The City of Edinburgh Council
Internal Audit

Planning and Performance Framework – Design Review

Final Report

30 June 2022

CS2109

Overall report rating:

Some improvement required	Whilst some control weaknesses were identified, in the design and / or effectiveness of the control environment and / or governance and risk management frameworks, they provide reasonable assurance that risks are being managed, and the Council's objectives should be achieved.

Contents

1. Background and Scope

Background

The Council's new business plan titled 'Our Future Council, Our Future City', covering three-year period 2021-2024, brings together the Council's three priorities of tackling poverty and inequality; boosting sustainability; and enhancing wellbeing. The plan includes fifteen outcomes and actions that will help to successfully deliver these priorities for the citizens of Edinburgh and its visitors.

It is essential that high level strategic performance objectives and priorities are established and communicated across the Council to support the business plan delivery. These should then be supported by divisional delivery performance objectives together with clearly defined employee expectations, and ongoing performance monitoring and reporting to confirm whether objectives are being consistently achieved. Planning and performance frameworks achieve this by creating a 'golden thread' that consolidates collective performance across organisation to determine progress towards delivery of strategic objectives.

The Council's new Performance Framework

An integrated planning and performance framework has been developed by the Data, Performance and Business Planning team ('DP&BP team') to support delivery of the business plan. The framework design is based on the 'plan, do, check, review, and act' performance cycle, with the objective of enabling effective performance discussions across all divisions and driving a continuous improvement culture.

The framework design involves analysing and presenting a combination of external data (for example from the Scottish Government), and internal data from a combination of the DP&BP team and Council divisions.

Data will be received by a generic team email, system generated reports, or manual data extraction from systems, that will be analysed and consolidated to produce data trend performance reports using the appropriate Business Intelligence application. A 'Data Dictionary' that details all KPI calculations is included in the design and is in the next phase of development, not covered by this audit.

The performance reports will assess ongoing strategic delivery progress in comparison to a range of specific performance milestones and SMART (Specific, Measurable, Achievable, Relevant, and Timebound) key performance indicators (KPIs) that are aligned to each of the 15 Business Plan outcomes.

Performance reports will be produced regularly to support both management decision making at all levels across the Council and elected member scrutiny, and the Council's main KPIs will also be published on the Council's website.

The new performance monitoring framework will see a shift from performance reporting based on single data points, which provide only a snapshot in time, towards data trend analysis.

A phased rollout of the performance framework has commenced across Directorates and the first performance report will be brought to the Policy and Sustainability Committee in November 2021.

Information Management Across the Council

Discussion with the Information Governance team has confirmed that the Council currently applies a devolved approach to managing information, with first line directorates and divisions responsible for managing their information assets. Information Asset Owners (division directors) are ultimately responsible for identifying and addressing any risks relating to their information and ensuring ongoing compliance with the Council's information governance policies. IAOs are supported in delivering these

responsibilities by System Administrators who should have authority to apply relevant information governance rules, including updating Council data and records to ensure their integrity and quality. Further detail is included on the Orb.

Scope

The objective of this review was to assess the design of the key controls supporting the newly developed integrated planning and performance framework. Our areas of audit focus as detailed in the terms of reference are included at Appendix 2. Testing was performed across the period May 2021 to June 2021.

The review also provides assurance in relation to the following Corporate Leadership Team (CLT) risks:

- Strategic Delivery - Inability to design and / or implement a strategic plan for the Council;

- Financial and Budget Management - Inability to perform financial planning; deliver an annual balanced budget; manage cash flows; and confirm ongoing adequacy of reserves;

- Technology and Information - Potential failure of cyber defences; network security; application security; and physical security and operational arrangements;

- Governance and Decision Making - Inability of management and elected members to effectively manage and scrutinise performance, and take appropriate strategic and operational decisions;

- Service Delivery - Inability to deliver quality services that meets citizen needs effectively and in line with statutory requirements.

Limitations of Scope

The scope of this review was limited to assessing the design of the new planning and performance framework prior to its implementation.

Both the effectiveness of the implementation process and the use of the framework by Council divisions and directorates were specifically excluded from our scope.

Existing data quality checks performed by first line teams on the performance data submitted to support consolidated performance reporting were also specifically excluded from our scope, however, the design of data quality checks performed by the second line Change and Delivery Team were included.

It is likely that a further review of the effectiveness of the performance framework will be completed once it has been embedded operationally across the Council that will include the data quality checks performed by first line teams.

Internal Audit recommendations included in this report will not be applied to the Health and Social Care Partnership as they have established their own performance framework.

Reporting Date

Our audit work concluded on 29 June 2021, and our findings and opinion are based on the conclusion of our work as at that date.

2. Executive summary

Total number of findings: 3

Summary of findings raised	
High	1. Completeness and Accuracy of Divisional Source Performance Data
Medium	2. Design of Performance Framework Operational Processes
Low	3. Directorate and Divisional Data Quality Objectives

Opinion

Some Improvement Required

Whilst some moderate control weaknesses were identified in the design of the key controls supporting the newly developed integrated planning and performance framework, they provide reasonable assurance that risks associated with the design of the framework are being managed, and that the Council's objectives to implement an appropriately designed framework to support ongoing monitoring of business plan delivery should be achieved.

Consequently, one high; one medium; and one low rated findings have been raised.

The design of the planning and performance framework is dependent on first line Council directorates and divisions providing complete and accurate source data to support calculation of KPIs and performance benchmarks and preparation of performance reports by the Data, Performance and Business Planning team ('DP&BP team'), with significant reliance on first line Information Asset Owners (IAOs) to ensure that this is consistently achieved.

Our High rated finding highlights this risk and includes some recommendations that, if implemented, should provide ongoing assurance on the completeness and accuracy of high-risk data that, if incomplete or inaccurate, could have a significant impact on the content and accuracy of performance reports.

Our Medium finding highlights the need to make improvements to the design of operational performance reporting processes that will be applied by the DP&BP team. These include ensuring that data and formulae included in key performance reporting spreadsheet models is appropriately protected.

Finally, our Low rated finding recommends that data quality performance objectives are defined and consistently applied in first line directorates and divisions involved in extracting and providing source performance data to the DP&BP team for inclusion in performance reports.

Further information on our findings is included at Section 3.

Areas of good practice

Our review identified that good progress is evident with the identification of relevant performance KPIs and benchmarks, and that the framework has been designed to support and encourage a culture of continuous improvement and data-based decision making within the Council.

The following specific areas of good practice were also noted:

- Significant research is evident in the design of the framework (which includes the "plan; do; check; and act" methodology) and identified best practice approaches have been incorporated in the creation of performance reporting KPIs; metrics; and milestones.

- Good engagement has been carried out with senior Council staff and elected members in order to produce the framework. This included an initial briefing to Policy and Sustainability on the proposed

approach, followed by a final paper setting out the full planning and performance framework. As part of the design, meetings were held with all political groups and a workshop was arranged with the Governance, Risk and Best Value Committee. Meetings were also held with the Wider Leadership Team and the Corporate Leadership Team was closely involved in the design of framework. Positive feedback on the framework design has been received from both officers and elected members.

- The benchmarks chosen for the KPIs are aligned with the Local Government Benchmarking Framework.

- The framework addresses a number of observations detailed in Audit Scotland's Best Value Assurance Report of the City of Edinburgh Council in 2020.

- Management intends to create a 'Data Dictionary' or 'single source of truth' that will include detailed performance metric calculations; their owners; and relevant data sources that will be shared across all relevant Council stakeholders.

3. Detailed findings

1. Completeness and Accuracy of Divisional Source Performance Data	High

The Data, Performance and Business Planning team (DP&BP team) confirmed that whilst a sense check is performed on source performance data received from divisions, there are no detailed quality assurance checks to confirm its completeness and accuracy.

Instead, reliance will be placed on the Council's first line Information Asset Owners (IAOs) and System Administrators to manage their information assets appropriately and confirm the completeness and accuracy of the performance data provided, with the DP&BP team highlighting significant variances in expected metrics and historic trends, where further first line investigation is required.

Additionally, no assessment has yet been performed to identify high risk first line data that, if incomplete or inaccurate, could potentially result in both inaccurate KPI outcomes and incorrect progress reporting on business plan delivery.

Management has advised that data quality is a recognised issue across the Council, and that the Information Board has been established with the objective of reviewing and addressing these known data quality concerns.

Risks

The potential risks associated with our findings are:

- **Technology and Information –** incomplete and/or inaccurate data is used as the basis for performance reporting;
- **Governance and Decision making** – incomplete and/or inaccurate data provided and used for decision making and scrutiny;
- **Strategic Delivery** – delivery of the business plan is impacted due to inappropriate strategic decisions based on incomplete/inaccurate data;
- **Service Delivery** – is impacted due to inappropriate operational decisions based on incomplete/ inaccurate data, and the inability to identify and resolve underlying performance issues; and
- **Reputational Risk** – reputational damage associated with inability to deliver the business plan and Council services to the expected standards.

1.1 Recommendation: Guidance for Divisions on Data Collation and Preparation

a. The DP&BP team should provide standardised guidance to first line directorates and divisions on how data for the Planning and Performance Framework should be extracted; analysed; collated; and submitted to the DP&BP team. This should include, but not be limited to guidance on how to:

- Review and cleanse data;

- Reconciliation controls that should be applied to support data extraction and confirm its completeness;

- Data analysis controls (especially when using spreadsheet models);

- The importance of appropriate quality assurance checks and review prior to submission; and

- The process for submitting data (use of the generic DP&BP team email address).

b. Directorates and divisions should be requested to confirm, at an appropriate frequency, that the guidance provided is being consistently applied, and proactively advise if there have been any changes to and/or significant issues with the process.

1.1a Agreed Management Action: Guidance for Divisions on Data Collation and Preparation

This recommendation will be implemented as recommended by Internal Audit.

Owner: Richard Carr, Interim Executive Director of Corporate Services **Contributors:** Gillie Severin, Head of Strategic Change and Delivery; Edel McManus, Change & Delivery Manager; Catherine Stewart, Lead Change and Delivery Officer; Layla Smith, Operations Manager Corporate Services; Michelle Vanhegan, Executive Assistant	**Implementation Date:** 30 September 2022

1.1b Agreed Management Action: Annual Questionnaire for Divisions on Data Collation and Preparation

A questionnaire will be designed based on the guidance provided and will be issued to divisions annually, in line with the requirement to provide annual assurance framework submissions, to provide assurance that they are performing data extraction; analysis; collation; and submission in line with original guidance from the DP&BP team.

Responses will be reviewed and considered as part of recommendation 1.3 below.

Owner: Richard Carr, Interim Executive Director of Corporate Services **Contributors:** Gillie Severin, Head of Strategic Change and Delivery; Edel McManus, Change & Delivery Manager; Catherine Stewart, Lead Change and Delivery Officer; Layla Smith, Operations Manager Corporate Services; Michelle Vanhegan, Executive Assistant	**Implementation Date:** 28 February 2023

1.2 Recommendation: Directorate Data Quality Checks and Assurance

Directorates and divisions should:

1. Incorporate the guidance provided by the Data, Performance and Business Planning (DP&BP) team into established processes to support the completeness and accuracy of high-risk divisional data to be provided for inclusion in performance reporting;

2. Ensure that these checks are consistently and effectively applied;

3. Take appropriate actions to address any data quality issues identified and ensure that these are included (where appropriate) in divisional risk registers.

4. Provide confirmation to the DP&BP team that the guidance is being consistently applied within agreed timeframes.

1.2a Agreed Management Action: Directorate Data Quality Checks and Assurance – Corporate Services

The guidance will be applied when issued by DP&BP team and dip sampling of data returns will be undertaken on a quarterly basis via the Directorate Assurance Officer to provide assurance that guidance is being applied. This will be aligned to required reporting to the Directorate Quarterly Performance and Assurance Meetings between the Divisions and the Executive Director.

Owner: Richard Carr, Interim Executive Director of Corporate Services **Contributors:** Hugh Dunn, Service Director: Finance and Procurement; Nicola Harvey, Service Director: Customer and Digital Services; Katy Miller, Service Director: Human Resources; Nick Smith, Service Director: Legal and Assurance; Layla Smith, Operations Manager; Prarthana Lasure, Directorate Assurance Officer	**Implementation Date:** 30 September 2023

1.2b Agreed Management Action: Directorate Data Quality Checks and Assurance – Place

The guidance will be reviewed, and relevant elements applied when issued by DP&BP team and dip sampling of data returns will be undertaken on a regular basis via the Directorate Assurance Officer to provide assurance that guidance is being applied.

Owner: Paul Lawrence, Executive Director of Place **Contributors:** Ross Murray, Operations Manager – Place; Alison Coburn, Operations Manager, Place	**Implementation Date:** 30 September 2023

1.2c Agreed Management Action: Directorate Data Quality Checks and Assurance – Education and Children's Services

ECS will implement dashboards at each level of the organisation and will also undertake case file audits, in which a percentage per month will be randomly selected across Audits, Thematic multi-agency audits, Complaints and complements, Reviews, Data, Voice – individual and group, Research and practice wisdom, Line of sight activity, in order to test for data quality.

This will be a mirror of regulation 44 when reports are compiled to ensure that the children are being kept safe and how well their wellbeing is being promoted.

Owner: Amanda Hatton, Executive Director of Education and Children's Services **Contributors:** Gillian Tracey, Education and Children's Services Operations Manager	**Implementation Date:** 30 September 2023

1.3 Recommendation: Assurance on Divisional High-Risk Source Performance Data

The DP&BP team should:

1. Complete a risk assessment on the source performance data provided by first line divisions to identify the high-risk data that (if incomplete or inaccurate) could have a significant impact on performance reports. It is recommended that source data should be assessed as either high; medium; or low risk with supporting rationale provided for these classifications;

2. Establish whether any first line checks are currently performed to confirm the completeness and accuracy of this data and (if so) whether these checks are adequately designed and consistently performed;

3. Where no first line checks are currently performed, agree with first line divisions the nature and frequency of checks that will be performed to confirm the completeness and accuracy of first line data;

4. Obtain confirmation from directorates and divisions that agreed data checks have been completed and that the data provided is complete and accurate, or obtain details of any inaccuracies identified and corrective actions; and

5. Include appropriate caveats in performance reports where any data inaccuracies have been identified.

1.3 Agreed Management Action: Assurance on Divisional High-Risk Source Performance Data

A phased approach will be applied to implementation of these recommendations, recognising that circa one year will be required to assess the quality of data provided by divisions for performance reports.

Once the process has been applied for a full year, a review will be performed by the DP&BP team to identify potentially high-risk data or divisions where additional support is required based on the outcomes of the survey (refer to Recommendation 1.1 above), and an action plan will be developed and discussed with IA.

Owner: Richard Carr, Interim Executive Director of Corporate Services **Contributors:** Gillie Severin, Head of Strategic Change and Delivery; Edel McManus, Change & Delivery Manager; Catherine Stewart, Lead Change and Delivery Officer; Layla Smith, Operations Manager Corporate Services; Michelle Vanhegan, Executive Assistant	**Implementation Date:** 31 March 2023

2. Design of Performance Framework Operational Processes	Medium

Review of the performance framework operational process design that will be applied by the Data, Performance and Business Planning (DP&BP) team in comparison with good practice, established that:

1. a detailed performance reporting timetable has not yet been created to ensure that divisions produce and provide data on time for inclusion in performance reports. Management has advised that a timeline is part of the implementation phase;

2. some source data for inclusion in performance reports will be provided by divisions via email to a group email address;

3. written processes for DP&BP data validation and cleansing have not yet been established but are part of the implementation phase;

4. collation and analysis of data used to calculate key performance indicators (KPIs) and prepare performance reports involves a significant amount of manual intervention from the DP&BP team;

5. KPI spreadsheet formulae and contents are not protected by cell protection to prevent inadvertent or erroneous changes; and

6. a change log has not yet been developed to record any changes made to KPI spreadsheet formulae and contents. Management has advised that this will be delivered as part of the design of the planned data dictionary.

Risk

The potential risks associated with our findings are:

- **Technology and Information** – incomplete and/or inaccurate KPIs and performance data is used to produce performance reports; and

- **Service Delivery** – performance reports are not delivered on time and to the expected level of quality.

2.1 Recommendation: Timeframes and Secure Provision of Source Performance Data

The DP&BP team should:

1. establish and agree a detailed timetable with directorates and divisions that includes timeframes for provision of source data for inclusion in performance reports;

2. establish a process (where feasible), where secure network folders or another suitable alternative (for example a SharePoint site) accessible by the DP&BP team and relevant first line divisional team members are used to support both provision and storage of first line performance data, avoiding use of email submissions (where possible).

2.1 Agreed Management Action: Timeframes and Secure Provision of Source Performance Data

As part of the implementation of the Planning and Performance Framework**,** the DP&BP team will establish a detailed performance reporting timetable for first line directorates and divisions that will include timeframes for the provision of source data to the DP&BP team for inclusion in performance reports.

All data received by email from divisions will be sent to a group email inbox as detailed in recommendation 1.1. Any emails sent directly to officers will be sent a reply request submission of future data via the group inbox.

Owner: Richard Carr, Interim Executive Director of Corporate Services **Contributors:** Gillie Severin, Head of Strategic Change and Delivery; Edel McManus, Change & Delivery Manager; Catherine Stewart, Lead Change and Delivery Officer; Layla Smith, Operations Manager Corporate Services; Michelle Vanhegan, Executive Assistant	**Implementation Date:** 31 December 2022

2.2 Recommendation: Performance Reporting Operational Processes

The DP&BP team should:

1. document data validation and cleansing processes that they will apply to deliver performance reports, and ensure that they are consistently applied;

2. ensure that all manual data collation and analysis processes are documented and consistently applied;

3. document all key performance indicator (KPI) and other performance metric calculations and ensure that they are consistently applied;

4. establish appropriate change control processes to support ongoing maintenance of operational procedures and any changes to KPIs and other performance metrics;

5. design and implement cell protection (where required) to ensure that source data and key formulae required to calculate KPIs and other performance metrics cannot be inadvertently overwritten or

changed.

2.2 Agreed Management Action: Performance Reporting Operational Processes

The DP&BP team will document the cleansing guidance and the manual data collation and analysis processes and ensure these are consistently applied by the team.

The proposed data dictionary will document all KPIs and other performance metric calculations and will be the only calculations applied.

The data dictionary will also act as a change log to capture any changes to the KPIs and other performance metrics and will include details of the original calculation and source data, the date of change, and how the change was authorised.

Finally, the Team will also ensure that the KPI spreadsheet formulae and data are protected to prevent inadvertent changes being made.

Owner: Richard Carr, Interim Executive Director of Corporate Services **Contributors**: Gillie Severin, Head of Strategic Change and Delivery; Edel McManus, Change & Delivery Manager; Catherine Stewart, Lead Change and Delivery Officer; Layla Smith, Operations Manager Corporate Services; Michelle Vanhegan, Executive Assistant	**Implementation Date:** 31 March 2023

3. Directorates and Divisional Data Quality Objectives	Low

Data quality performance objectives for directorates and divisions involved in managing, extracting and providing performance data to the Data, Performance and Business Planning team (DP&BP team) for inclusion in performance reports, have not yet been defined.

Risk

The potential risks associated with our findings are:

- **Service Delivery** – receipt of poor-quality source data from first line divisions leading to potentially inaccurate/incomplete performance reports.

3.1 Recommendation: Divisional Data Quality Performance Reporting Objectives

The DP&BP team should:

1. design a SMART (specific; measurable; achievable; realistic; and timebound) data quality objective for Directorates and Divisions involved in managing and providing source data for inclusion in performance reports.

2. the objective should include being clear that services are responsible and accountable for data quality in their teams.

3. communicate the data quality objective to Service Directors for their information and use.

3.1 Agreed Management Action: Development of Divisional Data Quality Objectives

The DP&BP team will prepare data quality objectives and share with directorates and divisions involved in provision of data for inclusion in performance report for discussion and agreement.

Owner: Richard Carr, Interim Executive Director of Corporate Services **Contributors:** Gillie Severin, Head of Strategic Change and Delivery; Edel McManus, Change & Delivery Manager; Catherine Stewart, Lead Change and Delivery Officer; Layla Smith, Operations Manager Corporate Services; Michelle Vanhegan, Executive Assistant	**Implementation Date:** 31 December 2022

3.2 Recommendation: Implementation of Divisional Data Quality Objectives

First line directorates and divisions should ensure that:

1. the performance reporting objective designed by the DP&BP team are considered and (where appropriate) incorporated into annual service plans and performance processes; and

2. any capacity and/or performance challenges associated with data management are discussed with the DP&BP team.

3.2a Agreed Management Action: Implementation of Divisional Data Quality Objectives – Corporate Services

The Corporate Services Directorate will continue to work closely with the DP&BP Team on the relevant performance reporting objectives, keeping these under regular consideration and review, and where appropriate will incorporate these into our Annual Service Plans.

Regular discussions will take place with the DP&BP Team to consider any capacity and/or performance challenges associated with data management.

Owner: Richard Carr, Interim Executive Director of Corporate Services **Contributors:** Hugh Dunn, Service Director: Finance and Procurement; Nicola Harvey, Service Director: Customer and Digital Services; Katy Miller, Service Director: Human Resources; Nick Smith, Service Director: Legal and Assurance; Layla Smith, Operations Manager; Prarthana Lasure, Directorate Assurance Officer	**Implementation Date:** 30 September 2023

3.2b Agreed Management Action: Implementation of Divisional Data Quality Objectives – Place

Performance reporting objectives designed by the DP&BP team will be considered and (where appropriate) incorporated into the Place Annual Service Plan.

Achievement of these objectives will be closely monitored with performance challenges associated with data management discussed with the DP&BP team.

Owner: Paul Lawrence, Executive Director of Place **Contributors:** Ross Murray, Operations Manager – Place; Alison Coburn, Operations Manager, Place	**Implementation Date:** 30 September 2023

3.2c Agreed Management Action: Implementation of Divisional Data Quality Objectives – Education and Children's Services

ECS will integrate Performance reporting objectives designed by the DP&BP i.e. PoaP in collaboration with the Change & Culture Framework to achieve clarity of targets so everyone can see their role in delivering data quality, including rigorous monitoring of progress towards impacts, ability to highlight and celebrate success, risk mitigation and management.

Owner: Amanda Hatton, Executive Director of Education and Children's Services **Contributors:** Gillian Tracey, Education and Children's Services Operations Manager	**Implementation Date:** 30 September 2023

Appendix 1: Basis of our classifications

Finding rating	Assessment rationale
Critical	A finding that could have a: • ***Critical*** impact on the operational performance; or • ***Critical*** monetary or financial statement impact; or • ***Critical*** breach in laws and regulations that could result in material fines or consequences*; or* • ***Critical*** impact on the reputation of the Council which could threaten its future viability.
High	A finding that could have a: • ***Significant*** impact on operational performance; or • ***Significant*** monetary or financial statement impact; or • ***Significant*** breach in laws and regulations resulting in significant fines and consequences*; or* • ***Significant*** impact on the reputation of the Council.
Medium	A finding that could have a: • ***Moderate*** impact on operational performance; or • ***Moderate*** monetary or financial statement impact; or • ***Moderate*** breach in laws and regulations resulting in fines and consequences; or • ***Moderate*** impact on the reputation of the Council.
Low	A finding that could have a: • ***Minor*** impact on operational performance; or • ***Minor*** monetary or financial statement impact; or • ***Minor*** breach in laws and regulations with limited consequences; or • ***Minor*** impact on the reputation of the Council.
Advisory	A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.

Appendix 2: Areas of audit focus

The areas of audit focus and related control objectives included in the review were:

Audit Area	Control Objectives
Development of performance metrics and methodology	• Effective engagement has taken place with Directors and Divisions to discuss the outcomes and actions contained within the Council's Business Plan and develop a set of SMART KPIs and milestones (where relevant). • The methodology used in developing the integrated planning and performance framework considers the Council's best value audit recommendations (where appropriate). • KPIs and milestones have been developed for all levels of the organisation that are aligned to the Council's strategic priorities and the outcomes and actions contained within the Business Plan. • Performance measures include an assessment of the effectiveness of Council processes as well as performance measures and outcomes. • An appropriate balance of quantitative and qualitative measures will be used to inform management decision making. • Service level KPIs and performance milestones will be accurately aggregated at Division, Directorate and top of Council level to enable timely escalation of performance issues and provide a 'golden thread' from the Council's strategic priorities to the performance targets of individual teams and employees.
Strategic Change and Delivery (second line) Data quality	• Clear definitions and detailed guidance are made available for the calculation of performance data. This is distributed to all employees responsible for producing performance data. • An assessment has been performed to identify high risk data to be reviewed, validated and cleansed. This will include (but should not be limited to) data produced for statutory returns provided to external organisations. • A risk-based approach to performing data quality checks has been designed to confirm the completeness and accuracy of high-risk data. • There is a clear methodology and process supporting data cleansing.

Performance monitoring and reporting	• Appropriate benchmarking partners have been identified (where possible) and will be used as part of performance reporting to identify any potential areas of concern and inform management decision making.
	• A performance reporting timetable has been designed that includes reporting at Council, Directorate, Division and Service level.
	• Committee feedback is obtained and used to make continual improvements to the suite of performance data measures and report content.
	• Employee contributions to the achievement of corporate objectives is reflected within personal development plans through the inclusion of role-specific performance measures.
• **Data protection**	• The performance management system enables the alignment of performance measures in accordance with the Council's methodology for the aggregation and escalation of KPIs and milestones.
	• The performance management system is supported by robust business continuity and contingency planning arrangements.
	• Role profiles are in place which include appropriate system access levels which are consistently applied and regularly reviewed to ensure that they are fit purpose.
	• Admin system access rights are strictly limited and tightly controlled to ensure that no unauthorised amendments are made to system data.
	• Sensitive data is held in a secure location which can only be accessed by a limited number of authorised staff.
	• If a cloud-based system is to be used for performance monitoring, controls should be in place to ensure compliance with the Council's 'Externally Hosted Cloud and Web Services Protocol for Procurement and Adoption' policy.