



GREENER EALING LIMITED

MEETING OF THE BOARD OF DIRECTORS

WILL BE HELD AT 13:00 ON THURSDAY 6th JULY 2023, BY MS TEAMS

AGENDA

Item No.	Agenda Title	Lead	Action	Paper/Verbal
1.	Apologies for Absence	MB	Information	
2.	Declarations of Interest (in respect of items on the agenda)	MB	Information	
3.	Minutes of the meeting held on 27th April 2023	MB	Approval	(3)
4.	Matters Arising	KOL	Information	(4)
Governance				
5.	HR Update	BG		
	• Drug and Alcohol Standard		Approval	(5a)
	• Violence and Aggression at Work Policy		Approval	(5b)
6.	Corporate Governance	KOL/LP		
	• Annual policy review:			
	○ Anti-Fraud Policy		Approval	(6a)
	○ Risk Management Policy		Approval	(6b)
	○ Matters Reserved and Scheme of Delegation		Approval	(6c)
	○ Financial Regulations		Approval	(6d)
Strategy, Project & Operations				
7.	MD Report	KOL	Information	(7)
8.	Combined Performance Report including HSEQ and Transport	KOL	Information	(8)
9.	Risk Management Report	KP	Information	(9)
10.	Finance Update	KP	Information	(10)



Board Forward Plan

- | | | | | |
|-----|---|--------|-------------|------|
| 11. | Board Forward Plan | KOL/LP | Information | (11) |
| 12. | Any Other Business | MB | Information | |
| 13. | Date of next meeting: 14 th September 2023 | | Information | |

Present:	Mike Boulton	MB	Chair and Director
	Alison Reynolds	AR	Director
	Joanna Pavlides	JP	Director
Attendees:	Kerry Stevens	KS	Observer
	Kevin O'Leary	KOL	Interim Managing Director, GEL
	Bill Gilmour	BG	Head of HR and Comms, GEL
	Katarina Pohancenikova	KP	Head of Finance, GEL
	Earl McKenzie	EM	Assistant Director Street Scene, GEL
	Helen Harris	HH	Director of Legal and Democratic Services, LBE
	Nicky Fiedler	NF	Shareholder Representative, LBE
	Lizzie Purewal	LP	Waterstone/Bridgehouse Company Secretaries (minutes)

Apologies:

**GREENER EALING LIMITED (“GEL”)
MINUTES OF THE BOARD OF DIRECTORS’ MEETING
HELD AT 13:00 HOURS ON THURSDAY 9th MARCH 2023 BY MS TEAMS**

Present:	Mike Boulton	MB	Chair and Director
	Alison Reynolds	AR	Director
	Joanna Pavlides	JP	Director
In attendance:	Kevin O’Leary	KOL	Interim Managing Director, GEL
	Bill Gilmour	BG	Head of HR & Comms, GEL
	Katarina Pohancenikova	KP	Head of Finance, GEL
	Darren Henaghan	DH	Interim Director of Housing, LBE
	Helen Harris	HH	Director of Legal & Democratic Services, LBE (attended from item 7)
	Earl McKenzie	EM	Assistant Director Street Services, LBE
	Lizzie Purewal	BCS	Bridgehouse Company Secretaries (minutes)

1. Apologies for Absence Action

1.1 MB welcomed those present. There were no apologies.

2. Declarations of Interest

2.1 There were no conflicts of interest regarding items on the agenda.

3. Minutes of the Board – 9th March 2023

3.1 The minutes of the Board meeting on 9th March 2023 were **approved** with no changes.

4. Matters arising and Actions from the previous Board meeting

4.1 The Board discussed and **noted** the summary update of matters arising from previous Board meetings, all of which were complete.

Corporate Governance

5. Annual Policy review

5.1 Anti-Bribery (Gifts and Hospitality)

5.1.1 KOL advised that a review of the Anti-Bribery (Gifts and Hospitality) policy had been undertaken, with no suggested changes required. A gift of confectionary had been accepted and shared with staff and a meal at a networking event had also been accepted, both received from a contractor.

5.1.2 The Board **noted** the Annual Review of the Anti-Bribery (Gifts and Hospitality) Policy and **approved** the hospitality from the contractor

5.2 Freedom of Information Update

5.2.1 The Board **noted** that no FOI requests had been made to Greener Ealing over the past 12 months.

Strategy, Project & Operations

6. Managing Director’s report & update on business objectives

6.1 KOL provided an overview of the Managing Director’s report, and the following was discussed:

- 6.2**
- The Council had issued a letter of intent to award the Graffiti and Fly Posting Removal Contract to GEL. Two staff from the present incumbent, MPM would transfer under TUPE. Delivery of the vehicle and equipment was expected in the next few weeks.

- 6.3
- Parking enforcement contract – Percival House would now be retained by the Council and there was an opportunity to relook at what that meant for Greenford. A detailed session had taken place on the technical specification to understand the activities that GEL would take on. A high-level commercial review of the contract would be undertaken. A TUPE transfer of existing staff to GEL was expected to take place later in the year and would be discussed in detail with the Board.
- 6.4
- DH commented that support would need to be provided from the Council to effectively manage the parking enforcement team, the scope of which would need to be discussed. Severance pay might be needed so that people had the opportunity to leave. SERVCO staff were already managed by people within the Council, and it was important to avoid duplicating reporting lines within the Council structure. Consideration would be given to how this could be managed. A parking operations person would need to be appointed to GEL's senior management team.
- 6.5
- DH commented that the order in which services would transfer into GEL should be considered. Discussions were also underway within the Council regarding other services. The new Director of Children's Social Care had identified the number of children in schools that had been statemented, which were almost an automatic assumption of passenger support. There needed to be a discussion within the Council on what that would look like. The Council was keen that GEL as a successful service delivery model was approached to decide if taking on passenger transport would be viable. DH was concerned that the take on of additional services should happen within an ordered timeframe so that GEL could continue the effective delivery of services. These were all services that had been run in-house / via an outsourced set up and it was logical to transfer these to GEL, but it was important to consider the pace that changes could happen to enable GEL to continue to provide real expertise. KOL confirmed he was sighted on the other potential services DH had mentioned. KOL had been in discussion with a contact in SEN transport and would be providing a price for several vehicles as an initial starting point on figures.
- 6.6
- Deed of Variation – discussions were underway with the Council on the DOV, including indexation and the Dividend Policy. It was hoped that the DOV would be considered at the Council's Cabinet meeting on 17th May
- 6.7
- Business Plan 22/23 Objectives – 80% had been completed, with 10% still in progress, and 8% delayed.
- 6.8
- Work on efficiencies was in hand and the Trade Teams had been reduced to 2. DH commented that more visibility was required regarding what could be expected in relation to street cleansing savings and for reducing the HWRC. KOL provided assurance that good progress had been made on all efficiencies and discussions were underway with the GMB on the HWRC
- 6.9
- The grounds maintenance and HWRC teams had received approvals on their BSI Inspections.
- 6.10
- Key items going forward included the dividend policy, the parking mobilisation, and the pay negotiations. Contact had been received from the GMB and discussions were underway with the Council regarding this, and Board members had received a separate briefing. The initial meeting with the GMB would be on 16th May.
- 6.11
- DH acknowledged the volume of matters that KOL and the GEL team were currently undertaking and congratulated KOL for maintaining performance and for the open and constructive way that the future services coming into the model had been discussed.
- 6.12
- The Board **noted** the Managing Directors Report.

7. Combined Performance Report including HSEQ & Transport

7.1 KOL presented the report, and the following points were noted:

- The HGV driver shortage was an issue that fluctuated. There had been a shortage of drivers in March, however there had been 7 excess drivers that morning and people were being encouraged to take leave to avoid too many staff being off over summer.
- The amber ratings in the overall dashboard were mostly related to driver or agency shortages. All core services were showing as green. Vehicle incidents had decreased.
- There had been 2 MOT failures in consecutive months. The issue had been raised at GPL Director level to request a plan of action to improve recent poor service levels.
- ER cases were showing as red, which was thought to be because of work being undertaken on sickness levels which were now particularly low. Consideration would be given to how that HR indicator was rated.

7.5 The Board **noted** the Consolidated Performance Report including the HSEQ & Transport report.

8. GEL Risk Management Report

8.1 The Board noted the risk register.

8.2 KOL commented that it was taking longer to get the food vehicles repaired and back into service than initially expected. It had been indicated that the pay load for the vehicles would be lower than previously anticipated, making it difficult to deliver on the food efficiency. There had been another major failure and the findings of all reports would be revisited. MB commented that issues with food waste vehicles were common.

8.3 DH highlighted the following points that would be presented to Cabinet in the coming weeks:

- Inflationary uplift – the GEL contract was currently price based, and it had been proposed that an industry standard inflationary uplift should be employed instead. From the Council's point of view this would mean that GEL would need to manage any issues, unless something extraordinary occurred.

8.4 • Dividend Policy – each year GEL was required to sign a statement of ongoing concern. The Board would need to consider entering into a Dividend Policy, because if surpluses were created there would be an expectation that this would be passed back to the Council, which was not currently the case. Given the Council would now be putting more services into GEL which should be run at a surplus, there would be an assumption that those surpluses come back to the Council as dividends. DH suggested the Board received a briefing (without the shareholder rep present) on the Dividend Policy because it was a different relationship from how GEL had originally been established, it would be a risk transfer from the Council to GEL. The Council would expect GEL to deliver a series of efficiencies each year and if a surplus was made it would be expected that that would be paid back. MB confirmed that related Board discussions had already taken place, and this could not be dealt with in isolation. MB understood that there still several caveats around the Dividend Policy which were still under discussion. DH commented that a report was due to be provided to the May Cabinet meeting, setting out the parameters and framework for the Dividend Policy. The aim was to ensure more vigilance on costs in high inflation years. There would be an expectation from the Council of a significant dividend flowing back to the Council. It was important that the Board understood the risk that presented to GEL.

8.5 MB confirmed that the Board understood and shared the issues and concerns relating to the Dividend Policy and were keen to understand the forum for concluding on the matter. KOL

would arrange a briefing in the next week on the indexation and the Dividend Policy **[ACTION]**. **[KOL]** KOL commented that the Dividend Policy sought to protect GEL's level of reserves and there was the possibility for a dividend share over and above a profit figure related to the businesses turnover. It would be critical to get agreement on the indexation and meetings with the Council were being arranged to conclude this.

- 8.6** Food waste – EM commented that a discussion was required to consider the implications of issues in the capacity of the vehicles. Service expansion was being considered with plans to increase the number of properties to be serviced. It was important to understand the capacity issues to support this planning. KOL commented that the Council was trying to grow the food waste service. The evidence to date was that the impact on the tonnage had not been significant. KOL suggested that the food vehicles could be reduced from 7 to 6. This had been delayed to the difficulties experienced with the current vehicles. Several options had been considered, including returning the vehicles. In the medium term 6 vehicles were needed with a bigger pay load. KOL was happy that GEL could cope with the growth that the Council was asking for, whilst still maintaining the current level of service. Asked by MB whether the food waste reductions in tonnage was due to the modifications that had been made to the vehicles, KOL commented that it was the intrinsic nature of the vehicle, there was a maximum tonnage that type of vehicle could carry.

9. Finance Update – September 2022

- 9.1** KP presented the financial results, highlighting the following:
- 9.2** • GEL financial results to March 2023 showed a positive variance before tax of (£541k).
- 9.3** • The overall draft financial position to 31st March 2023 was a profit before tax of £152k against a budgeted loss of £389k.
- 9.4** • Positive variances related to (£1,233k) as a result of non-contractual work provided: (£698k) Grounds maintenance including Gunnersbury Park contract; (£340k) 22/23 Pay Award contribution from the Council; (£271k) Streets leafing; (£128k) 2x Queens BH recharge not budgeted; (£70k) Streets cleansing; (£58k) Waste; £5k Other; £74k rechargeable costs including statutory cost recharges; £253k efficiency savings.
- 9.5** • The staffing costs adverse variance of £575k was made up of savings on HWRC (£120k); (£65k) Support staff; Holiday pay accrual (£15k); Other staffing cost £12k; £123k Waste; £234k Grounds; £406k Streets inclusive of leafing;
- 9.6** • Operating costs had an adverse variance of £193k, the additional costs related mainly to (1) (£202k) Vehicle and plant: favourable variance as a result of lease refinancing and release of vehicle end of contract damage accruals for the rescheduled RCV vehicles, partially offset by increases in fleet and plant repairs, maintenance costs and fuel cost. (2) £129k Professional fees including additional consultancy fees; legal fees; training; audit fees and stationery. (3) £247k Other Direct Costs for BSI Audit, direct costs, and rechargeable bags offset in revenue.
- 9.7** • The funding costs had a positive variance of (£76k) as a result of the loan drawdown in March 2023 to fund GEL capital and stock start-up costs. The budget had assumed the loan drawdown at the beginning of financial year, whereas it was not drawn down until March 2023, resulting in a saving on the interest payable.
- 9.8** • Financial year 22/23 had been challenging with the cost-of-living crisis, food and energy prices rising markedly over the year, and the inflation rate in double digits for more than half of the year. GEL had agreed a pay award representing an average increase of 7.5% with additional funding provided by the Council. As part of the 22/23 budget setting process, GEL had been asked to deliver operational efficiency savings of £253k for the year and despite the challenges had delivered a positive financial result, profit before tax of £152k. The main factors contributing to the full year profit

included (1) lease refinancing of 37 RCV vehicles from 5 years to 7 years. As part of the lease term extension, the residual values for the 37 vehicles were reduced to 0% and the end of contract damaged accrual had been released. (2) Service optimisation in HWRC, saving the labour costs of 2 drivers. (3) The provision of services to a third party and the additional parent company contracts were being delivered at the lower costs than originally anticipated. (4) Staffing and overtime costs had been reviewed with control measures implemented. (5) The weather had been favourable and sickness absences had not been significant.

- 9.9
 - Outstanding issues included the Heads of Terms. There had been no further update and the estimated completion date was Spring 2025.
- 9.10
 - GEL had drawdown £1.1m on the Company loan facility to fund the repayment of start-up costs to the Council. The interest rate was calculated using the EU Base rate of 3.52% and Margin of 8.5% set by the Council to comply with any subsidy control regime rules. The Council would update the EU base rates on a quarterly basis once they were available.
- 9.11
 - The company credit card spend from February 2023 to March 2023 was £1,693.40.

9.12 AR sought clarification on whether there was a link between sickness absence and the weather. KP explained that these were 2 separate items. No additional agency costs had been incurred to cover sickness absences. Bad weather could prevent work being done on a particular day, which could then result in additional costs to catch up.

9.13 AR highlighted that April had been a very wet month and questioned whether that was likely to have an impact moving forward. KOL confirmed that feedback to date from the grounds team had been better than in previous years, particularly on housing estates where there had been difficulties in the past.

9.14 MB thanked KP and team for monitoring the financial results and thanked KOL for ensuring that a strong review of costs had been undertaken at each stage.

9.15 The Board **noted** the overall draft financial position to 31st March 2023.

10. **Board Forward Plan**

10.1 The Board **noted** the plan, which had no changes.

11. **Any Other Business**

11.1 **Shareholder Representative**

DH explained that his contract with the Council would finish at end of June and Nicki Fiedler would be coming across to LBE from London Borough of Redbridge to take over as the Shareholder Representative. NF had a waste and street scene background with a good knowledge of housing and environmental issues. KP sought clarification on the timeline for appointing the NF. DH confirmed that NF was due to start on 3rd July and would be the shareholder representative with support from EM as the technical lead for GEL. HH confirmed that the appointment was straightforward, and EM could include this in the report to Cabinet. HH commented that, if necessary, NF could be appointed ahead of 3rd July. MB thanked DH for his time, commenting that it had been a positive experience working with him. DH commented that GEL was one of the countries more successful LAPCO and NF would continue the open dialogue with GEL.

11.2 HSE

MB requested an update on the HSE visit and the issues that had been identified. KOL commented that discussions were underway with the Council on who was responsible for the repairs, confirming that they were due to be completed in the next week.

11.3 Eunomia

MB questioned whether the Eunomia report had been finalised and when it would be circulated to the Board. DH confirmed that there had been some last-minute changes and it would soon be circulated [**ACTION**]. The report confirmed that GEL was performing well, and that GEL would require additional capacity to support this service and that a parking expert would be required to support KOL as this was a different skill set to waste management.

[DH]**12. Date of next meeting: 6th July 2023**

12.1 There being no other business, MB thanked those present and closed the meeting at 1:50 p.m.

Signed**Chair of the Board****Date**

GREENER EALING LTD - ACTION LIST – 6 th July 2023					
Minute Ref	Action items arising from minutes	Officer	Due By	Comments	Status
Actions arising from 27 th April 2023					
8.5	GEL Risk Management Report – To arrange a briefing in the next week on the indexation and the Dividend Policy.	KOL		Final agreement with LBE on indexation mechanism is outstanding. Full briefing to follow once agreed.	OPEN
11.3	Eunomia – To circulate the Eunomia report to the Board once finalised.	DH			OPEN

(KO) Kevin O’Leary

(MB) Mike Boulton

(AR) Alison Reynolds

(JP) Joanna Pavlides

(EMc) Earl McKenzie

(HH) Helen Harris

(KP) Katarina Pohancenikova

(BHCS) Lizzie Purewal

(WG) Bill Gilmour

(DH) Darren Henaghan

Report Title	Drug and Alcohol Standard		
Meeting	Greener Ealing Board Meeting		
Date	6 th July 2023	Agenda Number	5a
Type of Report	For Approval		
Author	Bill Gilmour can be contacted on gilmourw@greenerrealting.co.uk		
Background	<p>GEL is committed to providing a safe and healthy working environment for all employees and individuals affected by our activities.</p> <p>Part of this requires us to monitor drug and alcohol use of employees and others, to ensure that this does not impair their ability to work for us.</p> <p>The attached Drug & Alcohol Standard sets out in detail how we will manage this through education, monitoring and testing.</p>		

Introduction

GEL is committed to providing a safe and healthy working environment for all employees and individuals affected by our activities. Part of this is monitoring drug and alcohol use of employees and others.

The attached Drug and Alcohol Standard formalises what has largely been our approach since taking over the contract in July 2020.

Key Points

- As a company, GEL accepts its obligation to protect staff and others who may be affected by our activities.
- Each of us has the responsibility to report for work and remain throughout the working day in a fit and safe condition to work, without impairment of drugs or alcohol.
- All GEL employees and sub-contractors may be subject to drug and Alcohol testing (for cause) and safety critical roles may additionally be subject to random testing.
- Any employee who declares a drug or alcohol dependency problem will be treated sympathetically and offered support, so long as they do this **before** being selected for testing and/or before being involved in an incident or accident that is likely to lead to testing – otherwise the matter will be considered under the Disciplinary Provisions.
- Staff are notified through various means – induction, Toolbox talks - of the standards and the likely consequences for attending work “under the influence”.

- Each case will be considered on its merits and will examine the “breach”, the nature of the employee’s work and the level of risk posed to themselves and others.
- Testing – uses a combination of Intelligent Fingerprint technology (which is cost-effective, quick and conducted on site by trained GEL managers) and lab analysis.
- A non-negative test will be considered as Gross Misconduct and may lead to dismissal without notice.

Conclusion

Drug & Alcohol misuse is a feature in all workplaces. As a front-line business we have particular obligations to ensure that we are doing all we can to manage and mitigate risks to our staff and to others.

The Drug and Alcohol Standard sets out in detail how we will do this through education, monitoring and testing.

Contents

1. Introduction	2
2. Scope	2
3. Definitions and Acronyms	3
4. Code of Conduct.....	4
5. Communication, Education and Training.....	4
6. Assistance with Dependency Issues.....	5
7. Management Responsibilities.....	5
8. Employee and Sub-Contractor Responsibilities.....	6
9. Control Measures.....	6
9.1 Testing	6
9.1.1. Circumstances for Testing.....	6
9.1.2 Refusing a Test	7
9.1.3 Positive Results of Testing.....	7
9.1.4 Action following a Positive Test Result	7
9.2 Medication	8
9.3 Searches	8
10. Monitoring and Review	8

1. Introduction

Greener Ealing (GEL) is committed to providing a safe and healthy working environment for all employees and individuals affected by our activities and to ensure, so far as reasonably practicable, that the health, safety or condition of any person or property will not be adversely affected through the misuse of drug or alcohol by those directly and indirectly employed by GEL.

The misuse of drugs or alcohol by individuals can lead to an increased risk of accidents or incidents; GEL aims to reduce these risks by means of our commitment to the processes set out in this document.

The purpose of this standard is to:

- Ensure that GEL complies with relevant legislation relating to substance misuse at work (including without limitation: The Health and Safety at Work Act 1974, The Transport and Works Act 1992, Road Traffic Act 1988 and The Misuse of Drugs Act 1971).
- Ensure a proactive approach is taken to create and maintain a drug and alcohol-free environment as part of our commitment to providing a safe and healthy workplace. This will be achieved by ensuring all relevant individuals are aware of the standard and their responsibilities required by the standard.
- Ensure any employee who, at an appropriate time, declares a drug, alcohol, or substance-related dependency problem is treated sympathetically and offered support.
- Ensure measures are in place to prevent persons attending work under the influence of alcohol, illegal drugs, misused prescribed or over the counter medication, misused legal substances such as solvents.
- Provide information, instructions, and awareness training to all relevant individuals on the effects of alcohol and illegal drug use on their health and safety.
- Communicate the principles of this document and the repercussions of a breach of it (including disciplinary action and dismissal).

2. Scope

This standard applies to all Greener Ealing operations and to all GEL employees and those who work for on or behalf of GEL, without exception.

It applies at any location or operation in which an employee is required to attend for their employment and includes travelling to or from such locations. It applies during work hours and includes any period of overtime, shift work, breaks/rest periods and periods of standby or emergency call-out duty.

The standard covers the use and misuse of intoxicating substances which include alcohol, solvents, legal and illegal drugs, prescriptions and over-the-counter medicines and other substances that could adversely affect work performance and/or health and safety.

3. Definitions and Acronyms

For this standard, the following definitions apply:

Alcohol – Refers to any beverage that contains ethyl alcohol including but not limited to beer, wine, pre-mix drinks and other spirits.

Alcohol Misuse refers to:

Any drinking, either intermittent or continuous, which interferes with an individual's health, work capabilities or conduct, or which affects their work performance and/or the safety of others.

At present, the legal limit for driving in the UK is 35 microgrammes of alcohol per 100 millilitres of breath or 80 milligrammes of alcohol per 100 millilitres of blood. To the extent that these limits may from time to time be varied by statute, reference shall be made to the prevailing limit in force. For the purpose of this Policy, "under the influence of alcohol" is defined as detection by testing of:

Equal to or greater than:

- 80 milligrammes of alcohol per 100 ml of blood
- 35 microgrammes of alcohol in 100ml of breath
- 107 milligrammes of alcohol in 100 ml of urine

Drug:

For the purpose of this document, a drug means a 'controlled drug' as defined in the Misuse of Drugs Act, 1971 and its subsequent modification orders, or other substances (including so called "legal highs") that could affect an employee's ability to carry out their duties safely. This includes medication either prescribed by a medical practitioner or purchased over the counter.

Drug Misuse:

Drug misuse shall mean the use or consumption of any drug or other substance (by whatever means), whether intermittent or continuous, which interferes with an individual's health, work capabilities or conduct, or which affects their work performance and/or the safety of others, including:

- The accidental or intentional misuse of prescribed or 'over the counter' medication.
- The misuse of substances, e.g., solvents, which can impair behaviour, judgement, or job performance of the individual.
- **Employee** – A person directly employed by Greener Ealing or works for or on behalf of the GEL.
- **Agency worker/Sub-contractor** – Any person who is not employed directly by Greener Ealing Ltd, but via an agency or other sub-contractor.
- **Incident** – Unplanned, uncontrolled event which could have resulted in or did result in death, ill health, injury, or other loss.
- **Safety-critical** – Refers to drivers of company vehicles and operators of equipment or machinery that have the potential to import risk onto GEL's premises or vehicles.
- **Laboratory** – A testing facility accredited to UKAS 17025 standards where the sample collected is analysed to screen and/or confirm the presence of specific drugs or their metabolite(s).

- **Dismissal** – Termination of employment, and in the case of agency workers or sub-contractors, termination of the contract.

4. Code of Conduct

- No employee, agency worker or sub-contractor may report for work/work while unfit to do so through the use or misuse of drugs or alcohol.
- No employee agency worker or sub-contractor may possess (unless for legitimate medical reasons) sell or give away drugs while at work or during work hours.
- No employee may consume drugs (unless for a legitimate medical reason) or alcohol while at work or during rest or lunch breaks.
- Alcohol for domestic purposes should not be left at work for longer than necessary. It should be stored away and remain unopened while on GEL premises.
- No employee, agency worker or sub-contractor should undertake safety-critical tasks if taking prescribed or non-prescribed medication that has the potential to affect their ability to work safely, without first informing their manager or supervisor.
- Employees involved in Court proceeding arising from a drug or alcohol-related offence must report the matter immediately to their manager or supervisor.

While GEL does not condone, encourage, or recommend the consumption of alcohol, it recognises that as part of business life, at organised business events and entertainment, alcohol may occasionally be consumed. In cases such as these, it is the duty of the relevant individual not to go to any GEL premises until she/he is below the policy alcohol limit. This includes driving to or from any such location.

If requested, employees, agency workers and sub-contractors are required to consent to be tested for drugs and alcohol. All should be aware that the consumption of alcohol or drugs at a time or in a quantity that would cause them to test positive at work will be considered a breach of this standard.

A breach of this standard by a GEL employee will be thoroughly investigated and dealt with under GEL's Disciplinary Procedure. Due to the potential impact on the safety and health of employees and customers, breaches of this standard may lead to dismissal.

A breach of this standard by an agency worker or sub-contractor will result in the individual being excluded from the site and referred to their company for disciplinary action.

5. Communication, Education and Training

This Standard will be communicated to all employees through induction, educational material, management training, team meetings and notice board displays. Efforts will be made to ensure the Standard is brought to the attention of all job applicants and sub-contractors through induction and terms and conditions of contract prior to their arrival at site.

All employees will be given education material to cover:

- Awareness of the Standard and Standard rules.
- The effects of drugs and alcohol can have on a user's health and ability to work safely.
- How and where to seek help if you have a drug and alcohol problem.
- How to recognise the signs and symptoms of drug and alcohol misuse.

- How to ensure your body is free from drugs and alcohol at work.

Managers will receive drug and alcohol awareness training to cover:

- The principal ways in which drugs and alcohol affect behaviour.
- How to recognise the signs and symptoms of drug and alcohol misuse.
- The distinction between signs associated with dependency and signs associated with recent substance misuse.
- How the drugs testing elements of the standard will be managed.
- How the test processes work.

6. Assistance with Dependency Issues

Where an employee seeks assistance from GEL for a drug or alcohol dependency problem and GEL acknowledges this problem to exist, they will treat the problem as a medical condition and offer the employee assistance with rehabilitation. The level of assistance and conditions attached to the assistance will be assessed on a case-by-case basis and will normally be detailed in a rehabilitation agreement. Failure on the part of the employee to comply with the terms of the rehabilitation agreement may lead to disciplinary action.

This offer of assistance is only available if the dependency issue is declared **before** the individual being selected for testing or being involved in an incident or accident that is likely to lead to testing. If drug or alcohol dependency is discovered by means other than self-disclosure (e.g., as the result of the testing process), the individual will be subject to the disciplinary procedures.

Individual circumstances and safety issues will be taken into consideration to determine whether the employee can continue with their normal duties during the period of rehabilitation. If normal duties cannot be continued, the employee may be required to undertake non-safety critical duties or stay away from the workplace. Any period of rehabilitation required away from the workplace will be classed as sickness absence.

7. Management Responsibilities

All managers are required to:

- Be familiar with the Standard and procedures.
- Ensure their members of staff understand and comply with the Standard.
- Recognise impaired workplace performance or behaviour likely to be caused by the misuse of drugs or alcohol.
- Take appropriate action if drug or alcohol misuse is suspected.
- Be able to encourage members of staff to ask for advice and help in respect to problems arising from drug or alcohol misuse.
- Undertake appropriate training as provided by GEL.

Drug and Alcohol Standard

8. Employee Responsibilities

All employees and other workers are required to:

- Comply with the Standard.
- Be familiar with the Standard and Procedures and the disciplinary implications resulting from the standard.
- Ascertain if the medication they are taking could impair their ability to perform a safety-critical task and if so, to report their use of the medication before any such task is undertaken.
- Seek help for themselves or to encourage colleagues to seek help if they have problems arising from drug or alcohol misuse.

9. Control Measures

9.1 Testing

All employees and other workers have the potential to be tested.

The drug and alcohol testing process will be carried out, on site, by members of the GEL management and Supervisory teams, who have been trained to use Intelligent Fingerprinting technology. Where “Non-Negative” results are obtained, these will be sent off to the lab for further analysis. (Intelligent Fingerprinting Ltd, 14-17 Evolution Business Park, Milton Road, Impington, Cambridge, CB24 9NG).

GEL may also use the services of Hampton Knight, another independent third-party specialist agency, to conduct drug and alcohol testing. (Hampton Knight, Medigold House, Queensbridge, Northampton, NN4 7BF.

9.1.1. Circumstances for Testing

Pre-employment – All candidates for employment may be required to undergo pre-employment testing for drugs and alcohol. The tests will be carried out during the pre-employment medical, during induction period or other time designated by GEL.

Reasonable Suspicion – Whenever a manager, supervisor or other GEL official has reasonable cause to suspect that an employee agency worker or sub-contractor has misused drugs or alcohol and is unfit to continue working, a reasonable suspicion “for cause” test will be instigated. The official’s observations will be documented, and such documentation shall be kept in the donor’s confidential drug and alcohol testing file.

Post-Incident - Drug and alcohol testing of employees, agency workers and sub-contractors shall be conducted following an incident where there are reasonable grounds to suspect that the effect of drugs or alcohol may be the cause or a contributory factor. This testing is mandatory following an incident in which a serious injury or fatality has occurred.

Unannounced random – (Safety Critical roles only) Individuals will be selected randomly and given no advance notification of the test. The random selection process is computer generated and gives all present an equal chance of being selected without influence or bias from GEL.

Drug and Alcohol Standard

9.1.2 Refusing a Test

Refusing to take a test includes, but is not limited to:

- Failure to consent to a test.
- Failure to cooperate with any part of the testing process.
- Failure to appear for testing at a collection site at the time allotted.
- Leaving the scene of an incident in which a serious injury or fatality has occurred, without just cause and without submitting to a test.

Refusal to undergo a test may lead to disciplinary action up to and including dismissal.

9.1.3 Positive (Non-Negative) Results of Testing

Drugs - A laboratory-confirmed positive test result will be recorded if a drug is detected in the donor's sample for which no legitimate explanation, medical or otherwise, can be found. An employee or sub-contractor will be in breach of this standard if they receive a laboratory-confirmed positive drug test result.

Alcohol – A positive alcohol test result will be recorded if alcohol is detected in the donor's breath sample at a concentration equal to or above the relevant limit in two consecutive breath tests. An employee or sub-contractor will be in breach of this standard if they receive a positive Alcohol test result.

A non-negative result will be recorded at 14 mcg per 100ml. GEL's Standard goes further than the law (54 mcg per 100ml) as evidence shows that when people have even a small amount of alcohol in their blood, their ability, performance, and judgement is impaired.

9.1.4 Action following a Positive (Non-Negative) Test Result

An employee will be considered to be unfit for duty through the misuse of drugs or alcohol if a positive test result is recorded. The following action will be:

Circumstances for Test	Action
Pre-Employment	Employee - Contract of employment will not be offered
Reasonable suspicion	Employee - Disciplinary procedures and possible dismissal. Sub-contractor – Removed from site
Post Incident	Employee - Disciplinary procedures and possible dismissal. Sub-contractor – Removed from site
Unannounced random (Safety critical roles only)	Employee - Disciplinary procedures and possible dismissal. Sub-contractor – Removed from site.

GEL reserves the right to remove an employee from GEL premises while a full investigation is undertaken.

If a positive result is received for a sub-contractor, the sub-contractor's management should be advised by the Operations Manager that the employee will not be permitted to return to the site. HR will liaise with the Operations manager and arrange to send out a notification of positive D&A test to the sub-contract management with copies of testing documentation in support of their disciplinary proceedings.

Drug and Alcohol Standard

9.2 Medication

Many medicines obtained with or without a prescription can affect performance at work. These include, but are not limited to, tranquillisers, anti-depressants, painkillers, sleeping pills, some antihistamines, and some medicines for cough, colds, and indigestion.

All employees who attend for work must, before undertaking any tasks, declare to their line manager or supervisor any medication they are taking that has the potential to affect their ability to work safely. All discussions with individuals regarding medical information are strictly confidential subject to the provisions of the law. To determine if the medication being taken has the potential to impair the performance, employees should speak to their doctor or, if buying over the counter medication, to the pharmacist, or read the warning labels on the packaging.

9.3 Searches

GEL reserves the right to search an employee and / or subcontractor or any of their property held on GEL premises at any time if there are reasonable grounds to believe that the prohibitions on alcohol or drugs are being or have been infringed.

A refusal to comply with the search may be subject to disciplinary procedures.

10. Monitoring and Review

This document will be monitored and reviewed regularly to ensure it remains fit for purpose. Next review - July 2024.

Revision history

VERSION	DATE	AMENDMENTS	OWNER	AUTHORISER
1.0	19/06/2023	New document	GEL-HSEQ/HR	Kevin O'Leary

Report Title	Violence and Aggression at Work Policy		
Meeting	Greener Ealing Board Meeting		
Date	6 th July 2023	Agenda Number	5b
Type of Report	For Approval		
Author	Bill Gilmour can be contacted on gilmourw@greenerrealting.co.uk		
Background	<p>As a responsible employer, Greener Ealing Ltd. (GEL) accepts it has a duty of care to all its employees, to provide a healthy and safe working environment. Preventing work-related violence is an aspect of this duty of care.</p> <p>The attached Violence and Aggression at Work Policy confirms the expectations we have of our staff and what support and protections they can expect from us in return.</p>		

Introduction

As a responsible employer, GEL accepts it has a duty of care to all its employees, to provide a healthy and safe working environment. Preventing work related violence is an aspect of this duty of care.

We believe that all our employees have the right to be treated with respect and dignity and to work in an environment where they feel safe from verbal abuse or threats of physical harm – whether from colleagues, members of the public or others - during the course of their duties.

As a front-line service, interactions with residents and others, is an everyday feature of the job. Occasionally, we receive complaints about the conduct of our staff, which we investigate fully and, where necessary, take action. Equally though, we receive, on occasion, reports from staff members about abusive and threatening language they encountered whilst going about their work. Inevitably, questions are then asked by the staff about what support they can expect from us.

The attached Violence and Aggression at Work Policy confirms the expectations we have of our staff and what support and protections they can expect from us in return.

Key Points

At its heart, the Policy aims to communicate to all that:

- No employee should feel accepting abuse is a part of the job. It is an employee's duty to report such incidents to his /her line manager whenever they occur.
- We recognise that employee morale and pride in the service they provide can be undermined if the public or fellow workers subject them to violence or abuse.
- Verbal abuse can be just as upsetting as a physical attack to some people.

Conclusion

As a front-line business we have particular obligations to ensure that we are doing all we can to manage and mitigate risks to our staff and to others.

The Violence and Aggression at Work Policy confirms the expectations we have of our staff and what support and protections they can expect from us in return.

Violence and Aggression at Work Policy



Introduction

As a responsible employer, Greener Ealing Ltd. (GEL) accepts it has a duty of care to all its employees, to provide a healthy and safe working environment. Preventing work related violence is an aspect of this duty of care.

We believe that all our employees have the right to be treated with respect and dignity and to work in an environment where they feel safe from verbal abuse or threats of physical harm – whether from colleagues, members of the public or others - during the course of their duties.

We acknowledge that the front-line nature of our services means that our employees will frequently interact with members of the public who may, on occasion, be dissatisfied with the quality of service provided. In such cases, they may wish to use the Council's Complaints procedure: we will not tolerate any violence or aggression towards our employees.

Definition

The Health & Safety Executive defines work related violence as:

“Any incident, in which a person is abused, threatened or assaulted in circumstances relating to their work.”

Principles

- We will create a working environment where all employees are treated with respect and dignity and feel safe from verbal abuse, threats of physical harm or assault, whether from colleagues or from members of the public/others -in the course of their duties.
- No employee should feel that accepting abuse is a part of the job. It is an employee's duty to report such incidents to his /her line manager whenever they occur.
- We recognise that employee morale and pride in the service they provide can be undermined if the public or fellow workers subject them to violence or abuse.
- Verbal abuse can be just as upsetting as a physical attack to some people.
- Where an employee alleges that they have been subject to verbal abuse, threats, or assault, from a colleague, a full and objective investigation will take place in line with the company's internal Grievance and/or Disciplinary procedures. If any allegations are upheld this may result in disciplinary action being taken.
- Where an employee alleges that they have been subject to verbal abuse, threats, or assault, from a member of the public, or other, the matter will be fully investigated and, where appropriate, will be reported to the Police.
- Employees making a complaint will be protected from victimisation.

Violence and Aggression at Work Policy



Raising a Complaint

Any employee who believes they have been subject to verbal abuse, threats, or assault, should report this as soon as possible to their Supervisor/Line Manager and via the Alcumus system.

Any colleague who witnesses violent or aggressive behaviour, should report this as soon as possible to their Supervisor/Line Manager and via the Alcumus system.

Preventative Measures - Training

All GEL employees will receive, on Induction and periodically through toolbox talks thereafter, training in customer service and dealing with aggression, to help them to either avoid this or to feel confident enough to be able to deal with the situation.

Training will stress that employees should never feel that accepting abuse is a part of the job. It is not; and they should report such incidents to their line manager, as soon as possible, whenever they occur.

Communications

GEL's approach to dealing with violence and aggression towards staff is contained in the Customer Charter notice (**Appendix 1**).

This will be placed in GEL buildings and posted on our website, to reassure our employees and to warn members of the public that violence and aggression towards our staff will not be tolerated.

Monitoring and Support

Employees who have been subject to verbal or physical assault will be offered the following support:

- Counselling/Debriefing - victims will need to talk through their experience as soon as possible after the event – either with a line manager, member of HR or Health and Safety departments.
- Access to the Employee Assistance Programme - this is a confidential service available 24 hours a day seven days a week, including bank holidays.
- Specialist Counselling from a trained professional.
- Referral to Occupational Health.
- Time off work - individuals will react differently and may need differing amounts of time to recover.
- Legal help – in serious cases legal help to victims may be appropriate.

Violence and Aggression at Work Policy



Conclusion

This policy affirms our view that all of our employees have the right to be treated with respect and dignity and to work in an environment where they feel safe from verbal abuse or threats of physical harm – whether from colleagues, members of the public or others - during the course of their duties.

We will not tolerate any abuse towards staff and will report all such incidents to the Police. Where necessary, we will seek to prosecute offenders.

Associated Documents

- **Customer Charter (Appendix 1)**

Revision Status

VERSION	DATE	AMENDMENTS	OWNER	AUTHORISER
1	15/06/2023	New document	Bill Gilmour	Kevin O'Leary

GEL Customer Charter

Our Commitment to you.

We are committed to providing high quality customer care in the services we provide to our service users. If you are dissatisfied with any aspect of our services, please report this to:

GELCommunications@greenerrealting.co.uk or via the Council's website.

We require from you.

GEL employees deserve the right to work with dignity and respect at all times and so we will not tolerate any incidents of threatening behaviour, or threatening or abusive language, towards our staff.

Any such incidents will be reported to the Police and, where necessary, we will seek to prosecute offenders.

Thank you for your co-operation.

Report Title	Review of Governance Policies		
Meeting	Greener Ealing Board Meeting		
Date	6 th July 2023	Agenda Number	6 A-D
Type of Report	For noting and approval		
Author	Lizzie Purewal - can be contacted on lizzie@bhcsecretaries.co.uk prior to the meeting.		
Background	1. To review the following policies to check they are working in practice: <ul style="list-style-type: none"> a) Anti-Fraud Policy b) Risk Management c) Scheme of Delegation d) Financial Regulations 		

Annual Review of Governance Policies:

The purpose of the review is to advise whether any changes are to be made to the policies due to changes in legislation or best practice. We also look at whether the policies are working in practice, and are being adhered to, which will also help identify if any changes are required.

Anti-Fraud Policy, Risk Management Policy, Matters Reserved and Scheme of Delegation, and Financial Regulations

Katie Pohancenikova has undertaken a desk-top review of the Anti-Fraud Policy, the Risk Management Policy, Matters Reserved and Scheme of Delegation, and Financial Regulations. Katie affirms that the policies, delegation, and regulations are working in practice and being followed.

Katie proposes a wording amendment in the GEL Financial Regulations Capital Expenditure (Appendix 1). Currently it reads "Office furniture, fittings and equipment and computer equipment". The suggested amendment was to add "and vehicles" to simplify the approval and payment process in the future. Please see the tracked change in the attached Financial Regulations. There are currently no recommended changes to the other policies and delegation.

There have been no reports of suspected fraud in the last 12 months.

Lizzie Purewal
Bridgehouse Company Secretaries

ANTI FRAUD POLICY

The purpose of this policy is to set out clearly, Greener Ealing's approach to fraud. Greener Ealing expects all employees, directors, agency staff, consultants, volunteers, trainees and contractors (collectively referred to as employees) to be honest and to provide any help or information necessary in dealing with cases of alleged fraud and corruption. We have developed a specific anti-fraud policy to reassure all our stakeholders that Greener Ealing treats suspicions seriously and takes a consistent approach to any reported cases of fraud and corruption. Greener Ealing wants to ensure that actual or attempted fraud, bribery or corruption once discovered, is reported in line with legal and regulatory requirements.

Policy Aims and Objectives

Greener Ealing is committed to preventing, detecting and deterring fraud, corruption or any other financial irregularity from occurring and to act when such behaviour is suspected or detected. The policy's objective is to encourage detection, provide clear guidance on roles and responsibilities, set out the response to any cases of suspected fraud and to ensure that the Greener Ealing stance on fraud is clearly communicated, both internally and externally.

Policy application

The Anti-Fraud Policy applies to all employees, directors, agency staff, consultants, volunteers and trainees and contractors (collectively referred to as employees) and all individuals and groups who benefit from Greener Ealing's services.

Policies

Greener Ealing has developed a number of policies and statements that clearly state the expected standards of behaviour from employees to act with integrity at all times, to be honest, and trustworthy and comply with all relevant laws and regulations

These policies include:

- **Whistleblowing Policy** outlines in detail Greener Ealing's commitment to protecting those who raise issues of concern from repercussions, and explains how concerns may be raised, both internally and externally.
- **Anti-Bribery Policy incorporating Gifts and Hospitality Procedures** outlines the action that should be taken by any staff offered gifts or hospitality by external suppliers, potential suppliers or partners.
- **Financial Regulations and Scheme of Delegations** - An important document detailing how Greener Ealing's financial affairs are to be handled to ensure transparency.

What is Fraud and Corruption?

Definitions include the following:

“A deception deliberately practiced in order to secure unfair or unlawful gain”.

“The offering, giving, soliciting or acceptance of an inducement or a reward, which may influence the action of any person.”

“The use of one’s position of trust for personal gain”

“A lack of integrity or honesty (especially susceptibility to bribery)”

“The intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to conceal the misappropriation of assets or otherwise for gain”

These definitions therefore include acts such as:

- Theft
- Deception
- Bribery
- Forgery
- Extortion
- Corruption
- Conspiracy
- Embezzlement
- Misappropriation
- Money Laundering
- False representation
- Concealment of material facts
- Collusion

Roles and Responsibilities

Board

It is the responsibility of the Board to:

- Set the standard of behaviour for the organisation by demonstrating zero tolerance for fraud;
- Satisfy itself through thorough monitoring and reports from internal and external auditors that internal controls within Greener Ealing are operating as they should and any identified weaknesses in the control framework are remedied in accordance with auditors’ recommendations.

Individual Directors

Each Director member must:

- Be open and honest in their dealings with Greener Ealing and always act in the organisation’s best interests;
- Declare any conflicts of interest as soon as they are recognised as such;
- Report any cases of fraud, or suspicion of fraud, to the Board and Company Secretary without delay;

- Co-operate fully with any investigation into alleged or potential fraud;
- Ensure that there are sound systems of internal control, where possible within Greener Ealing's activities;
- Develop and implement controls specifically to reduce the risks posed by fraud and to increase the likelihood of its detection should any wrongdoing occur.
- Implement any agreed audit recommendations within the agreed timescales to ensure systems are effective in preventing and detecting fraud.
- Ensure the results of any investigation are communicated to the individual who raised the initial concern;
- Ensure any fraud allegation is reported to the Council's representative as required.

Internal Audit

It is the role of the Council's Internal Audit team to:

- Review and evaluate the adequacy, reliability and effectiveness of Greener Ealing's internal control processes and report the findings to the Board.
- Follow up agreed recommendations to ensure implementation within agreed timescales.

Employees including staff members, consultants, agency staff and contractors

Employees are expected to:

- Be honest in their own dealings with Greener Ealing and always act in Greener Ealing's best interests, complying with both the letter and spirit of their contract;
- Report promptly any suspicion of fraud to an appropriate person as detailed below;
- Co-operate fully with any investigation into alleged or potential fraud.

Reporting and Responding to Fraud

In accordance with Greener Ealing's whistleblowing policy, employees must report any suspected cases of fraud and corruption to the Managing Director, Chairman or, if necessary, directly to the Council's Director of Legal and Democratic Services. There is also a route to report independently to the Council's fraud hotline fraud@ealing.gov.uk or telephone 0800 328 6453.

As soon as any member of the Board (including the Council's Director of Legal and Democratic Services) becomes aware of any fraudulent action the Council's representative must be notified immediately. On receiving notification, the Council's representative will assume sole responsibility for investigating any suspected fraud or malpractice. (In cases of whistleblowing that are not related to fraud, these will be investigated as laid out in that policy).

Greener Ealing has a duty to ensure that full access is given to the Council's representative, nominees or agents in the course of their investigation. The Council's representative has the right to request Greener Ealing to suspend any individual suspected of fraudulent action or malpractice.

This policy should be read in conjunction with Ealing Council's policies relating to fraud.

Revision	Date	Amendment	Content owner	Mandated by
First issue	28 May 2020		Finance	Kevin O’Leary
Second issue	15 April 2021	Changes to Reporting section to bring in line with Whistleblowing policy as amended in December 2020.	Finance	Kevin O’Leary
Third issue	06 July 2023	No updates	Finance	Kevin O’Leary

RISK MANAGEMENT POLICY

1. Introduction

This policy provides the framework for the management of business and operational risk in the performance of Greener Ealing's activities to meet the requirements of good corporate governance and protect the interests of Greener Ealing's stakeholders. It is the responsibility of the Directors to ensure that risks are understood and appropriately managed in accordance with this policy.

Taking and managing appropriate levels of risk is an integral part of all our business activities. Risk Management performed rigorously and comprehensively, creates stability, indirectly contributes to profit & delivery and is a key element of reputation management.

2. Applicability

Greener Ealing covering all business activities.

3. Definitions

Risk is defined as events that may prevent achievement of the aims or goals of one or more key business areas or projects.

Risk Management is a systematic way of protecting business resources and income against losses so that the objectives of the company can be achieved without unnecessary interruption.

Risk Assessment is the systematic process of identifying and analysing risks.

4. Objective and Commitment Your responsibilities

Greener Ealing is committed to implementing appropriate strategies and processes that identify, analyse and manage the risks associated with our activities as a means of minimising the impact of undesired and unexpected events on our business activities. We will therefore:

- Identify business objectives that reflect the interests of all our stakeholders;
- Identify the threats to the achievement of our business objectives;
- Control and manage our exposure to risk by appropriate risk reduction and mitigation actions;

- Regularly review our exposure to all forms of risk and reduce it as far as reasonably practicable or achievable;
- Ensure risk management is considered and applied at all levels of the business as part of decision making processes and during project development;
- Ensure all our staff and consultants are aware of this risk management policy and are supported in carrying out their risk management duties;
- Regularly review the risks we face as a result of our business activities and of the business and economic climate in which we operate;
- Identify cost effective risk treatment options;
- Identify and regularly measure key risk indicators and take appropriate action to reduce our risk exposure;
- Regularly review our key risk controls to ensure that they remain relevant, robust and effective;

We will demonstrate achievement of the individual components of this Policy through the reporting and review of risk at all levels of the business. In addition this policy and its adherence thereto will be reviewed on an annual basis.

5. Principles

Managers and consultants will carry out risk assessments regularly, record the findings and take appropriate management actions in a timely fashion. Risk reviews will specifically address business, operational, financial and reputational risks as well as risks covered by environmental protection legislation. This Policy should be read in conjunction with the Health & Safety Management System (HSMS) and Policy. Individual Health and Safety risks will be identified, assessed and mitigated in accordance with the HSMS.

In particular, the following activities will be undertaken:

- Ongoing comprehensive health and safety risk assessments undertaken in accordance with the HSMS;
- Integrated business plan monitoring and risk management processes;
- Regular review and update of risk register;
- Preparation of contingency plans for high risks;

- Early identification of emerging risks and initiation of risk reduction or mitigation action;
- Where appropriate, managers/consultants may need to consider specialist advice for areas such as health and safety;
- Environmental protection;
- Fire and security;
- Disaster recovery;
- Safety-critical systems and operations;
- Insurance;
- Media/public relations;

6. Requirements

Processes

Greener Ealing will ensure that:

- the procedures and processes outlined in sections 8 to 14 of this policy are followed to identify the risks associated with the Company's activities, assess risks in terms of probability and consequence and evaluate reduction and mitigation measures and allocate ownership. Management of risk is a continuous process.

Risk Assessment

Greener Ealing will ensure that:

- Risk assessments are conducted for new contracts and projects, existing contracts and contract changes. The assessments are to address potential risks to the expected business benefits and to ensure compliance with relevant legal requirements;
- Risk assessments are performed by competent personnel including, where appropriate, expertise from outside the business;

- Risk assessments are updated at appropriate intervals and assessments are reviewed regularly.

Planning

Greener Ealing will ensure that:

- Management plans are prepared which describe the actions to be taken to address significant risks;
- Crisis management plans are prepared which describe the actions including media/public relations response to be taken to address crisis or disaster situations. The plans need to be reviewed, updated and tested at regular intervals;

Management

Greener Ealing will ensure that:

- Assessed risks are addressed by levels of management appropriate to the nature and magnitude of the risk and an overall view of the portfolio risk to the business is taken;
- Risks are considered in the light of potential opportunities;
- Decisions are documented and the resulting actions implemented through appropriate procedures;
- Appropriate and cost-efficient actions are taken to manage and control risks;
- Specific measures are put in place to ensure continuing compliance with Health and Safety and Environmental Protection legislation.

Reporting

Greener Ealing will ensure that:

- Regular risk management reports and the register identifying key risks and risk management actions are submitted to the Board for review at regular intervals.

Audit & Review

Greener Ealing will ensure that:

- The Board reviews and approves the full risk register at least annually;
- Major risks (orange) and Severe risks (red) are presented to every Board meeting;
- Any changes or additions to the risk register are reported to the Board at each meeting, which will also show that planned risk reduction/mitigation actions have been implemented;
- A regular review of the risk management policies and procedures to ensure that they continue to meet Corporate Governance requirements and the needs of the business.

7. Responsibility and Authority

This policy is issued under the authority of the Directors of Greener Ealing Ltd. Responsibility for implementation of this policy is set out below.

- The Directors set the Risk Appetite (below) for the Greener Ealing and delegate responsibility for the achievement of this policy to the Managing Director;
- Staff/consultants are responsible for implementing the policy, monitoring its implementation in the everyday activities of their operations;
- All staff and consultants are responsible for the ownership and undertaking of their risk management functions in accordance with this Policy and for its implementation within the framework of Greener Ealing's procedures;
- The Managing Director (meaning the person appointed who is responsible for the day to day running of the business) is responsible for maintaining the Greener Ealing risk register, for providing appropriate reports to the board and relevant stakeholders; and for undertaking regular reviews of the risk register.

8. Risk Appetite

Our risk appetite at its highest level is determined by the Board. It is influenced by the actions we are or are not prepared to take in furthering our business goals.

The most significant judgements affect our assessment of return for the risk we take in investing in customer service, our efficiency strategy and our obligations under our core contract, regulation and legislation and our financial stability.

We have a low-level appetite for risk which would impact our record on regulatory compliance, health and safety record and reputational damage for GEL or the Council.

We have a higher level of appetite for opportunities and growth subject to the scope, fit with our business objects, our expertise, the value of the work and location.

We regularly monitor our effectiveness in managing risk through key indicators to ensure we remain within the appetite levels determined by the Board.

This ensures that our exposure to particular risk is informed by changes in the external environment, taking swift and appropriate action to maintain an overall approach which does not adversely affect our ability to deliver our vision.

Risk Management performed rigorously and comprehensively, creates stability and is a key element of reputation management.”

9. Procedure

The risk management cycle below illustrates the risk management process that should be followed:



10. Identifying Risks

The initial stage of the risk management process is to identify risks that would impact on the achievement of business objectives / priorities.

Risks can be identified using the categories listed below:

Main Category	Sub Category	Examples
Finance	Budget Financing Sales Economy	An increase in staff costs result in failure of business to break even (or create profit) and therefore mitigation would be required to reduce this impact

Reputational	Political Media/PR Partners/Suppliers Communication Environmental	A breakdown in the relationship with the Shareholder; Poor health and safety culture leading to reputational risks (as well as legal risks – below); Environmental issues leading to reputational damage
Legal	Health & Safety Contracts/Procurement	Failure to adhere to H&S legislation; poor H&S culture leading to accidents Failure to deliver services in accordance with contract/specification
Management	HR ICT	Failure to adopt or adhere to HR policies/legislation leading to claims; Critical failure of IT systems used by Greener Ealing and the requirement to have adequate backup systems
Greener Ealing Board	Regulation Compliance Business Interruption	Failure to adhere to Companies Act requirements; Failure to adopt good governance; Insufficient internal controls;

11. Risk Analysis

All identified risks must be assessed based on the likelihood of it occurring and the relative impact if it does.

Impact

Analyse the risk using a scale of 1 to 5, in terms of the impact of the risk, if it occurs using the risk scoring criteria table below. The table also gives impact descriptors to be used in the scoring:

Impact descriptors	
1	<p>Insignificant</p> <ul style="list-style-type: none"> Financial impact less than 1% of relevant budget Service delivery impairment less than 1% Minor article in local media or lobby group website Management action at local level
2	<p>Minor</p> <ul style="list-style-type: none"> Financial impact >1% and <10% of relevant budget Service delivery impairment >1% and <5% Headline article in local media, minor article in national media Director required to approve action
3	<p>Moderate</p> <ul style="list-style-type: none"> Financial impact >10% and <20% of relevant budget Service delivery impairment >5% and <10% Headline article in national media Director required to approve action
4	<p>Major</p> <ul style="list-style-type: none"> Financial impact >20% and <40% of relevant budget Service delivery impairment >10% and <20% Significant national media campaign Board required to approve action
5	<p>Fundamental</p> <ul style="list-style-type: none"> Financial impact more than 40% of relevant budget Service delivery impairment more than 20% Prolonged national media campaign or lobby group campaign Board required to approve action

Likelihood

Analyse the risk using a scale of 1 to 5, in terms of the likelihood of it occurring using the table below. The table also gives descriptors for the likelihood of the risk occurring:

Likelihood descriptors	
1	Rare: Likelihood less than 1% likelihood <ul style="list-style-type: none"> • No experience of a similar failure • Probably requires 3 or more coincident events • If it has happened sufficient controls now in place • Aggregate impact: Unlikely to occur at area in next 5 years.
2	Unlikely: Likelihood between 1% and 5% <ul style="list-style-type: none"> • 10% of team know of this occurring • Conditions exist for this loss to occur • Probably requires no more than 2 coincident events • Aggregate impact: will probably occur in an area in the next 3 years.
3	Possible: Likelihood between 5% and 30% <ul style="list-style-type: none"> • Most of the team know of this occurring • Measures that reduce likelihood have been taken but not fully effective • Aggregate impact: will happen once in next year.
4	Likely: Likelihood between 30% and 70% <ul style="list-style-type: none"> • Everyone in the company knows this could happen • No effective measures to reduce likelihood have been taken • Aggregate impact- will happen more than once in the next year.
5	Almost Certain: Likelihood greater than 70% <ul style="list-style-type: none"> • People outside of the company knows this could happen • No effective measures to reduce likelihood have been taken • Aggregate impact- will happen more than three times in the next year.

12. Prioritisation of Risks

A total risk score must be allocated to each risk; this will be multiplying the impact and likelihood scores. Scores should be given to risks absolutely, i.e. before the application of controls and residually i.e. after the application of mitigation / controls.

LIKELIHOOD

5. Fundamental	5	10	15	20	25
4. Major	4	8	12	16	20
3. Moderate	3	6	9	12	15
2. Minor	2	4	6	8	10
1. Insignificant	1	2	3	4	5
	1. Rare	2. Unlikely	3. Possible	4. Likely	5. Almost Certain

IMPACT

Red	Severe Risks	<p>Risks that fall into the area highlighted as red will require immediate attention. The status of the risk with regard to effect on Greener Ealing's activities and the progress of action taken to ensure its effective completion will require to be monitored.</p> <p>As a minimum these will form part of the monthly risk management review cycle.</p>
Amber	Major Risks	<p>Risks that fall into the area highlighted as amber will require continuous attention. The status of the risk with regard to effect on Greener Ealing's activities and the progress of action taken to ensure its effective completion will require to be monitored.</p> <p>As a minimum these will form part of the monthly risk management review cycle.</p>

Yellow	<i>Moderate Risks</i>	Risks that fall in to the area highlighted as yellow may require action but will require to be monitored for any changes in the risk or control environment which may result in the risk attracting a higher score. As a minimum this will form part of the monthly risk management review cycle.
Green	<i>Minor Risks</i>	Risks that fall in to the area highlighted as green will require review only, but no further action. This will form part of the annual risk management cycle.
Green/Blue	<i>Insignificant Risks</i>	Risks that fall in to the area highlighted as green/blue will require noting only, but no further action.

13. Risk Control

At this stage a decision must be made as to what should be done with the risk. The decision must be proportionate to the level of risks, the costs of any controls and likely benefits.

There are four main actions that can be taken in addressing risks. They are listed below:-

- Terminate- this could be by stopping the relevant activity that is causing the risk;
- Treat- The greatest number of risks would be treated this way. Any action taken should be to constrain the risk to an acceptable level. And the type of action that could be taken is listed into different types of control action that could be taken and listed below:
 - Preventative – to limit the possibility of an undesirable outcome being realised- e.g. independent inspection;
 - Corrective- to correct undesirable outcomes which have been realised- e.g. contingency planning;
 - Directive to ensure a particular outcome is achieved- e.g. training required;

- Detective e.g. asset checks.
- Transfer- for some risks the best response may be to transfer them, either through conventional insurance or paying a third party to take the risk on;
- Tolerate- some risks may be tolerable without action, it could also be possible that due to budgetary constraints nothing can be done.

It is important to compare the inherent and residual risk scores to make an assessment over the strength of the existing control environment for the purposes of managing each risk.

14. Risk Registers, Monitoring and Reporting

Each risk scenario should be logged onto the appropriate risk register:

- Strategic – those risks that effect Greener Ealing itself (as a company) e.g. financial, governance, legal
- Operational – those risks that effect provision of the service e.g. staff resourcing; Health & Safety; equipment & vehicles.

The risk registers will be regularly monitored and progress in connection with the action being taken will be reported on regularly.

All risk registers should identify risk owners, the individuals responsible for monitoring and reporting on the risks identified i.e. changes in the nature of the risk, level of exposure and the on-going effectiveness of internal controls that are in place for managing or mitigating the risk.

15. Reviews

Monthly

Risk owners will review all risks that they are responsible for and update the register accordingly.

At each Board meeting

The Board will undertake a review of the severe and major risks:

- review progress of risks against risk management action plans;

- review the controls to ensure controls are fit for purpose;
- review new and emerging risks, particularly in connection with the key business objectives contained in the business plan;
- ensuring the actions as stated in the registers by the owners are still relevant and within the necessary delegated authority.

Annually

The Board in conjunction with key managers/consultants will:

- consider a business plan produced by the Directors of key risks for Greener Ealing;
- include a statement in the Corporate Governance Statement (in the event that one is produced) on the effectiveness of the internal control environment in the management of risk;
- Undertake an annual review of the Business Plan and the key risks associated with its successful delivery;
- Undertake a thorough review of the full risk register.



MATTERS RESERVED AND SCHEME OF DELEGATIONS

Introduction

This document draws together the reserved matters of the shareholder and board as are dictated by various documents including Cabinet reports, Articles Association and Service agreements as well as best practice (in relation to Board reserved matters).

The Matters Reserved to the Shareholder are listed in Schedule A.

The Matters Reserved to the Board are listed in Schedule B.

The Scheme of Delegation can be found at Schedule C.

URGENT MATTERS

In drawing up a schedule of matters reserved for the board it is important to establish procedures for dealing with matters which need to be dealt with urgently between regular board meetings.

Virtual Meetings

In these circumstances, it is recommended that a telephone or video conference meeting should be held in which as many directors as possible participate. This allows directors the opportunity to discuss the matter and ask questions.

- Such virtual meetings must be quorate as with a face to face meeting (any two directors).
- Any director who cannot attend should still be sent the relevant papers and have the opportunity to give their views to the chairman, another director or the company secretary before the meeting.

Written resolutions

If the matter is routine and discussion is not necessary or a virtual meeting cannot be convened in time, the approval of **all** the directors may be obtained by means of a written resolution, which can be sent and responded to via email.

In all cases, however, the procedures should balance the need for urgency with the overriding principle that each director should be given as much information as possible, the time to consider it properly and an opportunity to discuss the matter prior to the commitment of the company.

A Schedule of matters reserved for the shareholder

Matters Reserved to the Shareholder as per the Articles of Association

1. General		
1.1	The shareholder may, by special resolution direct any Director to take, or refrain from taking, specified action.	Art 2.1
1.2	The Council will exercise its sole shareholder vote through its representative (as determined by the Council from time to time) (Council Representative) or through its Cabinet and in accordance with the procedure set out in Article 19.2.	Art 2.3
1.3	Chairman - The Council shall have the sole and exclusive right to appoint any person (whether already a Director or not) as the Chairman of the Board.	Art 14
2. The following matters are reserved to the Council Representative acting on behalf of the Shareholder as per Cabinet Report "Environmental Services Company (Greener Ealing Limited) Governance Arrangements and Business Plan" Considered 15 October 2019)		
2.1	changing the nature of the Company's business;	Art 1.1 "Interpretation" Reserved Matters (a)
2.2	bidding for contracts in excess of £500,000 on any one contract (whether singly or as part of a series of contracts which might properly be viewed as part and parcel of the same matter);	Art 1.1 "Interpretation" Reserved Matters (f)
2.3	agreeing or amending the Company's business plan in force from time to time;	Art 1.1 "Interpretation" Reserved Matters (g)
2.4	acquiring or disposing of assets not included in the Company's business plan in force from time to time, or which exceed £100,000.00 in value	Art 1.1 "Interpretation" Reserved Matters (h)
2.5	the right to appoint or remove Directors by notice in writing;	Art 1.1 "Interpretation" Reserved Matters (j)
2.6	the right to appoint or request the removal of a Director	Art 1.1 "Interpretation" Reserved Matters (k)

2.7	Appointment of Chairman “by notice in writing addressed to the Company from a representative of the Council (being the Council Representative, unless the Council Representative is unavailable).”	Art 14
3. The following reserved matters will be subject to Cabinet approval (as per Cabinet Report “Environmental Services Company (Greener Ealing Limited) Governance Arrangements and Business Plan” Considered 15 October 2019)		
3.1	forming or participating in a joint venture (howsoever described);	Art 1.1 “Interpretation” Reserved Matters (b)
3.2	forming a subsidiary or acquiring shares in another corporate entity;	Art 1.1 “Interpretation” Reserved Matters (c)
3.3	declare a dividend or distribution (whether monetary or in specie);	Art 1.1 “Interpretation” Reserved Matters (d)
3.4	raising finance or incurring indebtedness, including (without limitation) by way of finance or operating lease, hire purchase, loan or deferred payment terms (other than standard trade credit on no more than thirty days terms);	Art 1.1 “Interpretation” Reserved Matters (e)
3.5	the ability to change the share capital or bring in private capital;	(i)
The above reserved matters “together with any further matters which the Council may notify to the Company from time to time in writing (and “ Reserved Matter ” shall be construed accordingly)”		

B Schedule of matters reserved for the board

Matters Reserved to the Board as per Companies Act, other legal requirements or best practice requirements.

These matters may not be delegated to the Managing Director or other employees. They may not be delegated to Committees for decision, although may be delegated to Committees for consideration, with recommendations for final decisions referred back to the Board.

1. Strategy and management	
1.1	Responsibility for the overall leadership of the Company and setting the company's values and standards.
1.2	Approval of the group's strategic aims and objectives, in line with any Business Plans approved by the Shareholder.
1.3	Approvals of the annual operating and capital expenditure budgets and any material changes to them, within the overall Business Plans and budgets approved by the Shareholder.
1.4	Oversight of the group's operations ensuring: <ul style="list-style-type: none"> • competent and prudent management; • sound planning; • maintenance of sound management and internal control systems; • adequate accounting and other records; and compliance with statutory and regulatory obligations.
1.5	Review of performance in the light of the group's strategic aims, objectives, business plans and budgets and ensuring that any necessary corrective action is taken.
1.6	Extension of the group's activities into new business or geographic areas (as long as the nature of the business remains unchanged – see Shareholder Reserved Matters 2.1 above)
2. Financial reporting and controls	
2.1	Approval of the annual report and accounts.
2.2	Approval of any significant changes in accounting policies or practices.
2.3	Approval of treasury policies.
3. Internal controls	
3.1	Ensuring maintenance of a sound system of internal control and risk management including: <ul style="list-style-type: none"> • Approving the company/group's risk appetite; • Receiving reports on, and reviewing the effectiveness of, the group's risk and control processes to support its strategy and objectives; • Approving procedures for the detection of fraud and the prevention of bribery; • Undertaking an annual assessment of these processes; and • Approving an appropriate statement for inclusion in the annual report.
4. Contracts	

4.1	Bidding for or entering into contracts between £250,000 and £499,000 on any one contract (whether singly or as part of a series of contracts which might properly be viewed as part and parcel of the same matter); contracts over £500,000 are reserved to the Shareholder (see above).
5. Communications	
5.1	Ensuring a satisfactory dialogue with shareholders based on the mutual understanding of objectives.
5.2	Approval of resolutions and corresponding documentation to be put forward to shareholders at a general meeting.
5.3	Approval of press releases concerning matters decided by the board.

C Scheme of Delegation

The principal objective of the Scheme of Delegation is to reduce the risk of loss or irregularity in the Company and to ensure that the financial control system is not compromised. Accordingly, there needs to be proper segregation of duties and a sound internal check system in place whereby:

- No individual has sole responsibility for all stages of a process
- Partners, spouses or others with a close family relationship are not involved in processes together (e. g. as requisitioner and authorisers).
- Managers automatically have the same authorities as the staff they supervise and may therefore sign in the absence of their subordinates, providing such actions do not run contrary to any material segregation of duties.
- Only original signatures are acceptable as evidence of authorisation outside of a password protected approval system due to the risk of fraud.

All staff and members are expected to take steps to ensure compliance with this document. Any 'waiver' must be justified in writing to the Managing Director who shall consider whether or not to accept the waiver with or without conditional actions.

C1 Authorities and Authorisation Limits

The sole Shareholder of the Company is the London Borough of Ealing (LBE). There are certain matters which are reserved to the Shareholder and cannot be delegated. These are detailed in Schedule A.

The Board is the most senior authority in the Company and is responsible for setting the strategic direction of the Company. There are certain matters which are reserved for the Board and cannot be delegated. These are detailed at Schedule B.

The Managing Director is the most senior manager in the Company responsible for the implementation of the strategic direction of the Company.

Managers will be assigned an authorisation level. Finance concurrence is required to ensure matters in budget or agreed forecast.

C2 Authority limits are detailed as follows:

Category	Type of Authorisation	Limits	Authoriser	2 nd Authoriser
Financial	Purchase Orders / Vendor and Non-Vendor Payments	Over £500k	Shareholder Rep	Head of Finance
		Over £250,000 - £500,000 (inclusive)	One Board Director	Head of Finance / Managing Director
		Over £100,000 - £250,000 (inclusive)	Managing Director	Head of Finance
		£0 - £100,000 (inclusive)	Operations Manager	Head of Finance / Managing Director
	Sales Invoices/Credit Notes	Over £500k	Shareholder Rep	Head of Finance / Managing Director
		Over £250,000 - £500,000 (inclusive)	One Board Director	Head of Finance / Managing Director
		Over £0 - £250,000 (inclusive)	Managing Director	Head of Finance
	Opening new Bank account	No limit	Two Board Directors (in accordance with Bank mandate)	Head of Finance / Managing Director
	CHAPs / Faster Payments for payments to: Government departments; LBE, employees where requested by payroll; and one-off suppliers without POs.	Over £0 - £250,000 (inclusive)	Managing Director	Head of Finance / Depot Transport Compliance Manager / One Board Director
		Over £250,000 - £500,000 (inc.)	One Board Director	Head of Finance / Managing Director / Depot Transport Compliance Manager / One Board Director

Date approved: 1 July 2021

Next Review Date: July 2023

		Over £500,000	Shareholder Rep	Head of Finance / Managing Director / Depot Transport Compliance Manager / One Board Director
	Loans from outside the Group	Standard trade credit on no more than thirty-day terms	GEL Board	Head of Finance / Managing Director
		All other external loans	GEL Board	LBE Cabinet
	Loans from LBE	Over £0 - £250,000 (inclusive)	Managing Director	Head of Finance
		Over £250,000 - £500,000 (inclusive)	GEL Board (if decision taken outside of a Board meeting, approval must be unanimous via email)	Head of Finance / Managing Director Head of Finance / Managing Director
		Over £500,000	GEL Board	
	Write down of Asset Value	Over £0 - £50,000 (inclusive)	Managing Director	Head of Finance
		Over £50,000	GEL Board	LBE
Budget/Business Plan		N/A	GEL Board	LB Cabinet
Statutory Accounts and Auditors	Approval of statutory accounts	N/A	GEL Board	Shareholder Rep
	Appointment of auditors	N/A	GEL Board (recommendation)	Shareholder Rep (Approval of auditors, as shareholder)
Winding Up	Passing any resolution for the company's winding up or presenting any petition for its administration		Approval and recommendation To LBE of a solvent winding up / entry into a voluntary arrangement; Approval and recommendation To LBE of voluntary entry into insolvency Proceedings.	LBE
Contractual relations	Giving notice of termination of any arrangements,	N/A	GEL Board (to recommend to LBE)	LBE

Date approved: 1 July 2021

Next Review Date: July 2023

	contracts or transactions which are material in the nature of the company's Business, or materially varying any such arrangements, contracts or transactions.			
Legal	Commencing any claim, proceedings or other litigation brought by or settling or defending any claim, proceedings or other litigation brought against the company, except in relation to debt collection in the ordinary course of the business		Managing Director	GEL Board

C3 APPROVALS/AUTHORISATIONS – EVIDENCE

Written evidence of approvals should be kept with the legal documentation. Such evidence may be in the form of minutes, signed resolutions, signed letters, or emails as appropriate.

C4 SIGNING CONTRACTS

Once appropriate approvals are received as per the above scheme of delegations, contracts may be signed by a Director of the Company or the Managing Director (as hereby authorised by the Board) on behalf of the Company.

Deeds

If a contract is to be entered into as a Deed, any two of the following may sign on behalf of the Company:

- Any Statutory Director of the Company;
- The Managing Director
- The Company Secretary

Date approved: 1 July 2021

Next Review Date: July 2023

All signatures to such deeds must be made in the presence of a witness who attests the signature.

C5 Roles

Managing Director

Managing Director is responsible for:

- Proper financial administration and stewardship of the Company.
- Consult with the Directors and seek approval on any matter liable to affect the Council's finances materially for both income and expenditure.
- Ensuring that the Council, the Cabinet Members and Directors are advised of the financial implications of all proposals as appropriate.
- Setting and monitoring compliance with financial management standards
- Advising on the Company's financial position and on the key financial controls necessary to secure sound financial management.

Head of Finance

Head of Finance is responsible for:

- Proper financial administration and preparation of the Annual Financial Statement in accordance with proper practices.
- Providing appropriate financial information to the Managing Director in a timely, accurate and appropriate form and level of detail.
- Actively seeking additional income or savings opportunities.
- Ensuring that the appropriate financial controls are in place.

Depot Transport Compliance Manager / GEL Board Director: Mike Boulton

Depot Transport Compliance Manager / GEL Board Director: Mike Boulton is responsible for:

- To provide authorisation in the absence of the Head of Finance or the Managing Director (such absence being as a result of being incapacitated or on holiday and unreachable), providing that the approval cannot be delayed until the return of the Head of Finance or Managing Director. Under no circumstances, shall the Depot Transport Compliance Manager / GEL Board Director: Mike Boulton be authorised to approve on behalf of both the Head of Finance and the Managing Director in relation to the same matter. If both the Head of Finance and the Managing Director are unable to provide approval, approval must be sought from one GEL Board Director.



Greener Ealing Ltd

Financial Regulations

Date approved: 17 December 2020

Next reviewed: 6 July 2023

Table of Contents

1. Introduction.....	3
2. Abbreviations/Definitions	3
3. Financial Control.....	3
4. Responsibilities	3
5. Business Planning, Budgets and Management Accounting.....	4
6. Accounting Policies.....	5
7. Audit.....	5
8. Income and Write Offs	7
9. Purchase Orders	8
10. Payments	8
11. Credit Card	9
12. Salaries, Wages and Pensions	9
13. Bank Transfer Payments (CHAPS/Faster payments).....	9
14. Expenses	9
15. Banking.....	10
16. Insurance	10
17. Control of Cash, Stocks, etc	10
18. Title Documents.....	10
19. Depreciation Policy.....	11
20. Taxation	11
21. Expenditure	11
22. Emergency Authorised Signatory	11
Appendix 1.....	12

1. Introduction

- 1.1. The purpose of these Financial Regulations is to define the principal policies and procedures that must be followed by all staff/consultants when dealing with Greener Ealing's financial affairs.
- 1.2. These Regulations were approved by the Board on 22nd October 2020 and will be reviewed at least every two years. The absence of such a formal review will not, however, cause these Regulations to lapse.
- 1.3. The Managing Director shall be responsible for ensuring that these Regulations are adhered to by all members of staff including Directors within Greener Ealing and any consultants working on behalf of Greener Ealing. Failure to comply with these Regulations may lead to disciplinary action being taken against the employee, Director or consultant concerned.
- 1.4. A copy of these regulations will be made available to staff and consultants and it is each individual's responsibility to ensure that they have read and understood them. It is the responsibility of the Managing Director to advise all other Directors that the Regulations have been updated and are available. It is the responsibility of Managing Director to ensure that members of staff and consultants are provided with access to the latest version of these Regulations and that they are aware of the implications for their work.

2. Abbreviations/Definitions

- 2.1. "Board" means the Board of Directors of Greener Ealing Ltd.
- 2.2. "SMT" means the Senior Management Team consisting of the Managing Director, Head of Finance, Senior Managers and other individuals where appropriate.
- 2.3. "Council" means Ealing Borough Council.
- 2.4. "Director of the Company" means a statutory director of Greener Ealing Ltd.
- 2.5. "Company Secretary" means the company secretary of the Company as appointed by the Board.
- 2.6. "Finance Team" means the Finance Team of Greener Ealing Ltd.
- 2.7. "Council Finance Department" means Council Finance Department Team
- 2.8. "Internal Auditor" means the internal auditor of the Council which has agreed to provide Greener Ealing with an internal audit service.
- 2.9. "Managing Director" means the person appointed who is responsible for the day to day running of the business.

3. Financial Control

- 3.1. The Board of Directors has the ultimate responsibility for Greener Ealing's resources.

4. Responsibilities

4.1. Managing Director

- 4.1.1. The Managing Director is responsible for the operational management of Greener Ealing's business. The Managing Director will assist the Board in determining its strategic objectives and promote the achievement of such objectives through the effective deployment of Greener Ealing's resources.

Date approved: 17 December 2020

Next review: 6 July 2023

4.2. The Finance Team

4.2.1. The Finance Team is responsible to the Board for the administration and control of the finances of the Company and other support functions.

Responsibilities include:

- Assisting in long-term planning
- Presenting management accounts to the Board on a timely basis
- Maintaining an efficient system of operations and controls
- Preparing the annual accounts, liaising with Greener Ealing's auditors in respect of the year-end audit and arranging the final presentation of such accounts to the Annual General Meeting
- Monitoring the day to day running of Greener Ealing's finances
- Ensuring compliance with the requirements of regulating authorities
- Safeguarding the assets of Greener Ealing
- Reviewing the Financial Regulations as necessary from time to time but at least every two years
- Maintaining statutory records other than those maintained by the Company Secretary
- IT systems and equipment

4.3. The Finance Team reports to the Board on the level of resources proposed to be utilised in each financial year and keeps the Board regularly informed on Greener Ealing's finances and financial performance.

5. Business Planning, Budgets and Management Accounting

5.1. Business Planning

5.1.1. It is the responsibility of the Managing Director and Finance Team to ensure that a 5 - year Business Plan is prepared for Greener Ealing. The Business Plan will include the financial forecasts and plan for Greener Ealing's operations for at least five years and will be agreed by the Council in addition to the funding prospectus.

5.1.2. Following approval of the 5-year plan it is the responsibility of the Managing Director and Finance Team to ensure that the 5-year plan is updated on an annual basis to include annual KPIs for quarterly monitoring. The annual Business Plan should be reported to the quarter one Board meeting for approval.

5.2. Budgets

5.2.1. The Finance Team is responsible for preparing the Annual Budget for Greener Ealing.

5.2.2. The budget is to be prepared in a form agreed by the Board and is to be in line with the objectives of Greener Ealing and its Business Plan.

5.2.3. The annual budget should be presented to the Board at a Board meeting held during the last quarter of the year and the Board should approve the main underlying working assumptions for setting the following year's budget. These should include the level of profit/loss, the inflation rate, borrowing rates, salary increases, rent increases and the level of development activity.

Date approved: 17 December 2020

Next revised: 6 July 2023

- 5.2.4. Once approved, the budget is to be used as the basis for authority to incur expenditure in accordance with the Expenditure Authorisation limits (Appendix 1) and other approved procedures.
- 5.3. The inclusion of items in approved revenue estimates shall constitute authority to incur such expenditure in accordance with the Expenditure Authorisation Limits and other approved procedures, save to the extent to which the Board shall have placed a reservation on any such item or items. Expenditure on any such reserved items may be incurred only when and to the extent that such reservation has been removed.
- 5.4. **Accounts**
- 5.4.1. The Finance Team will ensure that the Board is presented with management accounting information on a monthly basis.
- 5.5. All reports to the Board, other than those for information only, will have a section on financial implications, and if there are none, state the fact. Where the paper identifies that there will be an implication for the finances of Greener Ealing, the Finance Team will be asked to provide comments for inclusion in the report. These comments will include, inter alia, the anticipated cost in the financial year under review and the anticipated cost for a full financial year. Where there will be a substantial long-term commitment, the effect on Greener Ealing's longer-term forecasts will also be identified.

6. Accounting Policies

- 6.1. All accounting procedures and records of Greener Ealing and its staff shall be determined by the Finance Team in accordance with requirements of statutory agencies and regulatory authorities or otherwise in accordance with good accounting practice and on the advice of the external and internal auditors.
- 6.2. Greener Ealing's financial statements will be prepared in accordance with International Accounting Standard (IAS).
- 6.3. All accounts and accounting records of Greener Ealing shall be compiled under the supervision of the Finance Team.
- 6.4. Records to be kept and the format thereof will be determined by the Finance Team from time to time but would normally include the nominal, rent control account, sales and purchase ledgers, payroll records, cashbook, fixed asset register, contracts register and loan register. By law Greener Ealing is required to retain the following documents:
- o Accounts raised (six years)
 - o Invoices and Receipts (six years)
 - o Payroll records (six years)
 - o VAT records (six years)

7. Audit

- 7.1. Preparation of annual accounts is to commence within one month of the financial year end each year and draft accounts (together with lead schedules) are to be prepared for the auditors by the time the audit commences.

Date approved: 17 December 2020

Next revised: 6 July 2023

- 7.2. A timetable is to be agreed with the auditors and every effort should be made to keep to the schedule.
- 7.3. Draft accounts are to be submitted to the Board for approval and signing at the meeting three to four months after the financial year-end and adopted at the Annual General Meeting
- 7.4. Final audited and signed accounts should be submitted to Companies House within nine months of the financial year end.
- 7.5. **Internal audit**
- 7.5.1. An internal audit should be arranged on a regular basis, which will usually be annually, to carry out an examination of accounting, financial and other operations of Greener Ealing. The Internal Auditor reports directly to the Managing Director, Finance Team and Board.
- 7.5.2. The main responsibility of internal audit is to provide the Board with assurance on the adequacy of the internal control systems, the risk management framework and compliance with internal and external regulations.
- 7.5.3. The Internal Auditor and his/her authorised representative shall have authority to:
- Enter at all reasonable times any Greener Ealing premises or land
 - Inspect all records, documents and correspondence relating to any financial and other transactions of Greener Ealing
 - Require and receive such explanations as are necessary concerning any matter under examination
 - Require any employee or consultant working on behalf of Greener Ealing to produce cash, or any other Greener Ealing property under his/her control.
- 7.6. Whenever any matter arises which involves, or is thought to involve, irregularities concerning cash, or other property of Greener Ealing or any suspected irregularity in the exercise of the functions of Greener Ealing, the officer concerned shall forthwith notify the Finance Team or Director of the Company who shall take such steps as he/she considers necessary by way of investigation and report. There is a specific procedure relating to whistle blowing and fraud.
- 7.7. **External Audit**
- 7.7.1. The primary role of external audit is to report on Greener Ealing's financial statements, and to carry out such examination of the statements and underlying records and control systems as are necessary to reach their opinion on the statements and to report on the appropriate use of funds. Their duties will be in accordance with advice set out in the Code of Audit Practice and Auditing Practices Board's auditing standards.
- 7.7.2. Each year the Board will review the effectiveness of external audit and determine if value for money is being provided and whether the external audit is independent and effective and make decisions regarding their re-appointment.

- 7.7.3. The Board will carry out a comprehensive review of the service together with a competitive tendering exercise at least every three years.

8. Income and Write Offs

8.1. General

- 8.1.1. The collection of all money due to Greener Ealing shall be under the supervision of the Finance Team.
- 8.1.2. All employees and consultants working on behalf of Greener Ealing shall provide the Finance Team with such particulars in connection with work done, goods supplied or services rendered and of all other amounts due as may be required by him/her to record correctly all sums due to Greener Ealing and to ensure that invoices are rendered for the recovery of income due.
- 8.1.3. The Finance Team shall be notified promptly of all money due to Greener Ealing and of contracts, leases and other agreements and arrangements entered into which involve the receipt of money by Greener Ealing.
- 8.1.4. All receipt forms, books, tickets and other such items shall be ordered and supplied by the Finance Team who will also specify the arrangements for their control.

8.2. Cash Receipts

- 8.2.1. All income of more than £250 received by any officer on behalf of Greener Ealing shall immediately be passed to the Finance Team who will ensure these sums are banked, wherever possible on the day of receipt. All income not banked on the day of receipt must be banked by the end of the following working day.
- 8.2.2. No deduction may be made from such money except to the extent that the Finance Team may specifically authorise. Each officer who so banks money shall enter on the paying-in slip a reference to the related debt.
- 8.3. Gifts & Hospitality shall only be accepted in accordance with the Code of Conduct and all instances recorded in line with that policy.

8.4. Rents and Service charges

- 8.4.1. The policy for determining the rent for different property types and/or categories of tenant must be approved by the Board. The Managing Director has overall responsibility for the operation of the policy.
- 8.4.2. The level of any general increase in rents to be charged under the agreed policy will be determined by the Board in accordance with market trends. The Managing Director has overall responsibility for implementing any agreed general increase in rent levels.
- 8.4.3. The policy for the calculation and collection of any service charges will be agreed by the Board and the actual charge to be recovered from individual tenants will be determined by the Managing Director and included in the level of rent payable by that tenant (and not as a separate service charge). The Managing Director will be responsible for distributing the service charge element of the rent to the Council or any external management companies as required.

Date approved: 17 December 2020

Next revised: 6 July 2023

8.5. Write off of Arrears and Debts

- 8.6. Greener Ealing will write off all established bad debts as soon as possible in order not to distort the current rent and service charges arrears and other bad debts position. Consideration should be given as to whether or not the present abode of ex-tenants in arrears is known to establish whether the doubtful debts are collectable or not.
- 8.7. The prior approval of the Board is required to write off rental income debts. Certain procedures must be exhausted before approval for write off is sought.

9. Purchase Orders

- 9.1. Official orders shall be in a form approved by the Finance Team.
- 9.2. Official orders must be signed by Directors or other authorised staff/consultants and must be issued for all work, goods or services to be supplied to Greener Ealing except for the supplies of public utility services, for periodic payments such as rent or rates or for petty cash purchases.
- 9.3. Staff/consultants authorising any order must ensure that the expenditure to be incurred is covered by an approved budgetary provision.
- 9.4. Before placing any orders, the member of staff concerned must ensure that Greener Ealing's Contract Procedure Rules have been followed.
- 9.5. All orders will show the agreed price or, in cases where this is not practical, the estimated price. In the event that the subsequent invoice does not accord with the agreed price or exceeds an estimate by more than 10% the reason for this must be identified, noted on the order and initialled by the member of staff responsible for placing the order.
- 9.6. Goods may not be taken on trial or loan in circumstances that could commit Greener Ealing to a future uncompetitive purchase.

10. Payments

- 10.1. The normal method of payment of money due from Greener Ealing will be by BACS payment or cheque drawn on Greener Ealing's bank account. BACS will be used where possible.
- 10.2. Individuals authorised to approve payments for either goods or services are listed in Appendix 1.
- 10.3. The approval of accounts for payment will be evidenced by the relevant member of staff signing and dating the original invoice. The signing off of an invoice for payment means that:
- the goods have been duly received, examined and approved in accordance with the specification and are satisfactory and in accordance with the contract or order;
 - the work done or services rendered have been satisfactorily carried out and where applicable the materials used were of the requisite standard, although in the case of maintenance invoices it is understood that this check can only be applied on a sample basis;
 - the account is arithmetically correct and prices are in accordance with the order;

- no other account has been paid in respect of the goods received or work done;
 - the relevant expenditure has been properly incurred on Greener Ealing's business; and
 - the relevant expenditure has been properly coded.
- 10.4. The expenditure codes must be in accordance with the approved budget heading and not changed because other original budget head is being used in order to "vire" expenditure.
- 10.5. All invoices and statements should be sent directly by suppliers to the Council Finance Department who will process them for payments.
- 10.6. Photocopies (including fax copies) of invoices will not normally be accepted for processing apart from in exceptional circumstances.
- 10.7. No amendment to an account shall be made. In the event of an account being incorrect, the supplier should be notified in writing stating the reasons and a credit note and/or replacement invoice obtained.
- 10.8. It is Greener Ealing's policy to make payments to suppliers as per agreed payment terms.

11. Credit Card

- 11.1. Request to use company credit card should be approved by Managing Director or Head of Finance
- 11.2. The Company credit card should only be used where the standard payment using purchase order can't be made.

12. Bank Transfer Payments (CHAPS / Faster payments)

- 12.1. Individuals authorised to approve bank transfer payments for either goods or services are listed in Appendix 1. The approval can be provided by email confirmation to Finance team.
- 12.2. The commercial banking online approval based on the payment approval as per point 12.1 can be completed by Managing Director and Head of Finance. In absence of Managing Director or Head of Finance, the bank submission will be completed by Depot Transport Compliance Manager or GEL Board Director: Mike Boulton.

13. Salaries, Wages and Pensions

- 13.1. The Board each year approves the annual increment for staff. The Board shall have regard to any arrangements with trade unions and to any increases in the public scale to which Greener Ealing may be linked as well as the terms and conditions of employment.

14. Expenses

- 14.1. Items regarded as expenses for the purposes of these Regulations are specified in the Company Expenses Policy and Procedure.
- 14.2. All claims by employees or consultants working on Greener Ealing's behalf for payment of car allowances, travelling expenses, subsistence allowances or

Date approved: 17 December 2020

Next review: 6 July 2023

any other incidental expenses shall be submitted in a form acceptable to the Finance Team and comply with the Regulations laid down from time to time. Expense claims must be submitted on a regular basis but no more frequently than monthly.

15. Banking

- 15.1. All arrangements with Greener Ealing's bankers will be made by the Finance Team with the approval of the Board. Banking services will be reviewed in agreement with the Council as major shareholder of the Company.
- 15.2. All cheque books and collection cards will be ordered only on the authority of the Finance Team. The Finance Team will be responsible for ensuring that proper arrangements are made for their safe custody.
- 15.3. The Board shall approve any new banking arrangements or accounts.
- 15.4. Authority to sign cheques or authorise other payments either by standing order or direct debit is detailed in the Appendix 1 to these Regulations. For the purpose of deciding the value of the standing order or direct debit, the annual amount payable should be used.
- 15.5. All bank accounts must be reconciled to their respective cash books and the nominal ledger at least monthly.

16. Insurances

- 16.1. The Managing Director will be responsible for ensuring that Greener Ealing is properly insured.
- 16.2. Greener Ealing will ensure that all risks are underwritten by well-established reputable offices.
- 16.3. Greener Ealing will ensure that all of its properties are insured against the usual risks required by lenders securing their funds on the property concerned.
- 16.4. Insurances will also be maintained against the following risks:
 - Motor vehicle and plant insurance
 - Public liability
 - Directors and Officers Insurance
 - Professional indemnity insurance
 - Company equipment
 - Structural insurance if required

17. Control of Cash, Stocks, etc.

- 17.1. Cash floats and balances will be maintained on the designated system and will be reimbursed by the submission of an authorised expense analysis to the Finance Team.
- 17.2. The issue of credit cards to staff members must be approved by the Board in advance. Only valid business expenditure should be charged and must be fully supported by invoices. The Finance Team must approve any increases in the credit limit.

18. Title Documents

- 18.1.1. The Company Secretary will maintain a register of all properties owned by Greener Ealing in a form approved by the Finance Team, recording location, extent and plan reference, purchase details, particulars of nature of interest and rents payable and particulars of tenancies granted
- 18.1.2. Greener Ealing or its bankers or solicitors will have custody of all title deeds under secure arrangements where such title deeds are not held by a security agent acting on behalf of Greener Ealing's funders.

19. Depreciation Policy

- 19.1. Any fixed asset owned by Greener Ealing will be depreciated over the expected useful life of the asset, in accordance with generally accepted accounting principles.
- 19.2. Small items of capital expenditure, such as office equipment costing below an agreed amount are treated as repairs or replacements and written off in the year of purchase.

20. Taxation

- 20.1. The Finance Team is responsible for advising on all tax issues and for ensuring compliance with statutory requirements with regards to CIS, VAT, SDLT and Corporation tax.
- 20.2. The Council Payroll Team is responsible for advising on all tax issues and for ensuring compliance with statutory requirements with regards to PAYE and National Insurance.
- 20.3. The Finance Team is responsible for maintaining all tax records, making all tax payments when due and submitting tax returns by their due dates.
- 20.4. The Finance Team is responsible for developing an effective tax strategy in consultation with professional advisors.

21. Expenditure Authorisations

- 21.1. The Board has approved the following procedures and Appendix 1 for the authorisation of expenditure commitments and invoices for payment. This is an important internal control of Greener Ealing's expenditure and all staff and consultants should have a good working knowledge of the content. It is the responsibility of Directors to ensure that all staff and consultants under their control are fully aware of their own authority levels and limits.

22. Emergency Authorised Signatory

- 22.1 The Directors authorise the Managing Director to sign any document requiring the signature of a director, in the absence of all Director (such absence being as a result of being incapacitated or on holiday and unreachable), providing that the signing of the document cannot be delayed until the return of one of the Directors.
- 22.2 Under no circumstances, shall the Managing Director be authorised to sign such documents if any of the directors can be available to sign the required document without prejudice to the interests of the Company.

Date approved: 17 December 2020

Next reviewed: 6 July 2023

- 22.3 This authorisation shall not extend to the signing of documents that are required to be executed as a deed, as under the Companies Acts, deeds may only be signed by two directors or one director and the Company Secretary.

APPENDIX 1

Section 1- Capital Expenditure

Office Premises Acquisition
Office Premises Improvements
Office Furniture, fittings and equipment

Section 2 - Revenue Expenditure

Running costs
Budget/Business Plan
Cheque and Bank Instruction Signature levels
Overhead costs

Appendix 1

SECTION 1: CAPITAL EXPENDITURE

Category	Type of Authorisation	Limits	Authoriser	2nd Authoriser
Capital Expenditure	Office Premises - Acquisition	Over £100,000	Shareholder Rep	GEL Board
		Over £0 - £100,000 (inclusive)	Managing Director	GEL Board
	Office Premises - Improvements	Over £500,000	Shareholder Rep	Head of Finance / Managing Director
		Over £250,000 - £500,000 (inclusive)	GEL Board	Head of Finance / Managing Director
		Over £0 - £250,000 (inclusive)	Managing Director	Head of Finance
	Office furniture, fittings and equipment and , computer equipment <u>and vehicles</u>	Over £500,000	Shareholder Rep	Head of Finance / Managing Director
		Over £250,000 - £500,000 (inclusive)	GEL Board	Head of Finance / Managing Director
		Over £0 - £250,000 (inclusive)	Managing Director	Head of Finance

Date approved: 17 December 2020

Next revised: 6 July 2023

SECTION 2: OTHER FINANCE APPROVALS

Category	Type of Authorisation	Limits	Authoriser	2nd Authoriser
Financial	Purchase Orders / Vendor and Non-Vendor Payments	Over £500,000	Shareholder Rep	Head of Finance Managing Director
		Over £250,000 - £500,000 (inclusive)	One Board Director	Head of Finance Managing Director
		Over £100,000 - £250,000 (inclusive)	Managing Director	Head of Finance
		£0 - £100,000 (inclusive)	Operations Manager	Head of Finance Managing Director
	Sales Invoices / Credit Notes	Over £500,000	Shareholder Rep	Head of Finance Managing Director
		Over £250,000 - £500,000 (inclusive)	One Board Director	Head of Finance Managing Director
		Over £0 - £250,000 (inclusive)	Managing Director	Head of Finance
	Cheques or Bank Transfers (CHAPs / Faster Payments for payments to: Government departments; LBE, employees where requested by payroll; and one-off suppliers without POs	Over £500,000	Shareholder Rep	Head of Finance Managing Director Depot Transport Compliance Mgr One Board Director
		Over £250,000 - £500,000 (inclusive)	One Board Director	Head of Finance Managing Director Depot Transport Compliance Mgr One Board Director
		Over £0 - £250,000 (inclusive)	Managing Director	Head of Finance Depot Transport Compliance Mgr One Board Director
	Loans from outside the Group	Standard trade credit on no more than thirty-day terms	GEL Board	Head of Finance Managing Director
		All other external loans	GEL Board	LBE Cabinet

Date approved: 17 December 2020

Next revised: 6 July 2023

Category	Type of Authorisation	Limits	Authoriser	2nd Authoriser
Financial	Loans from LBE	Over £500,000	GEL Board	Head of Finance Managing Director
		Over £250,000 - £500,000 (inclusive)	GEL Board (if decision taken outside of a Board meeting, approval must be unanimous via email)	Head of Finance Managing Director
		Over £0 - £250,000 (inclusive)	Managing Director	Head of Finance
	BACS Payments	As set out in GEL Business Plan and in accordance with GEL Budget	Managing Director Head of Finance	Council Payment Team
	BACS Salary Payments		Managing Director Head of Finance	Council Payroll Team
	Write down of Asset Value	Over £50,000	GEL Board	LBE Cabinet
		Over £0 - £50,000 (inclusive)	Managing Director	Head of Finance
	Write off of Arreas and Debts		GEL Board	Managing Director

Date approved: 17 December 2020

Next reviewed: 6 July 2023

OTHER FINANCE APPROVALS

Category	Type of Authorisation	Limits	Authoriser	2nd Authoriser
Budget/Business Plan	Approval, Amendment		GEL Board	LBE Cabinet
Bank Instruction Signature Levels	Changes to Authorisation Levels		GEL Board	GEL Board
	Opening new Bank Account		Two Board Directors (in accordance with Bank mandate)	Head of Finance Managing Director
	Direct Debit/Standing Order		One Board Director	Head of Finance Managing Director
Staff Appointments, Salaries And Staff Costs	New Appointments/ Replacement Staff	As set out in GEL Business Plan and in accordance with GEL Budget	Managing Director	Member of SMT
	Temporary Staff cover		Managing Director	Member of SMT
	Annual Salary Reward		GEL Board	Managing Director
	Board Members Expenses		GEL Board	Managing Director
Statutory Accounts and Auditors	Approval of statutory accounts		GEL Board	Shareholder Rep
	Appointment of auditors		GEL Board (recommendation)	Shareholder Rep (Approval of auditors as shareholder)

Date approved: 17 December 2020

Next reviewed: 6 July 2023

Report Title	Managing Directors Report		
Meeting	Greener Ealing Board Meeting		
Date	6 th July 2023	Agenda Number	7
Type of Report	For noting		
Author	Kevin O’Leary – olearyk@greenerealing.co.uk		
Background	<p>This report provides a summary on overall progress over the last period following the April Board meeting. The report highlights key issues.</p> <p>Contract performance remains good.</p> <p>The Graffiti contract has now started, and the team is performing well and within the required service level agreement.</p> <p>The Deed of Variation in relation to the core contract has now been agreed in principle by the Council’s Cabinet on the 17th May 2023. The final agreement on the contract indexation mechanism still needs to be agreed.</p> <p>Pay – a 5% offer has been made to the GMB who are currently consulting their members.</p> <p>The work on the mobilisation of the Parking Enforcement Contract is now becoming more intense a full update is provided below.</p> <p>The Board is asked to note the report.</p>		

Introduction

This report sets out the key issues that Greener Ealing has been addressing over the last few months and provides a brief update on other matters of interest.

Contract Performance

Overall performance on the contract remains good with the more detailed report on this agenda providing a full update. We commenced the Graffiti removal contract on 31st May 2023 – with good performance. It is hoped that we can extend the reach and scope of the staff in this area to generate additional revenue.

Service Level Agreement – Deed of Variation (DOV) and Dividend Policy

As indicated above the Deed of Variation (DOV) was agreed in principle by the Councils Cabinet on 17th May with details on the contract uplift mechanism to be agreed between GEL and Council

Officers. These discussions have not yet been held. At the same meeting it was agreed to extend the core contract by 5 years to 2030 with scope for a further extension beyond that date. This is good news and further demonstrates the Council's confidence in GEL.

Once we have reached agreement on the remaining details we will report in full on the DOV and the Dividend Policy which will be applicable from this financial year 23/24.

Staff Pay 2023/24

Following a rejection of the 4% offer made earlier in the year a revised offer of 5% was made to union officials on 12th June. This is currently being presented to GMB members. A verbal update will be provided at the Board meeting on 6th July.

The Board is asked to note that this offer is outside of the GEL budgetary provision for pay which is 2.5%. The offer has been made following a dialogue with the Council and their agreement to absorb this pressure, which is estimated at c£300k. Whilst the Council support is recognised and appreciated this does serve to underline how unsatisfactory the current arrangement is in the absence of a fit for purpose price indexation mechanism as described above.

Parking Enforcement Contract

As the Board is aware the Council intend to invite GEL to provide this service with effect from 1st April 2024. Regular meetings are now taking place with the client team, a high-level project plan has been drafted and detailed sessions are being held on specific issues e.g., fleet requirements and property issues.

The emerging issues from our discussions with the Council on this contract are as follows:

- **Depot space** – this remains a challenge. The Council has agreed to the temporary re-location of the current contractor SERCO into vacant space at Greenford Depot. This is due to expiration of their existing lease. This move is agreed up until March 2024. Beyond that the picture is not clear and discussions will be needed to clarify what space is available for a GEL base. On a more positive note, the Acton GM Depot provides an opportunity for a base in the east of the borough, something that the Ealing Parking Team are particularly keen on. I am pleased to report that the Council has agreed that steps can be taken to make use of this site and arrangements will be put in place to accommodate Parking staff from April 2024.
- **Service Specification** – we have held a detailed session with the Ealing Team on reviewing the overall technical specification which has given us a useful overview of the functions that will be included in the contract. It is a complex bundle of activities - these include CCTV Control monitoring and enforcement, On -street support for Pay and Display, Administration of pre notice owner challenges, Cash Collection service, Blue Badge Enforcement and Car Park cleaning and maintenance. We have engaged management support via Parking Associates to assist us in preparing our bid back to the Council including method statements, pricing etc. Anthony Collins is also reviewing the contract
- **Vehicles** – we will need to procure a number of vehicles for this contract including Vans, Cars with Automatic Number Plate Recognition (ANPR) Equipment, Scooters/cycles. We will be looking at Electric options in all categories. We have provisional arrangements in place to ensure that we will have vehicles from 1st April 2024 whilst we procure new vehicles the delivery of which may be beyond 1st April.

- **Other procurement activities** – handheld computers for staff, body worn cameras, uniforms (colour style etc to be agreed with the Council), ANPR equipment, stationery and a wide range of supporting materials.
- **British Parking Association (BPA)** – we are in discussion with the BPA about membership and what will best suit our needs. We do need to register in order to obtain Approved Operator Status (AOS) but they also offer comprehensive support including legal, operational and training advice.
- **TUPE** – there will be a TUPE transfer of the existing staff from SERCO to Greener Ealing. We have made initial contact with the local management of SERCO but will require the Council to broker the provision of necessary Employers Liability Information (ELI) in relation to the transfer. The Council has now asked on our behalf for early release of this information and we await a response from SERCO.
- **Future key milestones** – precise dates to be determined. Receipt of contract documents and GEL pricing, order vehicles and equipment, confirm depot sites, receipt of ELI and briefing of staff etc. probably early 2024.

GEL Strategic Review – Vehicles and Plant

GEL is just about to start its 4th year of operations. Whilst we have extended the leases on some of our larger vehicles, we have retained the smaller vehicles and plant on 5 year leases. Given the time it takes to procure vehicles and equipment we are proposing a review over the next few months to consider our options. We do have some issues with the fleet the Food vehicles being a case in point, in addition some of our larger mowing equipment in GM has proved not to be optimal and we need to make some changes. We will report back on this and will liaise with the Council over options and financing.

Special Educational Needs - Home to School Transport

Although not identified as a potential area for GEL growth I have been in discussions with colleagues at Ealing regarding Home to School Transport Services. This is a challenging market place and whilst at first glance one might not think that this would be something that GEL should consider, there are many similarities with what is essentially a logistics business albeit with some very special customers that need transportation.

At the moment we are in the very early stages of discussing what might be possible in terms of routes, packages, geography and what that might look like. The Council is interested in digital solutions that inform them what vehicles and drivers are doing and most importantly where children are when they are picked up and dropped off etc. I will keep the Board up to date on any developments.

Efficiencies

Updates on the various efficiency measures are included below.

- Trade Waste – teams have reduced by one from three to two.
- HWRC – discussions ongoing with GMB target date 1st August 2023
- Food Waste – delayed due to payload reduction with vehicles.
- Flats Teams (remove loader) – always a challenging efficiency but work in hand to optimise to seven teams Driver plus 1.
- Glyphosate Reduction – achieved.

Business Plan 23/24 Objectives 1-6

The 23/24 Business Plan Objectives have been revised and were agreed at the March Board meeting. The action plans for this year are being finalised and will be provided to the next Board for an update on progress.

Strategic Leadership and Partnership Panel (SLAPP)

This is now scheduled for the 13th July – this meeting between the GEL Chair and the Council's Deputy Leader is an opportunity to look back at previous performance for 22/23 and at strategic issues for the company and its relationship with its shareholder.

BSI Accreditations

I am pleased to report that Certificates were finally awarded to GEL on 8th June at BSI's headquarters in Milton Keynes. A special mention to Sandra Hewey who led the team and guided us through this very difficult process GEL were one of only two organisations of 150 that received awards for all three standards - Quality ISO 9001, Environmental ISO 14001 and Health and Safety ISO45001.

Conclusions and way forward

The priorities for the next period include:

- Finalising the DOV and Dividend Policy,
- Supporting the Parking mobilisation plan,
- Reporting back on the 2023 pay process,
- Delivering efficiencies as agreed with the Council for 23/24,
- Preparing a report on fleet and plant replacement options,
- Continuing conversations with Council departments on growth opportunities
- Commence Planning for 24/25.

Kevin O'Leary
Interim Managing Director
29th June 2023

GEL Combined Monthly Performance Report May 2023

Report Title	Combined Performance Report including HSEQ & Transport		
Meeting	Greener Ealing Board Meeting		
Report Date	May 2023	Agenda Number	8
Type of Report	For noting		
Author	Kevin O’Leary – olearyk@greenerEaling.co.uk		
Background	<p>This report updates the Board on performance against internal and external KPIs over the previous five months and provides brief commentary, mainly by exception, on the last month.</p> <p>The current format incorporates information across a broad range of indicators giving comprehensive view of the whole business. Client facing targets have previously been agreed with LBE.</p> <p>Internal targets for 21/22 and beyond based on our first year’s performance were agreed at a previous Board meeting and are now part of the KPI table.</p> <p>The Board is asked to note the report.</p>		

Operations

Overall performance in May was good, performance was still consistent from month to month in all key indicators. There were four amber status indicators in the month and two red. These are addressed in the individual service commentary.

Collections:

- The HGV driver shortage has stabilised, and we are seeing growth in the driver “pool”.
- Assisted Missed collections have increased since last month by one and are consistently amber. The Operational team have been tasked with reducing this figure and monitoring the crews more closely to reduce this number by utilising a crew league table. Comparative information from other providers suggest that GEL performance is very good on this indicator – we will continue to work hard to reduce the number of missed assisted collections.
- Container deliveries fell out of sla due to not having any 360ltr recycling bins in stock last month and the catch up continued into the beginning of this month.
- The bulky waste collections fell out of sla due to the size of items the team are collecting. This means increased tips which takes the crew to their completion time. Some bulky waste jobs were rolled over to the next day as a result.
- Despite continual pressure on capacity to deploy the core service, Collections have provided consistently good quality results to date.

Street Cleansing:

- First time A+B performance for May is at 91.72%.

HWRC:

- The recycling rate has increased in comparison to the previous month to 66.72%. Discussions between GEL and LBE still ongoing about the potential to improve this further.

GM & Cemeteries:

- The GM team are engaged in normal scheduled work for this time of year.

Complaints:

- The number of complaints remain at a very low level - 9 for the month. The consistently low numbers reflect the work of the frontline teams to deliver a stable, high-quality service despite the persistence of operational challenges.

Internal KPIs

- Internal KPIs remain reasonably consistent overall.
- Sickness absence is at an all-time low of 1.82%

HSEQ:

- HSEQ provision is good during this period.
- No RIDDORs in the last five months.

Transport:

- Transport Provision in-line with operational requirement – no change.
- Vehicle accidents have increased in comparison to last month, however; work is continuing to bring this figure down.
 - 4 accidents involved third party vehicles
 - 1 accident was involving a third party wall
 - 2 accidents involved a person and a deer running into our vehicles (the person ran into one of our vans)
 - 3 accidents were relating to minor scrapes with bollards/a wall/and opening a door onto oncoming traffic
- Idling remains slightly higher as expected due to the workshop engineers leaving the vehicles running during maintenance, and the Cemeteries department leaving vehicles running whilst working. Both departments have been spoken to about the impact of their actions.

GEL - Overall Dashboard

Indicator	Target	Jan-23	Feb-23	Mar-23	Apr-23	May-23
Missed Rectification %	100% within 24 Hours	100%	100%	100%	100%	100%
Right First Time %	-	99.97%	99.98%	99.97%	99.97%	99.97%
Assisted Missed Collections	Zero	7	7	7	8	9
Missed per 100k by Service						
Refuse	< 100	46	37	39	52	45
Recycling	< 100	37	33	34	31	28
Food	< 100	28	15	32	21	26
Garden	< 100	29	29	29	40	86
Streets A&B Inspection %	85%	95.64%	95.31%	96.41%	94.81%	91.72%
Flytip Clearance	95%	99%	99%	98%	96%	97%
Flytips Reported	-	1004	951	886	1159	1360
Bulky Waste Service	100%	100%	99%	93%	100%	96%
No of Container Requests	-	1037	1067	1941	1389	1314
Container Delivery %	100%	100%	51%	96%	94%	96%
HWRC Materials Recovered	-	253t	289t	297t	438t	587t
HWRC Visit Numbers	Report Actuals	5794	6029	5824	9177	10942
HWRC Recycling Rate %	TBA via Service Agreement	58.80%	62.10%	64.57%	62.26%	66.72%
Customer Complaints	<100	19	17	8	5	9
RIDDORs	0	0	0	0	0	0
No Lost Time Incidents	<3	4	1	1	3	0
Lost Time Incidents	0	1	1	0	0	0
Close Calls	Report Actuals	13	20	16	12	9
Vehicle Incidents	<7	19	14	8	5	10
VOR (Daily Average - RCV's)	<5	5.5	8.2	5.93	4.84	5.21
Fuel – DERV (Litres)	TBA	61,681	51,274	59,157	55,514	60,785
Fuel – Gas Oil (“red” litres)	TBA	0	0	0	0	0
CO2 – kg (baseline figure: 150,416 monthly – 1805,400 annually)	>7.5% reduction (150,416 target)	160,370	133,312	153,808	144,336	158,040
Total Vehicle Idling Time (hrs)	<140	146	144	150	157	224
Vehicle Availability	95%	96%	94%	96%	96.60%	95%
MOT Pass Rate	98%	100%	92%	100%	92%	100%
Average Sickness %	<4%	2.92%	2.22%	2.38%	3.60%	1.82%
ER Cases	<5	5	7	8	3	2
Staff Turnover	Report Actuals	4	7	7	5	5
YTD Actual	-	-£194,665	-£180,690	-£152,423	£10,010	TBC
FY Forecast	-	-£45,100	-£112,709	-£112,709	£160,814	TBC
Additional Revenue	-	-£93,448	-£156,331	-£191,425	-£58,648	TBC

GEL Risk Management – Risk Register

Report Title	GEL Risk Management – Risk Register		
Meeting	Greener Ealing Board Meeting		
Date	6 July 2023	Agenda Number	9
Type of Report	To Note		
Author	Katarina Pohancenikova can be contacted on pohancenikovak@greenerrealting.co.uk		
Background	<p>This report provides an update on the new risks or measures the company faces since the last update to the Board on 27th April 2023.</p> <p>The Risk Register is attached as a separate excel file for ease of review.</p>		

Budgetary management and control**Budget misalignment - HIGH**

GEL Finance team to ensure budget misalignment does not occur between GEL activities and LBE provisions.

GEL 2023/24 Business Plan assumes a loss of £161k. Management action plan to be provided to close the gap.

UPDATE: The Cabinet meeting held on 18th May 2023 agreed the contract extension between the Council and Greener Ealing Ltd for the provision of environmental services for 5 years from 7th July 2025 to 6th July 2030. The Deed of Variation payment mechanism and Dividend policy have been agreed in principle. We are liaising with our Council's colleagues to finalise these documents and will present the documents to the Board once the payment mechanism process is agreed.

Budgetary management and control**Pay Award - HIGH**

Pay Award costs for 2023/24

UPDATE: We have received a letter from GMB proposing a substantial pay increase for 2023/24 in line with the RPI index. This is unrealistic but we have made a flat rate offer of 5%. GMB is consulting with their membership on this and are hopeful that this will be accepted.

Budgetary management and control**Brexit impact on Fleet - HIGH**

The risk is reviewed by monitoring the market situation, impact on supply chain and ensuring the business deals with potential issues in advance and have contingency plan in place.

Initial issues were primarily directly linked to Brexit disruption of goods inwards due to revised customs/trade processes and checks on incoming part supplies, which now seem to have reduced, where possible GEL has arranged with subcontractors/suppliers to increase holdings on key items.

UPDATE: Mercedes parts issues have improved after onsite meeting with supplier. As mentioned in the last Board Risk update, workshop engineers have been difficult to secure for Go Plant Fleet Services (GPFS), our workshop contractor, as in recent London Councils forum large portion of workshop managers are also experiencing the same problem. The workshop contract has recently dipped in their monthly workshop management with 2 more MOT failures in 2nd quarter, GPFS have lacked full cohort of engineers to satisfy our contractual needs. The issue has been raised at GPL Director level. GPL plan of action to improve recent poor service levels had slowly improved with an apprentice, workshop controller, but in last few weeks 15 years experienced engineer has departed and apprentice has left the business. This is being monitored and directors update being provided. This is still a risk until some sort of continuity pattern can be established.

Budgetary management and control**Increased cost of fuel - HIGH**

The risk is monitored by monthly fuel spend report, reviewed by service delivery, performance/efficiency and making changes as appropriate in light of increased fuel costs. Carbon reduction measures being undertaken, including review of operational mileage and excessive vehicle idling.

*Increased cost of fuel is now seen as a **High Risk** underpinned by extremely volatile energy supply market and factors relating to Covid 19, Brexit and political situation in Ukraine.*

The planned control measures relating to the measurement and management of fuel use are in place across the contract, and the first phase of Carbon reduction relating to vehicle excessive idling is delivering demonstratable savings, albeit relatively minor in value being achieved.

Ongoing in-service optimisation of core operational services is being undertaken, with an expectation of reduced fuel usage in elements of the trade and garden waste collection activities.

UPDATE: Recent weeks have shown some stability with fuel prices currently at £1.08 ppl.

EV vehicles hired for Acton Grounds team with Gunnersbury and Housing contract proving there are real possibility to reduce CO2 by using alternative energy, but with LBE having no formal plans to make available EV infrastructure at Greenford depot it has been a challenge for electric vehicle trials to be successful.

HWRC 360 Material Handler electric version has now been delivered and is in full operation; last minute EV infrastructure issues at Greenford depot resulted in delays with the revised delivery now scheduled for early July.

Loss or damage of assets

Wear and tear costs to fleet – MEDIUM

Review monthly monitoring report to identify areas/vehicles, number of vehicles and defects.

Operational failure of food waste vehicles - GEL has experienced a number of rear suspension air bag failures on one of our 7 16t RCV vehicles employed primarily on food waste collection activities. Both vehicle chassis and body manufactures have been engaged in investigating and getting a resolution to the issue.

UPDATE: We have received 3 of the 7 DAF food vehicles with Chassis repaired. The revised completion target for the 7 vehicles to be put back into service is estimated to be around July 2023. Completed vehicles are delivering around 3t payload which is around 20% (0.6t) below LBE specified purchase weight (3.6t).

At the end of June 2023 large portion of HGV vehicles will be out of their 3-year bumper to bumper warranty, therefore a percentage increase of monthly repairs will need to be assumed from July onwards.

Report Title	Finance Update – July 2023		
Meeting	Greener Ealing Board Meeting		
Date	6 July 2023	Agenda Number	10
Type of Report	To Approve		
Author	Katarina Pohancenikova		
Background	<p>Executive Summary This report notes:</p> <ol style="list-style-type: none"> 1. May 2023 Month End Greener Ealing financial results to May 2023 shows a positive variance before tax of (£44k). 2. Outstanding Finance Issues The unresolved finance issue with the Council is premises lease agreement. 3. Loan Finance Loan drawdown in financial year 23/24. 4. Bank Update Company credit card spend. <p>Recommendations:</p> <p>To note the overall draft financial position to 31st May 2023.</p>		

1. Month End
Greener Ealing Ltd
Statement of Comprehensive Income (£'k)

	MAY 2023 YTD			2023/24 FULL YEAR		
	Actual	Budget	Variance	Forecast	Budget	Variance
Net Service Income	(4,060)	(4,008)	(52)	(23,794)	(23,609)	(185)
Other income	(14)	-	(14)	(14)	-	(14)
Turnover	(4,074)	(4,008)	(66)	(23,809)	(23,609)	(200)
Staffing costs	2,364	2,476	(112)	13,570	13,673	(104)
Agency Costs	405	277	128	1,989	1,826	162
Other staffing costs	40	47	(7)	282	283	(1)
Total staffing costs	2,809	2,800	9	15,841	15,783	58
Other Direct Costs	100	70	30	627	567	59
Depreciation & Amortisation	46	44	2	283	262	22
Vehicle Costs	731	775	(44)	4,713	4,682	31
Plant Costs	65	69	(4)	409	430	(21)
Property Costs	196	190	6	1,157	1,151	6
Communications	4	4	(0)	25	24	1
ICT Costs	43	44	(2)	250	277	(27)
Service Recharges	9	8	1	54	51	3
Professional Fees	70	51	19	477	465	12
Operating costs	1,263	1,254	9	7,996	7,909	87
OPERATING LOSS/(PROFIT)	(2)	46	(48)	28	83	(55)
Net funding costs	20	16	4	115	78	37
NET LOSS/(PROFIT) BEFORE TAX	18	61	(44)	143	161	(18)

The overall draft financial position to 31st May 2023 is a loss of £18k against a budgeted loss of £61k. Key variances relate to:

- Turnover - favourable variances of (£66k) as a result of non-contractual work provided: (£19k) Grounds maintenance including other none core GM contracts; (£22k) Streets cleansing; (£14k) rechargeable costs; (£11k) Waste.
- Staffing costs adverse variance of £9k is made up of savings on (£18k) Support staff; (£11k) HWRC; (£10k) Pensions saving; (£8k) Other; £5k Grounds; £10k Waste; £41k Streets.
- Operating costs adverse variance of £9k
 - (£48k) Vehicle and plant: favourable variance as a result of decrease in fuel price partially offset by increase in fleet and plant repairs and maintenance costs and additional hire of food vehicles.
 - (£2k) ICT and Communications savings due to undertaking a thorough review of ICT recharges and entering into a direct contract for mobiles with 3rd party.
 - £1k Service Recharges increase for SLA services, i.e. payroll, transaction services.
 - £2k Depreciation & Amortisation relating to small plant purchases.
 - £6k Property Costs: premises repairs and maintenance not budget for.
 - £19k Professional fees include timing difference on training delivered earlier than originally anticipated.
 - £30k Other Direct Costs for direct costs and rechargeable bags offset in revenue.

- Funding costs negative variance of £4k as a result of loan drawdown in March 2023 to fund GEL capital and stock start up costs and May increase of the EU Base rate from 3.52% to 4.24%.

The full year forecast has been updated and currently showing a loss of £143k against the originally budgeted loss of £161k. There are few factors contributing to the improvement of the financial result position such as decrease in fuel price, annual reduction in ICT SLA costs, revaluation of defined benefit pension scheme, staffing costs offset by cost increase in fleet hire and interest payable.

2. Outstanding Issues

Heads of Terms (Premises lease agreement) – the Council is looking to rationalise GEL's premises use as part of the savings programme and need to wait for this exercise to complete before a lease can be finalised. The estimated completion date is spring 2025.

3. Loan Finance

GEL has drawn down on the Company loan facilities amount of £1.1m to fund the repayment of start-up cost. The drawdown was split as follows: £0.930m on Fixed Capital loan facility and £0.170m on Working Capital loan facility; both on the principal repayment basis over the term of loans.

The interest rate is calculated using the EU Base currently at the rate of 4.24% and Margin of 8.5% set by the Council to comply with any subsidy control regime rules. The Council keeps updating the EU base rates on quarterly basis.

4. Bank Update

GEL Company credit card spend from April 2023 to May 2023:

Expense Type	£	Comments
Other Expense	972.42	Stationery, postage, vouchers, travel
Tools & Materials	382.50	Tools & materials
PCN Fines	625.00	Penalty charge notice
Transport for London	60.00	Street operatives Oyster card to ups
	2,039.92	

Greener Ealing Ltd - Board Forward Plan 2023

Date of Meeting	Standing Items	Governance	Strategic	Finance	Performance Management/ Operations/Specific Project Updates
14 Sept 2023	<ul style="list-style-type: none"> • Apologies • Declarations of Interest • Minutes of Meeting • Matters Arising <ul style="list-style-type: none"> - Circular Resolutions • HR Update • MD Report • Performance Report <ul style="list-style-type: none"> - H&S Update - incidents / accidents - Operations Update - Transport Update • Risk Management <ul style="list-style-type: none"> - Risk Register • Forward Plan 	<ul style="list-style-type: none"> • Equality and Diversity Policy and specific equalities objectives –review • Register of Directors’ Interests – review • Data Protection Policy • Health and Safety Policy • Environmental Policy • Quality Policy • Dividend Policy 	•	•	•
Nov/Dec 2023?	<ul style="list-style-type: none"> • Apologies • Declarations of Interest • Minutes of Meeting • Matters Arising <ul style="list-style-type: none"> - Circular Resolutions • HR Update • MD Report • Performance Report <ul style="list-style-type: none"> - H&S Update - incidents / accidents 	<ul style="list-style-type: none"> • CSR Policy – review 	•	•	•

Greener Ealing Ltd - Board Forward Plan 2023

Date of Meeting	Standing Items	Governance	Strategic	Finance	Performance Management/ Operations/Specific Project Updates
	<ul style="list-style-type: none"> - Operations Update - Transport Update • Risk Management <ul style="list-style-type: none"> - Risk Register • Forward Plan 				

ACCOUNTS - NEXT ACCOUNTS MADE UP TO: 31.03.2023 - DUE 31 December 2023

CONFIRMATION STATEMENT - DATE: 1 August 2023 - DUE 15 August 2023