

# Cavan County Council – Draft Internal Audit Review of the Operations and Management of Cavan Public Partnership Network (CPPN)



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# Draft Review of the Operations and Management of Cavan Public Partnership Network (CPPN)

## 1. Introduction

This review of Cavan Public Partnership Network (CPPN) was agreed by the Senior Management Team and Audit Committee of Cavan County Council (CCC) to be undertaken as part of the Internal Audit Plan for 2020.

A principal provision of Section 46 of the Local Government Reform Act 2014 was that each Local Authority adopts a framework for public engagement participation in local government.

CPPN was established in July 2014 replacing the former Community & Voluntary Forum. CPPN forms the main link through which CCC connects with community & voluntary, social inclusion and environmental sectors. The aim is to facilitate and enable public and/or volunteer led organisations (groups) operating within the wider community to articulate and give voice to a diverse range of views, issues and interests within the local government system.

CPPN membership is designed to accommodate the full and diverse range of groups in existence and is open to all groups meeting the general guidelines as set out in The DHPCLG Public Participation Networks (PPNs) User Guide March 2017.

Each member group must then choose to be part of one “college” which represents their primary interest, as follows :

- Environment Sector
- Social Inclusion Sector
- Community & Voluntary Sector

In addition each Municipal District has a PPN which is made up all the member groups with a postal address in the Municipal District, as follows:

- Ballyjamesduff Municipal District
- Cavan/Belturbet Municipal District
- Bailieborough Municipal District

CPPN is made up of number of interconnecting structures, these are

- The Plenary
- Secretariat and Resource Worker
- Municipal District PPN
- Linkage Groups (Representatives Network)
- Thematic Network

The **Plenary** is a meeting of all member groups of CPPN. Each member group has one vote in the Plenary. The Plenary ratifies representatives and policies. The Plenary meets twice a year and is the decision-making body of CPPN.

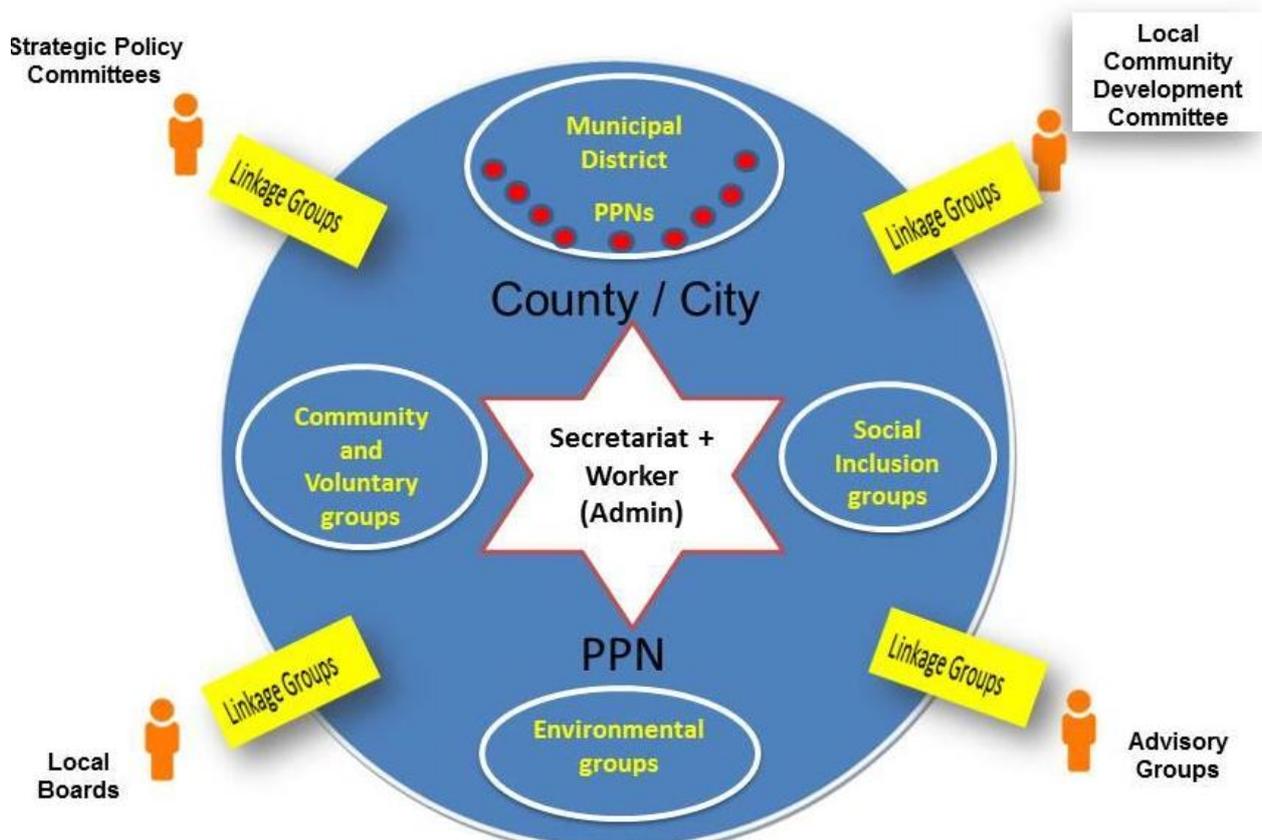
The **Secretariat** is the administrative body of CPPN and is elected by the Plenary. The Secretariat also oversees the day to day operations of CPPN and implements its annual Workplan. **CPPN Secretariat** meets at least four times per year and is made up of two representatives from each college and two representatives from each Municipal District PPN = 12 members.

The **Resource Worker's** role is to support the Secretariat and to co-ordinate CPPN in accordance with its annual Workplan. CPPN currently employs one full time Resource Worker whose employment commenced on 1<sup>st</sup> August 2012 and one full time Support Worker who commenced in 2020.

Each **Municipal District** also has a PPN which is made up of all member groups with a postal address in the relevant Municipal District.

**Linkage Groups** bring together groups with a common interest. These member groups elect representatives to various bodies throughout the county e.g. CCC SPCs, Breffni Integrated Ltd, Local Community Development Committee LCDC, Joint Policing Committee, Local Link, Drugs and Alcohol Taskforce and Cavan Sports Partnership.

**Thematic Network** established from the representatives to support with peer-group meetings and training & development. Linkage Groups choose one representative to attend per representation made to speak on their behalf.



It is intended that CPPN is a FLAT structure. This means that all groups have an equal voice and an equal input into decision making. There is no leader, no overall spokesperson or chairperson.

CPPN is the representative body of all registered public and Community Voluntary Groups within the County and therefore is required to provide an independent / equal consultative platform that is free from any type of undue influences including political, religious, sexual or other cultural persuasions.



Funding for PPNs is provided by both the Department of Housing, Planning, Community & Local Government (DHPCLG) and Local Authorities. This funding facilitates the engagement of a Resource Worker and other costs.

The Department provides a maximum of €50,000 per annum to each local authority, provided it is supplemented by a minimum of €30,000 per annum from each local authority's own resources. In order to recoup the full €50,000 grant, a local authority must spend at least €80,000. Funding is ring fenced and can only be used for the purposes of developing and maintaining the PPN.

## 2. Audit Objective

The objective of this audit of CPPN is to provide assurance to the Senior Management and the Audit Committee of CCC on behalf of all relevant stakeholders that CPPN:

- operates as a FLAT structure;
- adheres to its governance structures, policies and procedures;
- adheres to the principles and values of PPNs as outlined in The DHPCLG Public Participation Networks (PPNs) User Guide March 2017; and
- is operated and managed in accordance with guidelines issued by the DHPCLG.
- operates in line with the PPN Service Level Agreement / Memorandum of Understanding with CCC.

## 3. Audit Scope

It is recognised that there are local variations in how PPNs are implemented and this review will examine the operations and management of CPPN with specific reference to 2018 / 2019 documentation.

The scope of this review will primarily focus on the governance structures and procedures of CPPN and will cover the following:

- formal registration details and documentation;
- terms of reference;
- role and objectives;
- membership and appointments to plenary, secretariat, linkage groups, representative's network, thematic network and other committees;
- particulars of meetings, minutes and reporting lines;
- policies & procedures;
- decision making process;
- finances & funding;
- communication between CCC regarding initiatives and funding arrangements; and
- service level agreement and/or memorandum of understanding in place between CCC and CPPN.

It was intended as part of this review that an appraisal of the effectiveness of the activities and supports provided by CPPN be undertaken from a sample of past and present member groups. This appraisal required access to CCPNs membership database and was planned to be facilitated by CCC's Community & Enterprise Section (C&E) via a questionnaire with responses returned directly to the Senior Executive Officer of that Department. Due to work restrictions surrounding the Covid 19 pandemic this appraisal has not been completed to date and does not form part of this draft report.

At the beginning of this review, Internal Audit met with the Resource Worker to discuss audit scope, objectives and solicit input.

It was outlined that full access to all CPPN documentation and files including bank accounts would be required and that all information gathered would be dealt with in line with data protection regulations.

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## **4. Findings & Recommendations**

### **4.1. GOVERNANCE / OPERATIONAL STRUCTURE**

In accordance with the 2017 PPN User Guide, PPNs are permitted to establish a company or co-operative, provided that this activity does not detract operationally from the flat structure of the PPN.

As detailed in the PPN Network Annual Report 2018 out of a total of 29 PPN respondents, 6 were hosted by another Community Organisation, 19 were hosted by the Local Authority, 3 operated as Independent Companies for the full year and 1 was hosted until October 2018 before operating as an Independent Company for the remainder of the year.

#### ***Structure of Cavan PPN***

Up until the middle of 2019 CPPN operated as a Company Limited by Guarantee with no share capital (Cavan Public Partnership CLG). This was established in July 2014 replacing the former Cavan Community & Voluntary Forum Limited.

#### ***CLG Wind-up***

At a CPPN meeting of 12<sup>th</sup> February 2019 the Secretariat and the Directors of Cavan Public Partnership CLG decided to wind-up this company, effective 30<sup>th</sup> June 2019, and reverted to the same status as heretofore a voluntary non-profit making organisation. On 1<sup>st</sup> July 2019 Cavan Public Participation Network (CPPN) registered for Income Tax and PAYE/PRSI and was issued with a Tax Clearance Certificate on 12<sup>th</sup> September 2019.

Internal Audit was informed that the basis of this decision was prompted by a discussion document derived from a meeting of the PPN National Advisory Group (NAG) on 7<sup>th</sup> November 2018. The minutes of a subsequent NAG meeting dated 13<sup>th</sup> February 2019 stated that this was a discussion document only and was not meant for general circulation outside the remit of its members. The particulars of same referred to the main findings of an audit review of Limerick PPN undertaken by Deloitte Ireland LLP in 2018 and questioned the possible lack of rationale for formalising the independence of PPNs

via the establishment of private companies and the additional financial and administrative burden associated with them.

From discussions with the Resource Worker Internal Audit was of the understanding that the NAG had also indicated that the Department had given due consideration to the guidance pertaining in this document and were proposing to issue a circular to all LAs and PPNs on the conclusions of the Auditor's Report, directing that no further PPNs be established as limited companies and that where PPNs were currently operating as companies they should be wound up by voluntary liquidation by 30 June / 31 December 2019. In advance of this CPPN sought the necessary advice from their Accountants and immediately proceeded to wind-up the company replacing it with their preferred structure as a non-profit making organisation.

### ***CPPN Collaboration with CCC***

C&E were initially informed of the potential wind-up of the company at a meeting with the Resource Worker and Secretariat on 8<sup>th</sup> March 2019. A hardcopy of the NAG discussion document was provided to them with the understanding that a formal circular would issue in due course from the Department. Subsequently C&E followed this up with the relevant Department Official and were informed that this was only a discussion document and that no final decision was ever reached on the matter. The Resource Worker was made aware of same by C&E. In accordance with the clarification sought C&E were, therefore, of the assumption that the wind-up of the company would not proceed until formal instructions were issued. Ultimately if this was necessary C&E believed both parties would collaborate on the future of CPPN in accordance with the national status of the best operational practices for PPNs. Internal Audit also noted that at no stage had C&E given approval to proceed with the wind-up and there was no further communication from CPPN in this regard until well after the company had been formally wound up. The Department was also unaware of the change made to the operation structure of CPPN.

### **Plenary's Approval of the Wind-Up of CPPN CLG**

From a governance perspective the Plenary is the ultimately decision-making body of CPPN, with the Secretariat acting as an administrative body to facilitate the implementation of any decisions approved on their behalf.

Internal Audit was informed by the Resource Worker that Plenaries meetings were generally treated as networking seminars and that no formal minutes are recorded of any decision taken. Instead a short Plenary Report is generally prepared by the Resource Worker for the Secretariat of the PPN. On this basis it is our understanding that the Plenary had no major discussion on potential impact of the wind-up of the PPN company or on the rationale of the proposed new structure. While the decision taken was noted as accepted in the Resource Worker's Report of a gathering of the Plenary held on 15<sup>th</sup> June 2019 no formal minutes are available on the adoption or approval of same by its members. This Plenary gathering took place at a time very close to when the administrative / legal procedures of the CLG wind-up were near completion.

### **Internal Audit Overview of the CPPN Wind-Up**

Having examined the approach applied to the formal wind-up of the PPN company concerns are raised by Internal Audit on how this matter was primarily managed under the control of Secretariat with similar concerns expressed by the executive of C&E.

The main issues identified were:

- The fact that such a vital operational decision taken by CPPN was based purely on a discussion document and that the Department had not issued any formal circular to either CPPN or CCC advising them of the wind-up of such companies.
- The lack of any proper engagement or consultation in this regard by CPPN with the main funding body CCC. While it is acknowledged that in March 2019 CCC were informed that the Secretariat were considering winding-up the company as proposed in the discussion document, CPPN only informed CCC after the company dissolution and the new PPN structure was established in a letter dated 7<sup>th</sup> October 2019.
- More importantly there was no approval sought from CCC authorising the formal wind-up of Cavan Public Partnership CLG and no agreement was reached on the formation of the new voluntary non-profit making structure for managing the operations of the network. While a Service Level Agreement (SLA) and Memorandum of Understanding (MOU) are in place between CPPN and CCC

there appears to have been some disregard of the core role that the local authority plays in the operations of the PPN.

- Internal Audit is also of the opinion that prior to the formation of the new non-profit making organisational structure of CPPN there was no real appraisal of the alternative options available for managing CPPN or consideration given to how the majority of PPNs operate nationally with the support of their respective authorities.
- Given the current informal meeting structure applicable to the Plenary of CPPN and the limited availability of minutes on the operational / representational decisions taken Internal Audit found it difficult to provide reasonable assurance on the transparency of the decision-making process of network as the structure applied appears somewhat informal or unregulated.

#### 4.1.1. Recommendation -

- It is recommended that a review of the current governance structure of the network be undertaken by CPPN and CCC to ensure that the structure in place is open, transparent, socially inclusive and operates effectively and efficiently in addressing the ongoing needs of all voluntary groups in County Cavan.

#### 4.1.2. Recommendation -

- For future reference all Plenary decisions taken should be clearly documented and fully implemented in line with the PPN User Guide.  
All decisions ratified by the Plenary should be recorded in the minutes of their meetings. In convening Plenary meetings on the agenda item “matters arising” a progress report on any matters previously discussed should be noted.

## 4.2. ELECTORAL PROCEDURES - SECRETARIAT MEMBERSHIP AND REPRESENTATION APPOINTMENTS

### *CPPN Representatives Charter and the Electoral Procedures*

The membership of the Secretariat is designed to be as broad as possible and reflective of the diversity of the groups. People elected to the Secretariat must be nominated by a registered community group in their MD or college. No volunteer or group of volunteers should be able to / left to administer the PPN on a long-term basis. A truly participative PPN requires a regular refreshing of different roles.

Internal Audit have reviewed the CPPN Representatives Charter and the Electoral Procedures (**Appendix 1**) which state:

*“The method through which the CPPN elect community representatives is via the Linkage Groups, public engagement events where registered community groups may put forward and elect representatives to the various bodies the CPPN holds representation upon on behalf of the community groups of County Cavan”*

Internal Audit has found no evidence that this Linkage Group route is used.

The electoral procedure appears to be that Community elections are advertised on the CCPN website, expressions of interest are requested, after which mandating or ballot (where there are multiple nominations) takes place at the next Plenary. In most instances new representatives elected since the last Plenary are simply mandated at the next Plenary. The query of why Plenaries were mandating already elected reps was raised by one member at the June 2019 Plenary.

- There was no evidence supplied to support verification of the nominees by the Secretariat to ensure they meet the criteria laid down in the aforementioned Electoral Procedures and PPN Guidelines or evidence of ballot if multiple nominations.
- In some instances, nominees have no proposer or seconder and were appointed based on their own expression of interest.

- It is noted that a detailed review of the 2020 CPPN Secretariat and Representatives against the registered groups indicate that all of the groups they represent are currently registered.

#### 4.2.1. Recommendation –

- The election procedures of CPPN are currently not in accordance with the PPN guidelines in that all elections should be by secret vote. It is vital that the electoral process is robust and transparent as it may be open to challenge. Internal Audit notes that re-establishment of Linkage Groups is a priority of the Resource Worker for 2020 and recommends CPPN reviews the PPN User Guidelines regarding election procedures.

### **4.3. FLAT STRUCTURE**

Having a flat structure ensures that no single voice or group of voices controls the PPN. Final decisions are made by the Plenary i.e. all the member groups.

As there were no formal Plenary minutes kept by CPPN Internal Audit undertook a detailed review of the Secretariat minutes for 2018 and 2019 the particulars of which were available on file. This review indicates;

- The Resource Worker and a quorum were present for each meeting.
- Rotation of the Chair and the Secretary positions was taken up by only 37.5% of members.
- Minutes were proposed and seconded by 42% of members.
- The finance reports were proposed and seconded by 42% of members.
- Minutes were signed by 12.5% of members.
- Internal Audit also noted over the years that administration / management of the Cavan Public Partnership CLG and the responsibility of the company returns was largely left to one member of the committee with all submissions and forms signed by that member.

On this basis some concern is expressed on whether a culture had unknowingly developed whereby too much reliance is vested in certain members.

While it is acknowledged that this situation within the Secretariat may have evolved unintentionally over time, it is important that when identified such control weaknesses are addressed to ensure best practice applies in managing the operations of the PPN. Ultimately as a key financial contributor to CPPN it is vital to ensure the public reputational risk of CCC is protected at all time.

Internal Audit is also of the view that the company structure which CPPN had operated over the years i.e. the former limited company and now the current non-profit making organisational structure could have been somewhat counteractive in attracting renewed representation by groups within the county. It is possible that the envisaged bureaucracy of such a structure may be considered as outside the whole ethos of community volunteerism therefore viewed as non-attractive to any proposed beneficiaries of CPPN.

#### 4.3.1. Recommendation –

- With the aim of maintaining a flat tiered representative system that enhances involvement by more community groups within the County, CPPN must ensure the structure presented is reflective of the diversity of its membership. It needs to proactively encourage ongoing renewed representation onto the various committees including the Secretariat. This should help curtail the level of dependency placed on the usual hardworking committee members.

#### 4.4. DATABASE MEMBERSHIP & DATA PROTECTION

The DHPCLG has rolled out a Salesforce Database System to all PPNs, to facilitate efficient communications and comply with data protection requirements. Salesforce also provides a facility to manage a variety of communications processes and events such as email campaigns, newsletters, workshops and training events and to log and track meetings and attendances at meetings.

The Secretariat is responsible for managing the membership database. Groups should re-register with CPPN each year, to ensure that their information is up to date.

It is noted that CPPN Data Protection Policy (**Appendix 1**) was adopted by the Secretariat on 12.06.2018 and is available on [www.cavancommunity.ie](http://www.cavancommunity.ie).

##### ***CPPN Performance Indicators***

The performance indicator statistics of CPPN highlighted a growth in active registered groups to the network between 2016 to 2017, decreasing in 2018 and increasing in 2019 and 2020. The particulars of same are as follows:

<b>Year</b>	<b>31/12/2016</b>	<b>31/12/2017</b>	<b>31/12/2018</b>	<b>11/07/2019</b>	<b>08/06/2020</b>
Active Groups	<b>192</b>	<b>280</b>	<b>211</b>	<b>257</b>	<b>270</b>
Registered					

Following CPPN recent re-registration of groups on the system the figures currently stand at 270 live groups. The rationale for variations in the figures should be examined by both the CPPN and CCC to identify any concerns that may exist on the ground about the operations or supports provided by CPPN. Perhaps there is a lack of awareness by the community groups of the services and operations of CPPN.

On reviewing these 270 Salesforce membership listings provided (dated 3<sup>rd</sup> June 2020) there are numerous instances where individuals are listed as the contact point for multiple groups. This may give an unfair advantage in seeking nomination onto the Secretariat or other bodies.

#### 4.4.1. Recommendation –

- Internal Audit is concerned that from commencement of this audit there has been numerous versions of the registered groups list supplied by CPPN from Salesforce and Excel records. It is recommended that both CPPN and CCC undertake an assessment of the active groups currently registered to ensure the information is complete and accurate on the database.

#### 4.4.2. Recommendation –

- The CPPN Data Protection Policy (**Appendix 1**) should be reviewed in accordance with new GDPR legislation and adopted by Plenary.

#### 4.4.3. Recommendation –

- It is advised that training on Salesforce is arrange for the relevant staff as the new Support Worker is unaware of the system software and the Resource Worker requires some upskilling on the system.

### 4.5. FUNDING

Details of CPPN funding for 2018 / 2019 is as follows:

CPPN Funding	CCC (Local Authority)	Department	Other	Total Income	Comment re Other Income
2018*	27,500	45,833	11,000	84,333	Employment of a Volunteer Information Worker
2019**	27,500	45,833	27,500	73,333	Contribution towards the engagement of Support Worker – Not Utilised until 2020

\* Public Participation Networks Annual Report 2018

\*\* Budget CPPN 2020

## ***Memorandum of Understanding (MOU) and Service Level Agreement (SLA)***

In accordance with Circulars CVSP1/2015 & CVSP2/2019 funding should only be provided to PPNs on the basis of a clear Memorandum of Understanding (MOU) and Service Level Agreement (SLA) being in place between the PPN and the Local Authority. A Service Level Agreement (SLU) between CCC and CPPN was signed on 09.08.2016 and a Memorandum of Understanding (MOU) between CCC and CPPN was signed on 08.03.2019 (**Appendix 2**).

- At the time of this review the revised SLA and MOU agreeing a resource allocation for 2020 of €104,032 to come into force on 01.01.2020 have not been signed by CCC.
- Having reviewed the quarterly claims for 2019 submitted by CPPN to CCC Q3 and Q4 were found to have been incorrectly totaled and understated by €37.55.

Internal Audit noted from the CPPN Finance Policy (**Appendix 1**) that two cheque signatories are appointed by the Secretariat and that two members of the Secretariat must authorize any expenditure on any single item over €1,200 except when paying for monthly salaries and Revenue.

### **4.5.1. Recommendation –**

- On implementation of the recommendations of this report Internal Audit advises that the relevant SLA and MOU agreements for 2020 be immediately reviewed by CCC in accordance with any amendments made to governance procedures or operational structure of CPPN.

### **4.5.2. Recommendation –**

- It is advised that control checking procedure of the financial transactions of CPPN be enhanced to avoid possible errors prior to submission to CCC.

### **4.5.3. Recommendation –**

- At present the Resource Worker has sole responsibility for financial matters of CPPN and an opportunity for segregation of duties should be given consideration in light of the recent appointment of a Support Worker.

#### 4.5.4. Recommendation –

- As CPPN is governed by the Prompt Payment of Accounts Act all invoices / dockets should be in the name of CPPN and date stamped when received.

#### **4.6. TRAVEL EXPENSES**

The travel policy (**Appendix 1**) of CPPN states that payment shall be made to elected members who are actively representing the PPN in their allocated meetings and/or events requested that they attend as PPN representatives in the absence that the representative body cannot pay the travel cost to the member. In addition, a Travel Claim Form shall be made available to all members in the final quarter of each year for completion and submission to the Resource Worker prior to the end of the first week of December. A total of €4,288.55 was paid to 12 claimants for travel expenses in 2019 at rates which were as outlined in the policy. A detailed review of these expenses was undertaken and indicates:

**37%** relates to the role of the Resource Worker

**29%** relates to travel of one individual Claimant / Representative

**34%** relates to the travel of 10 Claimants

An examination of the travel expense claims for 2019 found that the travel expense form needs to be enhanced e.g. column for mileage being claimed.

- There should be evidence supplied by claimants to back up claims if representative bodies cannot pay travel costs.
- It was also found that forms were not signed by the claimant or countersigned by the appropriate supervisor as outlined in Finance Policy.
- As best practice there needs to be a certification control process introduced prior to travel expenses being issued to claimants.

#### 4.6.1. Recommendation –

- It is recommended that the travel expense claim documentation, and expense certification procedures of CPPN be enhanced.

## 4.7. MONITORING & EVALUATION

Each PPN and LA should have a plan to monitor their own activities against the workplan and against the national guidelines. It is noted that regular minuted meetings are held between C&E and CPPN. In addition to this C&E is updated monthly by email of all PPN meetings / activities.

A PPSN National Advisory Group was established in 2016 to aid in the further development of PPNs. This group will provide the necessary oversight, monitoring and evaluation of PPNs and will serve as a channel through which performance indicators etc. will be collated and reported to the DHPCLG. To date 3 annual reports on PPNs have been published and a series of recommendations have been made to develop the PPNs (refer Section 7 of the Public Participation Networks Annual Report 2018).

### 4.7.1. Recommendation –

- It is the opinion of Internal Audit that an enhancement of the current reporting structure between C&E and CPPN is required.
- As previously mentioned in the Audit Scope of the report it was intended as part of this review that an appraisal of the effectiveness of the activities and supports provided by CPPN be undertaken from a sample of past and present member groups. Internal Audit recommends that this appraisal be carried out as soon as practicable by C&E.

## 4.8. POLICIES & PROCEDURES

CPPN's Constitution adopted 09.04.2019 (**Appendix 1**) states it shall abide by the PPN's User Guide, a MOU, a SLA and maintain the following Network policies. A Well Being Statement, A Representative's Charter, Data Protection Policy, Good Governance and Electoral Procedures and review these policies from time to time.

As per the guidelines CPPN has developed a Wellbeing Statement and the Representatives Charter to show the interlocking relationships between Linkage Groups, Representatives and the Boards/Committees they sit on.

## **4.9. OFFICE ACCOMMODATION / ACCESS**

CPPN is based in Cana House, Farnham Street, Cavan, Co Cavan H12 R7Y2 in a premise provided by CCC as part of their funding agreement. The offices are located on the second floor of a damp building and are not serviced by a lift or have adequate meeting facilities.

### **4.9.1. Recommendation –**

- It is recommended that CPPN ensures their office accommodation is fully accessible to all users. Due consideration should be given to sourcing alternative offices that are located in a more prominent position that creates greater awareness of the PPN services available to voluntary organisations.

## **4.10. WEBSITE / DOCUMENTATION – GENERAL**

Following a review of the CPPN website and documentation submitted as part of this review Internal Audit have the following general recommendations:

### **4.10.1. Recommendations –**

- The CPPN website, compared to research of other PPN websites, has indicated that the CPPN website layout needs updating and regular maintenance.
- All CPPN documentation should be fully dated and signed (if required).
- Attendance Sheets should be taken at each meeting and attached to minutes and/or reports. In addition, these minutes should clearly state who is acting as Chairperson and Secretary and be signed and dated by both the Proposer and Seconder.
- Representative attendance at external meetings / events should be tracked and consideration given to an enhancement of the feedback reporting system which is currently included in Secretariat Minutes under Representatives Reports.

#### **4.11. RESOURCE WORKER**

Internal Audit observed a willingness from the Resource Worker to make CPPN a success and to allow it to deliver on its objectives. The difficulties of working within a flat structure and being answerable to a rotating chair and committee are acknowledged. It is noted that the Department's advice regarding the formation of a Staff Support and Liaison Committee has been actioned at the September 2019 Secretariat Meeting.

From discussions with the Resource Worker, Internal Audit noted that there is a need for additional HR assistance and support for all employees of CPPN.

A review of the Winter 2019/20 Community Focus Newsletters was conducted and same was felt to portray an excellent reflection of the activities of the CPPN.

#### **5. Management Response**

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## 6. Audit Opinion

The objectives of the Cavan Public Participation Network are reflected in CCC's Corporate Plan 2019-2024 and its mission statement:

***“A Council that leads and collaborates with all  
to drive and shape a better future for our County”***

Having undertaken this review, Internal Audit can provide reasonable assurance that CPPN adheres to the principals and values of PPNs as outlined in the Public Participation Networks (PPNs) User Guide March 2017 and is operated and managed in accordance with its own policies and procedures.

Having completed the review several governance concerns were raised by Internal Audit with the Secretariat and the Senior Executive Officer of C&E especially with regard to:

- The lack of any proper consultation on the formal wind-up of CPPN CLG.
- The rationale for the decision of the CPPN Secretariat to cease the company without receipt a formal circular from the Department or approval from CCC to undertake same.
- Limited consultation with CCC on the establishment of the new non-profit making structure of the representative body.
- Potential weaknesses in the electoral procedures of the PPN.
- Concerns about the variation in network membership database and the need for appropriate CPPN evaluation procedures.
- Current office accessible and location issues.

With a view to enhancing the PPN procedures operated by CPPN the Internal Audit Team on behalf of CCC has outlined a number of proposed recommendations for implementation which are summarised in Section 7 of the report.

## 7. Follow Up

Internal Audit will follow-up on the implementation of the recommendations in this report.

### Analysis of key findings for which recommendations are set out in the report

Associated Risk	No. of Recommendations / Actions
High	
Medium	
Low	

**High** Risk Recommendations should be implemented within 3 months.

**Medium** Risk recommendations should be implemented within 6 months.

**Low** Risks within 12 months.

Ref	Audit Recommendation /Agreed Actions	To be implemented by		Status
		Comment / Whom	When	
4.1.1.	It is recommended that a review of the current governance structure of the network be undertaken by CPPN and CCC to ensure that the structure in place is open, transparent, socially inclusive and operates effectively and efficiently in meeting the ongoing needs of the voluntary groups of County Cavan.			
4.1.2.	It is recommended that all decisions ratified by the Plenary on behalf of CPPN must be clearly documented in the minutes of their meetings. It also advised that the Secretariat at the following Plenary meeting under “issues arising” indicates how decisions taken at the previous Plenary meeting are progressing. Ultimately for future reference all Plenary decisions taken should be clearly documented and implemented in line with the PPN User Guide.			

4.2.1	It is vital that the electoral process of CPPN is robust and transparent and operates in accordance with the recommended PPN guidelines. Internal Audit also notes that re-establishment of Linkage Groups is a priority of the Resource Worker for 2020 and recommends CPPN reviews the PPN User Guidelines regarding election procedures.			
4.3.1.	Aimed at maintaining a flat tiered representative system that enhances involvement of more community groups within the County, CPPN must ensure the structure presented is reflective of the diversity of its membership. It needs to actively encourage ongoing renewed representation onto the various committees including the Secretariat to curtail the level of dependency placed on the same hardworking committee members.			
4.4.1	It is recommended that both CPPN and CCC undertake an assessment of the active groups currently registered to ensure complete and accurate information on the database.			
4.4.2.	It is advised the CPPN Review their Data Protection Policy in accordance with new GDPR legislation.			
4.4.3.	It is recommended that Salesforce Training be undertaken by the Resource Worker and Support Worker of CPPN to ensure maximise usage of the system facilitates of software supports.			
4.5.1.	On implementation of the recommendations of this report Internal Audit advises that the relevant SLA and MOU agreements for 2020 be immediately reviewed by CCC in accordance with any necessary amendments to governance procedures or operational structure of CPPN.			

4.5.2.	It is advised that controls procedures for cross checking the financial transactions of CPPN be enhanced to avoid possible return errors or submission to CCC.			
4.5.3.	At present the Resource Worker has sole responsibility for processing and managing the financial matters of CPPN. In line of the recent appointment of a Support Worker consideration should be given to an opportunity to facility the possible segregation of the related duties.			
4.5.4.	As CPPN is governed by the Prompt Payment of Accounts Act all invoices / dockets should be in the name of CPPN and date stamped when received.			
4.6.1.	It is recommended that the Travel Claim Form and introduction of certification control process of CPPN be enhanced.			
4.7.1.	<p>Monitoring and Evaluation - enhancement of the current reporting structure between C&amp;E and CPPN.</p> <p>Proposed Questionnaire appraisal of the effectiveness of the activities and supports provided by CPPN to be undertaken from a sample of past and present member groups. Internal Audit recommends that this appraisal be carried out as soon as practicable.</p>			
4.9.1.	It is recommended that CPPN ensures their office accommodation is fully accessible to all users. Due consideration should be given to sourcing alternative offices that are located in a more prominent position that creates a greater awareness of the PPN services available.			
4.10.	<p>Internal Audit proposes that the website of CPPN be reviewed in line with other PPN websites to take account of the possible enhancement and updating the of site layout and incorporating regular maintenance of same.</p> <p>All CPPN documentation should be fully dated.</p>			

	<p>Attendance Sheets should be taken at each meeting and attached to minutes and/or reports.</p> <p>Due to chair rotation it should be clearly stated on all Minutes who is acting as Chairperson and Secretary.</p> <p>Minutes should be signed and dated by both the Proposer and Seconder.</p> <p>Representative attendance at external meetings / events should be tracked and consideration given to an enhancement of the feedback reporting system which is currently included in Secretariat Minutes under Representatives Reports.</p>			
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Note: The proposed actions referenced in **Red** are those which Internal Audit considers to be most urgent. Note the management responses should be incorporated in the relevant section of the draft report together with the Agreed Actions Schedule. This report should be returned by email to the Internal Audit Unit before **26<sup>th</sup> June 2020**.

**Chairperson:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Secretariat – CPPN**

**Senior Executive Officer:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Community & Enterprise, Cavan County Council**

**Director of Service:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Community & Enterprise, Cavan County Council**

## 8. Acknowledgements

Internal Audit wishes to acknowledge and thank the Cavan Public Participation Network, the Resource Worker and Support Worker and Staff of Cavan County Council's Community & Enterprise Section for their assistance throughout this audit.

## 9. Audit Team

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John O'Reilly  
Internal Auditor  
Cavan County Council

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Orla Conaty  
Internal Audit  
Cavan County Council

Draft Report: 08.06.2020

## APPENDIX 1

1. Electoral Procedures of Cavan Public Participation Network (CPPN)
2. Cavan PPN Representatives Charter – Adopted 11.09.2018
3. Cavan Public Participation Network DATA PROTECTION POLICY – Adopted 12.06.2018
4. Cavan Public Participation Network Finance Policy – Procedures – Controls
5. Cavan Public Participation Travel Policy & Travel Claim Form
6. Constitution of Cavan Public Partnership Network – Adopted 09.04.2019

## **APPENDIX 2**

1. Service Level Agreement (SLU) between CCC and CPPN signed on 09.08.2016.
2. Memorandum of Understanding (MOU) between CCC and CPPN signed on 08.03.2019.

DRAFT