

REPORT TO:	CABINET 25th November 2020 COUNCIL 30th November 2020
SUBJECT:	The Croydon Renewal Improvement Plan and the Croydon Renewal Improvement Board
LEAD OFFICERS:	Interim Chief Executive, Katherine Kerswell Executive Director Resources, Jacqueline Harris Baker Director of Finance, Investment & Risk, Lisa Taylor & Section151 Officer
CABINET MEMBERS:	Leader of the Council, Councillor Hamida Ali Cabinet Member for Croydon Renewal, Councillor Stuart King Cabinet Member for Resources & Financial Governance, Councillor Callton Young
WARDS:	All

SUMMARY OF REPORT:

The agenda item for the Croydon Renewal Plan contains a report submitted in two parts. Part 1 covers the Croydon Renewal Improvement Plan and the Croydon Renewal Improvement Board and Part 2 covers the Croydon Renewal Financial Recovery Plan and the submission to MHCLG for the capitalisation direction.

Both parts of this single agenda item seek to demonstrate that the Council fully recognises and accepts the scale of the challenge facing it and the scope of the work required to change the Council into one which can secure continuous improvement in the way in which its functions are exercised having regard to a combination of economy, efficiency and effectiveness within a financially sustainable budget.

This report is produced in the context of a Report in the Public Interest having been received and accepted by the Council and a S.114 notice having been published.

The scale of the challenge faced by the council is without recent precedent in London.

KEY DECISION REFERENCE NO: The decisions detailed in this report are reserved to Council and therefore not Key Decisions.

The Cabinet is recommended to:

RECOMMENDATIONS:

- 1.1 Agree to recommend to Full Council the approval of the development of the Croydon Renewal Improvement Plan, noting the first high level draft at Appendix A.
- 1.2 Agree to recommend to Full Council the approval for consultation on the terms of reference and membership for the Croydon Renewal Improvement Board at Appendix B.
- 1.3 Agree to recommend to Full Council to delegate to Cabinet in January 2021 approval of the final version of the Croydon Renewal Improvement Plan.
- 1.4 Recommend that the feedback on the terms of reference and membership for the Croydon Renewal Improvement Board following consultation and feedback from Scrutiny & Overview Committee (S&O), General Purposes & Audit Committee (GPAC), Staff, Partners and MHCLG is presented to Full Council in January 2021.
- 1.5 Note the outcome of the recent staff survey and staff focus groups and that their contents are reflected in the high-level draft Croydon Renewal Improvement Plan at Appendix C.
- 1.6 Agree to recommend to Full Council that the Interim Chief Executive is delegated authority to submit to MHCLG the proposal for a capitalisation direction, in consultation with the Leader of the Council, Cabinet Member for Croydon Renewal, Cabinet Member for Resources and Financial Governance, the Director of Finance, Investment and Risk, and that an update be presented to the next relevant Cabinet meeting when this is completed.
- 1.7 Agree to recommend approval to Full Council; the adoption of the new Council Priorities and Ways of Working in Appendix D and that this replaces the Council's Corporate Plan 2018-2022, which forms part of the Council's policy framework.
- 1.8 Note that the Interim Chief Executive in her statutory role as Head of Paid Service will, in accordance with her Section 4 duty under the Local Government and Housing Act 1989; commence consultation on a restructure of the Council's management arrangements. Following formal consultation, the proposals will be brought back to Cabinet and Full Council for final decision.

1. Executive Summary

- 1.1 This report seeks to demonstrate that the Council has begun to understand the scale of the challenge it faces; it is starting to take the necessary action to correct previous mistakes and take the first steps on its journey to becoming an efficient, effective and financially sustainable council.
- 1.2 The Croydon Renewal Plan was commissioned by the September 2020 Cabinet and Full Council. The Croydon Renewal Plan is an umbrella term that covers a financial recovery plan, the submission to MHCLG for the capitalisation direction and the Improvement Board to provide assurance to government and the people of Croydon on the implementing of the changes required.
- 1.3 When the Croydon Renewal Plan was commissioned, a number of other independent and expert led pieces of work were also commissioned to ensure the final improvement plan captured the full extent of the issues needing to be addressed; for example the staff survey and focus groups report which is an appendix to this report and the Strategic Review of Council Companies and Other Entities which is also on this committee's agenda.
- 1.4 It is important to note that the scale of the challenge facing the Council means that, while some changes can and are being delivered relatively quickly, the type of systemic change Croydon needs to make will take a number of years if it is to be sustainable. This is not without precedent in local government, and other councils such as the London Boroughs of Camden and Hackney who have made whole council fundamental improvements from similar situations through sustained multi-year effort.
- 1.5 The Council will continue to learn from other local authorities' best practice and our partners in Croydon who have experience of delivering wholesale change and will use best practice programme management reporting and assurance methodologies to track implementation.
- 1.6 This report will set out the background to the Council's challenges. It will set out the improvement proposals framed around the different strands of work that will form the Croydon Renewal Improvement Plan. These will include:
 - The new Priorities and Ways of Working;
 - Improvements to governance and leadership practice
 - Improvements to management practice
 - Service improvements to manage demand and cost
 - A new system of internal control – Finance, Performance and Risk
 - A new approach to involving residents and partners
 - A new engagement and involvement programme with staff to create a working environment that values all our staff.
 - A new approach to ensuring respect for all and equity of opportunity for our staff.
 - A review of the member and officer code of conduct to fully embed the Nolan Principles in all work.

The depth and breadth of these strands of work means that some of the work is further forward, and other areas require development.

2. BACKGROUND

- 2.1 Along with many councils in England, Croydon has experienced a challenging financial period, following the reductions in annual funding from national government due to its austerity programme.
- 2.2 Croydon faced further difficulties from its own decisions on expenditure. These led to the council experiencing deteriorating financial resilience for a number of years, culminating in a S.114 notice being issued in November 2020.
- 2.3 Since July 2018, the Council's external auditor consistently raised concerns in its Annual Audit letters about the need to "manage cost pressures, increase income sources and address the level of reserves". In October 2019, they issued an adverse conclusion on the Council's value for money assessment noting that "we are not satisfied that the council has made proper arrangements to secure economy, efficiency and effectiveness in its use of resources".
- 2.4 Structural deficits in the children's social care and adult social care budgets were not addressed in a timely fashion year on year which then manifested as significant overspends at the end of each financial year. Over £50m of transformation monies were spent on adults, children's services. Yet significant issues still remain with continued overspending and unresolved cost pressures
- 2.5 Since 2016, significant borrowing was undertaken (approximately £500million). Investments were made in external companies and assets acquired which increased the Council's liabilities and risk exposure. The governance of those external companies, the complexity of loan agreements and the investments themselves were not adequately supported by dedicated officer resources nor oversight by officers or members.
- 2.6 Reserves, either general or earmarked were not increased commensurately to mitigate the increased level of risk. The council's general fund and earmarked reserves reduced in value over this period by nearly 42m. The Council now has one of the lowest level of reserves in the country at £7m on an annual expenditure of approximately £300 million.
- 2.7 Funding for the Council's financial service was reduced and posts deleted. The management of and regular governance reporting to member was significantly weakened. The internal control system for assuring management and members was not able to adequately track, record, monitor and report upon the council's expenditure appropriately.

- 2.8 Following a meeting in April 2020 between the previous Chief Executive, the Director for Finance, Investment and Risk and the external auditor in which the issuing of statutory recommendations were discussed but then paused; a letter was sent to the previous Chief Executive with a number of actions which required a formal response.
- 2.9 In May 2020 the previous Chief Executive in response to the letter established an independently chaired Financial Review Panel, appointed an independent Finance Consultant to undertake significant improvement work, introduced a 15% staff reduction programme to reduce operating costs, initiated an “Immediate Measures” programme to reduce in-year spending and opened informal discussions with MHCLG.
- 2.10 Over the following months, work focused on the financial challenges the council faced. The independent Finance Consultant produced a report with 75 recommendations to improve the Council’s financial governance. This was presented to the General Purposes and Audit Committee in October 2020
- 2.11 The previous Chief Executive left the Council in August 2020. An internal appointment was made of an interim “caretaker” Chief Executive pending the external appointment of an interim Chief Executive. This appointment was advised upon and supported by the Local Government Association. The new Interim Chief Executive joined the Council on 14th September 2020.
- 2.12 At the 21st September Cabinet and then 28th September Full Council, the immediate measures and in-year savings that had been developed over the preceding summer months were agreed as an in-year amendment of a further £27.9m savings to the council’s budget. In addition, the Interim Chief Executive was requested to make a formal approach to MHCLG to seek a capitalisation direction to enable the 2020/21 budget to be balanced.
- 2.13 The report also gave authority to the new interim Chief Executive to develop the Croydon Renewal Plan as it was evident that a fundamental transformation of the Council’s systems of internal control, governance and management were required to underpin any financial recovery.
- 2.14 In October the Council’s external auditor published a Report in the Public Interest (RIPI) that set out the systemic issues that led to the Council’s current situation. The report set out a series of recommendations which the Council has accepted in full and proposed an additional 4 recommendations to further aid recovery.
- 2.15 The Action Plan was agreed at the Extraordinary meeting of Full Council on 19 November 2020. Delivery of the RIPI Action Plan will be incorporated into the Croydon Renewal Improvement Plan.
- 2.16 During September and October, the Council received support from a number of external bodies and has also initiated a number of further pieces of work, both internal and external to start to better understand the scale of the situation. PwC were commissioned to support the financial recovery work and

to conduct a strategic review of the Council's companies. This work is reported elsewhere on the agenda.

- 2.17 The Local Government Association has been enlisted to assist with member development, support and challenge on the Adult Social Care budgets and delivery model and to carry out a review of the Resources function. The interim Chief Executive has commissioned the LGA to carry out an investigation to gain better understanding of how the Council has arrived at this situation. Tower Hamlets provided early support to the Interim Chief Executive and new Leader. Camden Council are providing improvement partner support to our children's services and have provided additional expert communications resources. Internally, the council established the Croydon Renewal Task and Finish Group, drawing together staff from across the council to deliver the financial recovery plan (part 2 of this report), support the external reviews and develop the high-level Croydon Renewal Improvement Plan and Improvement Board.
- 2.18 On the 19th October 2020 the Interim Chief Executive also initiated a new staff survey and series of 18 staff focus groups to begin listening to staff and their ideas for what needed to change. The staff survey and output from those focus groups is attached at this report at Appendix C. A series of weekly webinars have been held by the Leader of the Council and the Interim Chief Executive with staff following the publication of the Report in the Public Interest. These have been attended by over 1000 staff at a time and the questions raised by staff have also helped shape the focus of the Croydon Renewal Improvement Plan.
- 2.19 The previous Leader of the Council and Cabinet Member for Finance & Resources resigned, and on the 22nd October 2020, a new Leader was elected and new Cabinet appointed.
- 2.20 Throughout this period the Interim Chief Executive and the Director of Finance, Investment & Risk have been in very regular dialogue with MHCLG.
- 2.21 On 20th October 2020 the Council welcomed the MHCLG non- statutory Rapid Review team who are undertaking a comprehensive assessment of the Council's position. The outcome of their review is expected at the end of November 2020.

3. NEW ADMINISTRATION PRIORITIES AND WAYS OF WORKING

- 3.1 The new Leader and her team have worked quickly to identify a framework of new "Priorities and Ways of Working" that will help shape the Council's initial approach to its improvement work and crucially provide a high-level guide to help prioritise scarce resources.
- 3.2 As part of demonstrating the Council's understanding and awareness of its situation, it is important to acknowledge that the existing Corporate Plan for

Croydon, 2018-2022 needs to be replaced by the new Priorities and Ways of Working.

- 3.3 A full statement of the administration's new approach is at Appendix D. This will need to be developed into a new full corporate plan for presentation to Full Council for decision at the appropriate time.

4. CROYDON RENEWAL IMPROVEMENT PLAN

- 4.1 As has been described already, there are a number of supporting reviews, action plans and recommendations that need to feed into the Croydon Renewal Improvement Plan. There are also a number of pre-existing reviews such as the Governance Review and the Centre for Public Scrutiny Review whose recommendations will also need incorporating.
- 4.2 Work to date has identified a number of discrete reports or reviews and nearly 400 different recommendations for action. It is likely that additional recommendations will come from work yet to be concluded such as the MHCLG Rapid Review. These will all need to be drawn together, prioritised and assessed for input to the overall programme plan for improving the council.
- 4.3 A consistent theme identifying the Council's shortcomings has been the Council's previous failure to deliver on its plans. This will need to be addressed in the programme delivery aspect of the improvement plan through clarity on accountabilities, targets, reporting schedules, definitions of success, agreed RAG definitions of progress and effective challenge.
- 4.4 This will be essential to not only give assurance to MHCLG that their capitalisation monies are being effectively used but also to the people of Croydon that their council is properly addressing its weaknesses.
- 4.5 It is recommended that Cabinet and Council agree to a Croydon Renewal Improvement Plan to bring together all of the different strands of work and recommendations from the various reviews. The first draft of the high level improvement plan is attached at Appendix A.
- 4.6 It is further recommended that delivery of the Improvement Plan is not only overseen by Croydon Council member led bodies: S&O, GPAC, Cabinet and Full Council but it is also overseen by an independent Croydon Renewal Improvement Board. The draft terms of reference and membership of the Croydon Renewal Improvement Board are at Appendix B. The Board membership and terms of reference will be consulted on and brought back to January Cabinet and Full Council for final approval.

5. WORKING WITH OUR STAFF

- 5.1 Croydon Council will not be able to fundamentally improve if it does not properly listen to and fully involve its staff in the Improvement Plan. Staff have made clear their concerns, worries and anger at the situation the Council is in.
- 5.2 Their views are laid out in the report from the recent staff survey and focus groups as attached at Appendix C. Staff have also made a series of suggestions on how to improve the situation, for example, improving contract management, clearer priorities, more effective use of digital technology. A very strong message from the Council's staff is the need to change the culture from one which is seen by many as a fearful culture with staff unable to speak up, to challenge bullying or other inappropriate behaviour, with less hierarchical silo-ed behaviour, better communication, more openness and trust. In addition we know we need to build on the work done to date listening to staff concerns about equality and diversity in the workplace, co-create a working environment that respects and values all our staff and take positive action to ensure that this is the case.
- 5.3 The LGA led independent investigation that is underway, will offer more insight and hopefully help build a more detailed understanding of how the council has arrived in this situation. It will also offer a route for any questions that arise that need to be addressed in terms of accountability through other formal processes. The report will be published.
- 5.4 High numbers of staff have attended the webinars. Staff will be going through a great deal of uncertainty over the next weeks and months as the Council begins to implement its financial recovery plan (part 2 of this report). It is essential to keep listening to staff, reaching out in these webinars either on a whole Council basis or more targeted smaller meetings, communicating as regularly as possible and fully involving them in designing the new organisation. Croydon Council is facing a significant challenge in the work needing to be done to improve on top of continuing to deliver its services to the people of Croydon - whilst in a pandemic.
- 5.5 The Council will need to continue to be able to rely on the support of staff to help us deliver the improvement needed. For this reason it is recommended that the results of this, and future, staff surveys are fully embedded in the Council's Improvement Plan.
- 5.6 A huge number of council staff from across the authority have been involved in the work to date as laid out in this report over and above their normal duties. The process for producing these reports is the first example of the new way in which the Council will work as one team harnessing the energy and idea of its staff. This report formally notes, acknowledges and thanks those staff for their contributions and suggestions to help shape the Council for the future.

6. CAPACITY TO DELIVER

- 6.1 The Council's track record of delivery of its plans has been the subject of much criticism in the external reviews that have taken place. It is accepted that to deliver change of this magnitude the Council will need to set higher expectations of itself and its leadership both political and executive.
- 6.2 In the short-term to address gaps in capacity and capability the Council has sought the support of the Local Government Association, PwC, independent financial consultants and mutual aid from other Local Authorities.
- 6.3 As part of the restructure, the Interim Chief Executive will need to take steps to address the capacity and capability needed to deliver the plan, ensure service delivery is maintained and that the necessary skills and resources are available for the improvement work. There will need to be critical focus on:
- The delivery of high-quality statutory services
 - Finances are appropriately managed and controlled
 - A sound understanding of risk management at the heart of the organisation
- 6.4 The Council will need to take a refreshed approach to training and development for staff to give them the skills that are needed to deliver change. This will need to include financial management and budget setting, management of risk, development of business cases and project management delivery.
- 6.5 The LGA is already working with both the administration and opposition groups and has developed a detailed programme to improve skills and practice in governance, financial management, oversight and scrutiny for all Members. In addition to this there is a more detailed development programme available for Cabinet and Scrutiny & Overview Members to include finance, finance for scrutiny, finance management for audit.
- 6.6 To underpin the new way of working the Council will introduce a new system of internal control focussed on finance, performance and risk to manage the delivery of the Council priorities, its services and the overall improvement programme. This will follow a monthly cycle of Departmental Leadership Teams, Executive Leadership Team, Cabinet and Scrutiny and Overview as appropriate. In addition, progress on the improvement work will be reported to the Croydon Renewal Improvement Board.

7. APPROACH TO RISK

- 7.1 Key to ensuring the improvement work will be successful will be adopting a new approach to risk, both in terms of how risk is assessed and managed. There will need to be a programme of training and development for decision making scrutiny and audit rules and also for council management.

- 7.2 The Council's management team has already commenced this work with a detailed review of the current risk register. Work is underway to strengthen the risk management framework.
- 7.3 Aligned to changing the approach and processes around risk, a change in behaviours and attitudes will be needed to ensure that all staff are able to manage risk appropriately in their day to day work. This change will take time to deliver and have impact.
- 7.4 The revised risk register and an update on this work will be reported to GPAC in January 2021.

8. WORKING WITH COMMUNITIES, RESIDENTS, BUSINESSES AND PARTNERS

- 8.1 The administration's new priorities and ways of working highlight the need for greater transparency and openness in the Council's relationship with residents, communities, businesses and partners.
- 8.2 The first step the Council will take to demonstrate its new approach is a borough wide full consultation on the savings proposals for 2021/22. This consultation will take place with all residents and the business community on all the budget proposals being presented in part 2 of this report.
- 8.3 The next step is to seek to fully involve the residents of Croydon, its communities and the Council's partners in the improvement work. The draft terms of reference for the Croydon Renewal Improvement Board seek to establish Croydon Communities Board. This Board will receive the Improvement Boards papers will be asked to give their views first each meeting to the Improvement Board. Consultation will be undertaken on the best way to achieve this. They will also be able to suggest specific items for the Board agenda. There will also be a question and answer session for residents mirroring the Council's public question time at Full Council. Partners will be invited to be on the Improvement Board and on the Croydon Community Reference Board. All meetings will be held in public and every quarter the independent chair of the Improvement Board will be asked to present an update to Full Council and take questions from members on progress.
- 8.4 The Improvement Board will also report to MHCLG and the LGA on progress.
- 8.5 This is all in addition to the work that S&O and GPAC will undertake on the Improvement Plan.

9. CONSULTATION

- 9.1 The draft high level Improvement Plan, Improvement Board membership and terms of reference will be consulted on and brought back to January Cabinet and January Council for final approval.

- 9.2 The interim Chief Executive will consult all staff and elected members on a restructure of the Council's management arrangements. The outcome of that consultation will be brought back to cabinet and Council for final decision.

10. REASONS FOR RECOMMENDATIONS/DECISIONS

- 10.1 It is essential that the council takes steps to address the improvements required to enable Croydon Council to be a financially sustainable council delivering value for money efficient and effective services.

11. OPTIONS CONSIDERED AND REJECTED

- 11.1 Should the Council have chosen not to act, it is very likely that MHCLG could have used their powers for intervention to address the situation. The proposals in this report aim to keep Croydon in local democratic control while working closely with national government, the LGA and others to make the necessary changes to become a financially sustainable and well governed council.

12. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 12.1 The financial consequences arising from the work of the Improvement Plan will need to be assessed once the plan is more fully developed. These will be presented to January Cabinet.
- 12.2 There are likely to be costs arising from the Improvement Board and these will also be brought back to members at January Cabinet.
- 12.3 Risk assessment and reporting will be an essential part of the reports on delivering the Financial Recovery Plan and the Improvement Plan. The most immediate risks that will need to be mitigated are a lack of resources both financial and human to undertake the amount of work needed. These will need to be mitigated by careful planning and prioritisation and seeking peer support from the local government sector.
- 12.4 There is also the risk of further disruption from the pandemic to council business and any impact of Brexit. Each of these risks will need to be assessed and reported upon and addressed as they become known.

13. LEGAL CONSIDERATIONS

- 13.1 The Head of Litigation and Corporate Law comments on behalf of the interim Director of Law and Governance that the Local Government Finance Act 1992 section 31A places the Council under a statutory responsibility to set a balanced budget i.e. the expenditure of the authority incurred (including

expenditure it proposes to incur) in a financial year must not exceed resources (including sums borrowed) available to it to meet that expenditure.

- 13.2 Whilst the Council must have due regard to the Equality Duty when taking decisions, there is a recognition that local authorities have a legal duty to set a balanced budget. However, where a decision is likely to result in detrimental impact on any group with a protected characteristic it must be justified objectively. This means that the adverse impact must be explained as part of the formal decision making process and attempts to mitigate the harm need to be explored. If the harm cannot be avoided, the decision maker must balance the detrimental impact against the strength of legitimate public need to pursue the service change to deliver savings. Finances cannot be the sole consideration.
- 13.3 Members are specifically referred to the case of *WX v. Northamptonshire County Council* [2018] EWHC 2178 (Admin) <https://www.casemine.com/judgement/uk/5b7a6bd92c94e0268d0dc356where> where decisions of both the Cabinet and Council to make budget cuts and changes to the delivery of library services following the service of a section 114(3) report were found to be unlawful and quashed for failure to take account of consultation responses. The court held that whilst Cabinet could not be criticised for being motivated by the financial situation this could not be their only concern when there were statutory duties to comply with. The key point of this decision therefore is the need to ensure that the rules surrounding consultation and decision-making are followed when reaching decisions about service provision even where there is a recognised urgent need to make a decision because of finances.

Approved by: Sandra Herbert Head of Litigation and Corporate Law on behalf of the interim Director of Law and Governance & Deputy Monitoring Officer

14. HUMAN RESOURCES IMPACT

- 14.1 The council recognises that its workforce is fundamental to the success of the improvement plan but also that services need to be reorganised to meet the financial challenges it faces. The impact on the workforce will be set out through specific proposals and the council's HR policies on consultation and managing organisational change will be followed.
- 14.2 The council will consult with its recognised trade unions in accordance with its collective bargaining arrangements on the proposals and cumulative impact across the workforce. Regular dialogue and engagement will continue throughout the course of the improvement plan.

Approved by: Sue Moorman, Director of Human Resources

15. EQUALITIES IMPACT

15.1 In April 2011 the Equality Act (2010) introduced a new public sector duty which extends the protected characteristics covered by the public sector equality duty to include age, sexual orientation, pregnancy and maternity, and religion or belief.

15.2 Section 149 Equality Act 2010 requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- foster good relations between people who share a protected characteristic and people who do not share it.

15.3 Having due regard means consciously thinking about the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken

15.4 Public bodies are required to analyse the likely effects of policy on the relevant protected groups. Where there is evidence of an adverse impact on any of the protected groups, the public authority must consider whether that policy is nevertheless justified in the light of wider aims. Even if it is justified, they should consider whether it should take proportionate steps to mitigate or avoid the adverse impact.

15.5 High quality information about the equality impact of savings proposals is necessary to enable budget decisions to be taken in an informed, fair and transparent way. At a time of significant financial pressure this is essential to maintaining the Council's commitment to tackling inequality and disadvantage, as well as fulfilling the authority's legal duties.

15.6 The Council will consider the extent and in what manner decisions were taken in accordance with the duties, whether there might be improvements in the process of decision-making; and propose ways in which future such exercises could be more effective, transparent, and offer greater value for money by ensuring that spending is better targeted.

15.7 The specific duties require listed bodies to meet the engagement provisions as part of assessing the impact on people with protected characteristics. This will help listed bodies to better understand the impact of their proposals on the different characteristics.

15.8 For our services to meet the needs of local residents, and of the community at large, it is essential that our plans and policies take into account the views of local people and others who use our services. Proportionate and relevant

consultation must be carried out with relevant public bodies, voluntary, community, trade union and other interest groups, such as staff, with an interest in the matter. This will help us to take account of the potential impact of the proposals on these groups, and to mitigate these impacts where possible

Approved by: Yvonne Okiyo, Equalities Manager

16. DATA PROTECTION IMPLICATIONS

16.1 The Head of Democratic Services and Scrutiny Comments that there are no data protection implications arising from the contents of this report.

Approved by: Elaine Jackson, Assistant Chief Executive

CONTACT OFFICER: Katherine Kerswell, Interim Chief Executive

APPENDICES TO THIS REPORT:

- Appendix A - High Level Draft of the Croydon Renewal Improvement Plan
- Appendix B - Draft Croydon Renewal Improvement Board Terms of Reference and Membership
- Appendix C - Staff Engagement Report
- Appendix D - Administration Priorities for the Croydon Renewal Plan

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

Letter from External Auditor, Grant Thornton to former Chief Executive, 22 April 2020.