending on the risk assessment are tested to confirm that they are operating correctly. The selection of work in this category is driven by internal audit's and senior managers' risk assessment and may also include work in areas where the Council services are delivered in partnership with or by other organisations.
- **Key Financial Systems:** Audits of the Council's key financial systems on a continuous basis.
- **Probity Audit (schools/other establishments):** Audit of a single establishment. Compliance with legislation, regulation, policies, procedures or best practice is confirmed.
- **Computer Audit:** The review of ICT infrastructure and associated systems, software and hardware.
- **Contract and Procurement Audit:** Audits of the Council's procedures and processes for the letting and monitoring of contracts, including reviews of completed and current contracts.
- **Counter-Fraud and Ad-Hoc Work:** The in-house Corporate Anti-Fraud Team undertakes a programme of pro-active and reactive counter-fraud investigations. A contingency of audit days is also included in the annual audit plan to cover any additional work due to changes or issues arising in-year.

- **Advisory:** Supporting management with advice and guidance regarding new systems and processes and how an efficient and effective control environment to manager risk can be implemented. Our mix of in house and outsourced resources, enables us to provide this added value service without conflicts of interest arising.

Follow-up

Internal Audit will evaluate the Council's progress in implementing audit recommendations against agreed targets for implementation. Progress will be reported to management and to the Corporate Committee on a quarterly basis. Where progress is unsatisfactory or management fail to provide a satisfactory response to follow up requests, Internal Audit will implement the escalation procedure as agreed with management.

Reporting

Internal audit reports the findings of its work in detail to local management at the conclusion of each piece of audit work and at the follow up stage. The appropriate officers to receive the report at the draft and final reporting stage of the audit will be determined at the planning stage of the work and reviewed at the end of the fieldwork period to ensure completeness. Summaries of findings are reported to the Corporate Committee as part of the quarterly reports and within the Head of Internal Audit's annual report which contributes to the assurances underpinning the statutory Annual Governance Statement of the Council.

Internal Audit Plan 2022/23

The annual internal audit plan has been discussed and is being agreed with the Senior Leadership Team; Priority Owners; and nominated clients. The plan and strategy are submitted to the Corporate Committee for final approval and any significant changes to the annual internal audit plan and/or the internal audit strategy will be reported during the year to the Corporate Committee for formal approval. Any change to the plan will also be reported to the committee on a regular basis.

The table below sets out the internal audit work to be completed by the external contractor. The total number of days to be delivered excludes audit work that will be completed as part of the corporate anti-fraud team’s work.

The work planned aims to provide coverage across the value protection and value added requirements of the Council. The internal audit service has focused its annual plan to align it with the identified key risks within the Borough Plan in order to provide assurance across the directorates.

Audit Area	Client		Days
Corporate/Cross Cutting Risk Audits			
Community Engagement	Director of Culture, Strategy & Engagement		15
Customer Pathway Arrangements	Director of Culture, Strategy & Engagement		15
Business Continuity Planning	Director of Placemaking & Housing		10
Council Plan Delivery	Director of Culture, Strategy & Engagement		15
Recruitment, Retention and Leavers	Director of Culture, Strategy & Engagement		15
Arrangements for Managing Transformations	Director of Finance		15
Health and Safety	Director of Placemaking & Housing		10
Control and Monitoring of Purchasing Cycle (Strategic)	Director of Finance		15
Sub-total – Corporate Risk Audits			110
Children’s Services			
Arrangements to satisfy the legal requirement to review EHCPs annually.	Director of Children’s Services		15

Audit Area	Client		Days
Early Years Commissioning	Director of Children's Services		15
Admissions and school place planning	Director of Children's Services		10
Missing Children Service	Director of Children's Services		10
Delivery of Special Education Needs Improvement plan	Director of Children's Services		10
Fostering	Director of Children's Services		12
Arrangements for the management and control over child protection cases - from 2021/22	Director of Children's Services		10
Arrangements for planning, monitoring and controlling the use of residential placements - from 2021/22	Director of Children's Services		10
Sub-total			92
Adults, Health and Communities			
Purchase of Care Plans	Director of Adults, Health & Communities		15
Arrangements for dealing with Domestic Violence	Director of Adults, Health & Communities		10
Mosaic System Implementation	Director of Adults, Health & Communities		In-house
Public Health - Sexual Health delivery and management	Director of Adults, Health & Communities		12
Adult Mental Health Service provision	Director of Adults, Health & Communities		15
Sub-total			52
Environment and Neighbourhoods			
Management and control of Anti Social behaviour	Director of Environment & Neighbourhoods		10
Street Cleansing	Director of Environment & Neighbourhoods		10
Delivery of the Haringey Climate Change Action Plan	Director of Environment & Neighbourhoods		10
Control and Monitoring of Purchasing Cycle (Strategic)	Director of Environment & Neighbourhoods		15
Youth Services	Director of Environment & Neighbourhoods		10
Fleet Contract and Strategy	Director of Environment &		12

Audit Area	Client		Days
Management	Neighbourhoods		
Management of inspection of Trees from 2021/22	Director of Environment & Neighbourhoods		10
New Rivers Leisure Centre – Follow up	Director of Environment & Neighbourhoods		5
New Parking System implementation, parking permit and system's controls	Director of Environment & Neighbourhoods		15
Sub-total			82
Placemaking and Housing			
Acquisitions and Disposal of Assets	Director of Placemaking & Housing		15
Delivery of Capital project /Schemes	Director of Placemaking & Housing		15
Homelessness and Temporary Accommodation	Director of Placemaking & Housing		15
Leasehold Consultation process (S20)	Director of Placemaking & Housing		12
Application Review - Tech Forge	Director of Placemaking & Housing		15
Housing Development Programme	Director of Placemaking & Housing		15
Landlord Health and Safety - Gas Safety	Director of Placemaking & Housing		10
Strategic Asset Management and improvement (to have a focus on Decent Homes)	Director of Placemaking & Housing		10
Disrepair claims	Director of Placemaking & Housing		10
Management of voids	Director of Placemaking & Housing		10
Stocks and stores	Director of Placemaking & Housing		8
Estate Management (to have a focus on the cleanliness of estates and buildings/blocks)	Director of Placemaking & Housing		8
Lettings (to have a focus on the lettings process and new build)	Director of Placemaking & Housing		10
Sub-total			153
Your Council			
Advice and assistance in the arrangements to administer the Local	Director of Culture, Strategy & Engagement		In-house

Audit Area	Client		Days
Welfare Assistance Scheme.			
Sub-total			0
Corporate Digital Services Audits			
IT / Infrastructure Resilience	Chief Information Officer		10
IT Strategy	Chief Information Officer		10
IT Service Management	Chief Information Officer		15
IT Procurement Control	Chief Information Officer		12
Corporate IT Audits			47
Contract and Procurement Audit			
Contract Management	Director of Finance		20
Management and Control of Contract Register	Director of Finance		10
Post Implementation Review of ERP Solution	Director of Finance		15
Sub-total – Contract Audits			45
Risk Based Audits of Key Financial Systems			
Accounts Receivable (Sundry Debtors)	Director of Culture, Strategy & Engagement		13
Accounts Payable (Creditors)	Director of Culture, Strategy & Engagement		13
Housing Benefits	Director of Culture, Strategy & Engagement		15
Council Tax	Director of Culture, Strategy & Engagement		12
NNDR	Director of Culture, Strategy & Engagement		8
Payroll	Director of Culture, Strategy & Engagement		12
Pensions Administration	Director of Finance		10
Treasury Management	Director of Finance		10

Audit Area	Client		Days
Sub-total – Key Financial Systems			93
School Audits Risk Based Programme			
Belmont Infant School	Head Teacher		5
Bounds Green	Head Teacher		5
Devonshire Hill	Head Teacher		5
Earlham	Head Teacher		5
Earlsmead	Head Teacher		5
Highgate	Head Teacher		5
Lordship Lane	Head Teacher		5
South Harringay School	Head Teacher		5
St Francis de Sales	Head Teacher		5
The Willow	Head Teacher		5
Tiverton	Head Teacher		5
The Brook	Head Teacher		5
Pembury House Nursery	Head Teacher		5
TBC	Head Teacher		5
TBC	Head Teacher		5
Management and follow-up of 2021/22 Schools' Audit Recs	Head Teacher		15
Sub-total – School Audits			90
Follow up of Audit Recommendations			30
Admin and Management			35
Risk Management			In-house
Contingency			11
Total			840

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Report for: Corporate Committee – 15 September 2022

Title: Anti-Fraud & Corruption Progress Report 2022/23 – Quarter 1

Report authorised by: Director of Finance

Lead Officer: Minesh Jani, Head of Audit and Risk Management

Ward(s) affected: N/A

**Report for Key/
Non-Key Decision:** Information

1. Describe the issue under consideration

- 1.1 This report details the work undertaken by the in-house resources in the Audit and Risk team and communicates the work plan for 2022/23.

2. Cabinet Member Introduction

- 2.1 Not applicable.

3. Recommendations

- 3.1 To note the activities of the team during quarter one of 2022/23.

4. Reasons for decision

- 4.1 The Corporate Committee is responsible for monitoring the effectiveness of the policies on Anti-Fraud and Corruption and receiving assurance with regard the Council's internal control environment and mechanisms for managing fraud risk. To facilitate this, progress reports are provided on a quarterly basis for review and consideration by the Corporate Committee with regards Anti-Fraud & Corruption.

5. Alternative options considered

- 5.1 Not applicable.

6. Background information

- 6.1 The information in this report has been compiled from information held by Audit & Risk Management.

7. Contribution to strategic outcomes

- 7.1 The Audit & Risk team makes a significant contribution through its pro-active work in ensuring the adequacy and effectiveness of internal control throughout the Council, which covers all key Priority areas.

8. Statutory Officers comments - Chief Finance Officer and Head of Legal & Governance (Monitoring Officer)

8.1 Finance and Procurement

There are no direct financial implications arising from this report.

8.2 Legal

The Council's Head of Legal and Governance has been consulted in the preparation of this report, and in noting the progress made with delivering the Audit Plan, and the activities undertaken in relation to risk management and anti-fraud, advises that there are no direct legal implications arising out of the report.

8.3 Equality

The Council has a public sector equality duty under the Equality Act (2010) to have due regard to:

- tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation.
- advance equality of opportunity between people who share those protected characteristics and people who do not.
- foster good relations between people who share those characteristics and people who do not.

The Audit & Risk team is required to demonstrate a strong commitment to equality and fairness in their actions and work practices, and adherence to the Equality Act 2010 and this is built into the team's operational procedures. Ensuring that the Council has effective counter-fraud arrangements in place will assist the Council to use its available resources more effectively.

9. Local Government (Access to Information) Act 1985

Not applicable.

10. Performance Management Information

10.1 Local performance targets have been agreed for Audit and Risk Management, these are reported against in the sections below.

11. INTRODUCTION

- 11.1 This report covers the period from 4 April 2022 to 1st July and summarises the work of the Audit & Risk Service in relation to anti-fraud and corruption.
- 11.2 The work of the team is driven by the Council's Anti-Fraud & Corruption Strategy a review of which was underway in quarter one.
- 11.3 The Audit & Risk Service consists of a Head and Deputy Head of Audit & Risk, six Fraud Investigators, and the Assistant Investigator post, which is currently vacant.
- 11.4 The in-house resources in Audit & Risk work with Mazars, our audit partner, who deliver the majority of the internal audit plan. To ensure robust independent assurances with regard the internal control environment, including those designed to prevent, deter, and detect fraud and corruption. Fraud risk is considered when scoping all audit assignments and where there is a high inherent risk of fraud in the system and process additional focus is included in the scope. The in-house resource investigates issues that arise, or other risk areas identified in the strategic audit planning. The results of all this work feeds into our assessment of fraud risk in the council.
- 11.5 Annually the governance of the organisation is reviewed, and this informs the Annual Governance Statement. This review, along with any audits of core governance process for example declarations interests, helps us to assess our efforts to prevent internal fraud. The governance framework of the Council has been strengthened significantly in the last few years; however, audits and the annual review indicate that more work is required. Technological enhancements to strengthen process and the second line of defence controls is needed.

12. Risk Assessment 2022/23

- 12.1 Fraud risks, both internal and external threats, are well known in public sector organisations and efforts to quantify them show that whether the economy is in recession or boom the fraud threat remains high. However, we have to acknowledge that in times of economic downturn individuals will find it easier to justify that act of fraud. In the 2020s the threat of organised crime and cybercrime are more prominent than ever; these are areas that all Council's struggle to mitigate with their available resources. In Haringey the highest risk fraud areas, with regards specific business areas, after assurances with regards effective controls are considered are:

Procurement – Limited Assurance Audit Report in 2020/21 indicate the there are significant control weaknesses with regards contracts and procurement.

Social Care – due the expenditure this is a high inherent risk area, however proactive fraud and audit work indicates that we are more successful in mitigating the risks in Haringey than some other Boroughs.

Housing Tenancy – The fraud team undertake some proactive fraud checks to try to help housing mitigate fraud risk. Housing officers also use checks to verify individuals circumstances. Despite these efforts the risk remains high.

Data Matching and the National Fraud Initiative are used to help detect fraud. Many referrals are received from the residents of the Borough each year and from the Tenancy Officers responsible for the patch.

Internal Fraud – is high when the cumulated impacts are considered. Controls like pre-employment screening; segregation of duties in processes; governance around conflicts of interest and delegated authority etc help to mitigate.

No Recourse to Public Funds – the fraud team undertake proactive checks where the No Recourse team have concerns or where there are fraud flags in an application. This intelligence helps to ensure that the application process is robust.

Business Rate and Council Tax – The Covid Business Grant projects has helped to bring business rate data up to date for the Borough, which flagged issues with tax avoidance. The base data now is much more robust and will enable more robust fraud prevention activity to occur. Data matching tells us we have a high level of SPD fraud or error in the Borough and a project is underway to ensure that there is more challenge to entitlement for discounts in the control environment as well as withdraw discounts that are no longer applicable.

Right to Buy - Every Right to Buy application is checked to ensure there is no housing fraud occurring and that Money Laundering Regulations are being adhered to. Every year this work identifies referrals for housing fraud not only for Haringey but also for other Boroughs.

Blue Badge/Parking Permit – To assess the fraud risk in this area Audit work has been planned for 2022/23 and it will be considered as part of our work plan for 2023/24. We get a lot of Blue Badge related referrals from members of the public but note there have been enhancements in the enforcement activity and technology in this area in the last 12-18 months.

Grants – the Covid Business Grants Project was very high risk of fraud so during 2020/21 and 2021/22 – audit and fraud resources worked as an extension to the project team completing advisory work on control but also pre and post payment checks. Although required by Government our response and input to the project was very much risk based and as a result the levels of fraud were very low, particularly compared to other Council's.

13. Anti- Fraud & Corruption Work Plan for 2022/23

12.1 The area of our work most impacted by Covid-19 was definitely the Housing Tenancy Fraud area. This alongside a restructure in tenancy services and the insourcing of the team back to the council have impacted our outcomes in the last two financial years. Housing Tenancy Fraud will be our focus for 2022/23 with proactive work including data matching being used to target resources and subject to other internal referrals over half of our resources undertaking reactive investigations, from the referrals received.

12.2 We will be training the newly structured and resource tenancy teams on Housing Fraud and reviewing the cross team working arrangements to ensure

they are efficient and effective. We will also be re-training housing officers, who use credit checks as part of processes, to interpret the data robustly. These activities will ensure that more fraud is identified and referred to the team to investigate.

- 12.3 Data matching and use of data held by the council to more efficiently inform our fraud work are key objectives for 2022/23. The team are preparing for another National Fraud Initiative and our role is to facilitate the services across the council to firstly provide the data required and then process the intelligence that we receive back. We will be joining a pilot scheme with regards mortality data in 2022/23 also via our software provider.

14. ANTI-FRAUD ACTIVITY

- 14.1 The team undertakes a wide range of anti-fraud activity and have two performance indicators to monitor its work relating to tenancy fraud and the other right to buy fraud. These targets have in the past been consistently achieved, although as above impacts of COVID-19 and the resource diverted to the related Covid Grants Project have impacted results in the last two years.
- 14.2 Financial values are assigned to these outcomes based on the discounts not given and the estimated value of providing temporary accommodation to a family. The Audit Commission, when in existence, valued the recovery of a tenancy, which has previously been fraudulently occupied, at an annual value of £18,000, as noted above this related to average Temporary Accommodation (TA) costs. This figure has recently been revised to £42,000 by a network of housing and fraud bodies and is supported by the Cabinet Office.
- 14.2 **Table 2 - Local Performance measures – anti fraud activity**

Performance Indicator	Q1	YTD	Annual Target
Properties Recovered	5	5	50
Right to Buys prevented	15	15	80

*There are five properties identified for recovery in the period, however there was a delay in serving Notice to Quit to tenants which has had an impact on recovery. Figures for quarter two, already available at the time of drafting this report indicate the process has reinstated. Paragraph 14.7 below includes more insights into cases in that are expected to generate property recoveries this year.

14.3 Tenancy Fraud – Council properties

- 14.4 The Fraud Team works with Housing colleagues to target and investigate housing and tenancy fraud. Housing continues to fund a Tenancy Fraud Officer co-located part time within the Fraud Team. There are plans to do cross team proactive tenancy fraud campaigns and use data matching in coming months. It is hoped that this will ensure our annual targets are achieved and try to shift the Council's work on tenancy fraud to a more proactive and preventive approach.
- 14.5 The Fraud Team will continue to work with the newly restructured Housing team to identify the most effective use of fraud prevention and detection resources across teams to enable a joined-up approach to be taken, especially where cases of multiple fraud are identified e.g., both tenancy fraud and right to buy fraud.

14.6 Table 3 - Tenancy Fraud Activity and Outcomes

Opening Caseload	209	
New Referrals received	43	
Total		252
Properties Recovered	0	
Case Closed – no fraud	42	
Total	(-)	42
Ongoing Investigations		210

14.8 Right-to-buy (RTB) applications

- 14.9 As at 31st March 2022 there were 309 ongoing applications with 118 under investigation. During quarter one, 15 RTB applications were withdrawn or refused either following review by the fraud team and/or due to failing to complete money laundering processes. 54 new applications were received in this period for review, 29 applications remain in process awaiting re-valuation. 12 applications ceased for reasons other than the fraud teams intervention. 12 properties were sold.

14.10 Gas safety – execution of warrant visits

The fraud team have attended several gas safety visits in quarter one, where risk of fraud is identified. 21 of the teams on-going investigations were generated by this activity.

14.11 Pro-active counter-fraud projects

Quarter ones focus has been planning the proactive projects for they year and gathering data sets for these. The team have had an 'away day' session to plan the proactive fraud projects.

14.12 No Recourse to Public Funds (NRPF)

In quarter one, fifteen referrals have been received and responded to by the Fraud Team. The role of the Fraud Team is to provide a financial status position for the NRPF team to include in their overall Children and Family Assessment. The average cost of NRPF support per family (accommodation and subsistence for a two-child household) is around £20,000 pa.

14.13 Internal employee investigations

In accordance with the Council's Constitution, the in-house Fraud Team investigates all allegations of financial irregularity against employees.

At the start of quarter one we had two investigations ongoing.

One has been concluded and a disciplinary hearing is scheduled to take place in September.

The other investigation was stopped at an early stage when it was concluded that not fraud or corruption could be identified, and the issues were of a disciplinary nature.

The Audit and Risk service work closely with officers from HR and the service area involved to ensure that the appropriate investigation, following a referral, is completed as quickly as possible.

14.14 Whistleblowing Referrals

The Head of Audit and Risk Management maintains the central record of referrals made using the Council's Whistleblowing Policy. The three whistleblower case on-going at the end of March

One resulted in disciplinary action and two resulted in management action, both with some support and advice from audit. There were no new referrals in quarter one.

14.15 Prosecutions

As at 30 March two suspected tenancy fraud investigations had been advanced for prosecution. One case is scheduled for trial shortly.

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Report for: Corporate Committee – 15 September 2022

Title: Anti-Fraud and Corruption Strategy

Report authorised by: Director of Finance

Lead Officer: Minesh Jani, Head of Audit and Risk Management

Ward(s) affected: N/A

**Report for Key/
Non-Key Decision:** Information

1. Describe the issue under consideration

- 1.1 As part of the 2017 UK Public Sector Internal Audit Standards (PSIAS), Haringey Council needs to ensure that there are appropriate processes in place for the reporting and investigation of allegations of fraud and corruption.
- 1.2 The Corporate Committee is responsible for Anti-fraud and Corruption arrangements as part of its Terms of Reference. In order to provide assurance that the corporate policy is consistent with relevant regulations and other best practice requirements, it is reviewed on a regular basis.

2. Cabinet Member Introduction

- 2.1 Not applicable.

3. Recommendations

- 3.1 To agree the Corporate Anti-Fraud and Corruption Strategy and the following policies:
- Fraud Response Plan;
 - Whistle-blowing Policy;
 - Sanctions Policy;
 - Anti-money Laundering Policy; and
 - Anti-bribery Policy.

4. Reasons for decision

- 4.1 The Corporate Committee is responsible for approving the Council's Anti Fraud and Corruption Strategy under its Terms of Reference.

5. Alternative options considered

- 5.1 Not applicable.

6. Background information

- 6.1 Haringey Council seeks to maintain high standards of probity and has put in place arrangements for protecting the public purse. Sound systems to demonstrate public accountability are also vital for effective management of services and in maintaining public confidence; the minimisation of losses from fraud and corruption is essential for ensuring resources are used for their intended purpose.
- 6.2 To investigate fraud and corruption the Council has a dedicated Corporate Anti-Fraud Team comprising six investigators and a vacant assistant investigator who undertake pro-active and reactive work across all areas of the Council's activities. Generally, local authorities have invested in London in particular, have invested in anti-fraud work consistently over many years following guidance and advice from regulatory bodies including the former Audit Commission, CIPFA, the Cabinet Office and by the National Fraud Authority in their 'Fighting Fraud Locally' publications.
- 6.3 The Council's Anti-fraud and Corruption Strategy gives guidance to relevant individuals, employees, Councillors, members of the public and organisations working in partnership with the Council, on the Council's stance on Fraud and Corruption and the steps people should take if they suspect fraud and corruption. The strategy also sets out how the Council will deal with any allegations.
- 6.4 Essentially, the strategy states the Council has a zero tolerance to fraud and corruption and the Council will use the full range of sanctions to act against individuals or organisations found to be committing fraud against the Council. Ultimately with finite resource a risk based approach is taken and an annual work plan is set each year. The Corporate Committee receive quarterly updates and an Annual Report that communicates the outcome of our work under this strategy.
- 6.5 The Council's Anti-fraud and Corruption Strategy and the related appendices are published on the Haringey website and intranet site. In addition, all policies are published separately to enable anyone searching for the individual policy to locate these easily. The website pages also provide details of how to report suspected cases of fraud and corruption.
- 6.6 The Head of Audit & Risk is the responsible for maintaining the Anti-fraud and Corruption Policy, together with all related policies: Whistleblowing, Sanctions, Anti-Money Laundering and Anti-bribery. The Head of Audit and Risk Management, in consultation with senior stakeholders, review all anti-fraud and corruption policies to ensure they reflect current legislation and recommended best practice. The most recent update incorporates the themes from the guidance document "Fighting Fraud & Corruption Locally – Strategy for the 2020s".
- 6.7 The review of the Whistleblowing policy is undertaken in consultation with the Head of Human Resources to ensure all relevant employment issues are incorporated into any changes to the policy.

- 6.8 The Council's Anti-fraud and Corruption Strategy follows the Chartered Institute of Public Finance and Accountancy's (CIPFA) guidance and best practice recommendations. The Council's Whistle-blowing policy conforms to the best practice guidance issued by Public Concern at Work, the independent charitable organisation which advises on whistleblowing and governance matters.

7. Contribution to strategic outcomes

- 7.1 The Council has an important role to demonstrate stewardship of the public purse. The management of fraud risks is an important part of the Council's work to enable the Council to utilise its resources to achieve its corporate aims.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

8.1 Finance and Procurement

There are no direct financial implications arising from this report. The strategies will be implemented within existing agreed budgets.

8.2 Legal

The Head of Legal and Governance has been consulted in the preparation of this report, and in noting that the policies, plan and strategy follow legislative requirements / industry guidance and best practice, has no comments.

8.3 Equality

There are no direct equality implications for the Council's existing policies, priorities and strategies as a result of this report. However, ensuring that the Council has effective anti-fraud and corruption arrangements in place and taking appropriate action to improve these where required will assist the Council to use its available resources more effectively.

9. Use of Appendices

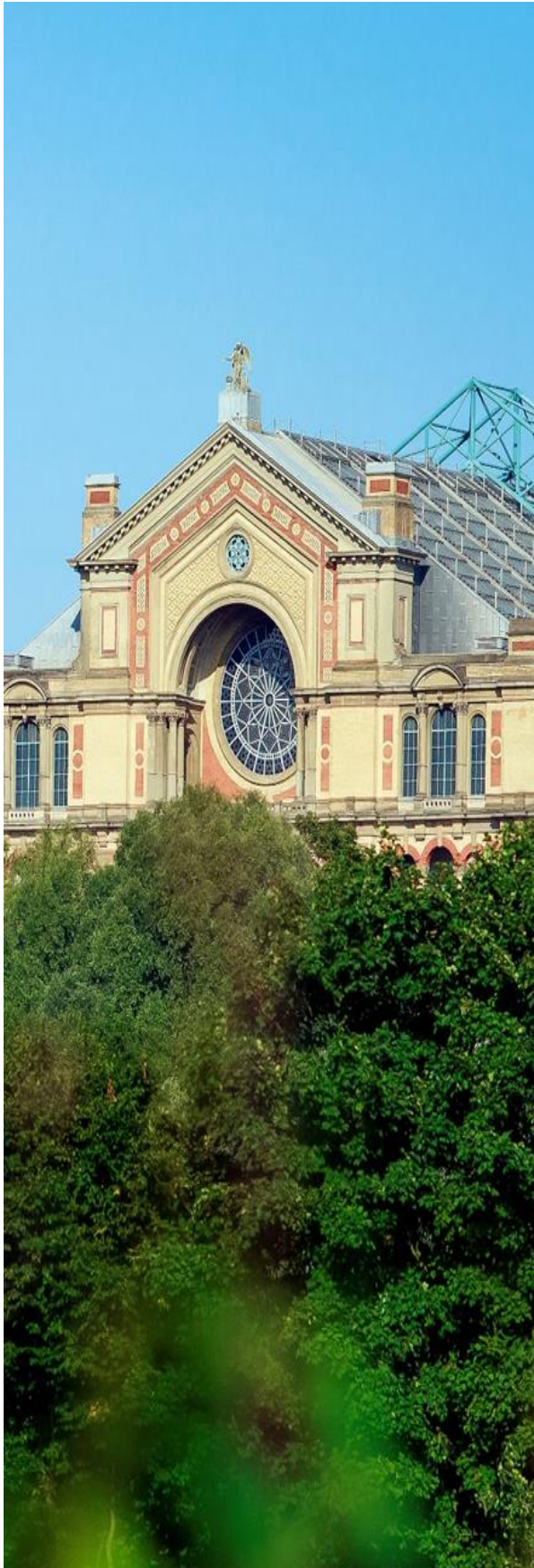
Appendix 1 – Fraud Response Plan
Appendix 2 – Whistle blow Policy
Appendix 3 – Sanctions Policy
Appendix 4 – Anti Money Laundering Policy
Appendix 5 – Anti Bribery Policy

10. Local Government (Access to Information) Act 1985

Not applicable.

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HARINGEY COUNCIL

ANTI-FRAUD & CORRUPTION POLICY & STRATEGY

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Policy History					
Version	Summary of Change	Contact	Implementation Date	Review Date	EqIA Date
8.1	Added Standards in Public Life (Nolan Principles) at para 3.1	Head of Audit & Risk Management	July 2018	June 2018	June 2014
8.2	Updated Money Laundering Regulations	Head of Audit & Risk Management	Sept 2020	July 2020	July 2020
8.3	Aligned to the Fighting Fraud Locally Strategy for 2020s	Head of Audit & Risk Management	Sept 2022	August 2022	August 2022

Links and Dependencies

Employee Code of Conduct
 Member Code of Conduct
 Contract Terms and Conditions
 Disciplinary Policy & Procedures
 Council Constitution
 Whistleblowing Policy
 Sanctions Policy
 Anti-money Laundering Policy
 Anti-bribery Policy

Related Forms

Declaration of Interests Form
 Declaration of Receipt of Gift or Hospitality

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Appendix 3 – Sanctions Policy	
Appendix 4 – Anti-money Laundering Policy	
Appendix 5 – Anti-bribery Policy	

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Anti-fraud Policy Statement

- 1.1** We (Haringey Council) operate a 'zero tolerance' approach towards fraud and corruption and we will use the full range of sanctions available against any individual or organisation found to be committing fraud. Every pound taken by theft or fraud reduces our ability to provide services to the people who need them the most.
- 1.2** There are both internal and external threats of Fraud & Corruption against the Council. We are compliant with good practice in local government; we seek to Govern, Acknowledge, Prevent, Pursue and Protect the public purse and the interests of our clients, partners, employees, and other stakeholders and retain a high ethical standing within the community.
- 1.3** This policy applies to all parts of the Council and to all our employees, temporary and agency staff, volunteers, contractors, and consultants in relation to their work with/for us. We rely on the support of staff, businesses, and the community to deliver the services we provide to people in need. Loss of confidence in the Council as a result of fraud or corruption could have an adverse impact on our funding and investment in the area, leading to a more severe impact on the services we deliver than the initial theft.
- 1.4** We expect all our Councillors, employees, agency and temporary workers, consultants, contractors, partner organisations, service users and all residents to be honest, and to give us any help, information and support we need to deal with fraud and corruption. In return, we will:
- Take appropriate measures to prevent and deter fraud;
 - Introduce and maintain procedures to detect fraud;
 - Encourage employees to report any suspicions of fraud;
 - Provide resources to train our staff about fraud risk and investigate fraud;
 - Take appropriate disciplinary, civil, or criminal proceedings; and
 - Report suspected fraud to the police and all relevant organisations.
- 1.5** It is in everyone's interests to prevent fraud and corruption from happening. Report any suspected incident immediately to your manager and to the Head or Deputy Head of Audit & Risk Management (unless you suspect your manager may be involved). This strategy and response plan sets out what we mean by fraud; how we tackle fraud; what you should do if you suspect fraud; and how we will respond.

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 <p>SPEAK OUT ABOUT FRAUD</p>	<p>If you have any concerns about fraud, we want to know:</p> <p> Call in confidence: 0330 808 4269</p> <p> Email: fraudcall@haringey.gov.uk</p> <p> Write to: Fraud Team, PO Box 22727, London, N22 7WS</p>
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Anti-fraud and Corruption Strategy

2. Definition of Fraud and Corruption

2.1 The **Fraud Act 2006** introduced the first legal definitions of fraud, which is used for the criminal prosecution of fraud offences. **Fraud** is defined as a wrongful act or criminal deception intended to result in financial or personal gain. **Corruption** is defined as the offering, giving, soliciting or acceptance of an inducement or reward, which may influence the action of any person.

2.2 The following are some of the highest risk fraud areas for the Council, from external threats, these are the frauds most likely to be instigated by residents or individuals outside of our organisation:

- Housing tenancy fraud including subletting of a council property;
- False identity or making false declarations to obtain council services, this includes but is not limited to:
 - privileges such as a parking blue badge,
 - ad hoc financial support,
 - disabled facilities or covid grants;
 - discounts or exemptions on business rates or council tax,
 - direct payments;

all council processes where there is some form of assessment or criteria are vulnerable to this fraud. In addition where the award of services is legitimate a failure to notify of a change in circumstances or even death of the service user so that the financial benefit received can continue and/or be received by others.

- False or exaggerated insurance claims;
- Collusion between companies when tendering for Council contracts; and
- Right to Buy fraud.

2.3 The following are some examples of internal fraud or corruption, which you may come across:

- Providing false identity or right to remain/work documents, references, or any other information when applying for a job;
- Making false claims for expenses, overtime, flexitime, or any other allowance;
- Not declaring a conflict of interest e.g., owning properties which are leased to the Council, or receiving benefits from the Council; you or your family owning companies which we do business with; or working for organisations which receive grant funding from the Council;
- Abuse of position by allocating housing, or any other benefits or services, to people who are not entitled to them;
- Misusing Blue Badges, residential, business or any other parking permits;

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- Fraudulently claiming any benefits, we the DWP or HMRC provide, including housing benefits, working/child tax credits, disability benefits, and council tax benefits;
- Fraudulently making, or exaggerating, an insurance claim against the Council;
- Using our vehicles, IT equipment, offices/buildings, stocks, materials, or any other resources for personal use, or to run a private business;
- Theft of money, materials or other resources from the us, our partners, or our clients;
- Collusion with contractors including in the procurement process or raising orders, or submitting invoices for payment when the work hasn't been done;
- Working for another organisation, running a business, or being self-employed during contracted hours, including working whilst off sick;
- Accepting gifts or hospitality from contractors, or organisations who are bidding for work, or who we have contracts with, or who receive grants from us.

2.3 The above list can't cover every example of fraud or corruption. If you have any questions, please contact the Head of Audit & Risk Management for further advice.

3. Responsibilities

3.1 We expect all individuals, groups and organisations that receive services from, or provide services on behalf of the Council to be honest in their dealings with us and our clients and customers. Councillors and managers are expected to lead by example in regard to observing the Principles of Standards in Public Life, as set out by the Nolan Committee. These are shown below:

Selflessness- Holders of public office take decisions in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity- Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in their performance of their official duties.

Objectivity- In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability- Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

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Openness- Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty- Holders of public office have a duty to declare any private interests relating to their public duties to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership- Holders of public office should promote and support these principles by leadership and example

- 3.2** We expect our Councillors and employees, including any temporary, agency and consultancy resources, to lead by example in preventing, deterring, and advising of suspected fraud and corruption and these responsibilities are summarised below:

Individual/Group	Role/Responsibility
Corporate Committee	<ul style="list-style-type: none"> • Approving and monitoring corporate anti-fraud policies. • Reviewing reports relating to fraud risks and investigations from internal and external auditors.
Corporate Leadership Team (CLT)/ Statutory Officers Group (SOG)	<ul style="list-style-type: none"> • Overseeing the council's approach to counter-fraud activity, setting the tone to embed a culture of high standards. • Ensuring a consistent approach to identifying and managing fraud risk is adopted by all service areas. • Reviewing reports to ensure that risks relating to fraud are being managed appropriately.
Directors/ Assistant Directors/ Programme Managers/ Heads of Service	<ul style="list-style-type: none"> • Introducing and maintaining effective controls to prevent fraud or corruption from happening in their service area, or corporate programme. • Ensuring that a fraud or corruption risk assessment has been conducted for their service area/ corporate programme. • Notifying all suspected fraud or corruption incidents within their service area/ programme to the Head of Audit & Risk Management. • Approving follow up action to be taken in response to actual incidents of fraud or corruption.
Audit & Risk Management	<ul style="list-style-type: none"> • Undertaking regular assessments of fraud risks and the resources and skills available to tackle fraud. • Consulting with Directors/Assistant Directors about the best course of action when suspected fraud or corruption incidents are raised. • Allocating an investigator, consulting with appropriate senior managers and HR personnel at agreed stages during any investigation into internal fraud or corruption and completing

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Individual/Group	Role/Responsibility
	<p>the investigation within agreed timescales.</p> <ul style="list-style-type: none"> • Notifying the police, and other organisations, when a criminal prosecution is required. • Facilitating fraud and corruption awareness training. • Providing regular reports to CLT/SOG and Corporate Committee on fraud risks and pro-active and responsive investigations. • Providing advice and guidance on internal controls to prevent fraud or corruption. • Undertaking pro-active projects to identify possible fraud or corruption.
Employees and Members	<ul style="list-style-type: none"> • Complying with the Council's Codes of Conduct and Constitution. • Informing their manager, or Assistant Director and Head of Audit & Risk Management of any suspected fraud or corruption incidents.

4. **Our Approach to Fighting Fraud & Corruption**

We have aligned our fraud approach to the recommended Fighting Fraud Locally Strategy for the 2020s. The guiding principles of this Strategy are to: Govern; Acknowledge; Prevent; Pursue and Protect.

4.1 **Govern**

Those charged with governance support the local arrangements and the policy is embedded throughout the organisation. Our strategy should be read in conjunction with our **Fraud Response Plan** (Appendix 1) which sets out how we tackle the risk of fraud and investigate allegations of fraud; and the Council's **Whistleblowing Policy** (Appendix 2), which is intended to encourage and enable employees to raise serious concerns.

4.2 **Acknowledge**

The risks faced by the Council are recognised and evaluated to ensure the right capability and capacity are in place. Understanding the risks helps to determine how we respond. Annually, risks and responses are considered by the Head of Audit & Risk Management in consultation with stakeholders.

4.3 **Prevent**

As part of the Annual Audit Plan the controls within processes, owned by management, to prevent or deter internal and external fraud and corruption are evaluated as well as the corporate availability of technology and data sharing mechanisms that form a second line of defence in preventing and/or detecting fraud and corruption activities. The majority of resources are deployed to prevent the opportunity for fraud or corruption to occur in the Council.

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4.4 Pursue

The development of capacity and capability to efficiently investigate and use sanctions to punish fraudsters and recover losses. Prioritising use of civil sanctions and collaborating with other agencies. We will use all sanctions available to us to deal with anyone committing fraud or corruption, including referring cases to the police, prosecuting offenders, and seeking recovery of monies and/or other assets obtained by fraud or corruption. Our **Sanctions Policy** is attached (Appendix 3), which describes the process in more detail.

4.5 Protect

The protection of public funds, the organisation from serious and organised crime and protecting individuals from becoming victims of crime.

4.6 Related Council Policies

We also have arrangements in place where any instances of suspected money laundering or bribery are reported. Our **Anti-money Laundering Policy** (Appendix 4) explains what money laundering is, and what we do to manage the risks associated with crime and money laundering. Our **Anti-bribery Policy** (Appendix 5) explains the legal position for the Council and employees; and how to report any concerns.

5. Monitoring

5.1 This policy and the appendices are monitored and reviewed on a biennial basis. We will consult with all the relevant services areas to ensure that all relevant legal, financial and personnel issues are included in the review processes. Annually a workplan is set with actions to be completed in the year. How we prioritise resources is determined by our risk assessment.

5.2 The Council's Corporate Committee has overall responsibility for this policy, and it is presented to the Committee for its approval when any review takes place. The outcomes of fraud work are communicated to Corporate Committee as part of quarterly performance reports and our Annual Report.



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Fraud Response Plan

1. Why we have a Fraud Response Plan

- 1.1 Reports in the media suggest fraud is on the increase although fraud is not usually an everyday occurrence, and most people are surprised to discover a potential fraud issue. Knowing what to do and taking the right steps when the fraud is discovered allows us to make sure the investigation is carried out properly.
- 1.2 Having a structured response plan helps everyone to handle any fraud issues in the same way and avoid potential problems like: inadvertently tipping off the suspect, enabling them to destroy incriminating evidence; failing to keep the matter confidential; and taking inappropriate action caused by having insufficient information.
- 1.3 A Fraud Response Plan ensures that incidents are handled in a systematic and efficient manner, not only to conclude a successful investigation, but also to show that the organisation acted in an effective and lawful manner; and that it does not tolerate fraud.

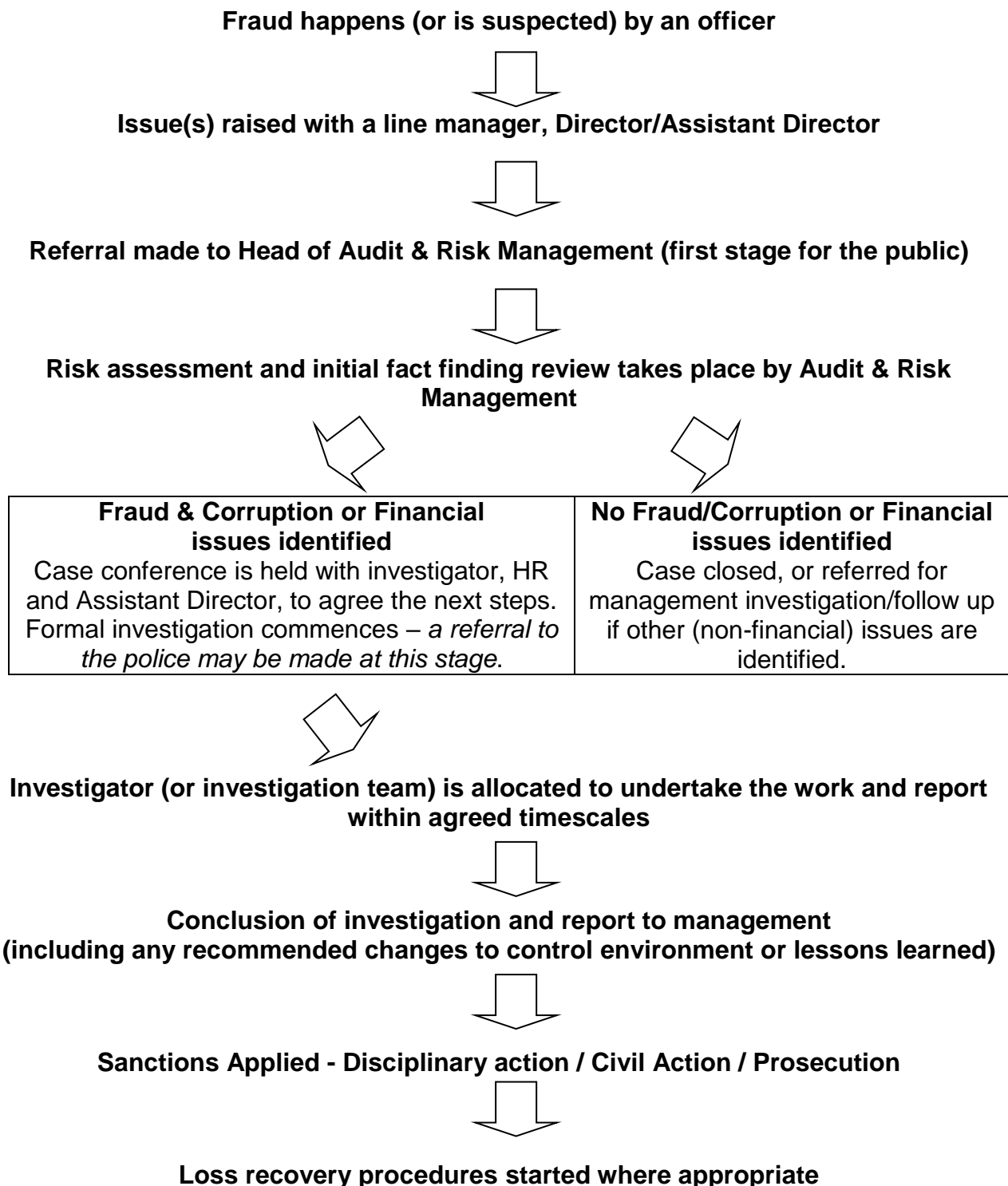
2. What you should do if you suspect fraud or corruption

- 2.1 Our employees and councillors are often the first to realise when things may be going wrong, or fraud and corruption may be taking place. However, they may think that they would not be supported if they raised their concerns, or they may even be afraid of being harassed or bullied. In these circumstances, an individual may feel it would be easier to ignore their concerns, rather than report it. We want to tell you that this is not the case.
- 2.2 Our 'Whistleblowing' Policy is in place to encourage and enable individuals to raise legitimate concerns, rather than overlooking a problem. The policy applies to all Haringey employees and agency workers and staff of Council contractors.
- 2.3 If you suspect fraud or corruption, you should raise your concern with your line manager. Failing that, you should approach your Head of Service, or Assistant Director. If you cannot raise your concern within your own service area, you should approach the Head of Audit & Risk Management.
- 2.4 We want to encourage any member of the public, or a partner organisation, who suspects fraud and corruption to contact the Council's Head of Audit and Risk Management in the first instance.
- 2.5 **Remember:** tell some-one, don't keep it to yourself; make a note of anything which made you think a fraud was happening; keep things confidential initially; do not confront the suspect(s); only take away any evidence if there is any risk that it will be destroyed or thrown away. **Leave the investigation to Audit & Risk Management.**

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3 Investigations into allegations of fraud or corruption

Although we cannot say how each individual case is dealt with, the following process is outlined as a general guide.





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Whistleblowing Policy

1. What is 'Whistleblowing'?

- 1.1 Whistleblowing encourages and enables employees to raise any serious concerns they may have, rather than overlooking a problem. Serious concerns include: criminal activity; not complying with legal requirements; miscarriages of justice; putting an individual's health or safety at risk including residents, clients and members of the public; and damage to the environment.
- 1.2 Employees are often the first to realise that there is something wrong within the Council. However, they may be reluctant to say anything or raise their concerns as they feel that speaking up would be disloyal to their colleagues or to the Council; or they may feel that they would be victimised for doing so.
- 1.3 The Public Interest Disclosure Act 1998 (PIDA) offers all employees legal protection against any detriment, or unfair dismissal, as the result of speaking out about crime, fraud, miscarriages of justice, dangers to health and safety, breaches of civil service code or risks to the environment.

2 Our Commitment

- 2.1 We are committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of our work to come forward and tell us about those concerns.
- 2.2 If any employee raises their concerns in the public interest (not for personal gain) and they reasonably believe that the information they are giving is true and in good faith, our Whistleblowing policy aims to ensure that they receive support; and their concerns are properly investigated and addressed.
- 2.3 We will publicise this policy across the Council on a regular basis, so all our staff are aware of the support available and what is required of them.

3 Who does the Policy apply to?

- 3.1 The policy applies to all our employees. This includes temporary and agency staff, 'as and when' employees, authorised volunteers or work experience staff. It also applies to contractors working for us on our premises e.g. agency staff, builders, and drivers. It also covers suppliers and those providing services under a contract with us in their own premises, for example, care homes and children's centres. The policy also covers our Members.
- 3.2 This policy has been shared with the relevant trade unions and professional organisations and has their support.



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4 Our aims

- To encourage everyone to feel confident in raising concerns; and to act upon their concerns about potential wrongdoing;
- To provide ways for all staff to raise concerns in confidence and receive appropriate feedback on any action taken;
- To ensure that staff receive a response to their concerns; and that staff are aware of how to pursue them if they are not satisfied; and
- To reassure everyone they will be protected from possible reprisals, or victimisation, if they have a reasonable belief that they have made a disclosure, which is in the public interest.

5 How to raise a concern

- 5.1 As a first step, any concerns should normally be raised with your immediate supervisor/manager. However, if the concern is serious, relates to a sensitive matter, or your line manager may be involved, you should approach a senior manager, or Assistant Director/Director within your service area.
- 5.2 Our Financial Regulations state that the Head of Audit and Risk Management should be told of any concerns that relate to financial or accounting irregularities or suspected irregularities. This policy allows the opportunity to raise your concerns about any financial matters directly to the Head of Audit and Risk Management.
- 5.3 If your concern is not about financial issues, you may also raise it with the Chief People Officer or Council's Monitoring Officer.
- 5.4 PIDA encourages staff to approach their employer in the first instance: this way you are legally protected; and any subsequent disclosure of the same information you make externally will be protected. However, the government advises that if you felt that your employer would cover your concerns up, or would treat you unfairly, or they have not resolved the issue when they have been told about it previously; you can make a referral to a 'prescribed person' and some examples of these are listed at the end of this policy.
- 5.5 Alternatively, you could ask your Trade Union to raise the matter on your behalf; or seek advice from your professional organisation, if you are a member of one.
- 5.6 Other procedures are available, for example the Grievance procedure which relates to complaints about your own employment. This policy also does not replace other corporate complaints procedures, which are for public use.

6 How we will respond to concerns raised under this policy

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- 6.1 We will aim to review your concerns and complete any investigations required as quickly as possible. It is not possible to say how every concern will be treated but as a general guide, within ten working days of the concern being raised, we will:
- Assess the complaint and identify the most effective process to use to investigate the allegations raised;
 - Notify the Head of Audit and Risk Management that a concern has been raised to ensure it is recorded properly in accordance with this policy;
 - Write to the person raising the concern (as long as the concern has not been raised anonymously) to acknowledge their complaint and indicate how the matter raised will be dealt with;
 - Indicate a likely timescale to complete the investigation; and
 - Provide individuals with information on staff support mechanisms that are available.

7 Confidentiality – Protection for Whistleblowers

- 7.1 We want to protect anyone who raises a concern; including keeping their identity confidential if this is what the employee wants. All concerns will be treated in confidence and we will make every effort not to reveal people's identity, but please consider that we may need to provide a witness statement if the matter is subject to a disciplinary process, or referred to the police.
- 7.2 This policy encourages you to put your name to your concern whenever possible. Please note that:
- Staff must believe the disclosure of information is in the public interest;
 - Staff must believe it to be true;
 - Staff must not act maliciously; or knowingly make false allegations; and
 - Staff must not seek any personal gain.

8 Safeguards and Victimisation

- 8.1 We recognise that the decision to report a concern can be a difficult one to make. If what you are saying is true, or you believe it to be true, you should have nothing to fear as you will be acting in the best interests of the Council and everyone we provide a service to.
- 8.2 We will not tolerate any harassment or victimisation (including informal pressures); and we will take appropriate action, including disciplinary procedures, to protect you when you raise a concern which is in the public interest.
- 8.3 If you make an allegation, which you think is genuine but is not proven, no action will be taken against you. However, where there is clear evidence that you have made a malicious allegation then action may be taken against you under the Disciplinary procedure.

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- 8.4 We want to encourage our staff to put their name to their concerns so we can investigate them properly. However, some people may wish to remain anonymous. In these circumstances, we will still consider concerns raised, taking into account the seriousness of the issues raised and the credibility of the concern, but our ability to take the matter further may be restricted if anonymity needs to be maintained.

9. Monitoring

- 9.1 The Council's Monitoring Officer, is responsible for the maintenance and operation of this policy. The Head of Audit and Risk Management will maintain a record of concerns raised and the outcomes (but in a form which does not breach your confidentiality) and will report as necessary to the Council.
- 9.2 The Monitoring Officer and Head of Audit and Risk Management will liaise with the Chief People Officer when the policy is subject to review in order to ensure all relevant employment requirements are taken into account.

WHISTLEBLOWING - GUIDANCE NOTES FOR MANAGERS

When staff suspect or discover something is wrong, they are encouraged to report this to their manager. This gives managers the chance to correct any potential or actual malpractice before the issue escalates. Please note that if there are allegations of potential fraud, or financial irregularity, then these must be reported to the Head of Audit and Risk Management in line with the Council's Financial Regulations.

Victimising or deterring staff from raising legitimate concerns is a serious disciplinary offence. Whistleblowers are also afforded protection under the Public Interest Disclosure Act. Therefore, managers must ensure that anyone who makes a complaint have confidence that it is going to be properly investigated and addressed; and they will suffer no detriment as a result of speaking out.

Managers must respect the confidentiality of any staff raising concerns if they (the staff) want this. However, managers should advise staff that during the investigation the source of the information may need to be revealed and the individual may be required to provide a statement, or appear as a witness in any disciplinary or police investigation. You should advise the employee that they will be supported in these processes, if required. You should also advise the employee of any other support processes that are available to them.

In all cases where an employee uses the Council's Whistleblowing policy to raise their concerns, the person receiving the concern must notify the Head of Audit and Risk Management. They are the Council's nominated officer for recording any Whistleblowing referrals and are required to maintain a log, which ensures



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confidentiality, and provide periodic information on the use of the Whistleblowing policy.

Investigating Referrals

Managers need to review an employee's concerns raised under the Whistleblowing Policy and complete any investigations required as quickly as possible. As a general guide, within ten working days of the concern being raised, the manager should:

- Formally acknowledge the concern to the employee, or their Trade Union/ professional organisation;
- Undertake an initial review of the concerns (or refer the matter to the Head of Audit and Risk Management where fraud is alleged);
- Appoint an independent and impartial manager to undertake an investigation;
- Agree a timescale to complete the investigation with the investigating manager and advise the employee, or their representative, of the likely timescale;
- Conduct an investigation under the Whistleblowing Policy, following the same process as the Disciplinary Procedures for investigating cases of misconduct/ gross misconduct;
- An investigation may conclude that, potentially, there has been a breach of the Council's Code of Conduct and Disciplinary Rules. In these circumstances, you should invoke the disciplinary process; and
- Subject to any legal constraints, inform the employee, or Trade Union/ professional organisation, of the progress and outcome of any investigation.

Examples of Relevant Prescribed Persons

If you decide to blow the whistle to a 'prescribed person' rather than your employer, the government has produced a [Prescribed Persons List](#).

More information on Whistleblowing can be found on the GOV.UK website:
www.gov.uk/whistleblowing

Examples of prescribed persons include:

Her Majesty's Chief Inspector of Education, Children's Services and Skills ("the Chief Inspector") about matters relating to the regulation and inspection of establishment and agencies for children's social care services.

Ofsted

Piccadilly Gate

Store Street

Manchester M1 2WD

Tel: 0300 123 3155

Email: whistleblowing@ofsted.gov.uk



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Care Quality Commission about the provision of health care on the NHS or independent health care services.

CQC National Customer Service Centre

Citygate

Gallowgate

Newcastle upon Tyne

NE1 4PA

Tel: 03000 616161

www.cqc.org.uk

The Health and Safety Executive about health or safety at work or the health and safety of the public.

Health and Safety Executive

Rose Court

2 Southwark Bridge

London

SE1 9HS

Online form: www.hse.gov.uk/contact/workplace-complaint.htm

Tel: 0300 0031647

www.hse.gov.uk

The Comptroller and Auditor General about the proper conduct of public business, value for money, fraud and corruption in relation to the provision of public services.

The Comptroller and Auditor General

National Audit Office

157-197 Buckingham Palace Road

London SW1W 9SP

Tel: 020 7798 7999

www.nao.org.uk/contact-us



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Sanctions Policy

1. Policy Statement

- 1.1 We will use the full range of sanctions available to us, including criminal prosecution, civil recovery, internal disciplinary procedures and referral to regulatory bodies in order to deter fraud, bribery and corruption.
- 1.2 Our Legal Services and the Crown Prosecution Service will be used to undertake prosecutions; and we will refer all relevant cases to the appropriate professional bodies and other law enforcement agencies. We will assist external organisations if they decide to bring their own prosecution cases.
- 1.3 Our fraud and corruption strategy states that we will seek the full range of sanctions against anyone found to have committed fraud against the Council: and they will apply to any fraud either against the Council or against money that the Council has responsibility for.

2. Deciding what sanction to apply

- 2.1 We have a range of sanctions that we can use, including internal disciplinary procedures and criminal and civil prosecutions; and we have this policy to make sure that we:
 - Apply all available sanctions consistently;
 - Apply sanctions efficiently and cost effectively; and
 - Have a transparent and robust decision making process.
- 2.2 In some cases, we may apply more than one sanction e.g. if a member of staff has stolen money from us, we may take internal disciplinary proceedings, refer the matter to the police, and undertake civil recovery procedures.
- 2.3 We may decide to pursue a criminal prosecution in some cases; these will usually be reserved for those cases, which we think, are the most serious. The Council has the power to undertake some prosecutions itself using our Legal Services, but some cases can only be decided on by the Crown Prosecution Service.
- 2.4 All cases which are considered for prosecution will apply firstly the 'Evidential Test'; and secondly the 'Public Interest Test', as set out in the Code for Crown Prosecutors 2020 as follows:
Evidential Test - The investigator will consider the following questions in assessing whether there is sufficient evidence to prosecute the case: Can the evidence be used in court? Is the evidence reliable? Is the evidence credible?



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Public Interest Test - If the Evidential Test has been met, the investigator will then consider whether or not a prosecution would be in the public interest. Each case will be assessed on its own merits and a review will include: How serious the offence is; the level of culpability of the suspect; the circumstances of and the harm caused to the victim; if the suspect was under the age of 18 at the time of the offence; the impact on the community; whether prosecution is a proportionate response; and whether sources of information require protecting.

3. Types of fraud and the possible sanctions

3.1 Employees, Councillors, Teachers, School Staff

If we find that any of our staff or councillors have committed fraud, or been involved in corruption, we will undertake disciplinary action in the first instance. If we identify that the Council has suffered any financial loss, we will always seek to recover this, including through civil and criminal prosecutions. Where staff are members of professional bodies, or have to comply with national codes of conduct (teachers, social care staff etc), we will refer any cases of fraud and corruption to these bodies.

3.2 Benefit Fraud

The Department for Work and Pensions is responsible for investigating housing benefits fraud, but the Council is still responsible for assessing and paying for some benefits including council tax support, and social fund.

3.3 Housing and Right to Buy Fraud

In all cases where anyone has fraudulently applied for Right to Buy, housing support, or a tenancy from the Council, we will always seek repossession of the property and recovery of any financial losses. Where we identify that a tenant is sub-letting their property illegally, we will use the Prevention of Social Housing Fraud Act 2013 to prosecute them and recover any money they gained by sub-letting their property. We will also consider using the Fraud Act 2006.

3.4 Other fraud

There are a number of other areas such as: insurance claims, direct care payments, grants to organisations, exemptions and reliefs from Council Tax or Non-domestic rate payments, and applications for financial and other assistance where theft and fraud may occur.

We will always seek to recover any money lost and consider a criminal or civil prosecution. Where an external organisation is involved, we will make a referral to any relevant governing body such as the Law Society, Charities Commission, or the Registrar of Companies.

4. Proceeds of Crime Act 2002



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- 4.1 The Proceeds of Crime Act 2002 (POCA) was put in place to demonstrate that crime does not pay. We will use POCA wherever we can to obtain confiscation orders, including compensation orders, as well as recovery of the full overpayment of benefits. We may use accredited Financial Investigators attached to other enforcement agencies, or the police, to assist us.

5. Monitoring

- 5.1 The Council's Monitoring Officer is responsible for the maintenance and operation of this policy. The Monitoring Officer and Head of Audit and Risk Management will liaise with the Chief People Officer when the policy is subject to review in order to ensure all relevant employment requirements are taken into account.

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ANTI-MONEY LAUNDERING POLICY

1. What is Money Laundering?

- 1.1 Money laundering is the term used for several offences involving the proceeds of crime, or terrorism. This includes possessing, or in any way dealing with, or concealing, or converting the proceeds of any crime, as well as funds likely to be used for terrorism and the proceeds of terrorism. Money laundering is used to describe the activities of criminals who convert the proceeds of crime into legitimate activities, with the intention of hiding the true sources of their income.
- 1.2 In relation to the Council, money laundering would be the attempt to do legitimate business with the Council e.g. buying/leasing property, or paying for goods and services using assets or money derived from the proceeds of crime or terrorism.
- 1.3 This policy applies to all employees and councillors and sets out the legal requirements relating to money laundering, including how to respond if anyone suspects that money to pay for property, goods, or services comes from criminal, or terrorist activities.
- 1.4 As money laundering seeks to legitimise cash or property from criminal or terrorist activities, it often involves the following three steps: -
 - **Placement** – cash is introduced into the financial system by some means. For example, depositing the cash into bank accounts, exchanging currency or simply changing small notes for larger notes (or vice versa).
 - **Layering** – a financial transaction to camouflage the illegal source; transfer between accounts including offshore, offering loans, investments and complex financial transactions.
 - **Integration** – acquisition of financial wealth from the transaction of the illicit funds. For example, buying residential or commercial property, businesses and luxury goods.

2. Laws covering money laundering

- 2.1 Legislation has shifted the burden for identifying acts of money laundering from police and government agencies to organisations and their employees. The principal legislation and regulation relating to money laundering are: the Proceeds of Crime Act 2002 (POCA), the Terrorism Act 2000 (TA), and the Money Laundering, Terrorist Financing and Transfer of Funds (information on the Payer) Regulations 2017.
- 2.2 There are two main types of offences, which may be committed:
 - Money laundering offences; and
 - Failure to report money-laundering offences.

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2.3 The main types of money laundering offences are:

- **Concealing** – knowing or suspecting a case of money laundering, but concealing or disguising its existence
- **Arranging** – becoming involved in an arrangement to launder money, or assisting in money laundering
- **Acquisition, use or possession** – benefiting from money laundering by acquiring, using or possessing the property concerned.

2.4 Examples include :-

- acquiring, using, or possessing criminal property;
- handling the proceeds of crimes, such as theft, fraud and tax evasion;
- investing the proceeds of crime in other financial products;
- being knowingly involved, in any way, with criminal or terrorist property;
- entering into arrangements to facilitate laundering criminal or terrorist property;
- transferring criminal property;
- failing to report a suspicion that money laundering offences are taking place; and
- ‘tipping off’ someone who is, or is suspected of being involved in money laundering, in such a way as to reduce the likelihood of being investigated, or prejudicing an investigation.

2.5 The Terrorism Act 2000 made it an offence of money laundering to become concerned in an arrangement relating to the retention or control of property likely to be used for the purposes of terrorism, or resulting from acts of terrorism.

2.6 Depending on the severity of the suspected offence, the Magistrates’ Court can issue fines of up to £5,000, or sentences of up to 6 months in prison (or both), and, in the Crown Court, fines are unlimited, and sentences of up to 14 years may be handed down.

3. The obligations of the Council

3.1 The main requirements of the legislation are:

- To appoint a Money Laundering Reporting Officer (MLRO);
- Maintain client identification procedures in certain circumstances;
- Implement a procedure to enable suspicions to be reported; and
- Maintain record keeping procedures.

3.2 The Council’s MLRO is the Head of Audit and Risk Management.



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- 3.3 The Council has developed formal client identification procedures, which must be followed when Council land or property is being sold. These require individuals (and companies) to provide proof of identity and current address. If satisfactory evidence is not obtained, the transaction must not be progressed and guidance should be sought from the MLRO. All records maintained in respect of suspected money laundering activity must comply with the Data Protection Act.

4. Examples of potential money laundering situations

- 4.1 It is not possible to provide a definitive list of possible situations involving money laundering; or how to decide whether to report suspicions to the MLRO. However, the following are risk factors, which either may, individually or cumulatively, suggest possible money laundering activity:

- Payment of a substantial sum of money in cash (over £10,000), either in a single transaction, or a number of smaller transactions which total more than £10,000;
- Payment of cash sums where cash is not the usual means of payment;
- A new customer, or use of a new/shell company, with no financial history;
- A customer who refuses to provide requested information without a reasonable explanation;
- Concerns about the honesty, integrity, location, or identity of a customer;
- Unnecessarily complex transactions e.g. routing or receipt of funds from third parties, or through third party accounts;
- Involvement of an unconnected third party without any reasonable explanation;
- Overpayments by a customer, or payments of deposits subsequently requested back;
- Absence of an obvious legitimate source of funds;
- Movement of funds overseas, particularly involving a higher risk country, or tax haven;
- The cancellation, or reversal, of a previous transaction;
- Requests for the release of customer account details, other than in the normal course of business;
- Transactions at substantially above or below current market values;
- Poor business or financial records;
- A similar previous transaction (completed or requested) from the same customer;
- An inability to trace the customer, or organisation;
- Individuals or companies that are insolvent but have funds.

5. Reporting procedure

- 5.1 If you have any questions or doubts about an individual, company, or transaction that you have been dealing with, then it is important to get advice from the MLRO or Deputy Head of Audit & Risk Management as soon as



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possible – **do not delay reporting your concerns, as this may make you subject to criminal prosecution.**

5.2 Your report to the MLRO should include as much details as possible, including:

- Full details of the people involved e.g. name, address, company name, directorships, contact details etc;
- Full details of their (and your) involvement;
- The type(s) of money laundering activity suspected;
- The date(s) of the suspected money laundering activity, including whether the transactions have happened, are ongoing, or are imminent;
- Where they took place;
- How they were undertaken (cash payment, bank transfer etc);
- The (likely) amount of money or assets involved;
- Why, exactly, you are suspicious.

5.3 Your report should also provide the MLRO with copies of any related supporting documentation. If you are acting in a legal capacity and consider that legal professional privilege may apply to the information, you should set this out in the report to the MLRO and why the information is legally privileged. The MLRO will determine whether the information should be exempt from any reports to the National Crime Agency (NCA).

5.4 Once you have reported your concerns to the MLRO, you must not undertake any further enquiries into the matter. The MLRO will refer the matter on to the NCA, if required, in order for them to undertake further investigation. No further action must be taken in relation to the transaction(s) until either the MLRO, or NCA, has given their consent in writing.

5.5 You should not voice any suspicions to the person(s) who you suspect of money laundering; or make any reference on IT systems, or client/hard copy files that you have reported your concerns to the MLRO. If an individual requests access to information, any notes will need to be disclosed, which may tip them off and may make you liable for prosecution.

5.6 A record will be maintained, including details of the customer due diligence, which will be kept for five years after the end of the business relationship; together with a record of the transactions also kept for five years. Guidance on performing the required due diligence checks can be obtained from the Head of Audit and Risk Management.

6. Review of disclosures by the MLRO

6.1 When the MLRO receives a report of suspected money laundering, they will review the information and any other relevant information, including:

- Reviewing any other transactions patterns and volumes;
- The length of any business relationship involved;
- The number of any one-off transactions and any linked one-off transactions;



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- Any identification evidence held.
- 6.2 The MLRO will complete their review, which may include speaking to the person who made the referral, in order to determine whether there is sufficient evidence of actual/suspected money laundering and whether there are reasonable grounds to know (or suspect) that this is the case. The MLRO will then determine whether the NCA needs to be involved and their consent obtained for a transaction to proceed. In these circumstances, the transaction must not proceed until the NCA consent has been formally received (or if no consent has been received from the NCA after 7 working days).
- 6.3 If the MLRO concludes that there are no reasonable grounds to suspect money laundering, they will record their decision on the report and give their consent to proceed with the transaction.
- 6.4 In cases where legal professional privilege may apply, the MLRO will liaise with the Council's s151 Officer to decide whether there is a reasonable reason for not reporting the matter to the NCA.
- 7. Additional requirements for Finance and Legal employees**
- 7.1 In addition to the reporting procedure in Section 5 above, employees providing certain finance and legal services must also comply with 'due diligence' requirements:
- Simplified due diligence.** Required when there is low risk of money laundering e.g. new business with a company; when checks on company and director registration details would represent sufficient due diligence.
- Enhanced due diligence.** Required when there is a higher risk of money laundering e.g. remote transactions where the customer is not present to be identified would require additional information and documents to be provided.
- If satisfactory evidence cannot be provided, then the transaction cannot proceed.
- 7.2 Customer identification processes must be undertaken when the Council:
- Forms a business partnership with a customer;
 - Undertakes a one-off transaction relating to property or debt of more than £10,000;
 - Undertakes a series of linked transactions involving total payment of more than £10,000;
 - Knows, or suspects, that a transaction or a linked series of transactions involves money laundering.
- 7.3 Customer identification must be completed before any business is undertaken with the individual in relation to accountancy, procurement, audit and legal services with a financial or real estate transaction. In order to complete customer identification the following processes should be undertaken:



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- Identify the person who wants to form the business relationship or complete the transaction;
- Verify their identity using independent sources of information;
- Identify who benefits from the transaction;
- Monitor transactions to make sure that they are consistent with what is understood about the individual or country;
- Understand the source of their funds;
- Ensure there is a logical reason why they would want to do business with the Council.

8. Training

- 8.1 The MLRO will ensure that training on the law relating to money laundering and the Council's procedures is provided to all relevant employees on a regular and ongoing basis.

9. Monitoring

- 9.1 The Council's Monitoring Officer is responsible for the maintenance and operation of this policy. The Monitoring Officer, Head of Audit and Risk Management will liaise with the Assistant Director of Human Resources when the policy is subject to review in order to ensure all relevant employment requirements are taken into account.

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Anti-Bribery Policy

1. Policy Statement

- 1.1 The Bribery Act 2010 made bribery a criminal offence. The Council and everyone employed by us, including members, temporary and agency staff, consultants and contractors, will not pay bribes or offer improper inducements to anyone for any purpose. We do not accept bribes or improper inducements.
- 1.2 To use a third party to channel bribes to others is also a criminal offence. We do not and will not engage indirectly in, or otherwise encourage, bribery.

The Council is committed to the prevention, deterrence and detection of bribery. We have zero tolerance towards bribery.

2. What is bribery?

- 2.1 Bribery is the offering, promising or giving of a financial or other advantages designed to induce an individual to take an improper decision or action. These inducements can take many forms including offering cash, holidays, event tickets, meals. Decisions could relate to recruitment, the award of contracts, planning consents and other awards.
- 2.2 There are four key offences under the 2010 Act:
 - bribing another person (section 1);
 - accepting a bribe (section 2);
 - bribing a foreign official (section 6); and
 - failing to prevent bribery (section 7).
- 2.3 Failure by a commercial organisation to prevent bribery is a corporate offence. For the purposes of the Bribery Act 2010, the Council is classed as a 'commercial organisation'. The Act also introduces an offence of bribing a foreign official. Individuals found guilty of an offence may be imprisoned for a maximum term of ten years and face an unlimited fine.

3. Scope of the policy

- 3.1 This policy provides a coherent and consistent framework to enable all our employees to understand and implement arrangements to enable compliance with the Act. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach.



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- 3.2 This policy applies to all of our activities and staff including all permanent, temporary and agency staff, contractors, agents, members (including independent members), volunteers and consultants. For our partners, joint ventures and suppliers, we will encourage the adoption of policies consistent with the principles set out in this policy.

4. Our commitment to anti-bribery

- 4.1 In order to comply with the Bribery Act, we will:
- Set out a clear anti-bribery policy and keep it up to date;
 - Maintain appropriate procedures to prevent bribery;
 - Undertake anti-bribery risk assessments where appropriate;
 - Make all employees aware of their responsibilities to comply with this policy at all times;
 - Maintain appropriate gifts and hospitality procedures;
 - Encourage employees to report any suspicions of bribery;
 - Investigate instances of alleged bribery and assist the police and other authorities in their investigations; and
 - Take a robust line against anyone found to have breached this policy or to have committed or facilitated bribery.
- 4.2 As part of our commitment to comply with the Bribery Act, it will be considered unacceptable to:
- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to 'facilitate' or expedite a routine procedure;
 - accept payment from a third party that you know, or suspect, is offered with the expectation that it will obtain a business advantage for them;
 - accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided in return;
 - retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy; and
 - engage in activity in breach of this policy.

5. Contracts and failure to prevent bribery

- 5.1 Under the Public Contracts Regulations, a company is automatically barred from competing for public contracts where it is convicted of a corruption offence. Companies that are convicted of failing to prevent bribery are not automatically barred from participating in tenders for public contracts. We have the discretion to exclude organisations convicted of this offence and you should get advice from our Procurement team on this issue.



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6. Raising a concern

- 6.1 We want everyone who has any concerns to be able to report these effectively. Our Whistleblowing policy sets out how to do this, including making an anonymous referral.

7. Monitoring

- 7.1 The Council's Monitoring Officer is responsible for the maintenance and operation of this policy. The Monitoring Officer and Head of Audit and Risk Management will liaise with the Assistant Director of Human Resources when the policy is subject to review in order to ensure all relevant employment requirements are taken into account.

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Report for: Corporate Committee – 15 September 20221

Title: Treasury Management Report Q1 2022/23

Report authorised by: Toyin Bamidele, Assistant Director of Finance (Deputy S151 Officer)

Lead Officer: Tim Mpofu, Head of Finance – Pensions and Treasury
tim.mpofu@haringey.gov.uk

Ward(s) affected: N/A

**Report for Key/
Non Key Decision:** Non Key decision

1. Describe the issue under consideration

- 1.1. The Council has adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice (the CIPFA Code) requires the Council to approve reports on the performance of the treasury management function at least twice yearly (mid-year and at year end).
- 1.2. The Council's Treasury Management Strategy for 2022/23 was approved by Full Council on 1 March 2022.
- 1.3. This report provides an update to the Committee on the Council's treasury management activities and performance in the three months to 30 June 2022 in accordance with the CIPFA Treasury Management Code of Practice.

2. Cabinet Member Introduction

- 2.1. Not applicable.

3. Recommendations

The Corporate Committee is requested:

- 3.1. To note the Treasury Management activity undertaken during the three months to 30 June 2022 and the performance achieved which is attached as Appendix 1 to this report.
- 3.2. To note that all treasury activities were undertaken in line with the approved Treasury Management Strategy.

4. Reason for Decision

4.1. Not applicable.

5. Other options considered

5.1. Not applicable.

6. Background information

- 6.1. The Council's treasury management activity is underpinned by CIPFA's Treasury Management in Public Services: Code of Practice (the CIPFA Code), which requires local authorities to produce annually, Prudential Indicators and a Treasury Management Strategy Statement. CIPFA has defined Treasury management as: "The management of the local Council's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."
- 6.2. The CIPFA Code recommends that members are informed of treasury management activities at least twice a year. Formulation of treasury policy, strategy and activity is delegated to the Corporate Committee and this Committee receives reports quarterly.
- 6.3. However, overall responsibility for treasury management remains with Full Council and the Council approved the Treasury Management Strategy Statement and set the Prudential Indicators for 2022/23 on 1 March 2022. The Corporate Committee is responsible for monitoring treasury management activity, and this is achieved through the receipt of quarterly/annual reports.
- 6.4. Government guidance on local authority treasury management states that local authorities should consider the following factors in the order they are stated:

Security - Liquidity - Yield
- 6.5. The Treasury Management Strategy reflects these factors and is explicit that the priority for the Council is the security of its funds. However, no treasury activity is without risk and the effective identification and management of risk are integral to the Council's treasury management activities.

7. Contribution to Strategic Outcomes

7.1. None.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance and Procurement

8.1. Finance Comments are included throughout the attached report.

Legal

8.2. The Head of Legal and Governance has been consulted on the content of this report which is consistent with legislation governing the financial affairs of the Council. In particular, the Council must comply with the requirements of the Local Government Act 2003, the Local Authorities (Capital Financing & Accounting – England) Regulations 2003 and other applicable legislation as well as the CIPFA Treasury Management code.

8.3. In considering the report Members must take into account the expert financial advice available to it and any further oral advice given at the meeting of the Committee.

Equalities

8.3. There are no equalities issues arising from this report.

9. Use of Appendices

9.1. Appendix 1 – Treasury Management Report Q1 2022/23

10. Local Government (Access to Information) Act 1985

10.1. Not applicable.

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Appendix 1 - Treasury Management Report Q1 2022/23

1. Introduction

- 1.1. The Council has adopted the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice* (the CIPFA Code) which requires the Authority to approve treasury management semi-annual and annual reports.
- 1.2. The Authority's treasury management strategy for 2022/23 was approved at a full Council meeting on 1 March 2022. The Authority has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Authority's treasury management strategy.
- 1.3. Treasury risk management at the Authority is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice* (the CIPFA Code) which requires the Authority to approve a treasury management strategy before the start of each financial year and, as a minimum, a semi-annual and annual treasury outturn report.
- 1.4. The Prudential Code includes a requirement for local authorities to provide a Capital Strategy, a summary document approved by full Council covering capital expenditure and financing, treasury management and non-treasury investments. The Authority's Capital Strategy, complying with CIPFA's requirement, was approved by full Council on 1 March 2022.

2. External Context (provided by the Council's treasury management advisor, Arlingclose)

Economic background

- 2.1. Following Russia's invasion of Ukraine in February 2022, global inflationary pressures intensified sharply, leading to a sizeable deterioration in the global economic outlook.
- 2.2. The economic backdrop in the April-June 2022 quarter was characterised mainly by higher oil, gas and commodity prices, and fears of rising and persistent inflation and its damaging impact on consumers' cost of living. There was little indication of an imminent end to Russia-Ukraine conflict and supply chain bottlenecks were exacerbated by the war in Ukraine and lockdowns in China.
- 2.3. Added to this was tough rhetoric and action by central bankers globally on fighting inflation through higher interest rates and quantitative tightening even as financial conditions became increasingly difficult for consumers, more so for those whose wages have not kept pace with inflation.
- 2.4. In the UK inflation remained elevated. Ofgem, the energy regulator, increased the energy price cap by 54% in April, equivalent to around £700 for a household with average energy consumption (the cap had already increased 12% back in October 2021). In May, data showed CPI edging higher to 9.1% while the core CPI rate, which removes energy, fuel and food was 5.9%. RPI rose to 11.7%.
- 2.5. The labour market continued to show signs of tightness as employers struggled to fill vacancies with workers who have the relevant skill sets matching their requirements. The unemployment rate for April fell to 3.8% and is now below pre-pandemic levels. Pay growth

was 6.8% for total pay (including bonuses) and 4.2% for regular pay; however, adjusted for inflation, growth in total pay was just 0.4%, whilst regular pay fell 2.2%.

- 2.6. Unsurprisingly, with disposable income squeezed and another energy cap increase due in October, consumer confidence plummeted to the level last seen during the 2008/09 financial crisis. Quarterly GDP growth in the first quarter of 2022 was 0.8%.
- 2.7. Having increased interest rates by 0.25% in April 2022, the Bank of England's Monetary Policy Committee (MPC) increased the official Bank Rate by a further 0.25% to 1.25% in June 2022. This was a split decision with some members of the MPC expressing a preference for a 0.5% increase instead.
- 2.8. Rises in the input and output producer price measures suggest further inflationary pressure is in the pipeline. The Bank of England is therefore unlikely to become complacent, so further rate rises look likely in the near term.
- 2.9. In the US, CPI annual inflation rose to 9.1% in June 2022, the highest in nearly 40 years. The Federal Reserve also stepped up its fight against inflation with a 0.5% hike in rates in May followed by a further increase of 0.75% in June, the latter is its most aggressive hike since 1994 and higher than markets expected, taking policy rates to a range of 1.5% - 1.75%.
- 2.10. In the Eurozone, inflation also pushed higher to 8.1%, with energy price pressures a major contributor. Europe has been heavily impacted by the energy crisis following the Russian invasion of Ukraine, but concerns about the Eurozone's peripheral members and highly indebted member states complicates the European Central Bank's (ECB) response as it seeks to normalise monetary policy. The ECB stated it would end quantitative easing at the beginning of July and then increase interest rates by 0.25% later in the month, the first hike since 2011.

Financial markets

- 2.11. Heightened uncertainty characterised financial market sentiment and bond yields were similarly volatile but with a general upward trend as concern over higher inflation and higher interest rates continues to dominate.
- 2.12. Over the quarter the 5-year UK benchmark gilt yield rose from 1.41% to 1.89%, the 10-year gilt yield rose from 1.61% to 2.35% and the 20-year yield from 1.82% to 2.60%. The Sterling Overnight Rate (SONIA) averaged 0.89% over the period.

Credit review

- 2.13. Arlingclose extended the maximum duration limit for several UK and non-UK banks to 6 months following a full review of its credit advice on unsecured bank deposits. The maximum duration for unsecured deposits with other UK and non-UK banks on Arlingclose's recommended list is 100 days. The Council did not have any unsecured bank deposits placed with any bank as at the end of the reporting period.
- 2.14. Arlingclose continues to monitor and assess credit default swap levels for signs of credit stress, but no changes have been made to the counterparty list or recommended durations. Nevertheless, increased market volatility is expected to remain a feature, at least in the near term and, as ever, the institutions and durations on the Authority's counterparty list recommended by Arlingclose remains under constant review.

3. Local Context

- 3.1. On 31st March 2022, the Council had net borrowing of £700.4m arising from its revenue and capital income and expenditure. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. These factors are summarised in Table 1 below.

Table 1: Balance Sheet Summary

Type of Liability	31.03.22 Actual** £m
General Fund CFR	598.1
HRA CFR	404.6
Total CFR **	1,002.7
Less: *Other debt liabilities	(28.2)
Borrowing CFR – comprised of:	974.5
- External borrowing	700.4
- Internal borrowing	274.1

* finance leases, PFI liabilities and transferred debt that form part of the Authority's total debt

** subject to audit

- 3.2. The treasury management position on 30 June 2022 and the change over the year is shown in Table 2 below.

Table 2: Treasury Management Summary

Type of Borrowing / Investment	31.03.22 Balance (£m)	Movement (£m)	30.06.22 Balance (£m)	30.06.22 Rate (%)
Long-term borrowing	600.4	(0.5)	599.9	3.00
Short-term borrowing	100.0	(15.0)	85.0	0.84
Total borrowing	700.4	(15.5)	684.9	2.73
Short-term investments	5.0	0.0	5.0	0.12
Cash and cash equivalents	66.2	(33.2)	33.0	1.00
Total investments	71.2	(33.2)	38.0	0.92
Net borrowing	629.2	17.7	646.9	

4. Borrowing Update

- 4.1. PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield. The Authority does not plan to borrow to invest primarily for commercial return and is therefore unaffected by these changes and retains its ability to continue to fully access the PWLB.

Borrowing strategy during the period

- 4.2. On 30 June 2022 the Council held £684.9m of loans, a decrease of £15.5m (compared to 31 March 2022), as part of its strategy for funding previous and current years' capital programmes. Outstanding loans on 30 June are summarised in Table 3 below.

Table 3: Borrowing Position

	31.03.22 Balance £m	Net Movement £m	30.06.22 Balance £m	30.06.22 Weighted Average Rate %	30.06.22 Weighted Average Maturity (years)
Public Works Loan Board	475.4	(0.5)	474.9	2.54	30
Banks (LOBO)	125	0.0	125	4.72	38
Local authorities (short-term)	100.0	(15.0)	85.0	0.84	0
Total borrowing	700.4	(15.5)	684.9	2.73	28

- 4.3. Over the April- June 2022 quarter, short-term rates rose between 0.5% and 0.9% and long-term rates rose between 0.6% and 0.8%.
- 4.4. The Council's chief objective when borrowing has been to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Authority's long-term plans change being a secondary objective. The Council's strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio.
- 4.5. In keeping with the Council's objectives, no new borrowing was undertaken during the period, while £15.5m of existing loans were allowed to mature without immediate replacement. This strategy enabled the Council to keep new borrowing costs at a minimum due to the increase in interest rates.
- 4.6. Due to these increases in the borrowing rates during the quarter, the Council considered it to be more cost effective in the near term to use internal resources. The current economic uncertainty has caused significant volatility in the financial markets. The Council is prepared to undertake additional borrowing should rates fall below the target rates due to the market volatility.
- 4.7. The Council has a significant capital programme which extends into the foreseeable future. A large proportion of this will be financed by borrowing, which the Council will have to undertake in coming years. The Council's treasury advisor, Arlingclose undertakes a weekly 'cost of carry' analysis which informs the Council on whether it is financially beneficial to undertake borrowing now or delay this for set time periods based on interest rate forecasts.
- 4.8. The Council's borrowing decisions are not predicated on any one outcome for interest rates and a balanced portfolio of short and long-term borrowing is maintained.

LOBO Loans

- 4.9. The Authority continues to hold £125m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the Authority has the option to either accept the new rate or to repay the loan at no additional cost. No banks exercised their option during the year.

5. Treasury Investment Activity

- 5.1. CIPFA's revised Treasury Management in the Public Services Code of Practice and Cross-Sectoral Guidance Notes defines treasury management investments as those which arise from the Council's cash flows or treasury risk management activity that ultimately represents balances that need to be invested until the cash is required for use in the course of business.
- 5.2. The Council holds invested funds, representing income received in advance of expenditure plus balances and reserves held. During the year, the Council's investment balances ranged between £71.2m and £38.0 million due to timing differences between income and expenditure. The investment position is shown in table 4 below.

Table 4: Treasury Investment Position

Investments	31.03.22 Balance £m	Net Movement £m	30.06.22 Balance £m	30.06.22 Rate of Return %	30.06.22 Weighted Average Maturity (Days)
Money Market Funds	0.0	20.0	20.0	1.06%	1
UK Government:					
- Local Authorities	5.0	0.0	5.0	0.12%	53
- Debt Management Office	66.2	(53.2)	13.0	1.00%	1
Total investments	71.2	(33.2)	38.0	0.92%	8

- 5.3. Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.
- 5.4. The 0.25% increases in Bank Rate at the Money Policy Committee's meetings in May and June and with the prospect of more increases to come, short-dated cash rates, which had ranged between 0.7% - 1.5% at the end of March, rose on average by 0.65% over the quarter.
- 5.5. At the end of June, the rates on Debt Management Account Deposit Facility (DMADF) deposits ranged between 1.05% and 1.78% and the return on sterling low volatility net asset value (LVNAV) Money Market Funds ranged between 0.9% and 1.1%.
- 5.6. The progression of risk and return metrics are shown in the extracts from Arlingclose's quarterly investment benchmarking in Table 5 below

Table 5: Investment Benchmarking – Treasury investments managed in-house

	Credit Score	Credit Rating	Bail-in Exposure	Weighted Average Maturity (Days)	Rate of Return
31.03.2022	4.46	AA-	44%	110	0.06%
30.06.2022	4.11	AA-	53%	8	0.92%
Similar Local Authorities	4.36	A+	71%	32	1.41%
All Local Authorities	4.20	A+	64%	16	1.78%

Scoring:

AAA = highest credit quality = 1; D = lowest credit quality = 26

Aim = A- or higher credit rating, with a score of 7 or lower, to reflect current investment approach with main focus on security

Non-Treasury Investments

- 5.7. The definition of investments in CIPFA's revised 2021 Treasury Management Code covers all the financial assets of the Authority as well as other non-financial assets which the Authority holds primarily for financial return. Investments that do not meet the definition of treasury management investments (i.e. management of surplus cash) are categorised as either for service purposes (made explicitly to further service objectives) and or for commercial purposes (made primarily for financial return).
- 5.8. Investment Guidance issued by the Department for Levelling Up Housing and Communities (DLUHC) and Welsh Government also broadens the definition of investments to include all such assets held partially or wholly for financial return.

Treasury Performance

- 5.9. Treasury investments generated an average rate of return of 0.67% in the first quarter of the financial year. The Council's treasury investment income for the year is likely to be above the budget forecast due to the increase in interest rates during the first half of 2022.
- 5.10. Borrowing costs for 2022/23 are forecast in line with budget at Q1 at £26.2m (£14.9m HRA, £11.3m General Fund).

6. Compliance

- 6.1. The Director of Finance reports that all treasury management activities undertaken during the quarter complied fully with the principles in the Treasury Management Code and the Council's approved Treasury Management Strategy.
- 6.2. Compliance with the authorised limit and operational boundary for external debt is demonstrated in table 6 below.

Table 6: Debt Limits

	30.06.22 Actual £m	2022/23 Operational Boundary £m	2022/23 Authorised Limit £m	Complied?
Borrowing	569.2	1,236.0	1,286.0	Yes
PFI and Finance Leases	28.2	23.4	25.7	Yes
Total debt	597.4	1,259.4	1,311.7	Yes

- 6.3. Since the operational boundary is a management tool for in-year monitoring it is not significant if the operational boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure, however, the Council's debt remained well below this limit at all points in the financial year.

Treasury Management Indicators

- 6.4. The Authority measures and manages its exposures to treasury management risks using the following indicators.

Security

- 6.5. The Authority has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit score of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

	30.06.22 Actual	2022/23 Target	Complied?
Portfolio average credit score	4.11 (AA-)	7.0 (A-)	Yes

Liquidity

- 6.6. The Authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing.

	30.06.22 Actual	2022/23 Target	Complied?
Total cash available within 3 months	38.0	10.0	Yes

Interest Rate Exposures

- 6.7. This indicator is set to control the Authority's exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interests was:

Interest rate risk indicator	30.06.22 Actual	2022/23 Target	Complied?
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Upper limit on one-year revenue impact of a 1% rise in interest rates	£0.10m	£1m	Yes
Upper limit on one-year revenue impact of a 1% fall in interest rates	£0.10m	£1m	Yes

- 6.8. The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at current rates.

Maturity Structure of Borrowing

- 6.9. This indicator is set to control the Authority's exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing were:

	30.06.22 Actual	Upper Limit	Lower Limit	Complied?
Under 12 months	13.9%	50%	0%	Yes
12 months and within 24 months	3.5%	40%	0%	Yes
24 months and within 5 years	3.4%	40%	0%	Yes
5 years and within 10 years	5.10%	40%	0%	Yes
10 years and within 20 years	13.1%	40%	0%	Yes
20 years and within 30 years	5.8%	40%	0%	Yes
30 years and with 40 years	21.4%	50%	0%	Yes
40 years and within 50 years	32.90%	50%	0%	Yes
50 years and above	0.00%	40%	0%	Yes

- 6.10. Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.
- 6.11. The Council has used short term borrowing (under 1 year in duration) from other local authorities extensively in recent years, as an alternative to longer term borrowing from PWLB, due to lower interest rates, and corresponding revenue savings.
- 6.12. However, short term borrowing exposes the Council to refinancing risk: the risk that rates rise quickly over a short period of time and are at significantly higher rates when loans mature, and new borrowing has to be raised. With this in mind, the Council has set a limit on the total amount of short-term local authority borrowing, as a proportion of all borrowing.

Short term borrowing	Limit	30.06.22	Complied?
Upper limit on short-term borrowing from other local authorities as a percentage of total borrowing	30%	14%	Yes

Principal Sums Invested for Periods Longer than a year

- 6.13. The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end were:

	2022/23	2023/24	2024/25
Actual principal invested beyond year end	Nil	Nil	Nil
Limit on principal invested beyond year end	£10m	£10m	£10m

Complied?	Yes	Yes	Yes
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Report for: Corporate Committee – 15 September 2022

Title: Progress Update on the renaming of Black Boy Lane

Report authorised by: Claire McCarthy, Assistant Director Strategy, Communications, and Collaboration

Lead Officer: Christina Andrew, Strategic Lead Inequalities

Ward(s) affected: All

**Report for Key/
Non Key Decision:** Information

1. Describe the issue under consideration

- 1.1 On 1 February 2022, Corporate Committee resolved that an Order be made so as to rename Black Boy Lane to La Rose Lane, with the Order to *'take effect from the 1 February 2023. However, officers are to use their best endeavours to achieve an earlier implementation date of 1 December 2022'*.
- 1.2 This report outlines the plans for the implementation of the name change on 23 January 2023 and how the council will support the needs of residents of the street, to make the process of the name change as smooth and simple as possible for all concerned.

2. Recommendations

- 2.1 To note plans for the implementation of the name change.

3. Reasons for decision

- 3.1 The date of 23rd January 2023 has been chosen as it meets the Committee's determination that the street be renamed by 1st February 2023, whilst allowing time for a further, adequate period of engagement to be undertaken with residents to ensure the necessary support is provided to assist them with the administrative changes required. The suggested timing of the Order taking effect, also addresses the administrative considerations involved in renaming a street from the council's perspective. The implications will be felt in a number of areas spanning the Electoral Roll, emergency services, the Land Registry, etc. as well as all address-based transactions and functions for individuals and households.

4. Alternative options considered

- 4.1 Not applicable.

5. Background information

- 5.1 In June 2020 the Mayor of London announced the Commission on Diversity in the Public Realm, seeking to diversify the stories that are shared and commemorated across the city, making them more representative of its current population, and more reflective of its history.
- 5.2 The Council announced, in June 2020, a Review of Building, Place and Street Names. Some early projects were initiated under this umbrella of work, including the renaming of Albert Road Recreation Ground to O.R Tambo Recreation Ground and the consideration of renaming Black Boy Lane. Reports were brought to Corporate Committee in July and December 2020 and March 2021 on the question of renaming Black Boy Lane. It was resolved by the Committee in March 2021 that more consultation was necessary.
- 5.3 Officers brought a report to Corporate Committee on 16th November 2021, suggesting the development of a strategic framework for a community-led and inclusive approach to renaming and the public realm more broadly. The report noted the importance of ensuring what we consider and deliver in the public realm is informed by the issues of structural racism and inequalities we're working to tackle. Within this engagement and the process of working towards representing the history of our borough more accurately, local activity on and / or around Black Boy Lane might include contextualising the name of the street, and indeed of other streets across the borough, setting out clearly the history of the name and its impacts for local residents, for example with a commemorative plaque, a local exhibition at Chestnuts Park, development of learning materials for local schools on the topic, and work with Bruce Castle Museum to develop historical content based on the history of Black Boy Lane for a range of places and platforms.
- 5.4 Corporate Committee put forward an amendment on 16th November, noting that the renaming of Black Boy Lane should not be further delayed, proposing the name change take effect on 1st February 2022. The meeting was adjourned until 23rd November 2021 in order to have comments from legal and finance.
- 5.5 Corporate Committee reconvened on 23rd November 2021 and was advised that further consultation should take place before any decision on renaming the street. This was agreed, with the results to be reported back to the Corporate Committee on 1st February 2022.
- 5.7 Corporate Committee considered the results of the further consultation on 1st February 2022, and resolved to make the order to rename Black Boy Lane to La Rose Lane, to take effect from 1st February 2023, requesting officers use best endeavours to achieve an earlier implementation date of 1st December 2022. The Committee recommended to the Executive that a support package including a 'voluntary payment' of £300 and administrative assistance be made available to all households and businesses of Black Boy Lane to minimise any inconvenience resulting from the processes required to reflect the renaming. Officers were asked to bring back a progress report to the Committee in September 2022.
- 5.8 By way of background, Haringey's Street and Building Naming and Numbering guidelines are referenced here for ease:

- In the Council's current [Guidelines for Street and Building Naming and Numbering](#) the guidelines:
 - State that "Renaming/renumbering of existing buildings and streets is normally only considered when changes occur which give rise (or are likely to give rise) to problems for the occupiers, Post Office or emergency services"; and
 - Follow London Fire Brigade guidance and conform to the Data Entry Conventions and British Standards 7666 - which sets out best practice of how streets and properties should be formally addressed.

5.9 The proposed process for implementing the road name change

5.9.1 Further resident engagement

Below is an outline of planned further engagement with residents of the street over the coming three months (September – November 2022).

A letter is scheduled to be circulated to residents in mid-September, to avoid missing people who may be away during the summer holidays, attached at Appendix 1. This outlines the planned date of the name change, the engagement opportunities people can use, the support we will provide, and a set of FAQs. A leaflet will be circulated alongside the letter to explain the background of the name change and provide information about the life of John La Rose.

The letter details the following engagement opportunities which will be scheduled over the next three months. These sessions will be led by Local Area Coordinators from Connected Communities to share information on the process, gain additional understanding of specific support needs among residents of the street, and answer questions:

- Door to door engagement
- Drop ins at St Ann's Library and Chestnuts Community Centre
- Pop ups on the street
- Online meetings
- Drop off boxes for feedback at nearby locations
- The option to write to us via email or by letter

As information is gathered through these sessions on any additional support required, the officer group coordinating the engagement and process of the name change will plan the most appropriate approach to providing administrative support to individuals, and any further information sharing that may be necessary.

Local Area Coordinators from Connected Communities leading the engagement with residents of the street will facilitate the identification of wider needs and engagement opportunities, separate to the support being provided on the renaming process. This may include making introductions to support services related to health, finances, or social activities.

The current street signage will be retained and part of the engagement with residents of the street will include thinking about how best to display the sign and represent its part in Haringey's history.

5.9.2 Other procedural steps

Communication is underway with Highways to prepare for new street signage being installed, and we have contacted TfL to plan for the changes that will be required to the bus stop and bus route which currently includes Black Boy Lane.

There are a number of services and bodies the council have undertaken to update about the change in road name, including Royal Mail, council services Geoplace etc.:

Organisations	Summary
Royal Mail	No charge. We will inform them of the street name change. The same postcode will be kept, and this will ensure smooth delivery of post and parcels via Royal Mail.
HM Land Registry (HMLR)	No charge. We will inform them of the street name change for them to update their data.
HM Passport Office (HMPO) UK Visas & Immigration (UKVI) / Home Office Office of National Statistics (ONS) Driver & Vehicle Licensing Agency (DVLA) Department for Work & Pensions (DWP) Companies House HM Revenue and Customs (HMRC) *All other Government Agencies	No charge. Updated via Ordnance Survey (OS) AddressBase. If required residents can make changes to their addresses for free (if this is an address change only) by using www.gov.uk or by post.
The Disclosure and Barring Service (DBS)	Quarterly updates via Royal Mail PAF address data via third party software. There are no impacts (or costs) on existing certificates already issued. Once the street name changes then certificates will be issued to the street name provided on the DBS application form.
Banks Mortgages Utility Companies (Gas, Electric, Internet, Telephone and Water) Insurance Companies (Home, Contents, Car etc)	Update address systems periodically. Might take a few months for address data to change with a lot of private companies. These companies use a mixture of Royal Mail PAF data and OS AddressBase data. Most forms have free text address fields where you can enter your address manually. Most will not charge to update. Some insurance companies

Organisations	Summary
Internet Shopping (accounts for online shopping etc) Courier Companies	may charge a nominal fee (such as an administrative fee) to update any information. A Street Naming Order document will be provided to show as evidence to update this.
Emergency Services (Fire Brigade, Police and Ambulance)	No charge. Updated addresses taken from OS AddressBase Premium.
Health (NHS, GP, Hospitals and Pharmacies)	No charge. Residents can update this via their local surgery to update their address. This should then replicate around so that Hospitals and Pharmacies have the latest address information.
Electoral Services Registrars (Births, Deaths & Marriages) Council Tax/Business Rates & Valuations Office Agency Schools Admissions Planning, Building Control, Local Land Charges and all other internal Council departments	No charge. Updated via Street Naming & Numbering and Local Land & Property Gazetteer (NLPG) Data – within 1-4 weeks of the change being made.
Solicitors (Tenancy agreements, Deposit agreements, Wills and other legal documents)	A charge may be incurred to update legal documents.

Other products such as Google Maps, Bing Maps and smart phone apps that use opensource address data will take up to a year to update. This will be mitigated by the postcode remaining the same, and the requirement to continue to display the previous street name for at least twelve months following the name change.

The council will make and publish the Street Naming & Numbering Order. Copies of this order will be made available to residents to assist with changes to legal documents etc. before the go live date. In order to mitigate lags in updating systems, we are required to ensure the street name reflects both the new name and the old name for a period of no less than a year. This is important for emergency services, but also allows other systems to be updated, including mapping systems such as Bing Maps and Google Maps as mentioned above.

It is intended that Executive decisions will be made in relation to the proposed 'voluntary payment' as required and, if approved, the process for distribution will be notified to residents and businesses on the street.

6. Contribution to strategic outcomes

- 6.1 This work contributes to and underpins the Council's approach to inequalities, as set out in the Borough Plan, ensuring all local residents feel supported and enabled by their local environment.

7. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

7.1 Finance

- 7.1.1 As set out in paragraph 7.3, the Corporate Committee's powers are limited to the making of the street renaming Order, and not to making decisions regarding resource allocation on behalf of the Council (i.e. agreeing a support package).

- 7.1.2 The report to Corporate Committee in March 2021 described the funding arrangements for the proposed support package in that report in respect of the renaming of Black Boy Lane, following the further consultation this support package is not proposed to be changed. However, as made clear in paragraph 7.3.3. the decision to approve this support package has yet to be made by the Executive. This must be undertaken before final details of the support package are provided to residents.

7.2 Procurement

- 7.2.1 Strategic Procurement note the content of the report. There are no procurement implications regarding the recommendations in the report.

7.3 Head of Legal & Governance

- 7.3.1 The Council has the power to rename streets and roads in the borough. Under Part II Section 6 of the London Building Acts (Amendment) 1939, the Council may by Order substitute the name of any street, way, place, row of houses or block of buildings with any name they think fit. The Act is a Local Act and a local choice function. Under the Council's constitution, the function is a non-executive function allocated to the Corporate Committee.

- 7.3.2 As noted in the report considered by Corporate Committee on 1 February 2022, the Council has complied with its duty to consult local residents and businesses. In addition, on 1st December 2021, the Council issued the Notice of Intention to make the Order. That Notice allowed for objections to be submitted by 19th January 2022. Having regard to the objections submitted to the proposed making of the Order and having due regard to the public sector equality duty contained in section 149 of the Equality Act 2010, Corporate Committee resolved that the Order be made.

- 7.3.3 Corporate Committee also resolved that "*Committee recommends to the Executive that a support package including a 'voluntary payment' of £300 and administrative assistance be made available to all households and businesses of Black Boy Lane to minimise any inconvenience resulting from the processes required to reflect the renaming;*". Accordingly, there remains a need for a

decision to taken by the Executive (e.g. Cabinet or Lead Member) as to whether or not to approve the support package.

7.4 Equality

7.4.1 The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

7.4.2 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

7.4.3 The report provides an update to Corporate Committee on the progress towards renaming Black Boy Lane.

7.4.4 The overall purpose of initiative to change the street name is to reduce discrimination. An EQIA was previously completed to understand the implications of the name change. The EQIA found potential negative impacts to individuals who share a protected characteristic where they may be more likely to be of lower socioeconomic status and face financial costs from the name change, (women who are single parents, BAME people, older people and disabled people) or would experience higher degrees of disruption from the name change (disabled people and older people). The Council has described steps to mitigate these negative impacts. To ensure residents of a lower socioeconomic status are not disadvantaged by this policy, the Council has proposed a payment of £300 to support with any costs of the name change which will mitigate financial implications, which is to be approved by the Executive, with particular regard to residents impacted due to socioeconomic background. We have also put forward a broader support offer to assist with administrative requirements, including FAQs, pro-formas, and more, outlined in Paragraphs 5.9.1 and 5.9.2.

7.4.4.1 The timeline for the name change will also help to mitigate administrative disruption by ensuring support needs can be identified and responded to, and minimises the risk of databases and systems being misaligned due to differing timetables for updates between services and organisations. These measures take into account the potential negative impact on people from protected groups, including single parents, older people, people from ethnic minority backgrounds, and disabled people.

8. Use of Appendices

Appendix 1 – Draft letter to households and businesses of Black Boy Lane, September 2022; and

Appendix 2 – December 2021 letter to households and businesses of Black Boy Lane, including Statutory Notice

9. **Local Government (Access to Information) Act 1985**
Not applicable.

APPENDIX 1 – Draft letter to households and businesses of Black Boy Lane

Important: Black Boy Lane

September 2022

Dear Occupier,

RE: Renaming Black Boy Lane to La Rose Lane

I am writing to you in relation to the decision to change the name of Black Boy Lane to 'La Rose Lane' taken at Corporate Committee on 1st February 2022. The name change is planned to take effect from 23rd January 2023.

We want to thank those who submitted responses and feedback during the consultation period. We know that while many residents across the borough, and on Black Boy Lane, were in favour of the name change, a significant number of residents of the street were against it. We committed to a period of further engagement with residents at the last Corporate Committee, to make sure all residents are aware of the administrative changes that will need to be made, when they will need to be made by, and importantly to make sure we are aware of any additional support needs we can help with as a Council.

Support for you from the Council

We want to reassure you that the support package we outlined during the consultation period will still be provided:

- Haringey Council will notify as many organisations as we can on your behalf
- Your postcode and house number will not change
- An official Street Naming and Numbering Order document will be provided
- The Council will provide practical help and support during the name change process
- A change in the name of the street will not affect any resident's immigration status

A support package will be provided and residents/ business will be notified regarding details of the package once it has been finalised.

We will be organising a number of opportunities to hear from you about your support needs or with any questions over the next three months, including:

- Door to door engagement
- Drop ins at St Ann's Library and Chestnuts Community Centre
- Pop ups on the street
- Online meetings
- Drop off boxes for feedback at nearby locations
- You can also write to us via the mailbox or by letter

We will communicate dates for the engagement opportunities listed above in the coming weeks.

Thank you for your contributions during the consultations and engagement process so far, and we look forward to hearing from you during this next phase in preparation for the name change taking effect on 1st December.

Kind regards,

Frequently Asked Questions (FAQs)

Q: What will happen next?

A: The Council is committed to supporting residents and organisations through the name change process. Over the coming months, in the lead up to 23rd January, we will be asking residents to tell us what kind of support they need with their address change, if any. We will be providing information on the bodies that need to be informed, and support with some of the administrative work that will need to be done – informing as many organisations as we can of the name change, and providing templates for residents to use where they need to contact organisations directly.

Q: Will my postcode and house number change?

A: No. The Unique Street Reference Number (USRN) for the street will also remain the same, which is used by many organisations.

Will I need to inform Royal Mail of the change to the street name?

A: No. The Council will inform Royal Mail of the address change. Because your postcode won't change, a change in the road name, should not affect any letters or parcels sent via Royal Mail. Utility companies and others buy address lists from Royal Mail.

Q: What organisations will I need to inform about my change of address? How will the Council help me?

A: The Council will notify as many organisations as we can on residents' behalf and provide practical help and support, including 'pro-forma' documents to send to relevant organisations.

Residents will also have a named person that you can speak to if you are facing any difficulties or need any particular support.

Many organisations use the National Address Database and so your details would be automatically updated if they are using the latest information. All government organisations now have to use AddressBase (GeoSpatial Commission – part of the Cabinet Office) which the Council will also ensure is automatically updated.

However, you will still need to inform some organisations yourself.

We will provide copies of the official name change Order, which will be proof of the name change. We will continue to compile a detailed checklist of organisations but the key organisations to think about, including those that the Council will contact on your behalf, include:

- Addresses linked with accounts for online shopping etc
- Utility companies e.g. internet, telephone, electric, gas, water
- Council Tax
- Schools / Education
- Electoral services
- Jobs and employment / benefits
- Bank accounts
- Mortgages
- Insurance: home, contents, car, etc

- NHS / GP / hospital / pharmacy information
- Her Majesty's Land Registry (HMLR)
- Her Majesty's Revenue & Customs (HMRC)
- Driver & Vehicle Licensing Agency (DVLA)
- Tenancy agreements, deposit agreements etc
- Wills, registrars and other legal documentation
- Home Office / HM Passport Office / immigration / visa documentation
- Next of kin details
- Organisations / businesses / self-employed – Companies House, websites, stationery, business accounts, invoices, contracts

Q: Will the Council reimburse me for the cost of updating my information with organisations?

A: A support package will be provided and residents / business will be notified regarding details of the package once it has been finalised.

Q: Will there be new street name plates?

A: Yes, the Council will provide replacement street name plates, showing the new name. The old name plate is also required to remain in place for a 12 month period. The Council will also inform Transport for London of the change and be responsible for making sure that TfL update all their relevant information, including nearby bus stops.

Q: Will this affect my residency, immigration status or UK Visa?

A: At the point at which any change in road name takes effect, if you have previously applied or are in the process of applying for a UK visa, you may need to update your address as part of your application. Haringey Council will provide a Street Naming and Numbering Order as official proof of the change to use when updating your details, and any other practical support to do this. This can be done online and there is no cost.

APPENDIX 2 – December 2021 letter to households and businesses of Black Boy Lane, including Statutory Notice

Important: Black Boy Lane

02 December 2021

Dear Occupier,

RE: Renaming Black Boy Lane to La Rose Lane

I am writing to you in relation to the proposal to change the name of Black Boy Lane to 'La Rose Lane'. The last consultation on whether or not the street should be renamed closed on 19 February 2021. A decision was due to be made on 17 March, however, the Council's Corporate Committee **deferred the decision to rename Black Boy Lane to La Rose Lane** until a later date after a period of further consultation with residents has taken place to provide further assurances and elicit their support to the proposed street name change. This further consultation would also review the support package to be offered to residents in the event of a street name change.

We want to thank those who submitted responses and feedback during the last consultation period, we have noted your feedback which will be considered as part of the final decision making process.

We are now moving into this additional phase of further consultation on whether the street name should remain as Black Boy Lane or be changed to 'La Rose Lane'. The last consultation was undertaken during the period of lockdown due to the Covid-19 pandemic. We are running this further consultation to allow for more engagement with residents.

The further consultation is being undertaken as part of our wider Review on Monuments, Building, Place and Street Names in Haringey. This is an important piece of work through which we will be looking at a range of creative ways to celebrate the culture and diversity that we are so proud of in our borough. We know that there are a number of ideas and ways in which we can do this, and this further consultation is an opportunity to hear your thoughts and feedback on the specific proposal on whether Black Boy Lane should be renamed as 'La Rose Lane' in celebration of John La Rose, a former Haringey resident, publisher, essayist and poet.

This further consultation is open from **1st December 2021 to 19th January 2022**.

During this period, you can complete the online survey at

www.haringey.gov.uk/renaming-black-boy-lane, [come along to one of our drop in sessions at St Ann's Library on Wednesday 14th December from 4 – 6pm and / or the Chestnuts Community Centre \(contact us to register your interest in this drop in session and we will send you further details\)](#), [join one of our online engagement conversations](#), write to Strategic Lead, Communities and Inequalities, Commissioning Service, Haringey Council, River Park House, 225 High Road, Wood Green, London, N22 8HQ or email the Council at bbiconsultation@haringey.gov.uk stating your support of or objection to the proposed order.

The consideration of whether a street name should be changed is a formal process. This requires publishing again the 'notice of our intention' to make an order to rename Black Boy Lane to La Rose Lane, and to further consult you on your views on whether the renaming should go ahead or not. The results of the further consultation will form part of the decision making on whether to proceed with the change or not. A copy of

our notice of intention is attached with this letter. This is a statutory requirement under Part II Section 6 of the London Buildings Acts (Amendment) Act 1939.

Throughout the consultation process to date we have taken your feedback into account and note some of you may still have concerns. We remain committed to listening to the views of all of our residents on this important matter and would encourage you to respond to the further consultation.

Support for you from the Council

We want to reassure you that, should the name change go ahead:

- Haringey Council will notify as many organisations as we can on your behalf
- Your postcode and house number will not change
- An official Street Naming and Numbering Order document will be provided
- The Council will provide practical help and support during the name change process
- A change in the name of the street will not affect any resident's immigration status
- Households / organisations will be provided with a 'voluntary payment' for their inconvenience

We are considering offering a voluntary payment of approximately £300 per household / organisation for any inconvenience the name changing may cause. We expect that the equivalent time and cost contribution for the vast majority, if not all, of households / organisations will be significantly less than this. If you have any views on this payment or other support needed, please [include those comments in your consultation response](#).

Why rename Black Boy Lane?

The Council is committed to taking action to both addressing inequality and celebrating the rich diversity of our borough. Whilst we recognise that there will be some inconvenience if the street name is changed, this must be balanced against the impact on those within our community who have called upon the Council to review the name.

While we appreciate this is a difficult time for everyone, and responding to consultations such as this may be more challenging, we believe that now, more than ever we should seek to send out a clear message in support of the diversity in our borough.

Thank you for your contributions during the consultations and engagement process so far, and we look forward to hearing from you during this phase.
Kind regards,

Charlotte Pomery

Assistant Director for Commissioning, Haringey Council

Respond to the Consultation or Contact Us

WEBSITE www.haringey.gov.uk/renaming-black-boy-lane

EMAIL bblconsultation@haringey.gov.uk

POST

Strategic Lead, Communities and Inequalities, Commissioning Service, Haringey Council, River Park House, 225 High Road, Wood Green, London, N22 8HQ

VIRTUAL MEETING To allow residents / organisations to ask Council officers any questions, we will also run an online engagement meeting. Those who would like to join the meeting should email bblconsultation@haringey.gov.uk to request details and register to take part.

Languages

ENGLISH

This letter is asking for your views on the renaming of Black Boy Lane to La Rose Lane and the support you would need to help make the necessary changes, if the renaming is approved. If you would like to see this letter in another language please visit www.haringey.gov.uk/renaming-black-boy-lane where versions will be available or contact us using the details above to request a translation.

TURKISH

Bu mektup, Black Boy Lane'in La Rose Lane olarak yeniden adlandırılması ve yeniden adlandırma onaylandığı takdirde gerekli değişiklikleri yapmanıza yardımcı olması için ihtiyaç duyacak olduğunuz destek ile ilgili görüşlerinizi sormaktadır. Eğer bu mektubu başka bir dilde görmek isterseniz, lütfen www.haringey.gov.uk/renaming-black-boy-lane internet adresini ziyaret edin ya da bir çeviri talep etmek için yukarıdaki ayrıntılar yoluyla bizimle temasa geçin.

KURDISH

ئەم نامەیه لە بیرورای تۆ دەپرسنیت بۆ گۆڕینی ناوی Black Boy Lane بۆ La Rose Lane و ئەو هاریکاریهێ پێویستته بۆ ئەنجامدانی گۆڕانکاری پێویست، ئەگەر گۆڕانکاری لە ناومکە ڕێگهێ پێدرا. ئەگەر دەتەوێت ئەم نامەیه به زمانیکێتر ببینیت تکایه سەردانی www.haringey.gov.uk/renaming-black-boy-lane بکە که چاپیتر بهردەسته یان پهيوەندیمان پێوهبکە بهو زانیاریانهی سەرموه بۆ داواکردنی وەرگیران.

BENGALI	<p>ব্ল্যাক বয় লেইনের (Black Boy Lane) নাম পরিবর্তন করে লা রোজ লেইন (La Rose Lane) করার ব্যাপারে আপনার মতামত জানার জন্যে এবং পুনঃনামকরণ অনুমোদিত হলে প্রয়োজনীয় পরিবর্তন আনতে আপনার যে সমর্থন প্রয়োজন হবে সে বিষয়ে এই চিঠিটি লিখা হয়েছে। আপনি যদি এই চিঠিটি অন্য ভাষায় দেখতে চান তাহলে অনুগ্রহ করে www.haringey.gov.uk/renaming-black-boy-lane সাইটে যান যেখানে ভাষানগুলো রয়েছে অথবা অনুবাদের অনুরোধ করার জন্য উপরের বিস্তারিত বিবরণ ব্যবহার করে আমাদের সাথে যোগাযোগ করুন</p>
PORTUGUESE	<p>Esta carta pede a sua opinião sobre a mudança de nome de Black Boy Lane para La Rose Lane e o apoio de que precisa para ajudar a fazer as alterações necessárias, se a mudança de nome for aprovada. Se pretender obter esta carta noutro idioma, visite www.haringey.gov.uk/renaming-black-boy-lane onde se encontram disponíveis versões ou contacte-nos utilizando os dados acima para solicitar a tradução.</p>
SPANISH	<p>En esta carta se le pide su opinión sobre el cambio de nombre de Black Boy Lane, para pasar a llamarse La Rose Lane, y sobre el apoyo que usted necesitaría recibir para realizar los cambios necesarios, en el supuesto de que se apruebe el cambio de nombre. Si desea ver esta carta en otro idioma, por favor visite www.haringey.gov.uk/renaming-black-boy-lane en donde encontrará versiones disponibles, o póngase en contacto con nosotros utilizando los datos que figuran más arriba, para solicitar una traducción.</p>
FRENCH	<p>Cette lettre vous demande votre avis sur le changement de nom de “Black Boy Lane” pour “La Rose Lane” et le soutien dont vous auriez besoin pour vous aider à effectuer les changements nécessaires, si le changement de nom est approuvé. Si vous souhaitez voir cette lettre dans une autre langue, veuillez consulter le site www.haringey.gov.uk/renaming-black-boy-lane où d’autres versions sont disponibles ou non contacter en utilisant les coordonnées ci-dessus pour demander une traduction.</p>
GREEK	<p>Με αυτή την επιστολή ζητούμε τη γνώμη σας σχετικά με τη μετονομασία της οδού Black Boy Lane σε La Rose Lane και την υποστήριξη που θα χρειαστείτε για να κάνετε τις απαραίτητες αλλαγές εάν εγκριθεί η αλλαγή της ονομασίας. Εάν θέλετε να λάβετε αυτή την επιστολή σε άλλη γλώσσα, επισκεφθείτε τη διεύθυνση www.haringey.gov.uk/renaming-black-boy-lane όπου υπάρχουν διαθέσιμες εκδόσεις ή επικοινωνήστε μαζί μας χρησιμοποιώντας τα παραπάνω στοιχεία για να ζητήσετε μία μετάφραση.</p>
ITALIAN	<p>La presente lettera chiede la Sua opinione in merito al modificare la denominazione di “Black Boy Lane” in “La Rose Lane” e al supporto di cui avrebbe bisogno per apportare le modifiche necessarie, qualora la ridenominazione venisse approvata. Se desidera visualizzare questa lettera in un'altra lingua, visiti il sito www.haringey.gov.uk/renaming-black-boy-lane dove sono disponibili</p>

altre versioni o ci contatti ai recapiti sopra indicati per richiedere una traduzione.

POLISH

Niniejsze pismo prosi o Państwa opinię w sprawie zmiany nazwy ulicy z „Black Boy Lane” na „La Rose Lane” oraz o określenie Państwa jakichkolwiek potrzeb z tego tytułu, (w razie dokonania zmiany). W celu przetłumaczenia listu, prosimy skorzystać ze strony internetowej urzędu www.haringey.gov.uk/renaming-black-boy-lane, gdzie dostępne są inne wersje językowe lub prosimy o kontakt z prośbą o uzyskanie tłumaczenia.

BULGARIAN

С това писмо искаме да Ви питаме за Вашите възгледи относно преименуването на „Black Boy Lane” в „La Rose Lane” и подкрепата, от която се нуждаете, за да направите необходимите промени, ако преименуването бъде одобрено. Ако искате да видите това писмо на друг език, моля, посетете www.haringey.gov.uk/renaming-black-boy-lane, където са налични версии, или се свържете с нас, като използвате данните по-горе, за да поискате превод.

ROMANIAN

Prezenta scrisoare vă solicită punctul de vedere cu privire la schimbarea denumirii străzii Black Boy Lane cu La Rose Lane și sprijinul de care ați avea nevoie pentru a implementa schimbările necesare, în cazul în care noua denumire este aprobată. Dacă doriți să citiți această scrisoare într-o altă limbă, vă rugăm să vizitați www.haringey.gov.uk/renaming-black-boy-lane unde există disponibile alte versiuni sau să ne contactați la detaliile de mai sus pentru a solicita o traducere.

SOMALI

Waraaqdani waxay ku weydiisaneysaa fikradahaaga ku saabsan magac-beddelka Waddada Black Boy Lane oo laga dhigo La Rose Lane iyo taageerada aad u baahan tahay si aad gacan uga geysato sameynta isbeddelada lagama maarmaanka ah, haddii magacaabista la oggolaado. Haddii aad jeclaan lahayd inaad ku aragto warqaddan oo ku qoran luqad kale fadlan booqo www.haringey.gov.uk/renaming-black-boy-lane halkaas oo noocyo kale laga heli karo ama nala soo xiriir adigoo adeegsanaya faahfaahinta kore si aad u codsato turjumaad.

Frequently Asked Questions (FAQs)

Q: Who is John La Rose?

A: Black Boy Lane is proposed to be renamed 'La Rose Lane' after John La Rose.

John La Rose was a publisher, poet and essayist. He founded the Caribbean Artists' Movement and publishing company New Beacon Books which has a bookshop in Stroud Green. In 1975, he co-founded the Black Parents Movement from the core of the parents involved in the George Padmore Supplementary School incident, in which a young Black schoolboy was beaten up by the police outside his school in Haringey.

A more detailed biography is available on our webpage at www.haringey.gov.uk/renaming-black-boy-lane.

Q: What will happen next?

A: Once the further consultation closes, we will carefully analyse all the responses and a report will be provided to the Council's Corporate Committee which will make a decision on whether to proceed with the change or not. Should the name change be agreed, we will notify residents and organisations and provide further information and support on the implications, in good time before the change would take effect later in 2022. The Council is committed to supporting residents and organisations through this, should the change be agreed.

Q: Will my postcode and house number change?

A: No. The Unique Street Reference Number (USRN) for the street will also remain the same, which is used by many organisations.

Will I need to inform Royal Mail of the change to the street name?

A: No. The Council will inform Royal Mail of the address change. Because your postcode won't change, a change in the road name, should not affect any letters or parcels sent via Royal Mail. Utility companies and others buy address lists from Royal Mail.

Q: What organisations will I need to inform about my change of address? How will the Council help me?

A: The Council will notify as many organisations as we can on residents' behalf and provide practical help and support, should the change be agreed, including 'pro-forma' documents to send to relevant organisations.

Residents will also have a named person that you can speak to if you are facing any difficulties or need any particular support.

Many organisations use the National Address Database and so your details would be automatically updated if they are using the latest information. All government organisations now have to use AddressBase (GeoSpatial Commission – part of the Cabinet Office) which the Council will also ensure is automatically updated.

However, you will still need to inform some organisations yourself.

We will provide copies of the official name change Order, which will be proof of the name change. We will continue to compile a detailed checklist of organisations but the key organisations to think about, including those that the Council will contact on your behalf, include:

- Addresses linked with accounts for online shopping etc
- Utility companies e.g. internet, telephone, electric, gas, water
- Council Tax
- Schools / Education
- Electoral services
- Jobs and employment / benefits
- Bank accounts
- Mortgages
- Insurance: home, contents, car, etc
- NHS / GP / hospital / pharmacy information
- Her Majesty's Land Registry (HMLR)
- Her Majesty's Revenue & Customs (HMRC)
- Driver & Vehicle Licensing Agency (DVLA)
- Tenancy agreements, deposit agreements etc
- Wills, registrars and other legal documentation
- Home Office / HM Passport Office / immigration / visa documentation
- Next of kin details
- Organisations / businesses / self-employed – Companies House, websites, stationery, business accounts, invoices, contracts

Q: Will the Council reimburse me for the cost of updating my information with organisations?

A: We are considering offering a 'voluntary payment' of approximately £300 per household / organisation for any inconvenience the name changing may cause. We expect that the equivalent time and cost contribution for the vast majority, if not all, of households/organisations will be significantly less than this.

This figure has not been finalised so if you have any views on this payment or other support needed, please [include those comments in your consultation response](#).

Q: Will there be new street name plates?

A: Yes, the Council will provide replacement street name plates, showing the new name should the change be approved. The Council will also inform Transport for London of the change and be responsible for making sure that TfL update all their relevant information, including nearby bus stops.

Q: Will this affect my residency, immigration status or UK Visa?

A: At the point at which any change in road name takes effect, if you have previously applied or are in the process of applying for a UK visa, you may need to update your address as part of your application. Haringey Council will provide a Street Naming and Numbering Order as official proof of the change to use when updating your details, and any other practical support to do this. This can be done online and there is no cost.

Q: Why are you doing another consultation?

A: The initial consultation asked residents of Black Boy Lane to provisionally choose between two new street names – La Rose Lane & Jocelyn Barrow Lane. As residents

opted for La Rose Lane, this is the name that was taken into the next phase. The second consultation was conducted during a period of lockdown due to the Covid-19 pandemic; we are running an additional consultation as agreed in March 2021, to allow for more engagement, including in-person drop in sessions at St Ann's Library and the Chestnuts Community Centre.

This consultation is a statutory consultation required under Part II Section 6 of the London Buildings Acts (Amendment) Act 1939 and where residents can raise objection or support to the proposal to change the name of Black Boy Lane to La Rose Lane. The Council must consider those received before making a final decision whether to change the street name.

**Notice of intention to make an order naming streets under the
London Buildings Acts (Amendment) Act 1939 Part II Section 6**

**The London Borough of Haringey
London Buildings Acts (Amendment) Act 1939 Part II Section 6
Naming of Streets**

NOTICE is hereby given that LONDON BOROUGH OF HARINGEY ("the Council"), pursuant to the London Buildings Acts (Amendment) Act 1939 Part II Section 6, intends to make an order to substitute the name of the street Black Boy Lane to La Rose Lane as set out in 0 below.


Any person who has any objection or support to the intended order may by *19 January 2022* write to the Council at Strategic Lead, Communities and Inequalities, Commissioning Service, Haringey Council, River Park House, 225 High Road, Wood Green, London, N22 8HQ or online www.haringey.gov.uk/renaming-black-boy-lane or email the Council at bblconsultation@haringey.gov.uk stating their objection or support to the order.

Dated: *01 December 2021*

Description & situation of street: *Black Boy Lane; between West Green & St Ann's Roads*

Reference and colour on map: *Coloured red on map*

Proposed name: La Rose Lane


Stephen Lawrence-Orumwense (Head of Legal Services (Social Care & Contracts) and Deputy Monitoring Officer)
for and on behalf of Fiona Alderman Head of Legal and Governance (Monitoring Officer), Haringey Council Legal
Services Alexandra House, 10 Station Road, Wood Green, London N22 7TR



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