

| FROM: | Audit and Risk Manager  | SUBJECT: | Communications   |
|-------|---|----------|------------------|
| то:   | Head of People and<br>Communications  | DATE:    | 10 February 2021 |
| C.C.  | Chief Executive (CE)<br>Deputy Chief Executive (AJ)<br>Head of Finance (MS)<br>Marketing & Communications<br>Manager (NC) |          |                  |

Portfolio Holder (Cllr Day)

### 1 Introduction

- 1.1 In accordance with the Audit Plan for 2020/21, an examination of the above subject area has been undertaken and this report presents the findings and conclusions drawn from the audit for information and action where appropriate. The review was undertaken by Nathan Leng, Internal Auditor. This topic was last audited in February 2018.
- 1.2 Wherever possible, findings have been discussed with the staff involved in the procedures examined and their views are incorporated, where appropriate, into the report. My thanks are extended to all concerned for the help and cooperation received during the audit.
- 1.3 The audit was undertaken during the COVID-19 pandemic. This has meant a slightly different approach has been taken to complete the audit. Rather than observing staff members and meeting staff face to face, correspondence has been via email, telephone calls or virtually through MSTeams.

### 2 Background

- 2.1 The Media team aims to deliver a first class, effective and efficient communication services for the Council which is valued by senior management, colleagues, councillors and stakeholders.
- 2.2 The previous Communications audit (February 2018) focused on social media and its use at the Council.

### 3 Scope and Objectives of the Audit

- 3.1 The audit was undertaken to test the management and financial controls in place.
- 3.2 In terms of scope, the audit covered the following areas:
  - Website
  - Social Media
  - Media

- Printing
- Internal Communications
- 3.3 The control objectives examined were:
  - Staff are aware of what should and shouldn't be included on the Council's website.
  - Only appropriate staff can update and publish information on the Council's website.
  - Management is aware of the number of visitors on the Council's website.
  - The Council is aware of customer experience of using the website.
  - The Council website is accessible to all customers.
  - There are strategy and policy documents in place governing the appropriate use of social media by staff and Members.
  - Only appropriate staff can update and publish information on the Council's social media accounts.
  - Council expenditure on social media is planned for, monitored and controlled.
  - The Council responds appropriately to comments and complaints raised via social media.
  - Content reaches the intended audience.
  - Staff have the skills, knowledge and support to appropriately interact with the media.
  - Council news is shared and where appropriate, celebrated with staff.
  - Management is aware of news articles relating to the Council.
  - Printing is guided by Council policy and adheres to relevant legislation.
  - Delivery of high-quality print materials.
  - Council expenditure on print materials is planned for, monitored and controlled.
  - The Council are committed to engaging with staff and Members.
  - Staff are able to raise concerns and receive responses form management as appropriate.

## 4 Findings

### 4.1 **Recommendations from Previous Report**

4.1.1 The current position in respect of the recommendations from the audit reported in January 2018 is as follows:

| Recommendation  | Management Response                                       | Current Status   |
|---|---|--|
| 1) The Social Media<br>Policy should be<br>presented to the<br>appropriate<br>committee for formal<br>approval. | The policy is under review and approval will be obtained. | The Social Media Policy<br>(2018) was approved by<br>the Employment<br>Committee on<br>21/03/2018. |

| Recommendation  | Management Response  | Current Status   |
|---|--|--|
| <ol> <li>The training should be<br/>amended to include<br/>details of the Social<br/>Media Policy.</li> </ol>   | This will be included prior<br>to the next sessions<br>being run.  | The training presentation<br>does not directly<br>reference the Social<br>Media Policy.  |
| 3) The importance of<br>attending the social<br>media training should<br>be reiterated to<br>Members, with further<br>training sessions<br>being made available<br>to those who did not<br>attend the first<br>session. | Members will be offered<br>further dates and Group<br>Leaders will be emailed<br>to ensure they know who<br>has attended the<br>training.  | Training has been<br>offered to members with<br>additional sessions<br>booked as necessary.  |
| <ol> <li>The potential for<br/>monitoring the<br/>numbers of service-<br/>specific enquiries<br/>should be examined<br/>in order to identify<br/>the value of using<br/>social media.</li> </ol>                        | This information exists in<br>a disparate format. The<br>Media & Communications<br>Manager will work with<br>the new Website<br>Manager to pull it<br>together into a useable<br>format for producing a<br>report. | There is minimal<br>evidence of monitoring<br>for the number of<br>service-specific enquiries<br>made through social<br>media or any<br>assessment for how<br>social media interactions<br>demonstrate the value of<br>using social media. The<br>auditor was advised by<br>Head of People and<br>Communications that<br>monitoring has been<br>impacted by the loss of a<br>media apprentice. |

## 4.2 Website

- 4.2.1 The Digital Strategy outlines the Council's aims to use digital technology to transform the District and enhance the lives of residents while generating long-term savings. The strategy highlights the Council website as fundamental to service delivery, recognising its ability to increase access to information and provide self-serve applications to residents.
- 4.2.2 The Digital Strategy is produced by the Head of ICT services and the ICT steering group. The current strategy document covers the period 2015-2019 and is available via the intranet on the Website Guidance and Policy page. The Marketing and Communication Manager (MCM) confirmed that the strategy is due for review and would contribute to the sections relating to media and communications when a new strategy is produced by the Head of ICT services and the ICT steering group.

- 4.2.3 There are links to relevant procedural guidance, training modules, accessibility guidelines and legislation documents included on the Website Guidance & Policy intranet page.
- 4.2.4 The Website Service Manager (WSM) has overall responsibility for maintaining the Council website. However, staff within each service area are responsible for making sure that service-specific content is appropriate and up-to-date.
- 4.2.5 Each service area has a website author or editor who is responsible for reviewing, updating and publishing content for their area. Staff can contact their service area website editor to get content published, updated or removed. A list of website editors is available via the intranet on the ICT Services page.
- 4.2.6 Website editors have access to guidance documents via the Web Guidance and Policy intranet page. Training was previously run through Moodle and consisted of an e-learning course. However, the MCM confirmed that the Moodle training was based on an old version of the website system, is very complex and in some cases does not adequately inform users how to perform simple tasks. The Council is no longer using Moodle, training is currently carried out in small groups or one-to-one sessions. The MCM plans to upload 'How-to' guides as an alternative to Moodle.

### Risk

### Staff do not have access to up-to-date training resources.

### Recommendation

# Training resources should be reviewed, updated and made available to staff.

- 4.2.7 The WSM monitors the number of site visits on a monthly basis. The Digital Content and Social Media Officer (DCSMO) produces a media stats infographic containing visitor statistics which is available via the intranet. A link is also sent to the Senior Management Team (SMT) on a monthly basis as per guidelines in the Marketing and Communications Strategy document (2019).
- 4.2.8 The customer service statistics spreadsheets reveal that in 2019, the website received an average of 170,000 visits per month. This represents a year-on-year increase since 2014 with the exception of 2018 where there was a slight dip in the figures.
- 4.2.9 More recently, site visit statistics for the period April-November 2020 reveal an average of 205,000 site visits per month. This increase coincides with the onset of the COVID-19 pandemic and suggests that people turned in increasing numbers to the WDC website for information, guidance and support.
- 4.2.10 Formal monitoring of the Council website revolves around two key measures: website success and user satisfaction. These measures are monitored on a

monthly basis and included in the media stats infographic. The results are also reported quarterly and shared on the Business Intelligence portal.

- 4.2.11 User feedback is collected via a pop-up survey, the results of which are collated into a spreadsheet and summarised to provide a general understanding of customer satisfaction levels.
- 4.2.12 The WSM conceded that survey responses represent a small percentage of overall site visitors. For example, in Q3 2020, the total number of web sessions was 619,522 while the total number of survey responses was only 231.
- 4.2.13 The WSM estimates that new website visitors have a one-in-three chance of being presented with the survey when they access the Council website. Repeat visitors, or visitors who have rejected the survey notification previously, may not see the survey due to their web browser cookies. This may limit the number of visitors sharing feedback via the pop-up survey.

#### Advisory

## The user feedback survey should be distributed more widely to receive a higher number of responses.

- 4.2.14 The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018) enshrined the legal duty of public sector organisations to ensure that their website meets accessibility requirements and publish an accessibility statement. These regulations build on existing obligations to people who have a disability under the Equality Act (2010).
- 4.2.15 The Council website has been designed to meet accessibility standards identified in the Web Content Accessibility Guidelines (WCAG) 2.1 which were introduced in September 2020.
- 4.2.16 The Council's accessibility statement indicates that there are some elements of the website design that do not meet requirements detailed in the new WCAG 2.1. An updated website design is currently in progress to meet these requirements.
- 4.2.17 The WSM advised that the usability testing software Silktide is used to continually monitor accessibility and track the level of compliance. This includes monitoring for broken links, spelling errors and profanities. Figures, as of September 2020, were reported with above 90% compliance. The WSM advised that he logs onto Silktide several times a week for review purposes and to address alerts.
- 4.2.18 The website was last tested for accessibility in January 2020. The test was carried out by external company The Shaw Trust who tested all web pages along with manual user testing of user journeys.

### 4.3 Social Media

- 4.3.1 The Digital Strategy (referred to in 4.2.1 above) specifically references social media and highlights its potential for promoting participation and engagement and ability to proactively broadcast information to residents.
- 4.3.2 There is a specific Social Media Policy available via the intranet which covers the appropriate use of social media in the workplace. Amendments to the Social Media Policy were approved by the Employment Committee in March 2018.
- 4.3.3 The Council's Internet and Acceptable Usage Policy, also available via the intranet, establishes how staff and Members can use the internet professionally, ethically and lawfully. Employees are expected to follow these guidelines in relation to any social media activity. The Policy was last updated in 2019.
- 4.3.4 Social media is managed by the Communication team. The DCSMO has overall responsibility for the Council's social media accounts. Other members of the Media team have access and will undertake some of the work as required.
- 4.3.5 There are a number of Council-affiliated social media accounts that are maintained by staff from other departments. The Council's website contains a list of the official social media accounts in use.
- 4.3.6 The MCM and DCSMO advised that the log-in details are held for these other accounts and that they monitor the accounts to ensure that content is appropriate.
- 4.3.7 Staff with access to Council-affiliated accounts are responsible for the content that they produce. If the content is found to contravene Council policy, the content is removed and the team responsible is notified. The MCM advised that repeated breaches will result in the Communications team assuming control of the account. To date, the team have not needed to do this.
- 4.3.8 The Communications team work to equip staff and councillors with the skills and knowledge to use social media effectively and to achieve a positive and consistent tone of voice. A mandatory Social Media Induction course was rolled out to staff in 2018. To date, 354 employees have attended.
- 4.3.9 Training is traditionally arranged in group sessions on an ongoing basis. As sessions are scheduled throughout the year, there are plenty of opportunities for staff and councillors to participate.
- 4.3.10 The DCSMO delivers social media training to staff and councillors. The training consists of a PowerPoint presentation covering the different types of social media, guidance around creating appropriate content and the impact of improper use. Handouts containing key information are circulated during the session for attendees to take away for future reference.

- 4.3.11 The presentation does not reference council policies directly. Notes to the course administrator do, however, include a prompt referring attendees to the Internet Acceptable Usage Policy. The Acceptable Usage Policy is also highlighted during staff inductions.
- 4.3.12 The previous audit report recommended that training should be amended to include details of the Social Media Policy. However, the training makes no direct reference to the policy although the MCM advised that it is mentioned verbally by the trainer.

### Risk

Staff may be unaware of the existence of the Social Media Policy and unfamiliar with its contents.

#### Recommendation

## Social media training should be amended to directly reference the Social Media Policy.

- 4.3.13 The training for councillors recognises that councillors are more likely to post work-related content using their personal social media accounts. As a result, the training directs councillors to the Social Media Standards for Councillors document and the Members Code of Conduct for further instruction and guidance. A total of 52 Council Members have attended the training sessions since 2018.
- 4.3.14 The MCM confirmed that there are few costs associated with using social media. However, a recurrent cost is the Communication team's subscription to social media management platform 'Hootsuite'.
- 4.3.15 Hootsuite consolidates all social media accounts into a single platform. It has various useful features and is particularly used for notifying the team of external engagement, scheduling posts, monitoring productivity and reporting on engagement data.
- 4.3.16 There is no dedicated annual budget for social media activities due to the minimal costs. Additional costs are small, ad-hoc in nature and purchased using the MCM's purchasing card.
- 4.3.17 One example of an additional cost is the use of paid-promotional posts. Payment is made to the social media platform to advertise or promote a post to followers or people within a geographical area. This is usually done as part of an information campaign. If the campaign is run on behalf of another Council department, the costs are recharged to that department's marketing budget.
- 4.3.18 The recently promoted 'Light Up the District Virtual switch-on event' post on Facebook had a budget of £50 and received 724 event responses which accounted for 66% of the total responses received. In this instance, the promoted content led to a significant number of event responses and therefore, the relatively small fee is entirely justified.

- 4.3.19 Social media channels are monitored daily. This is done through continuous monitoring of Hootsuite and native applications during regular working hours.
- 4.3.20 The DCSMO and MCM monitor channels 'out of hours' using applications installed on personal devices. This flexible approach to monitoring allows the Media team to quickly respond to issues or emergencies as they arise.
- 4.3.21 Hootsuite is used to monitor engagement, enquires and complaints. Specific enquiries are redirected to an appropriate officer and dealt with via private (non-public) communication channels.
- 4.3.22 For Twitter, Hootsuite monitors both direct (users who specifically use the @Warwick\_DC handle in a tweet) and indirect (users who mention terms associated with the Council i.e. Warwick District Council, Warwick DC etc.) mentions. Hootsuite notifies the Media team devices when the Council are mentioned.
- 4.3.23 The WSM provided a sample of comments and complaints raised through the Council's social media channels. The sample includes both public posts and private messages.
- 4.3.24 The sample revealed that the Media team adopt a consistent approach to handling public enquiries and complaints received via social media. All of the sample responses were clear, concise and informative.
- 4.3.25 The majority of Council responses were issued on the same day, some minutes after the initial contact. There is one case where the Council responded four days after the initial contact and, in this instance, an apology was provided.
- 4.3.26 Complaints are handled according to the normal process. This process is outlined in the 'Employee Guidelines A Complaint from the Public' document which is accessible via the intranet.
- 4.3.27 The WSM confirmed that performance monitoring is used to assess whether content reaches the intended recipients. Surveys and questionnaires are used to ascertain: a) whether a message is received and; b) how a message is delivered.
- 4.3.28 In January 2020, a survey of 102 residents was carried out to establish the effectiveness of different communication channels in informing residents of changes to Christmas refuse and recycling services.
- 4.3.29 The WSM noted that from their evaluation, the team could determine which Communications platforms were most effective (bin tags and social media) and also what was least effective (radio). This information has helped with planning and budgeting for 2020.
- 4.3.30 Statistical monitoring of social media analytics is carried out each month, with the results reported on a monthly and quarterly basis. Statistics monitored include the number of accounts who have subscribed to the

Council's feed, the number of 'likes' retweets, shares and click-throughs a post receives and the number of new posts on an account.

- 4.3.31 Performance against targets is considered in context. For example, Twitter periodically removes inactive accounts from its platform (around August-September each year). As a result, the Communications team anticipate that their followers may be lower than the tolerance for that quarter.
- 4.3.32 There are also a range of short-term factors which may impact engagement such as campaigns, events or emergency situations. The Digital Strategy stipulates that social media should be used to broadcast information, particularly in emergency situations. During the COVID-19 pandemic, Council social media has shared information and guidance to businesses and residents.
- 4.3.33 The monthly social media analytics form part of the Marketing and Communications statistics which are shared with the Head of People & Communications. This data is also reproduced in the monthly media stats infographic available via the intranet. There are no monthly targets for social media performance. Rather, the DCSMO reports the most common forms of engagement.
- 4.3.34 Quarterly social media data is inputted into the Business Intelligence portal (BIP) which is accessed by members of the Senior Management Team (SMT) and councillors. Reports are also uploaded to the intranet and available for all staff members to view.
- 4.3.35 The information reported in the BIP has increased since 2019-2020 to include Twitter 'likes' and all of the Facebook engagement statistics. However, the statistics do not include Instagram. The lack of performance monitoring of Council social media activity on Instagram poses a significant reputational risk due to a lack of oversight. Performance monitoring should be consistent across all social media platforms.

#### Risk

The Councils reputation may be damaged by inconsistencies in the measuring of corporate social media engagement.

#### Recommendation

## Management should receive performance monitoring data for all Council social media platforms, including Instagram.

4.3.36 The quarterly performance targets included in the BIP may be too low. For example, 'Increased number of click-throughs' has exceeded the target by at least four times in every quarter since April 2019. Performance targets should be reviewed and revised when presented with evidence of a consistent change in customer social media interactions.

### Risk

# Social media performance targets may become irrelevant as customer interactions change over time.

### Recommendation

# Social media performance targets should be reviewed and revised regularly to remain relevant.

4.3.37 A number of the performance targets included in the quarterly BIP reports are worded incorrectly. For example, 'Increased number of click-throughs' does not measure an increase but rather the total number of click-throughs during a quarter.

### Risk

Social media performance targets may not accurately represent the performance measure being assessed.

#### Recommendation

### Social media performance targets should be reviewed and revised to ensure that they accurately describe the performance statistics.

4.3.38 The information reported in the monthly and quarterly reports only includes statistics from the main Council social media accounts. Council-affiliated accounts are not included in the performance monitoring reports. This poses a risk that there is limited performance oversight of Council-affiliated social media accounts. However, social media accounts administered by services were not examined so no commentary is possible on these. These will be covered as part of service-oriented reviews.

### 4.4 Media

- 4.4.1 The Marketing and Communications Strategy 2019-2023 is available via the intranet and includes staff guidance on best practice when interacting with the media.
- 4.4.2 The strategy commits to supporting the development of staff and councillors in their media and social media training to maintain and develop a consistent and authoritative "voice" of the council.
- 4.4.3 In the policies and guidance section of the Marketing and Communications Strategy, reference is made to a 'Media Policy'. Although no specific Media Policy document is in existence there are guidance notes that provide advice to councillors and officers on dealing with the media. However, these guidance notes are not reviewed regularly and kept up-to-date.

#### Risk

# Councillors (and, in limited cases, officers) may not be properly prepared when dealing with the media.

### Recommendation

#### Guidance notes covering interaction with the media should be reviewed regularly and, where necessary, updated and re-issued.

- 4.4.4 The MCM has overall responsibility for media communications. The Media team has a list of contacts that they use regularly to contact the press.
- 4.4.5 The 'How Do I?' section on the Media team page includes an article titled 'Engage with the Media', produced in 2015. The article answers a range of questions relating to staff-media interactions.
- 4.4.6 The article advises that the Media team can provide basic internal media training for small groups or bring in an external consultant for more in-depth training for larger groups. The MCM last conducted a media training course for councillors in 2019.
- 4.4.7 The Communications team can provide appropriate spokespeople to comment on current and topical issues. These include the Council Leader, portfolio holders and other councillors.
- 4.4.8 Copies of the latest press releases containing Council news can be found in the news section of the website. This section is regularly updated and contains press releases on a range of topics. This feeds into actions detailed in the People Strategy Action Plan, namely the action 'Deliver the Council's news and celebrate its successes'.
- 4.4.9 The Marketing and Communications document indicates that media (press, radio and TV) should be monitored daily to determine the levels of coverage that are achieved, the quality of coverage and the overall tone. Feedback should be circulated to the Head of Service, Corporate Management team and councillors as appropriate.
- 4.4.10 The only monitoring evidence provided, relating to media coverage, was the quarterly media statistics reported on the Business Intelligence portal.
- 4.4.11 The figures cover positive press coverage as a percentage of overall reporting about the Council. The target is 60% with a reporting tolerance of -5%. In 2019-2020, positive press coverage as a percentage amounted to an average of 52% for the year which is below the performance target and reporting tolerance.
- 4.4.12 The Marketing and Communicating Strategy includes the following statement:

"The clear measurement and monitoring of our media coverage will continue to demonstrate the effectiveness and impact of our media liaison."

Daily monitoring of media coverage is used to inform future interactions. This information is shared with project leads with advice on how to respond to it. Statistics for Council media coverage are shared routinely on the intranet as part of the monthly infographic.

### 4.5 **Printing**

- 4.5.1 The Marketing and Communications Strategy (2019-2023), available via the intranet, contains a section describing the Council's role in the production of printed promotional materials. It confirms that the Media team can design, copyright and manage the printing of all promotional materials for the Council.
- 4.5.2 The Strategy stipulates that the Council are duty-bound to comply with best practice, plain English guidelines and accessibility legislation for all printed materials. The Council must also adhere to Copyright Law and the Code of Best Practice for Council Publicity, observing Purdah requirements and any other compliance relevant to the printing of promotional materials for a public body.
- 4.5.3 The Council offers an in-house printing service which can provide quick, costeffective, small-scale print runs. The Media team also participate in a Print Framework which provides a list of external print providers who have agreed to provide cost-effective and timely printing services.
- 4.5.4 Printing requests are facilitated by the Media team. All requests are subject to an approval process. Once a project is approved, designers receive a briefing sheet detailing the client's requirements. The designers complete a sign-off sheet which constitutes an agreement between the client and designer.
- 4.5.5 The designers are issued an 'Artwork Checklist' document which helps reduce the risk of waste. All designs are produced in accordance with the Council's guidance documents for accessibility and sent to the MCM for quality assurance purposes before final approval is given. The MCM confirmed that there are currently no examples of waste.
- 4.5.6 Once a design is complete, the Media team send an evaluation form to the client. Clients are invited to provide feedback and to confirm whether the final product met their brief.
- 4.5.7 Spending on the printing of promotional materials is controlled by the Print Framework. The Framework was created via a benchmarking exercise which identified printing providers who offer value for money, high-quality materials and who passed a strict procurement process. The Council entered into a contractual agreement with these print providers agreeing to only use providers from the Framework for external print work for the duration of the agreement.
- 4.5.8 All external printing jobs are allocated through the Print Framework. This ensures that work is only commissioned from printers who have gone through the tendering process and who meet the criteria laid out in the Print Framework. This includes adherence to any legal or statutory guidelines in the provision of printed promotional materials.
- 4.5.9 Details of expenditure on internal and external printing jobs are contained in the Budget Spend Spreadsheet. Expenditure on internal printing has remained within budget for the last two years as well as the first two quarters of 2020-2021.

4.5.10 Expenditure on external printing has exceeded budget allocations for the same period. However, these costs have been attributed to other services (e.g. elections, re-opening high streets).

### 4.6 **Internal Communications**

- 4.6.1 Internal communication is all the information that is shared within an organisation between various levels of staff and Members and includes; emails, publications, newsletters, the intranet as well as all external communications that staff receive.
- 4.6.2 The Marketing and Communication Strategy highlights engagement with staff, managers, councillors and anybody connected to the Council as a vital aspect of the communication strategy.
- 4.6.3 Internal communication is informed by staff surveys and the results of the Investors in People (IIP) review. The Council was awarded Silver accreditation, progressing from bronze, thereby demonstrating an ongoing commitment to supporting, engaging with and developing staff.
- 4.6.4 The Council are committed to building two-way engagement channels so that staff and members are able to seek guidance, clarify information and ask questions. Key internal communications channels include emails, Jabber, MS Teams, the intranet and the Rumour Mill.
- 4.6.5 One of the Council's aims is to address 'gossip' by ensuring that communication is accurate, timely and does not leave gaps for speculation and misunderstanding. The Rumour Mill provides an opportunity for staff to submit queries under anonymous conditions.
- 4.6.6 Rumour Mill questions or comments are sent directly to the Media team who will receive an alert before posting it live on the board. If a question or comment cannot be answered immediately, it is forwarded to an appropriate officer for a response.
- 4.6.7 The Rumour Mill is usually updated on a weekly basis. Comments which are deemed pertinent by the Media team are shared with SMT for formal action.

### 5 Conclusions

- 5.1 Following our review, in overall terms we are able to give a SUBSTANTIAL degree of assurance that the systems and controls in place in respect of Communications are appropriate and are working effectively.
- 5.2 The assurance bands are shown below:

| Level of Assurance    | Definition  |
|-----------------------|---|
| Substantial Assurance | There is a sound system of control in place and compliance with the key controls. |

| Level of Assurance | Definition  |
|--------------------|---|
| Moderate Assurance | Whilst the system of control is broadly satisfactory,<br>some controls are weak or non-existent and there is<br>non-compliance with several controls. |
| Limited Assurance  | The system of control is generally weak and there is non-compliance with controls that do exist.  |

- 5.3 A few relatively minor issues were, however, identified:
  - Unless appropriate training is provided, staff may be unaware of the existence of the Social Media Policy and unfamiliar with its contents.
  - Until Instagram is included in the monitoring of social media activity, the Council's reputation may be damaged by underperforming social media content.
  - Performance targets are not being reviewed and revised when there is clear evidence of a consistent change in customer social media interactions.
  - A number of the performance targets included in the quarterly BIP reports are worded incorrectly.
  - Guidance notes covering interaction with the media are not reviewed regularly and kept up-to-date.

## 6 Management Action

6.1 The recommendations arising above are reproduced in the attached Action Plan (Appendix A) for management attention.

Richard Barr Audit and Risk Manager

## Appendix A

## **Action Plan**

## **Internal Audit of Development Management – February 2021**

| Report<br>Ref. | Recommendation   | Risk  | Risk<br>Rating* | Responsible<br>Officers  | Management Response  | Target<br>Date |
|----------------|--|---|-----------------|--|--|----------------|
| 4.2.6          | Training resources should<br>be reviewed, updated<br>and made available to<br>staff.   | Staff do not have<br>access to up-to-date<br>training resources.  | Low             | Marketing &<br>Communications<br>Manager   | We will review our intranet<br>pages and all the relevant<br>documents to ensure they<br>are easily accessible for<br>staff. | April 2021     |
| 4.3.12         | Social media training<br>should be amended to<br>directly reference the<br>Social Media Policy.                                  | Staff may be<br>unaware of the<br>existence of the<br>Social Media Policy<br>and unfamiliar with<br>its contents. | Low             | Marketing &<br>Communications<br>Manager /<br>Digital Content<br>and Social Media<br>Officer | This will now be included in<br>the social media training<br>documents.  | April 2021     |
| 4.3.35         | Management should<br>receive performance<br>monitoring data for all<br>Council social media<br>accounts, including<br>Instagram. | There may be<br>inconsistencies in<br>the measuring of<br>corporate social<br>media engagement.                   | Low             | Marketing &<br>Communications<br>Manager /<br>Digital Content<br>and Social Media<br>Officer | Instagram will now be<br>added to our social media<br>monitoring and included in<br>our monthly media stats.                 | May 2021       |

| Report<br>Ref. | Recommendation  | Risk   | Risk<br>Rating* | Responsible<br>Officers  | Management Response  | Target<br>Date               |
|----------------|---|--|-----------------|--|--|------------------------------|
| 4.3.36         | Social media<br>performance targets<br>should be reviewed and<br>revised regularly to<br>remain relevant.   | Social media<br>performance targets<br>may become<br>irrelevant as<br>customer<br>interactions change<br>over time.        | Low             | Marketing &<br>Communications<br>Manager /<br>Digital Content<br>and Social Media<br>Officer | A review of our social<br>media accounts will be<br>included in Kris Walton's<br>objectives in his appraisal<br>to review quarterly. | Ongoing<br>from June<br>2021 |
| 4.3.37         | Social media<br>performance targets<br>should be reviewed and<br>revised to ensure that<br>they accurately describe<br>the performance<br>statistics. | Social media<br>performance<br>targets may not<br>accurately<br>represent the<br>performance<br>measure being<br>assessed. | Low             | Marketing &<br>Communications<br>Manager /<br>Digital Content<br>and Social Media<br>Officer | As above   | Ongoing<br>from June<br>2021 |
| 4.4.3          | Guidance notes covering<br>interaction with the<br>media should be<br>reviewed regularly and,<br>where necessary,<br>updated and re-issued.           | Councillors (and, in<br>limited cases,<br>officers) may not be<br>properly prepared<br>when dealing with<br>the media.     | Low             | Marketing &<br>Communications<br>Manager   | Guidance notes for dealing<br>with the media will be<br>reviewed and updated on<br>the media team intranet<br>pages.                 | Ongoing<br>from July<br>2021 |

\* Risk Ratings are defined as follows:

High Risk:Issue of significant importance requiring urgent attention.Medium Risk:Issue of moderate importance requiring prompt attention.Low Risk:Issue of minor importance requiring attention.