

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
1	Issue: Awareness and compliance with Council processes/procedures			
	<i>Area: A number of Council policies have and are being updated. Sufficient awareness of Council policy and key documents (e.g. Finance & Contract Procedure Rules) in some areas of the Authority has proven to be lacking. The processes and procedures supporting key Council policies needs to be communicated/reiterated to managers/staff and compliance monitored thereon.</i>			
	<p>The Constitution Committee has continued to review the Council's Constitution on an on going basis. The Committee considered a number of reports in 11/12 and made recommendations to full Council, leading to an update of the Constitution, including Finance and Contract Procedure Rules and Officer Schemes of Delegation.</p> <p>Corporate Management Team (CMT) to ensure service managers familiarise themselves with the Finance and Contact Procedure Rules, contained within the recently updated Constitution.</p> <p>As required by the Constitution, Managers are to ensure that they are familiar with the requirements of relevant delegated functions (Officer Schemes of Delegation), and that any further sub delegations are set out in a Local Scheme of Delegation.</p> <p>In addition, approval limits for financial transactions should be documented within a Financial Scheme of Delegation. Delegated approval limits must be consistent with the Oracle workflow limits, and these limits should be complied with, even when</p>	Service Managers/CMT	<p>July 2012</p> <p>To be reviewed by Corporate Governance Group (CGG) September 2012</p>	<p>Constitution Committee reviewed the Constitution, including the Finance and Contract Procedure rules at meetings throughout 2012. Constitution Committee recommended revisions to the Finance and Contract Procedure Rules to Council in December 2012.</p> <p>An additional report to the same Council recommended changes to the Council's scrutiny structure and the establishment of new Policy Development groups.</p> <p>Service Schemes of Delegation (Officer and Financial) were updated by 31st July 2012 as per CMT's request following a report from CGG to CMT. A process will be introduced, through the Annual Governance Statement work, to prompt Managers to regularly review and update their Schemes of Delegation.</p> <p>A review of the content of and compliance with Schemes of Delegation is being carried out by Internal Audit.</p> <p>Training and awareness-raising on financial, contract and procedure rules has taken place across the organisation through line managers and key services. Targeted advice has been delivered through the Procurement bulletins and an online training tool will be developed. The interim Chief Executive has delivered clear messages about the need for compliance and the</p>

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<p>purchases are initiated outside of the Oracle system.</p> <p>Service managers are asked to ensure such Schemes are in place, are kept up to date, and that compliance with approval limits and delegated functions is monitored.</p>			<p>importance of accountability for decisions.</p> <p>Following the implementation of the governance and monitoring framework and the guidance/training for staff, clear sanctions will be instigated for non compliance. These form part of the existing staff performance system and HR procedures and will be exercised where there is non-compliance.</p> <p>Delegated decision process has been in process since May 2012 and continues to operate.</p>
2	<p>Issue: Issues and actions arising from Lyme Green</p> <p><i>Area: In February 2012 a review of the Council's proposal to build a waste transfer station at Lyme Green Depot, Macclesfield commenced. This followed cessation on 30th November 2011 of all works in relation to the construction of the facility. The review, commissioned by the Chief Executive and Leader followed the resolution of the Audit and Governance Committee on 31 January 2012 which stated:</i></p> <p style="padding-left: 40px;"><i>“a thorough and robust investigation of all issues surrounding the expenditure incurred on the proposed waste transfer station at Lyme Green be added to the work plan; in particular to identify any governance issues and whether all financial and contractual regulations have been complied with.”</i></p> <p><i>The results of the review which were reported to the Audit and Governance Committee on 14 June 2012 indicated that whilst, in the main, appropriate Council procedures are in place to prevent financial and legal irregularities and ensure compliance with Officer Delegations, Standing Orders, EU procurement rules and ensure effective reporting to Members, in this instance there was evidence that officers failed to comply with many of these arrangements. An Action Plan, detailing proposed actions to prevent reoccurrence has been agreed and quarterly progress reports will be submitted to the Audit and Governance Committee</i></p>			
	As per the Action Plan agreed by the Audit and Governance Committee at its special meeting of 14 th June 2012.	Audit & Governance Committee	As per. Committee timetable.	<p>A progress report on the agreed Action Plan was presented to the Audit and Governance Committee on 27th September 2012.</p> <p>A further progress report will be presented to this meeting of the Audit and Governance Committee (31//01/13).</p>

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
3	Issue: Empower Card Review			
	<i>Area: In November 2011 a review of the Empower Card implementation process was undertaken following concerns raised by users and providers. The early findings established that there were difficulties with Client Contributions, payment arrangements with providers and the relationship and processes with the supporting bank. The review, which included feedback from staff, customers and providers, has identified changes required to the supporting processes and the product in the form of an action plan. Further background is available in the March 2012 report to Adult Social Care Scrutiny Committee</i>			
	<p>The review has been conducted by a task force led by the Strategic Director for Children’s Families and Adults and included input from Audit, Finance and Legal.</p> <p>A steering group is in place to oversee the implementation of the action plan.</p> <p>An update report, which will seek approval for the future vision and options, will be brought to Members during the autumn.</p> <p>Specific actions include:</p> <ul style="list-style-type: none"> • Undertaking an audit of payments and client contributions, by a specially created Empower Audit Task Team, aiming to establish the robustness of the payment arrangements with providers • Establishing and recovering directly from clients any contributions not paid in accordance with the Care Support Plan and Financial Assessment. • Once the above actions have delivered sufficient stability, determine a new 	Strategic Director of Children, Families and Adults.	March 2013	<p>The steering group has been in regular contact to ensure implementation of the action plan. Reports have been taken to the Adult Social Care Scrutiny Committee in Sept 2012.</p> <p>Detailed audits of all agency-held Empower cards have been carried out. This has resulted in identifying customers who have not been making the required client contribution and in identifying situations where the client was accumulating a significant balance on their card.</p> <p>The review is due to finish in March 2013. In addition a review of all Provider cash flow issues associated with the Empower product will complete this financial year leading to a deeper and broader review of all Empower and Direct Payment accounts to achieve care cost savings of £1m during 2013/14.</p> <p>Parallel to the Empower review, work has been on going on several other areas to improve Client Finance in general. This has included a review of Direct Payments, which has also identified over-allocated balances, and introduced improved processes to promptly identify and close down accounts cumulating balances.</p>

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<p>vision for the financial arrangements for Adults, explore future systems, banking products and processes to simplify and standardise</p>			<p>Work has also progressed on identifying new products to support the replacement of Social Care systems, including a new Customer Records System, a Financial/Contract Management system and a Banking Product). It is anticipated that by using a Procurement Framework, replacement products will be implemented during 2013/14 on a phased basis.</p> <p>The financial and contract management system replacement is the first part of this process with tenders currently being evaluated and implementation taking place during 2013/14.</p>
4	<p>Issue: Care Provider Failure</p>			
<p>Area: <i>There is increased potential for legal challenge around fees paid, and of provider sustainability and or failure in the current economic climate, as demonstrated by the collapse of Southern Cross, the UK's largest care home provider in July 2011.</i></p>				
	<p>The Council has commissioned a consultant to assist in developing a Fees Framework for Residential, Nursing, Domiciliary Care, Support Living and Direct Payments. This work will also achieve the development of Quality Frameworks – to assist the Council in raising standards of care, and to assure quality provision within the fees framework and affordability.</p> <p>By working with providers the aim will be to establish a fee structure that is sustainable for both the Council and providers over the medium term.</p>	<p>Head of Integrated Strategic Commissioning and Safeguarding</p>	<p>December 2012</p>	<p>The consultant support to develop a new Fees Framework for Residential, Nursing, Domiciliary Care, Support Living, including Quality Frameworks has been completed, and has been shared and consulted with providers.</p> <p>The new structures will be implemented as contracts are renewed during 2013/14. Due to the volume of the contracts the aim is to renew them on a phased basis, beginning with the residential and nursing contracts in the early part of 2013/14.</p>

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
5	Issue: Judicial Review			
	<i>Area: Challenges to the Authority in the form of judicial reviews are increasing. The basis of the challenges involves the allocation of funding and resources, and deprivation of liberty. The financial impact in 2011/12 is £500,000. The risk of provider failure in the care market has become a real concern during 2011/12, highlighted by the events at Southern Cross, the UK's largest care home provider until its demise in July 2011.</i>			
	<p>The service has improved the application of policy, staff training and tightened procedures with the assistance of Legal. However, the risk of Judicial Reviews remains significant because of the continuing growth and availability of litigation, and the changing personalisation agenda.</p> <p>Continued close liaison with Legal, jointly assessing and monitoring potential cases will continue for the foreseeable future, allowing early warning and action to be taken across the Council.</p>	Head of Local Delivery and Independent Living Service	March 2013 – to be monitored by Corporate Governance Group.	<p>A comprehensive review of the policies and supporting processes has been undertaken, along with training and support for the social work teams was completed during the Autumn of 2012, which has improved social work practice/documentation and reduced the risk of subsequent challenge and judicial review.</p> <p>There have been no further challenges during 2011/12, although the risk across Children's Families and Adults remains.</p>
6	Issue: Financial and Project Management			
	<i>Area: Delivery of the 2011/12 budget has proved challenging with a number of services facing out-turn pressures due to a range of factors, including inflation, ambitious delivery and savings targets and higher than anticipated levels of service demand. General economic pressures and the demands arising from the delivery of an ambitious capital programme and complex pay harmonisation package have added to the challenges.</i>			
	<p>Actions already implemented/in progress</p> <p><i>General</i></p> <ul style="list-style-type: none"> • Monthly performance monitoring embedded • Corporate Training Programme extended to include Budget Management module 	Director of Finance and Business Services/Finance Manager		<ul style="list-style-type: none"> • Monthly performance reports received by CMT on a regular basis • Budgeting & Budgetary Control courses available in November 2012 and December 2013

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<ul style="list-style-type: none"> <li data-bbox="259 252 797 384">• Development of improved suite of financial management reports and self-serve portal (Financial Reporting Centre) <li data-bbox="259 719 797 890">• 2012/13 budget adjusted to address permanent growth pressures (including Teachers Pensions, Placement costs for 16+ young people, Adults Care costs and undeliverable cross-cutting savings) <li data-bbox="259 1262 797 1321">• Monthly capital monitoring review meetings with main service directorates 			<ul style="list-style-type: none"> <li data-bbox="1377 252 2054 671">• Financial Reporting Centre went live in September 2012 launching a suite of five standard on-line reports for all budget managers. 268 out of target group of 290 budget managers have been trained and are being supported to use these reports. Further enhancements to the reporting suite are planned in 2013/14, this will extend the basic offering, which comprises a budget monitoring report and supporting payroll, general transactions, commitment and bad debt reports; to include forecasting reports, capital and summary debt reports. <li data-bbox="1377 719 2054 1214">• Budget delivery pressures have continued in 2012/13. Impacts have been identified through the monthly and quarterly performance reporting cycle. Some pressures are on-going from previous years e.g. Adult Social Care, others are new, emerging issues. Programmes of remedial action have been put in place to partly mitigate these pressures, but additionally; base budget adjustments in order of £8m have been made as part of the 2013/14 business planning round to address savings targets which are now considered undeliverable, and other unbudgeted cost pressures; with a view to further de-risking delivery of a balanced outturn in 2013/14 and beyond. <li data-bbox="1377 1262 2054 1388">• Regular meetings with all service directorates to review delivery of the capital programme and emerging issues are now taking place and are fully embedded.

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<p><i>Specific</i></p> <p><u>Children and Families</u></p> <ul style="list-style-type: none"> Development of in-house residential provision to reduce out of borough placement costs <p><u>Adults</u></p> <ul style="list-style-type: none"> Refinement of cost driver analysis <ul style="list-style-type: none"> Targeted debt recovery action <ul style="list-style-type: none"> Empower audit and review 	<p>Deputy Director of Children and Families</p> <p>Strategic Director of Children, Families and Adults</p> <p>Head of Business Management and Challenge</p> <p>Strategic Director of Children, Families and Adults and Director of Finance and Business Services</p>	<p>March 2013</p> <p>December 2012</p> <p>March 2013</p> <p>See Item 3 above.</p>	<ul style="list-style-type: none"> Further provision is being established in the Macclesfield area, with a review of the provision required across the middle of the Borough. <ul style="list-style-type: none"> Across Children, Families and Adults the cost drivers were discussed as part of developing the directorate plan and have been monitored through the review and monitoring of the plan and performance. Further work as part of developing the budget for 2013/14 and later years has focussed on the care cost element and associated cost drivers. <ul style="list-style-type: none"> A programme of targeted debt recovery action has achieved £1m by December 2012. The Council's Deferred Debt policy is also being reviewed to tighten the controls in place where the Council offers a deferred agreement. <ul style="list-style-type: none"> See response to Action 3

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<ul style="list-style-type: none"> <li data-bbox="259 252 797 352">• Consultant engaged to support care cost challenge and undertake 'stress testing' of future savings delivery. <li data-bbox="259 432 797 571">• <u>ICT</u> Rationalisation of Shared Service staffing levels and targeted VR programme. <li data-bbox="259 799 797 900">• Review of third party spend, cancellation and consolidation of contracts) 	<p data-bbox="826 252 1128 352">Head of Integrated Strategic Commissioning and Safeguarding</p> <p data-bbox="826 469 1128 571">Director of Finance and Business Services/ICT Strategy Manager</p> <p data-bbox="826 799 1128 900">Director of Finance and Business Services/ ICT Strategy Manager</p>	<p data-bbox="1146 252 1346 272">September 2012</p>	<ul style="list-style-type: none"> <li data-bbox="1375 252 2040 352">• This work was completed during the summer of 2012 and reported back to the officers of the Council. <li data-bbox="1375 469 2040 746">• A new Target Operating Model (TOM) has been implemented in April 2012. The new role based structure has a total of 158 FTE. This is a reduction of approximately 72 roles since April 2011. It should also be noted that the new structure includes a number of new skills and roles that were not previously performed in the old operating model. <li data-bbox="1375 799 2040 1294">• A project team comprising representatives from ICT Shared Services, ICT West and ICT East, Stakeholders; and Procurement, Finance and Legal has been setup. Five sourcing groups were set up to reflect the whole of the ICTSS spend, headed by a Core Group Lead. The Core Group Leads have been tasked to identify and report: <ul style="list-style-type: none"> <li data-bbox="1420 1050 2040 1150">a) The contracts that can be terminated and suppliers to be contacted in accordance with the statutory notice; <li data-bbox="1420 1155 2040 1219">b) The contracts that can extended or allowed to roll-on; <li data-bbox="1420 1224 2040 1294">c) The contracts that can be consolidated or aggregated;

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<ul style="list-style-type: none"> • Maximisation of partnership and third party income 	Director of Finance and Business Services/ ICT Strategy Manager		<p>d) The contracts that will need to be procured:</p> <ul style="list-style-type: none"> i) new developments ii) renewal of current arrangements <p>e) Identification of potential savings. Reports will be presented to Joint Officer Board and Joint Committee in January/February 2013.</p> <ul style="list-style-type: none"> • Work has progressed on the Public Service Network procurement with a view to greatly reducing our operating spend on network provision. Tenders closed on the 02/01/2013 and are currently being evaluated. New contract to run from 01/04/2013. Partners named on the Cheshire and Merseyside PSN are: <ul style="list-style-type: none"> ○ Cheshire West and Chester Borough Council ○ Cheshire East Borough Council ○ Warrington Borough Council ○ St. Helens Metropolitan Borough Council ○ Knowsley Metropolitan Borough Council ○ Wirral Metropolitan Borough Council ○ Cheshire Police Authority ○ Merseyside Police Authority ○ Cheshire Fire and Rescue Service ○ Merseyside Fire and Rescue Service ○ Cheshire and Wirral NHS Partnership Trust ○ Central and Eastern Cheshire PCT ○ Merseytravel

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<ul style="list-style-type: none"> <li data-bbox="259 576 797 671">• Review of third party spend, contract provisions and revised tonnage forecasts <p data-bbox="259 863 506 895"><u>Community Services</u></p> <ul style="list-style-type: none"> <li data-bbox="259 911 797 975">• Increased car park tariffs and alternative payment options 	<p data-bbox="826 576 1055 639">Head of Waste and Recycling</p> <p data-bbox="826 911 1066 975">Head of Community Services</p>	<p data-bbox="1146 576 1267 608">Sept 2012</p> <p data-bbox="1146 911 1290 943">March 2013</p>	<ul style="list-style-type: none"> <li data-bbox="1377 245 2045 528">• With alternative options for service delivery being considered by the Council, including the possible need for TUPE transfer of staff, any change in staffing provision was put on hold until a clearer picture emerged. This exercise identified a current budget shortfall in the 2012-13 which has been reported as part of in year financial reporting and reflected in the 2013-14 business planning. <li data-bbox="1377 576 2045 858">• Waste disposal contracts (Landfill and HWRC) are reviewed on a monthly basis in liaison with the Joint Waste Team/Waste/Finance, including both tonnage and financial forecasts – this has been completed since 2009-10. The Waste Strategy team provide a monthly update on both Recyclable material contract tonnage and income and Green Waste tonnage/costs to enable forecasting. <li data-bbox="1377 911 2045 1018">• Parking Fees have not been increased following a Scrutiny review and in agreement with the Environment Portfolio Holder. <li data-bbox="1377 1054 2045 1337">• Introduction of RingGO (Payment by mobile phone) into 20 car parks across the Borough during 2012 and piloting Card Acceptance Pay and Display machines in Wilmslow and Macclesfield railway station car parks. A further 6 Credit / Debit card machines have been procured for installation during January 2013 helping to reduce cash collection costs.

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<p>Further action proposed</p> <ul style="list-style-type: none"> • Roll out of Financial Reporting Centre to 250 budget managers, and development of capital and payroll forecasting reports. • Implementation of revised operating model for client finance • Development of fully costed product/service catalogue for HR and Finance and ICT Shared Service • Capital training module to be added to Corporate Training programme. • Strengthening of capital programme governance and monitoring arrangements in accordance with 	<p>Director of Finance and Business Services</p> <p>Strategic Director Children, Families and Adults and Director of Finance and Business Services</p> <p>Director of Finance and Business Services</p> <p>Finance Manager</p> <p>Director of Finance and Business Services</p>	<p>Dec 2012</p> <p>April 2013</p> <p>December 2012</p> <p>December 2012</p> <p>September 2012</p>	<ul style="list-style-type: none"> • The majority of managers have been trained. (See response to Development of Financial Reporting Centre under Action 6, General) • See response to Action 3. • A joint exercise has been undertaken with Cheshire West and Chester Council, and external support, to draw up a detailed client specification and statement of business requirements to formalise the commissioning of services from the HR and Finance and ICT Shared Service. This has included a review of respective roles, responsibilities and service boundaries. This has been shared with Shared Service Managers to help inform development of their product/service catalogues. This work has taken longer than originally anticipated, but should be substantially complete by March 2013. • Completed (Training events held in November 2012, and scheduled for March 2013) • Introduction of Executive Monitoring Board and Technical Enabler Group (Project Gateway).

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<p>Lyme Green Waste Transfer Station project.</p> <ul style="list-style-type: none"> 5 year capital programme planning being developed to ensure affordability and deliverability of medium term investment programme. 	Director of Finance and Business Services	September 2012	<ul style="list-style-type: none"> Further details are available in the Lyme Green update reports to Audit and Governance Committee 27th September 2012 and this meeting of the Audit and Governance Committee (31st January 2013) Incorporated into revised Business Planning process and Project Gateway process.
7	<p>Issue: Shared Services Separate Legal Entity (SLE)</p> <p>Area: <i>The Council has a range of shared services. Of these, it is proposed that the ICT and HR and Finance shared service be set up as a separate legal entity (SLE) to enable greater collaboration and potential increased trading. This arrangement would also allow for employees in those services to be employed on a single set of terms and conditions.</i></p> <p><i>In preparation for the SLE an extensive improvement programme has been undertaken to address performance issues and to stabilise infrastructure and systems. Another outcome was the development of a fit for purpose Target Operating Model to move the services into a company situation. Recruitment to the TOM is currently underway to enable a transition to shadow mode in anticipation of the move to an SLE as it is believed that this will help to minimise risk of failure.</i></p> <p><i>It is anticipated that the SLE Business Case will be approved by Shared Services Joint Committee in the autumn to enable new arrangements to be put in place from 1 April 2013. Existing governance will be reviewed to ensure that this continues to be appropriate to this new way of working.</i></p>			
	The latest Business Case will be subject to informal discussion by the Joint Committee in June 2012. Should Members informally endorse the Business Case, it will then be subject to the formal decision making processes of both Cheshire East and Cheshire West and Chester Councils. This will include formal consideration by the appropriate scrutiny committees of each authority.	Director of Finance and Business Services	On going – to be monitored by Corporate Governance Group during 2012/13	<ul style="list-style-type: none"> A joint workshop was held in October 2012 to review the existing Business Case proposal for a Shared Services SLE. A Strategic Options Appraisal and revised High Level Business Case were presented to the workshop, along with a detailed Market Analysis. Members from both Authorities reaffirmed their commitment to the preferred option of a Shared Service SLE. A report to the Shared Services Joint Committee on 30th November outlined the timelines for the

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
				<p>decision making process.</p> <ul style="list-style-type: none"> • Cheshire East Cabinet (7th January 2013) deferred the report on the Shared Services SLE to February 2013 Cabinet pending the receipt of further information and the arrangement of an All Member Briefing. • Cheshire West and Chester Executive (9th January 2013) agreed to the Shared Service Joint Committee's recommendations subject to the agreement of Cheshire East Council.
8	Issue: Data Protection breach			
	<p>Area: The Council was issued with a monetary penalty notice by the Information Commissioner's Office (ICO) for a breach of the Data Protection Act. The Council reported the breach to the ICO following an incident reported in May 2011, where an email containing sensitive personal information was sent to a wider audience than intended. A number of improvements to processes have subsequently been made.</p>			
	<p>Following the monetary penalty notice received in January 2012, the Chief Executive signed an undertaking with the Information Commissioner. The requirements of the undertaking included updating policy, introducing various organisational and technical measures and giving training to members and officers.</p> <p>Actions already implemented</p> <ul style="list-style-type: none"> • Data Protection Policy amended and updated. • Data Sharing Protocol and guidance leaflet published. • ICT Security policies updated. • Increased use of secure e-mail facilities. 	CMT/Data Protection Officer	On going – to be monitored by Corporate Governance Group during 2012/13.	<ul style="list-style-type: none"> • A Paper Records Policy has been developed and published, and the Data Sharing Policy and Personal Data definition leaflet are in development. • The use of DP liaison officers is being reconsidered as the existing network of DP contacts across the organisation is working well. • Member training has been offered on a voluntary basis, and consideration to mandatory training will be given. • Awareness raising continues with articles in Team Talk, responses to questions on the Team Talk Back message board and induction training sessions held. • A further report on Data Protection will be taken to this meeting of the Audit and Governance Committee (31st January 2013).

2011/12 AGS Action Plan – Progress at January 2013

No.	Actions	Responsibility	Target Date	Position at January 2013
	<ul style="list-style-type: none"> • Training delivered to managers and members • E-learning modules introduced. • Mandatory training for all members of staff as part of Personal Development Plan. • Establishment of Data Protection Liaison Officer within services. • Concerted communications campaign including Team Talk articles, refresh of intranet pages, separate DP e-mail address etc. <p>Actions in progress</p> <ul style="list-style-type: none"> • Development of Data Sharing Policy, Paper Record Policy, Personal Data Definition leaflet, standard paragraphs to be used by services restricting further distribution of information etc. • Further training for members planned. • Other targeted training, awareness sessions planned. • Continued establishment of DP Liaison Officers. 			