Borough Council of
King's Lynn &
West Norfolk

Annual Governance Statement

For the 2018/19 financial year

1. Scope of responsibility

1.1 The Borough Council of King's Lynn and West Norfolk is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. The council also has a statutory duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of the above.

1.2 The council has a Code of Corporate Governance in place which sets out how the council intend to apply the principles of corporate governance, in accordance with 'Delivering Good Governance' within the Local Government CIPFA/ SOLACE Framework. The code is on our website at www.west-norfolk.gov.uk. The code was reviewed by Audit Committee during 2018/19.

1.3 This Annual Governance Statement explains how the council has complied with the code and also meets the requirements of the Accounts and Audit Regulations 2015, regulation 6(1) which requires all relevant bodies to conduct a review of the effectiveness of the system of internal control and prepare a statement.

2. The purpose of the governance framework

2.1 The governance framework comprises the systems, policies, procedures and operations by which the authority is directed and controlled, and its activities through which it accounts to, engages with and, where appropriate, leads its communities. It enables the authority to monitor the achievement of its strategic objectives and outcomes and to consider whether those objectives have led to delivery of appropriate services and value for money.

2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an on-going process designed to:

- identify and prioritise the principal risks to the achievement of the council's policies, agreed priorities and objectives
- evaluate the likelihood and potential impact of those risks being realised
- manage them efficiently, effectively and economically.

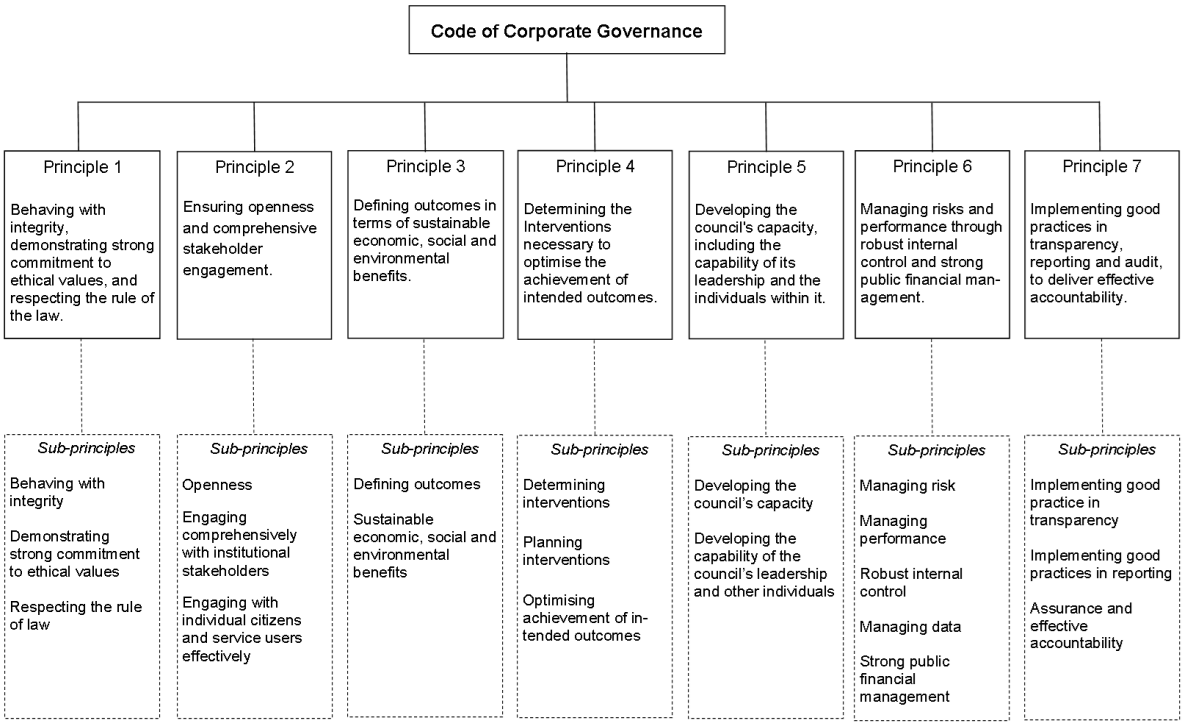
2.3 The governance framework has been in place at the council for the year ended 31 March 2019 and remains in place to date.

3. Key principles of our governance framework

3.1 The council's governance framework is made up of the many systems, policies, procedures and operations we have in place to help realise the following principles and sub-principles summarised in the following diagrams:

CIPFA/ SOLACE: Delivering Good Governance in Local Government Framework 2016

Borough Council of King's Lynn and West Norfolk Code of Corporate Governance framework



3.2 The table at Appendix A lists the types of evidence that will demonstrate how the principles of corporate governance have been upheld during the 2018/19 year.

3.3 Sections 4 to 10 summarise how we have sought to comply with the seven principles.

4 Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law (Principle 1).

4.1 Behaving with integrity.

4.1.1 The council has adopted a constitution which sets out how the council operates, how decisions are made and the procedures which are followed to ensure these are efficient, transparent and accountable. The Monitoring Officer has a duty to monitor and review the operation of the Constitution to ensure its aims and principles are given full effect. The council reviews the Constitution to incorporate any necessary changes. The constitution was amended in January 2019 following minor amendments to the scheme of delegation to take account of an additional area of responsibility, and to provide the Chief Executive with a formal Deputy Returning Officer and Electoral Registration Officer.

4.1.2 Roles and responsibilities of members and officers are set out clearly in the constitution. The council has adopted a number of codes and protocols that govern both member and officer activities. These are:

- Members Code of Conduct and guidance
- Officers Code of conduct
- Member / officer protocol
- Members' declarations of interest
- Register of gifts and hospitality
- Contract Standing Orders
- Code of Corporate Governance

4.1.3 Additionally, the council appoints a number of committees and panels to discharge the council's regulatory and scrutiny responsibilities. These leadership roles, and the delegated responsibilities of officers, are set out in the Constitution.

4.1.4 The council's Scheme of Delegation designates the Chief Executive as the council's Head of Paid Service. The Scheme of Delegation sets out the remit of elected member Portfolio Holders and the extent of delegations made to committees and officers under the principle that decisions should be made at the lowest or most local level consistent with the nature of the issues involved. The council also has Financial Regulations, Contract Standing Orders relating to contracts in place and all of these procedural documents are regularly reviewed.

4.1.5 It is the function of the Monitoring Officer to ensure compliance with established policies, procedures, laws and regulations. After consulting the Chief Executive and Deputy Chief Executive (S151 officer), she will report to the full council if she considers that any proposal, decision or omission would give rise to unlawfulness or maladministration. Such a report will have the effect of stopping the proposal or decision being implemented until the report has been considered.

4.1.6 The Monitoring Officer, is provided through the Council's arrangements with Eastlaw for the provision of legal services and provides advice on legal compliance. All decisions made by Cabinet and Council are on the basis of reports, including assessments of the legal and financial implications, and consideration of the risks involved and how these will be managed. The financial and legal assessments are considered by the S151 Officer and the Monitoring Officer respectively.

4.1.7 The Monitoring Officer has a duty to monitor and review the operation of the Constitution to ensure its aims and principles are given full effect. The council reviews the Constitution regularly to incorporate any necessary changes.

4.1.8 The Code of Corporate Governance was reviewed in 2018/19 and, in March 2019, the Audit Committee recommended it for approval by Cabinet. This updated version reflects the Delivering Good Governance in Local Government: Framework (CIPFA/Solace, 2016).

4.1.9 The Members' Code of Conduct sets out requirements for all councillors and co-opted members. Every member and co-opted member of the Borough Council of King's Lynn and West Norfolk must sign an undertaking to observe the Code.

4.1.10 Further measures include:

- Principles and values are covered in the induction programmes for elected members and officers and outline the standard of behaviour expected.
- Each member of staff has an annual appraisal which considers performance and objectives, areas of development and competencies.
- Values are reinforced via content within the regular staff briefing Internal Affairs and Members Bulletin. These are supplemented with media releases on matters such as long service awards.
- Contract Standing Orders identify roles and responsibilities for officers and promote the highest standards of integrity, fairness, openness and transparency.
- The members and officers code of conduct refers to a requirement to declare interests. Declarations of interest are made at each committee meeting and recorded in minutes.
- The committee meetings are conducted in an appropriate manner with training provided for committee chairmen and vice-chairmen and other members where relevant.

4.1.11 The council's Standards Committee met twice during 2018/19 considering a consultation on ethical standards (April 2018) and an investigation against a borough councillor (19 July 2018). The investigation identified a breach in the council's code of conduct and the councillor was censured and removed from committees and outside bodies.

4.1.12 Several registers are in place covering interests and gifts/hospitality.

4.1.13 A whistleblowing policy is in place and provides protection for individuals raising concerns. This policy has also been provided to the public, staff, partners and contractors.

4.1.14 A complaints policy is in place and 46 complaints regarding behaviour/conduct were recorded in 2018/19 compared with 52 complaints in 2017/18.

4.1.15 The council has in place key documents which communicate the standards of behaviour required of members and all council staff (officers). All relevant policies are published on the council's intranet or on the personnel system CIPHR and where required published on the council's website. These include the:

- Anti-Fraud and Anti-Corruption Strategy
- Data Protection Policy
- Data Quality Policy & Strategy
- ICT Security Policy
- Information Risk Policy
- Members Code of Conduct
- Members Code of Good Practice for

- Disciplinary / Grievance procedures
- Employee Handbook (includes employee code of conduct)
- Fraud Response Plan
- Health, Safety & Welfare General Policy
- ICT Asset Management Policy
- ICT Computer Usage Policy
- ICT Corporate Email Policy
- ICT Corporate Internet Policy
- Planning
- Procurement Strategy
- Protocol for Member/Officer Relations
- Record Retention and Disposal Policy
- Register of Disclosable Pecuniary Interests
- Risk Management Policy
- Safeguarding Policy
- Whistleblowing Policy

4.1.16 The following codes and policies were approved in 2018/19:

- Members Code of Good Practice for Licensing, Cabinet, June 2018.
- Health, Safety and Welfare Policy, Cabinet, May 2018

4.1.17 The five ICT related policies are reviewed annually and refreshed when appropriate to ensure they are in line with the latest ICT technology advancements and information security guidelines. Keeping information securely is vital for public confidence and the efficient conduct of business.

4.1.18 The Baseline Personnel Security Standard (BPSS) continues as standard practice within the Council's recruitment and appointment processes, to ensure that employees who access information held on the Public Services Network (PSN) meet a minimum baseline standard of security checks. It is a pre-appointment check which aims to ensure the council employs people who are entitled to work in the UK and who have the honesty, integrity and values needed.

4.1.19 The Performance Management Framework also describes how staff performance, including conduct, is managed. The staff performance related pay scheme was reviewed later in the year and trialled new grades. All employees have detailed job descriptions and person specifications.

4.1.20 The council also has a Harassment Procedure in place for staff, which demonstrates the belief that all employees have a right to be treated with dignity and respect, and that the council will take steps to ensure this right is protected. All policies are available to all staff and councillors via the council's intranet InSite.

4.1.21 Following the approval of a revised Equalities Policy a training programme will be developed during 2019.

4.2 Demonstrating strong commitment to ethical values.

4.2.1 An Internal Audit review of "Ethical culture" in 2018/19 received a full assurance rating demonstrating the council's strong commitment to ethical values.

4.2.2 The council has a Code of Conduct for elected and co-opted members, a Code of Conduct for employees and a local Code of Corporate Governance that provides guidance for officers and members on expected standards of behaviours to ensure integrity.

4.2.3 Members receive training on standards arrangements, declarations of interests and the Code of Conduct as part of the authority's discharge of its statutory duty to promote and maintain high standards of conduct by its members.

4.2.4 The Code of Conduct focuses upon the Nolan principles of conduct in public life of selflessness, integrity, objectivity, accountability, openness, honesty, and leadership. It sets an objective, non-political and high standard whose purpose is to remind members of the behaviour expected of them in public life and to set out clearly the key principles against which their conduct is measured.

4.2.5 The Monitoring Officer works closely with the Standards Committee and Independent Person on any complaints regarding the potential breach of the Code of Conduct by members. Complaints are handled in accordance with the authority's arrangements for dealing with standards allegations under the Localism Act 2011 and the outcome of such investigations are published on the council's website.

4.2.6 There were no identified cases of corruption or misuse of power in 2018/19.

4.2.7 There are a range of personnel policies which foster a commitment to strong, ethical behaviour. For example, the annual appraisal process provides a means of considering values and ethical behaviour. A key aim of the process is to provide employees with a clear understanding of what is expected of them in their job and how this links to corporate and service objectives. The process drives learning and development activities across the organisation.

4.2.8 Other related policies include the Disciplinary and Dismissal Procedure, Anti-Fraud and Anti-Corruption Strategy.

4.2.9 The terms of reference for the West Norfolk Partnership set out that the borough council provides policy and coordination support to West Norfolk Partnership via the partnership's strategy and governance groups. Robust governance is ensured as the council's input is subject to its internal controls and financial regulations and therefore the processes through which decisions are taken and implemented are in accordance with good practice.

4.2.10 The council has a number of service level agreements with external organisations to deliver services that help to improve the quality of life and provide support for communities. The recipient of the grant must comply with the council's Equality Policy, Health and Safety Policy and Safeguarding Policy. With regards to safeguarding, the council will apply its safeguarding risk assessment in circumstances where it is considering providing funding or a grant to an organisation whose work involves children, young people or adults at risk of harm.

4.2.11 Officers involved in the procurement process must attend the "Introduction to Effective Procurement" training. Other mandatory courses relate to particular roles in the procurement process including "Specification Writing and Selection of the Successful Contractor" and "Effective Contract Management".

4.3 Respecting the rule of law.

4.3.1 The council's constitution provides a comprehensive framework for the management of the authority's business and ensures compliance with relevant laws, regulations, internal policies, codes of practice and procedures. The council is the statutory body for many laws and the range of policies and codes of practice we have in place help

to ensure compliance. Policy review and development panels assist cabinet and council to ensure that compliance is considered where appropriate; report templates for those panels and for cabinet ensure all elements are given consideration at the time the report is presented. The statutory officers – Head of Paid Service, Monitoring Officer and Section 151 officer – are in post to monitor and ensure adherence.

4.3.2 All initiatives undertaken, including those with financial elements, are either progressed due to being a statutory requirement or because it will contribute to a key aim of the council. All initiatives are reviewed by regular meetings of the Management Team and senior managers in order to ensure compliance and that spend is legal.

4.3.3 Statutory guidance is followed and tested through the work programme of Internal Audit. The work programme is agreed by Management Team and reported to Audit Committee.

4.3.4 Widespread training for staff continued in 2018/19 to inform and support the council's response to the General Data Protection Regulation 2016 (GDPR).

4.3.5 Eastlaw and the Deputy Senior Information Risk Officer have worked with service managers to review the implications for their areas of responsibility to inform planning for any changes that may be required, helped identify data and records management issues and with completion of statutory registers including the Article 30 records of processing activities. An officer Information Governance Group was established in 2018/19 to support this corporate work.

4.3.6 The Record Retention and Disposal Policy was reviewed in 2018/19 and approved by cabinet in March 2019 to ensure conformity with the GDPR, working practices and new UK legislation. An Information Risk Framework has also been embedded.

4.3.7 Job descriptions and person specifications refer to specific requirements to discharge duties regarding specific legislation.

4.3.8 The council is also compliant with CIPFA's Statement on the Role of the Chief Financial Officer in Local Government (CIPFA, 2015).

4.3.9 The terms of reference for committees include relevant legislation and the support provided to committees helps to create the conditions whereby the council is able to fulfil its responsibilities in accordance with legislative and regulatory requirements.

4.3.10 Committee reports provide a record of advice provided by officers and are supplemented by specialist external reports where required.

4.3.11 Policies and procedures relating to anti-fraud and corruption are in place to ensure that these issues are identified and dealt with. Internal Audit include this within their assurance work and there have been no identified cases in 2018/19.

4.3.12 Following changes in legislation, the following policies were refreshed in 2018/19:

- Record Retention and Disposal Policy
- Information Risk Policy
- Data Protection Policy

4.3.13 The council remained 'Payment Card Industry (PCI) Compliant' in 2018/19; this is an increasingly important regulation in light of the council's move towards more digital services and the public's reduced use of cheques. Compliance is judged in two

ways: via an on-site audit; and through quarterly scans on behalf of the banks to try to find any vulnerability.

4.3.14 Other arrangements are in place to ensure compliance with relevant policies and to ensure that expenditure is legal. One example is the ICT Development Group; a group which for the 2018/19 year consisted of the portfolio holder, a second cabinet member, the Executive Director and the ICT Manager. The group manages the ICT capital budgets, reviews all new proposed ICT developments and keeps up to date with pertinent legislation. Officers write a report to the group outlining their business case and decisions are taken on spend to ensure that it complies with the council's priorities. The group monitors project delivery and items are recorded via agendas and minutes.

4.3.15 There were 6 data breaches in 2018/19; all minor and therefore not reported to the Information Commissioner's Office (ICO). These were dealt with in accordance with the council's Data Protection Policy. The Information Commissioner has taken no action against the council.

4.3.16 Each service manager is required to submit an annual data quality sign off sheet.

4.3.17 An annual programme of internal audit is agreed with Management Team and approved by Audit Committee.

5. Ensuring openness and comprehensive stakeholder engagement (Principle 2).

5.1 Openness.

5.1.1 The council has an open culture demonstrated by its work on transparency, the leadership style of officers and members, the use of regular team briefings and supervision meetings, staff and member bulletins, an annual briefing on the budget and publication of information on the intranet and website.

5.1.2 Meetings are open to the public except where personal or confidential matters are being discussed. In addition, senior officers of the council can make decisions under delegated authority – the extent of these delegations is set out in the Constitution.

5.1.3 Key decisions are generally taken in an open environment and supported by concise officer reports supported by additional documents such as business cases, equality impact and risk assessments, prior scrutiny by policy review and development panels. A number of officer project boards have embraced programme and project management principles to structure decision making and project review. Examples include the Officer Major Projects Board and Leisure Project Board.

5.1.4 The Annual Governance Statement and Financial Accounts provide a form of annual report and these are considered in an open meeting of the Audit Committee.

5.1.5 A wide range of information is available via the council's website. This includes a Freedom of Information Act publication scheme. A wide variety of datasets are

published within a "transparency" section and include data such as salaries, spending, grants, parking, assets and management information.

5.1.6 The "MyAccount" and "MyRevenues" online accounts enable customers to access their information and service requests via the council's website.

5.1.7 Committee meetings are timetabled a year ahead and have published agendas, minutes and reports which are available prior to the date of the meeting. These reports document the professional advice provided in reaching decisions.

5.1.8 Decision making protocols are set out in the Constitution.

5.1.9 A report pro-forma is used for reports to committees and to the internal Management Team.

5.1.10 Regular discussions between members and officers clarify the information needs of members to support decision making. The list of key decisions and committee work programmes provide further information on timescales.

5.1.11 The flow of information for committees is supported by a calendar of dates for submitting, publishing and distributing timely reports.

5.2 Engaging comprehensively with institutional stakeholders.

5.2.1 The council works in partnership with a wide range of organisations to deliver its aims, policies and objectives. These include council owned companies, commercial partners, contractors, grant funded community groups, statutory consultees, regulators, commercial services, other public services, commercial tenants and so on.

5.2.2 The council has an active communications programme engaging with local media, residents and other stakeholders over a range of traditional and digital channels.

5.2.3 Work to develop a new internal communication strategy is ongoing. An internal review in 2018/19 recommended a number of enhancements to the council's communications activities and are leading to changes in staffing and roles.

5.2.4 A Statement of Community Involvement outlines how the council will involve the community on planning decisions. A stakeholder management plan is being developed for a strategic housing growth area in West Winch/North Runcton. A large number of organisations are involved in this strategic site via a new housing access road and the infrastructure development plan.

5.2.5 Engagement approaches are bespoke to their purpose rather than rigidly adhering to a standardised approach. A number of consultation activities were held in 2018/19 including Nelson Quay regeneration and Hunstanton seafront. These engaged a wide variety of stakeholders.

5.2.6 The first West Norfolk Wins lottery draw took place on 26 May 2018 and now involves 65 local good causes and has helped to raise over £34,000. The council is a member of Gamble Aware which funds research, prevention and treatment services to help to reduce gambling harms. The lottery is administered by Gatherwell Ltd who operate over 50 local authority lotteries. An annual review of the lottery was presented to Environment and Community Panel in April 2019.

5.2.7 The West Norfolk Partnership has continued to promote the borough via its "Love West Norfolk" campaign. This has engaged a wide range of local organisations across different sectors within the borough and a number of local key influencers.

5.2.8 Norfolk Resilience Forum (a group of public services, emergency services, utility companies, armed forces and key voluntary groups) has undertaken preparatory work for a no deal Brexit scenario and the Council has been an active contributor to the core group and sub-groups concerning fuel and food related issues.

5.2.9 The council participates in a range of joint working arrangements with other bodies. Some arrangements are formal, and are a way to deliver the council's duties and obligations or generate income, such as the shared audit management with Fenland District Council, strategic housing services with Breckland District Council, parking control in Great Yarmouth and the management of disabled facilities grants in Breckland and Fenland. These arrangements are subject to formal governance arrangements and include processes for reviewing the delivery of benefits, and, where performance is unsatisfactory, arrangements for termination.

5.2.10 The council, as a responsible authority[1], is a member of Norfolk Community Safety Partnership with a district based multi-agency Operational Partnership Team and Norfolk Community Safety Scrutiny Sub Panel.

5.2.11 District councils not only affect public health through their direct roles and functions but also through their power to influence other bodies such as county councils, the local NHS, and health and wellbeing boards. The council is a member of Norfolk Health and Wellbeing Board and the related Norfolk Health Overview Scrutiny Committee. At a more local level, the council coordinates a multi-agency group focused on increasing activity levels.

5.2.12 There are a range of county-wide collaborative partnerships that the council engages with. Examples include Norfolk Business Rates Pool, Norfolk Arts Forum Executive, Norfolk Coast Partnership Core Management Group, Norfolk Joint Museums Committee, Norfolk Local Authority Tourism Group, Norfolk Parking Partnership Joint Committee, Norfolk Police and Crime Panel, Norfolk Rail Policy Group, Norfolk Records Committee, Norfolk Counter Fraud Hub, Norfolk Waste Partnership and the Norfolk Resilience Forum.

5.2.13 Focusing on financial matters, the Norfolk Business Rates Pool successfully bid for a 75% business rate pilot over the financial year 2019/20. The local authority members actively contribute joint submissions to government consultations such as the fair funding settlement in order to represent the interests of the county and its constituent districts.

5.2.14 Turning to waste management issues, the council is actively involved in a joint procurement for waste collection services with neighbouring councils in North Norfolk District Council and Breckland District Council. The potential for savings in the procurement of a collection contract for waste and recycling are more likely to be achieved by joint procurement and savings could also be made through the sharing of the costs of procurement exercise. There may also be improved opportunities for income generation and replicating charging policies. The Executive Director for Commercial Services is authorised to progress a joint procurement for the Borough council's refuse and recycling contract. An internal officer group has been established to support the transition process from the current to the new provider.

[1] Crime and Disorder Act 1998

5.2.15 On spatial matters, the council contributed to the development of the Norfolk Strategic Framework which documents areas of agreement that the Norfolk local planning authorities had reached and which they would follow when they prepared their individual local plans. It had been prepared by an officer team drawn from all of the Norfolk authorities supported by others from organisations such as the Environment Agency, Anglian Water and the New Anglia Local Enterprise Partnership (NALEP) (the Greater Cambridge Greater Peterborough Enterprise Partnership had also endorsed it). The framework will help ensure that the council discharges its legal duty to co-operate with neighbouring authorities in relation to strategically important land use issues which cross administrative boundaries. The result of such co-operation is expected to be better planning outcomes.

5.2.16 Regeneration is a corporate priority and, given the Enterprise Zone and other regeneration interests, the council actively engages with the NALEP Steering Group.

5.2.17 There are also a number of partnerships and outside bodies at or within borough level which are independent from the council, but have an impact on its service areas. In order that the council can maintain effective partnerships with a number of these organisations, representatives of the council, usually elected councillors, sit on the various committees and forums that are responsible for them. Examples include West Norfolk and King's Lynn Girls School Trust, West Norfolk Chamber of Commerce Council, West Norfolk Community Transport Project and West Norfolk Tourism Forum Executive Forum. Oversight of these is a responsibility of the appropriate scrutiny panel.

5.2.18 Other partnerships are of a contractual nature, such as the delivery of leisure services via Alive Leisure Trust, procurement support to Boston Borough Council, delivery of the council's payroll processing or the Housing Strategy and Enabling Service that the council delivers for neighbouring Breckland District Council. Following Cabinet's agreement in February 2018, arrangements were embedded for the delivery of the notice processing for on and off street parking for Great Yarmouth and South Norfolk councils in addition to North Norfolk, Breckland and Broadland. These partnerships are also subject to formal governance arrangements, are reviewed regularly, deliver benefits to the council such as additional income, provide good value for money for the receiving organisation as the council maximises its own existing infrastructure, but are not delivering our own statutory obligations.

5.2.19 The council also continues to participate in an informal, collaborative partnership with local partners via the West Norfolk Partnership Strategy Group. The strategy group agrees priority issues which will benefit from a combined and coordinated response from partners. New terms of reference were implemented in April 2017 and have been adhered to during 2018/19.

5.2.20 The council has established 3 wholly owned companies which are detailed in section 12 of the Annual Governance Statement. Research has been undertaken in 2018/19 to identify approaches to enhance the governance of these companies including the concept of a shareholder committee, risk management and company director development. These will be progressed in 2019/20.

5.3 Engaging with individual citizens and service users effectively.

5.3.1 The Corporate Business Plan 2015/16-2019/20 sets out the council's vision and provides the basis for investment, service planning and other decisions.

5.3.2 The plan refers to a range of intended outcomes and these are underpinned by strategies, service plans and the performance management framework and reported to overview and scrutiny panels.

5.3.3 During 2018/19 we consulted upon a range of significant issues including:

- Plans to regenerate the Nelson Quay area of King's Lynn
- Hunstanton Southern Seafront Masterplan 2018
- Draft Local Plan review

5.3.4 The findings from these exercises is being used to inform future planning and strategy development.

5.3.5 Impacts on equality are required for all reports and equality impact assessments are considered where required by the Equality Policy.

5.3.6 The council aims to ensure that it is open, honest and transparent, and to enhance inclusion by building on our understanding of customer needs and perceptions, through improved customer service and community engagement. This has informed our approach to digital transformation and thinking regarding digital exclusion and isolation evident in services such as Care and Repair and Lily.

5.3.7 The council engages with local people and stakeholders in the following ways on a range of issues: surveys; roadshows; community events; on line feedback; interviews; public meetings / consultation; compliments / complaints procedure.

5.3.8 Members of the public are also able to ask questions on a topic or service within the council's control at full council meetings.

5.3.9 A King's Lynn Area Consultative Committee is in place, which is made up of the councillors for the un-parished area of King's Lynn and West Lynn. The committee's terms of reference state that the committee is to act as a consultative forum and to encourage community engagement. The committee meets 5-6 times a year to discuss and make recommendations on issues relating to the un-parished area of King's Lynn and West Lynn.

5.3.10 There is an expectation from the majority of parish councils in the borough for the relevant borough councillor(s) to attend most, if not all, of their meetings; this assists with maintaining effective communication with parish councils and therefore the communities that they serve.

5.3.11 The council uses a variety of corporate communication tools including a website, intranet site, a newsroom, newsletters, media releases and social media to communicate and engage with the community and staff. Facebook and Twitter are used effectively to update on service provision. Social media is used for specific events, such as the Hanse Festival, and the Town Hall has its own Twitter and Facebook accounts to help engage with potential customers and promote the venue. Results of all methods of communication are fed back into service delivery, ensuring accountability. The council also monitors feedback from residents and service users through compliments and complaints received.

5.3.12 The council has continued to support the second year of a West Norfolk Partnership initiative called "Love West Norfolk" launched in January 2018. 'Love West Norfolk' aims to create pride and aspiration within the local area and give people a voice on what they believe makes the area so special. The campaign is being headed up by key community leaders, including the Chief Executive and Leader of the borough council, and the Chief Executives of the Queen Elizabeth Hospital, the College of West Anglia, Freebridge Community Housing, Community Action Norfolk, and the Clinical Commissioning Group. It is also supported by Norfolk County Council. People have shared their views on what they love about the borough via social media and events. Companies have been involved and have undertaken consultation and engagement activities for employees and customers to share what they think sets west Norfolk apart.

5.3.13 During 2018/19, the council continued to be an active partner in the Wash East Coastal Management Strategy Stakeholder Forum and was leading plans to manage risk to Hunstanton's coastline and a successful bid, in partnership with Fenland District Council, to the Coastal Communities Fund. The forum includes a wide range of public, private and voluntary sector organisations and consulted upon plans for managing a beach and addressing flood and coastal erosion risks. The council has contributed officer and financial resources to this activity.

5.3.14 During 2018/19 the council has complied with the requirements of the Local Government Transparency Code 2015. The code makes it a legal requirement for local authorities to publish specified data by prescribed deadlines and thereafter annually. The council publishes all specified data on its website, in the prescribed format, by the required deadline. This makes a direct line to the requirement to establish clear channels of communication with all sections of the community and other stakeholders, ensuring accountability and encouraging open consultation.

5.3.15 The Statement of Community Involvement was approved by Council in June 2017 and continues to inform how the authority consults with the public as part of the local plan process, on planning applications, and also on neighbourhood plans.

5.3.16 Cabinet has a protocol and terms of reference for four member champions who act as an advocate or spokesperson for a specific area of the council's business. The main responsibility of each member champion is to encourage communication and positive action over the issue they represent. The council member champions are for disability, armed forces, heritage and coastal issues.

5.3.17 Fair access to services is informed by equality impact assessments on new policies and strategies and compliance with statutory guidance. Feedback from the 3,311 customers who called the Council Information Centre from April 2017 to March 2018 indicated:

- 62% of customers thought the telephone service was excellent.
- 99% of customers were satisfied with the service provided.
- 32% of customers state the main reason for their rating is due to the helpfulness of the advisors.

6. Defining outcomes in terms of sustainable economic, social and environmental benefits (Principle 3).

6.1 Defining outcomes.

6.1.1 The Corporate Business Plan 2015/16-2019/20 is used as the basis for corporate and service planning. The sets out the council's vision and provides the basis for investment, service planning and other decisions. The plan currently in place was agreed by the council in January 2016. Borough elections were held in May 2019 and the corporate business plan will be reviewed during 2019/20.

6.1.2 The current plan outlines six priority aims, supported by 18 objectives in areas of key importance to the authority. The six priority aims within the plan are:

1. Provide important local services within our available resources
2. Drive local economic and housing growth
3. Work with our communities to ensure they remain clean and safe
4. Celebrate our local heritage and culture
5. Stand up for local interests within our region
6. Work with our partners on important services for the borough

6.1.3 The Corporate Business Plan is aligned with the council's Financial Plan and both documents are available on our website in order to be clear and transparent to local people, service users and stakeholders. Updates are also provided for members, staff and the public and available on the council's website via committee agendas and on the intranet InSite.

6.1.4 The plan is underpinned by directorate and service plans and the performance management framework.

6.1.5 The plan and related documents, such as the Cultural Prospectus, set out intended impacts or changes for customers and other stakeholders. Progress against the plan is monitored quarterly by Management Team and reported to Corporate Performance Panel every 6 months.

6.1.6 The plan is underpinned by a performance management framework that includes key performance indicators covering all of the directorates. These indicators and targets are reviewed annually. Progress trends are established and reported quarterly to the overview and scrutiny panels and Management Team. Action plans are identified for under-performing indicators.

6.1.7 The council's Management Team, consisting of the Chief Executive and executive directors meet on a weekly basis to consider matters commensurate with the corporate business plan and emerging issues. It also considers internal control issues, including risk management, performance management, compliance, value for money and financial management. Management Team receive monthly reports which details movements across a range of key indicators including measures of local economic performance.

6.1.8 The corporate risk register is routinely updated every six months and considers risks to the achievement of the corporate business plan. Mitigation plans are included for each risk. The risk reports to Management Team and Audit Committee also detail actions relating to "high risks".

6.1.9 Budget reports are provided on the intranet for staff and members to view. All budget holders are involved in the budget setting process.

6.2 Sustainable economic, social and environmental benefits.

6.2.1 Decisions regarding capital investment consider the appropriate life spans of projects and the potential for adaptation for alternative use or that resources (such as council owned land) are used to optimise social, economic and environmental benefits. These considerations are evident in the capital programme and investment strategy and across the projects considered by the Officer Major Projects Board established in 2018/19.

6.2.2 Regular discussions between members and officers consider the information needs of members and senior managers to support decision making. Away days, briefings, portfolio updates, sifting meetings and meetings between the Chief Executive and council leadership are examples of this dialogue.

6.2.3 Reports to committees and Management Team provide a record of decision making and related background information.

6.2.4 Using second homes council tax funding, the council engages with partners and schools to identify and undertake initiatives that seek to improve educational attainment and skills levels within the economy. Activities in 2018/19 included a university challenge held at the College of West Anglia with around 120 students attending, a project for disadvantaged students from each secondary school and booster conferences for 1,100 students in preparation for their maths GCSE. An update on performance was presented to Corporate Performance Panel in February 2019.

7. Determining the interventions necessary to optimise the achievement of the intended outcomes (Principle 4).

7.1 Determining interventions.

7.1.1 Portfolio holder discussions and stages within the decision making process, such as the preparation of committee reports, provide opportunities to shape objectives and robustly analyse options and associated risks.

7.1.2 Development of the financial plan draws together feedback from a range of sources such as service demand, local priorities, efficiency needs, new legislation and staffing to prioritise competing demands within the confines of a balanced budget.

7.1.3 Management Team generally meet on a weekly cycle and consider a wide range of strategic and operational issues related to the delivery of the corporate business plan.

7.1.4 Management Team have established programme boards to enable a greater focus on significant issues including the transition to a new delivery model for leisure services, major capital projects and its wholly owned companies.

7.1.5 The council's risk management framework requires that consideration of risk is embedded in all key management processes. These include aspects such as policy and decision making, service delivery planning, project and change management, contracts, budget management and partnership working.

7.1.6 The financial management of the council is conducted in accordance with the financial rules set out in the Constitution and Financial Regulations. The council has in place a Medium Term Financial Plan, updated annually, to support the aims of the Corporate Business Plan.

7.1.7 The Procurement Strategy was refreshed in April 2018 and provides a framework for the council as to how procurement activity should take place and a strategy to improve the service, to both our internal and external stakeholders. This will enable the council to maximise opportunities, minimise risks and support several of corporate business plan objectives through good procurement practice.

7.1.8 All budget lines are allocated to a named budget officer who is responsible for controlling spend against that budget, and who is also responsible for assets used in the provision of their service. Containing spending within budget is a high priority in the performance management framework for individual managers.

7.1.9 The council's contract management strategy emphasises that operational managers are responsible for contract management. Job descriptions for senior managers contain relevant responsibilities and appropriate training and development has been provided.

7.1.10 Corporate contract management support is provided by the procurement team who also actively manage a number of centralised contracts. These include: fixed wire testing; lift maintenance; boiler maintenance; air con maintenance; archive storage; external printing; drains and gutter clearing; fire alarms and emergency lighting maintenance.

7.1.11 The general approach is to hold regular review meetings with the contractors and invite sites/managers to provide feedback and/or attend the meetings.

7.2 Planning interventions.

7.2.1 A number of measures help to create robust planning and control cycles. These include calendars for developing and submitting plans and reports, the performance and risk management frameworks, corporate policy guidance and equality impact assessments.

7.2.2 Internal and external stakeholders are involved in determining how services should be planned and delivered. This is typified by internal working groups, project teams and boards, consultation on major developments and the formulation of new strategies.

7.2.3 Performance measures are identified within performance appraisals, service and directorate plans and strategies. Key performance indicators are identified by service managers, directors and portfolio holders and provide the basis of quarterly reports to overview and scrutiny panels.

7.2.4 The quarterly reports considered by the overview and scrutiny panels provide a direction of travel, an indication of variation against target and under-performing indicators have a mitigation plan. The panels can request follow up work such as briefings and written responses on matters within their remit.

7.2.5 The medium term financial plan is aligned with the corporate business plan. The cost reduction plan indicates how budget reductions are identified and managed. Annual budget setting guidance is issued to service managers to inform service planning. Monthly budget monitoring reports provide an indication of progress.

7.2.6 Project management approaches are used by project boards demonstrated by the use of project teams, project briefs, business cases and option appraisals and post project evaluation.

7.3 Optimising achievement of intended outcomes.

7.3.1 Over recent years, the council has adopted an approach of seeking efficiencies and different ways of delivering services to produce savings. The savings achieved have been the result of considerable change and transformation. In October 2016 the council published an efficiency plan in order to fix a four-year financial settlement from the government and work continues within all directorates to produce the changes required to deliver the savings identified, before 2020/21. Executive directors and all service managers are directly involved in monitoring the work being completed and savings achieved are reported in the monthly budget monitoring reports and quarterly reports to Management Team. Where savings are achieved in advance of 2020/21 these are transferred to reserves to fund investment in major capital projects which will provide future revenue income.

7.3.2 One of the corporate priorities is the delivery of a 'channel-shift' programme. The key document for delivery is the 'Switched On' Transformation Plan. The plan sets out how the authority is approaching service transformation, and introducing improved digital services across the organisation and is underpinned by communications and training plans to support employees through the changes required, equipping them with the skills they will need to implement new ways of working.

7.3.3 The council's shift towards digital services progressed well during 2018/19 with improved take up of My Account, use of online integrated forms and the online help function. A new customer portal was introduced in Revenues and Benefits allowing customers to self-serve via the council's website, accessing real time data about their council tax, business rates accounts and benefit claims. Online Revenues and Benefits forms with direct integration into the back office systems are also available for customers to complete. These are key parts of the channel shift programme and provide the foundation for much of the work planned in this area over the remaining life of the Corporate Business Plan. The new website is fully responsive and works well across a wide range of devices such as tablets and mobile phones. Feedback received on the change and how the change was managed was positive from both external customers and internal staff. During 2018/19, new/revised online forms were introduced for:

- Benefit New Claims and Changes in Circumstances
- Council Tax and Business Rates Method of Payment changes, including setting up a Direct Debit
- Council Tax and Business Rates refund requests
- Council Tax Single Person Discount application

7.3.4 There are also several new forms in development for council tax and business rates which are awaiting testing and functionality and these are anticipated in 2019/2020.

7.3.5 Take up of the new forms has been high with nearly 1,300 MyRevenues forms completed by customers since they went live. High levels of take up demonstrate the ease of use and benefit that being able to complete forms at a time convenient to the customer has enabled. Many Revenues and Benefit forms integrate directly with our back office system and further work in 2019/20 will be completed to integrate revenues and environmental health forms into the respective back office systems.

7.3.6 The council continues to encourage take up of digital services by providing assisted self-service facilities supported by staff at the King's Court offices.

7.3.7 The council's financial ledger underpinning its internal system of financial control was retendered in 2018/19 with implementation ongoing into 2019/20. This is supported by a framework of regular management information, financial regulations, administrative procedures, management supervision and a system of delegation and accountability. Development and maintenance of the ledger software is undertaken by the council's financial services team. In particular, the system includes:

- Comprehensive budgeting systems;
- Measurement of financial and other performance against targets;
- Regular reviews of periodic and annual financial reports, which indicate financial performance against the forecasts and targets;
- Clearly defined capital expenditure guidelines;

7.3.8 Financial management processes and procedures are set out in the council's financial regulations and include:

- Financial management processes and procedures
- Financial planning including budgeting and budget monitoring
- Risk management and control, including asset management and treasury management
- Systems and procedures
- External arrangements including council owned companies, service level agreements and partnerships

7.3.9 The council seeks to provide the maximum benefit for its communities from every taxpayer pound that is spent. This is assisted by the procurement strategy and via our regeneration role through which we take responsibility for generating economic, environmental and social growth our local communities.

7.3.10 Contract Standing Orders encourage services to consider social value particularly in respect to contracts over the EU threshold. In larger contracts, the council includes social value issues such as 'use of local apprenticeships' and 'use of local sub-contractors' as award criteria. We will continue this practice and look for ways of increasing the social value obtained from our contracts.

7.3.11 The council engages with the voluntary, community, social enterprise (VCSE) sector usually through the route of grants, other financial support and through the West Norfolk Wins lottery. We have relatively few contracts that would be suitable for VCSE providers but we will continue to look for opportunities for this sector and

encourage local organisations and groups to compete when appropriate. Currently, we have Information and Advice Services contracted out to two VCSEs that have been successful thus far and the contracts are being retendered in the 2019/20 financial year.

7.3.12 The procurement team use methods such as brief tender documentation, early identification of potential local suppliers, encouraging local businesses to sign up to online alerts for local contract opportunities and provision of briefings for SMEs on the procurement process.

7.3.13 Procurement monitors the proportion of business that we have with small and medium enterprises (SMEs) and voluntary, community and social enterprises (VCSEs) via the use of spend analysis data. Considering the total number of suppliers that we used in the 2018/19 financial year, 7.76% were VCSEs and 70.25% were SMEs. Of our total spend in 2018/19, 1.98% has been with VCSEs and 21.18% with SMEs. The capital expenditure for major housing development projects that we have undertaken with major construction companies may account for the variation between sectors.

8. Developing the council's capacity, including the capability of its leadership and the individuals within it (Principle 5).

8.1 Developing the council's capacity.

8.1.1 The council aims to ensure that its members and officers have the skills, knowledge and capacity they need to discharge their responsibilities and recognises the value of well trained and competent people in effective service delivery. The online corporate induction course is available for all new members and staff to familiarise themselves with protocols, procedures, values and aims of the council and is regularly reviewed.

8.1.2 An established member training and development programme, including an induction process and regular updates throughout the year. Specific training is also provided to members who sit on regulatory committees, and they are unable to take up a position on these committees without having first received the relevant training.

8.1.3 Regular reviews of activities, services and strategies are undertaken. These may be within the service, utilising Internal Audit or Policy and Performance, incorporate lean management principles or external consultants. The Cost Reduction Plan is focused on identifying and realising efficiency savings across the organisation.

8.1.4 Reviews often draw upon benchmarking information and research into practice at other local authorities to inform option development.

8.1.5 The council recognises that it alone cannot necessarily impact on outcomes and collaborates with partners. West Norfolk Partnership typifies this with its work on improving educational attainment, increasing active lifestyles and promoting the reputation of the borough.

8.1.6 Other examples of benefits from partnership working are evident in waste management, parking enforcement, community safety, cultural and regeneration activities and strategic housing.

8.1.7 Service planning is complemented by workforce planning which considers skill development, succession planning and recruitment options.

8.1.8 All posts have a detailed job description and person specification. Training needs are identified through team meetings, 1:1s and annual appraisals and addressed via Personnel and/or individual services as appropriate. A performance related pay system provides an incentive to exceed.

8.2 Developing the capability of the council's leadership and other individuals.

8.2.1 The annual appraisal process provides an opportunity to review job descriptions and the capability of employees. The absence management procedure informs capability and capacity considerations.

8.2.2 Regular dialogue between the chief executive and council leadership helps to maintain a shared understanding of future direction and progress. Robust governance is informed by regular meetings between the three statutory officers. The council's senior managers and portfolio holders have been with the council for many years and that harmonious relationship has helped to build a strong foundation for broader leadership of the organisation.

8.2.3 The scheme of delegation is periodically reviewed and typically triggered by legal and organisational changes such as restructures.

8.2.4 Standing orders and financial regulations are reviewed periodically.

8.2.5 The respective roles and responsibilities of members and senior officers provide a check and balance.

8.2.6 The capabilities of members and senior officers are supported by development activities to enable the organisation to respond to the changing operating environment. This is typified by induction programmes, access to briefings and training events on new legislation and government policy, personal development plans for officers and networking opportunities.

8.2.7 For example, for members this may include the ability to:

- scrutinise and challenge
- recognise when outside expert advice is required
- promote trust
- work in partnership
- lead the organisation
- act as a community leader

8.2.8 Other examples of activities to enhance capability include:

- Using efficient systems and technology to provide effective support e.g. roll out of Office 365
- Arrangements for succession planning.
- Reviewing individual member performance on a regular basis taking account of their attendance and considering any training or development needs
- Staff development plans linked to appraisals
- Implementing appropriate human resource policies and ensuring that they are working effectively e.g. trial of absence management approach.

8.2.9 The Constitution sets out how the council operates, how decisions are made and the procedures to be followed to ensure that these are efficient, transparent and accountable to local people. This defines, amongst other things the roles of the Council, Cabinet, how scrutiny and overview is undertaken, the Scheme of Delegation, and the roles and responsibilities of officers and members. The different elements of the Constitution are subject to periodic change either through national legislation or local decision. For example, at Council on 14th June 2018, a review of key decision levels was approved which raised the threshold to £0.5m from £0.25m.

8.2.10 Within the Constitution, full council sets the overall budget and policy framework of the council, while the cabinet makes decisions within this framework, and is held to account by the overview and scrutiny arrangements. Meetings are open to the public except where exempt or confidential matters are being disclosed. In addition, senior officers of the council can make decisions under delegated authority. The council publishes a Forward Decision List which contains details of key decisions to be made by the council, its bodies and executive directors under their delegated powers.

8.2.11 A comprehensive programme of learning and development is provided for officers and members. Learning and development needs for staff are identified through the performance management process and in response to organisation and service level needs and these are translated into an annual training programme. Examples would include performance management training for managers, training on the Regulation of Investigatory Powers Act 2000 for senior officers, event management training and briefings on the council's Incident Response Plan.

8.2.12 The council has a commitment to management training and delivers a range of development activities to support managers at all levels, including specific training to support the development of service managers. The second cohort of service managers participated in a Level 7 management programme in 2018/19. A number of one-off 'Extended Management Team Development Sessions' have been delivered to ensure Service managers are kept informed on current issues.

8.2.13 Senior officers also participate in relevant sessions relating to changing technical requirements to ensure the up to date position is known and to feed in to relevant central government departments at appropriate times; examples are attendance at major projects development meetings, meetings with ministers and their civil servants on programmes and policy development and Brexit preparation meetings with the Norfolk Resilience Forum.

8.2.14 Member development needs are identified through use of a questionnaire following their election, and are also identified during the year as matters arise at meetings and questions of training needs arise. Particular emphasis has been given to ICT training for councillors during the 2018/19 year to continue to support the digital agenda. Feedback forms following any training undertaken continue to be used to develop training in areas where further needs have been identified. Plans are in place for an additional training needs analysis to take place during the 2019/20 year following the borough elections.

8.2.15 The policy review and development panels regularly receive updates on relevant topics as part of their agenda, particularly around any new or current initiatives, and training is run throughout the year as identified. Topics for updates or training are identified either by officers or members and help to ensure members are better

informed and have input at an early stage. The Audit Committee has received specific briefings / training throughout the year.

8.2.16 The council values the health and wellbeing of its workforce. This is underpinned by its Health, Safety and Welfare Policy and supported by staffing changes that will bring a greater focus on health and wellbeing within the council. There is a positive relationship with the main trade unions and an active staff social club. There are a number of major community events (GEAR and Fawkes in the Walks) throughout the year which are assisted by staff volunteers and sponsorship.

9. Managing risks and performance through robust internal control and strong public financial management (Principle 6).

9.1 Managing risk.

9.1.1 We recognise that everyone has a role in managing risk which is proportionate to their role. The corporate risk register is reviewed every six months with updates reported to Management Team and Audit Committee. An additional risk related to fire safety at the council's headquarters was added to the register between the scheduled reviews.

9.1.2 The risk management policy and strategy had a scheduled refresh that was informed by an Internal Audit review which rated the current arrangements as "substantial". The updated policy and strategy were developed with Audit Committee and approved by Cabinet in March 2019. The updated approach will be rolled out in 2019/20 following training and embrace the council's companies and include operational risks at the service level.

9.1.3 All committee reports contain a section on risk.

9.1.4 Business continuity is a key risk and an Incident Response Plan was developed by the Business Continuity Corporate Officer Group to support the council's response to incidents. This was rolled out corporately via briefings to a wide range of senior officers.

9.1.5 Relevant officers participated in a number of business continuity/emergency planning multi-agency events considering King's Lynn port, cyber security and the no deal Brexit scenario.

9.1.6 Following concerns arising from a late loan repayment, the council commissioned Internal Audit to review its arrangements with the recipient, NWES. A lesson learnt report was considered by Audit Committee in March 2019 and was considered at a special Council meeting in April 2019.

9.1.7 An independent inquiry will follow and a cross party task group has been established under the Audit Committee to consider ways to enhance due diligence processes. The Officer Major Projects Board will establish a report mechanism to enable the Audit Committee to monitor major projects and identify any steps or actions required and commence a programme of reviewing each of the large scale projects currently underway.

9.1.8 The council's internal audit team have developed a fraud risk register to monitor fraud risks across the council and review them to establish mitigations in place and improvements required in conjunction with standard internal control testing.

9.2 Managing performance.

9.2.1 The council has an effective Performance Management Framework, which is driven by the corporate business plan. Performance targets and actions are cascaded through directorate, service, team meetings and 1:1s. The Performance Management Framework was reviewed in 2016 and, following the May 2019 elections, will be refreshed to align with the new corporate business plan.

9.2.2 The council has a performance management framework which describes how the authority measures and monitors the performance of its activities and is available on the council's website. A number of updates occurred in 2018/19 including:

- The framework was generally refreshed during the 2018/19 year to ensure it reflects current objectives and priorities.
- The suite of key performance indicators and targets was reviewed in May 2018 and agreed by executive directors and portfolio holders.
- Following a scrutiny review in 2018, arrangements for all overview and scrutiny panels to monitor their own indicators were embedded.

9.2.3 Through reviews by external auditors, external agencies, Internal Audit, and the Policy and Performance Team, the council seeks ways of ensuring the economical, effective and efficient use of resources and for securing continuous improvement in the way in which its functions are exercised for example an internal review of communications, marketing, customer engagement and tourism was undertaken during 2018.

9.3 Robust internal control.

9.3.1 All committees have clear terms of reference and work programmes to set out their roles and responsibilities The Audit Committee meet throughout the year to provide independent assurance to the Council and considers the reports and recommendations of internal and external audit and inspection agencies and their implications for governance, and risk management or control, and supports effective relationships between external audit and internal audit, inspection agencies and other relevant bodies, and encourages the active promotion of the value of the audit process and review the financial statements.

9.3.2 The committee considers the internal and external auditor's opinion and reports to members, and monitors management action in response to the issues raised by internal and external audit. These arrangements ensure that the council has processes and procedures in place to ensure that an it fulfils its overall purpose, achieves its intended outcomes for service users and operates in an economical, effective, efficient and ethical manner, as prescribed in the CIPFA/the role of the head of internal audit statement.

9.3.3 A data quality assessment takes place at year end supported by checks through the year.

9.3.4 There is an agreed programme of Internal Audit reviews through the year. With reports approved by lead managers/directors and a summary provided to Audit Committee.

9.3.5 The Council complies with the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA, 2014). There is an Anti-Fraud and Anti-Corruption Strategy,

Whistleblowing Policy and Fraud Response Plan. The council investigates fraud relating to Council Tax and Business Rates payments, Council Tax Support, as well as other types of fraud identified across the authority. Responsibility for investigating housing benefit fraud transferred to the Department for Work and Pensions in 2015 and a referral system is in place between the council and the DWP if housing benefit fraud is suspected.

9.3.6 The Annual Governance Statement is developed corporately involving service managers across the council, the senior Management Team and Audit Committee in its drafting.

9.3.7 An effective internal audit service is resourced and maintained with the Internal Audit Manager shared with neighbouring Fenland District Council who contributes learning from the two authorities and professional networks.

9.3.8 The Audit Committee complies with best practice set out in "Audit Committees: Practical Guidance for Local Authorities and Police (CIPFA, 2018)". There is a clear terms of reference which is periodically reviewed. The committee members meet at least 6 times per year. Members receive a number of training sessions throughout the year and in 2018/19 covered internal audit, annual accounts and the capital programme. There are regular attendances from a range of senior officers including the Deputy Chief Executive (Section 151 officer and the lead officer for the committee), the Chief Executive and the Internal Audit Manager and the appointed external auditor. Other attendees include the monitoring officer.

9.3.9 During 2018/19, the council began to explore ways to enhance the oversight of its wholly owned companies initially drawing upon notable practice from the LGA, white papers published by legal/accountancy companies and research into practices at other authorities. This work will continue into 2019/20 and will ultimately strengthen oversight of company performance and business plans together with the development of council appointed directors.

9.3.10 Effective arrangements are in place for the discharge of the Monitoring Officer, Head of Paid Service and Section 151 roles. There are regular meetings of the 3 statutory officers to consider governance issues.

9.3.11 The council's Monitoring Officer is responsible for ensuring compliance with established policies, procedures, laws and regulations. After consulting with the Head of Paid Service, the Monitoring Officer will report to full council if it is considered that any proposal, decision or omission would give rise to unlawfulness or maladministration. The Monitoring Officer's annual report summarises the more important matters arising from their work for the council from 1 April 2018 to 31 March 2019 and comments on other current issues. No contraventions have been identified or reported.

9.3.12 The Chief Executive is the council's Head of Paid Service and has overall responsibility for the management and co-ordination of the employees appointed by the council. The Chief Executive is required to report to the council as appropriate with regard to the way in which the different functions of the council are co-ordinated, the number and grades of staff required for the discharge of these functions, the way in which these people are organised and managed and the way in which they are appointed.

9.3.13 A Deputy Chief Executive was appointed in July 2018 to provide further resilience to the council's management arrangements following the extension of the phased retirement of the Chief Executive.

9.3.14 The council has a corporate complaints procedure in place, available on the council website. The council also deals with any incidents of racial complaints, or complaints relating to a disability, in a similar but separate process. The complaints received are analysed and results presented to the Corporate Performance Panel on an annual basis.

9.4 Managing data.

9.4.1 With the introduction of GDPR in 2018, the council strengthened its governance regarding data management framework and procedures. There is a designated data protection officer, a senior information risk owner (SIRO) and deputy SIRO. A range of information asset owners and administrators have also been identified.

9.4.2 The data protection policy was updated in 2018.

9.4.3 Corporate training for GDPR was provided in 2018/19 and informed the corporate preparation of privacy notices, records of processing activity and the review of the authority's document retention and disposal policy.

9.5 Strong public financial management.

9.5.1 Financial management supports the delivery of services and transformational change as well as securing good stewardship of the council's resources.

9.5.2 The CIPFA statement describes the roles and responsibilities of the chief financial officer, who is bound by both professional standards and also legislative responsibilities, with a fiduciary duty to the local taxpayer.

9.5.3 The council's arrangements fully comply with the principles described: the chief financial officer is also Deputy Chief Executive and reports directly to the Chief Executive. To strengthen our arrangements, a senior member of the Financial Services team was appointed as Deputy Section 151 Officer (currently vacant).

9.5.4 Budget monitoring reports are provided on a monthly basis and published on the intranet for all staff and councillors to view.

9.5.5 The development of the revenue and capital budget, medium term financial strategy and treasury management strategy all engage members and are reported to Audit Committee and Cabinet.

9.5.6 The council has a cost reduction programme which is monitored on a quarterly basis by Management Team and covers a range of service areas. The programme extends to 2021/22.

10. Implementing good practices in transparency, reporting and audit, to deliver effective accountability (Principle 7).

10.1 Implementing good practice in transparency.

10.1.1 Committee meetings are open to the public except where sensitive or confidential matters are being discussed. Appropriate reports are available for the public to review on the council's website and reference the contact details of the key officers and members.

10.1.2 Internal Audit is an independent and objective service to the management of the council and undertakes a programme of reviews throughout the year to provide an annual opinion on the framework of governance. Significant weaknesses in the control environment are reported to senior management and the Audit Committee by the Internal Audit Manager as part of the regular reporting process. Outstanding audit recommendations are discussed at senior management meetings and Audit Committee, and issues with addressing the urgent recommendations are also discussed at Management Team. Audit recommendations are generally implemented by the agreed date but some may slip or recommendations are overtaken by unforeseen events leading to revised dates.

10.1.3 The council has a Code of Corporate Governance in place, which sets out how the authority intends to apply the principles of corporate governance, in accordance with CIPFA/SOLACE guidance. The code includes a chart to demonstrate the different parts of the framework and reflects the council's current processes and procedures. The code will be reviewed every three years to reflect any changes in the council's governance framework and/or any revised guidance. The three statutory officers will meet quarterly to review high risk projects and identified issues.

10.1.4 Progress towards achieving the aims outlined in the council's Corporate Business Plan was monitored through the Corporate Business Plan Monitoring Report which was collated quarterly during 2018/19. Updates at the end of quarters 2 and 4 were taken to the Corporate Performance Panel for review and progress checking. As part of collating and reviewing the monitoring report, the council's senior management team consider and review the aims, actions underway and progress made. The governance arrangements in place for the year under review were appropriate for delivery of our aims.

10.1.5 The website, intranet, communications function, published datasets and social media channels all contribute towards being a transparent organisation. Members of the public are able to raise questions at council meetings in addition to raising matters directly with services, senior officers and councillors. Policies are in place for responding to requests made under access to information regulations including the Data Protection Act 2018, Freedom of Information Act 2000, Environmental Information Regulations 2004 and via the corporate complaints system.

10.2 Implementing good practices in reporting.

10.2.1 A wide range of information is reported publicly including:

- Annual financial statements
- Agendas, minutes and reports
- Appropriate approvals
- Records of decisions made under delegated powers
- Procurement and spending
- Performance against key performance indicators
- Lessons learnt reports
- Annual governance statement which follows the best practice recommended by CIPFA/Solace.
- Risk management updates
- Progress on the corporate business plan and updates on key objectives.

10.3 Assurance and effective accountability.

10.3.1 The Internal Audit process helps to drive improvement. An example of this includes the review of the council's risk management policy and strategy which was developed via Audit Committee.

10.3.2 The council complies with CIPFA's Statement on the Role of the Head of Internal Audit and with Public Sector Internal Audit Standards.

10.3.3 The council periodically has peer reviews and takes part in benchmarking and other relevant processes to inform its learning and development. Feedback is welcomed and considered to ensure that it can be implemented. Senior officers have undertaken peer reviews at other councils with learning brought back to the council.

10.3.4 Effective management is based on a framework of regular management information, financial regulations, standing orders and a structure of varying levels of responsibility, including arrangements for delegating decision making. The council has all these elements in place, including those which meet 'The Openness of Local Government Bodies Regulations 2014', and we regularly review these to ensure they remain relevant and fit for purpose. The Constitution was revised during 2018/19 including an increase in the value of decisions. There is a protocol for recording and broadcasting of meetings. Decisions are made in open, public meetings, or via the various delegation arrangements in place and all adhere to the policy position in place – for example, planning decisions are taken with regard to the adopted Local Plan and all other relevant guidance.

10.3.5 The council works in partnership at many different levels. Continued participation is reviewed regularly to ensure it remains effective. Decision making in partnerships is governed by the structure outlined within the appropriate constitution. As in one example, the Norfolk Coast Partnership (a formal partnership with Great Yarmouth Borough Council, North Norfolk District Council, DEFRA and Norfolk County Council) there is a 'Memorandum of Agreement' that outlines how decisions will be made within the partnership.

10.3.6 A Memorandum of Agreement for the Wash & North Norfolk Marine Partnership, brings together the interests, skills and resources of 21 local authorities, environmental interest groups and national agencies to address matters of mutual interest in and around the Wash is under development.

10.3.7 During the 2018/19 year, the council worked in partnership with other public sector organisations in Norfolk in the 'One Public Estate' programme running across the county following a successful 2016 bid for funding towards feasibility work. Formal governance for the partnership is outlined within the 'Norfolk Partnership Services & Assets Delivery Plan' document.

10.3.8 The council is working with Homes England and Ministry of Housing, Communities and Local Government on the Accelerated Construction programme.

10.3.9 The council has a Data Quality Policy and Strategy in place and available on its website. Having this in place indicates that the council understands the importance of data quality and is committed to being consistent in its management of data quality within the organisation and in partnership with others. It also means that the council ensures that the data produced adheres to the 7 principles of data quality. The policy was reviewed, and the strategy was refreshed during the 2018/19 year.

10.3.10 Following a review of the council's scrutiny function by the Centre for Public Scrutiny in 2015, the cross party Scrutiny Structures and Policy Development Task Group made recommendations to panels, Cabinet and Council on the Scrutiny and Policy Development Structure. The Task Group reconvened in August 2017 to review the revised operation and structures. The Task Group's proposals were considered by the policy and review panels and were approved by Cabinet in January 2018. Implementation of the changes continued into 2018/19. These changes included:

- the attendance of Audit Committee members for training becoming obligatory as it is for Planning and Licensing initial training.
- Panels being encouraged to use the powers available to them and therefore making clear recommendations on items coming before them so they can be incorporated into reports in the progress of being prepared, or taken into account at Cabinet.
- Panels considering their own performance indicators and being encouraged to monitor the progress in line with the corporate objectives through that route.
- when working on policy development and reviews and project programme work, Panels being encouraged to have discussions with portfolio holders.
- the Leader nominating the panel/committee chairs for agreement at Council with the vice-chairs to be appointed by the panels/committee.
- terms of reference being approved for chairs of scrutiny bodies.

10.3.11 The role referred to by CIPFA as the Head of Internal Audit has a critical role in delivering the organisation's strategic aims by championing best practice in governance, objectively assessing the adequacy of governance and management of existing risks, commenting on responses to emerging risks and proposed developments; and giving an objective and evidence based opinion on all aspects of governance, risk management and internal control. The Internal Audit Manager has direct access to the Audit Committee. The arrangements in place for 2018/19 conformed to the requirements outlined in the CIPFA Statement on the Role of the Head of Internal Audit.

10.3.12 During 2018/19, the shared arrangement with Fenland District Council to manage the Internal Audit team continued and is underpinned by a Section 113 agreement. These arrangements were entered into in order to provide a cost saving to the borough council, whilst at the same time continuing to provide an effective internal audit function through a different model of delivery. The arrangement enabled the shared Internal Audit Manager to provide the assurance required by management and members, and issue an Audit Opinion for the Annual Governance Statement.

10.3.13 The council's external auditor during 2018/19 was Ernst & Young.

10.3.14 From April 2016, the council has had a standalone Audit Committee in place providing increased opportunity for effective assurance about the adequacy of financial and operational management and reporting.

10.3.15 Training has been provided during 2018/19 to the members of the Audit Committee in key areas. Examples include training on and Introduction to the

Audit Committee, The differences between internal and external audit, Funding, the Statement of Accounts and the Treasury Strategy.

10.3.16 Each year, a review is undertaken of the effectiveness of the Audit Committee. For the year covered by this statement, the review was presented to the Audit Committee in June 2019. The review concluded that the committee is continuing to perform effectively and the council is meeting its requirements under the Accounts and Audit Regulations 2015.

10.3.17 Commercialisation has introduced a new set of risks for the council. These impact upon local authority owned companies and investments.

10.3.18 The council has a number of wholly owned companies and appoints company directors. The governance framework in which these companies operate will be reviewed and enhanced in 2019/20. Training for the appointed company directors will be delivered in 2019/20.

10.3.19 During 2018/19, two investigations have resulted in the identification of learning regarding due diligence processes. An Internal Audit lessons learnt review was commissioned and reported to Audit Committee in March 2019.

10.3.20 The key control issues identified in the audit were:

- The project required greater management oversight and a more thorough approach to deliver the project and identify risks.
- The Steering Group needed independent leadership to avoid time delays and changes to the project plan.
- Conflicts of interest should be raised at the earliest opportunity and monitored throughout the course of the project.
- Financial implications should be thoroughly investigated including viability assessments to prevent the Council from being subjected to a risk that was not intended at the commencement of the project.

10.3.21 The key recommendations arising from the audit are:

- Continuous due diligence exercise should be completed on the financial position of any partner on an annual basis.
- Project Boards should be set up for each major project with agreed Terms of Reference and use an enhanced initiative checklist to ensure risks are identified at the earliest opportunity.
- All critical documents should be retained in a central location.
- Financial representation should be maintained throughout the project lifecycle.

10.3.22 Following a special Council meeting in March 2019 an independent inquiry will be established into the partnership with Norfolk and Waveney Enterprise Services (NWES) and its subsidiaries and associated companies and those with common shareholders or directors, regarding the award of and administration of the KLIC project and all aspects of its (their) financial relationship with the Borough Council of King's Lynn and West Norfolk.

10.3.23 An Audit Committee Task Group will also focus on the future composition and operation of the Major Projects Officer Board, the Major Projects Progress overview and other lessons learnt from the 'KLIC Lessons Learnt Review'. This work will continue into 2019/20.

10.3.24 A Major Projects Member Board will be considered in 2019/20 to provide additional oversight of the operation of the Major Projects Officer Board.

10.3.25 A number of reviews were undertaken of service changes implemented in previous financial years. These included:

- Review of effective closure of Downham Market and Hunstanton area offices (CPP, 17 July 2018).
- Review of the operation of Planning Sifting Panel (CPP, 19 Feb 2019).

11. Review of effectiveness

11.1 The council has a responsibility to review the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of Internal Audit and the senior managers within the authority who have responsibility for the development and maintenance of the governance environment, the Internal Audit Manager's annual report, the Monitoring Officer's annual report and also by comments made by the external auditors and other review agencies and inspectorates, where undertaken.

11.2 The process of maintaining and reviewing the effectiveness of the system of internal control includes the following measures and actions:

- the work of senior managers within the council who have responsibility for the development and maintenance of governance.
- the Internal Audit work programme .
- comments made by the external auditors and other review agencies and inspectorates.
- systems and controls within the council as outlined above.

11.3 In-year and year-end review processes have taken place. In year review mechanisms include:

- Cabinet and the Corporate Performance Panel are responsible for considering overall financial performance and receives reports on a regular basis. It is also responsible for key decisions and for initiating corrective action in relation to risk and internal control issues.
- The Monitoring Officer has a duty to monitor and review the operation of the Constitution to ensure its aims and principles are given full effect. The council reviews the Constitution regularly to incorporate any necessary changes.
- The Standards Committee have met regularly throughout the year to consider and review issues relating to the conduct of Members.
- The Audit Committee has oversight of the activities of the council's internal and external audit functions. Members of the Audit Committee are provided with copies of all reports produced by Internal Audit and the external auditors, and also receive regular reports on matters relating to finance, fraud investigation and risk management. The committee approves the annual plans for Internal and External Audit, and receives regular progress reports throughout the year. The Audit Manager submits to the committee an annual report and opinion, and the external auditors submit an annual audit letter. The Audit Manager has included an audit opinion on the adequacy and effectiveness of the council's systems of internal

control in the annual report and opinion on work completed during 2018/19 which was considered by Audit Committee on 3rd June 2019. The report states that in the Audit Manager's opinion, the council's control arrangements were adequate and effective in 2018/19, with sound controls in all key areas.

- The Audit Manager has also completed a review of the effectiveness of the Audit Committee itself. The result will be reported to Cabinet in August 2019 and concluded that the committee is continuing to perform effectively and the council is meeting its requirements under the Accounts and Audit Regulations 2015.
- During 2018/19 Internal Audit has issued no reports with a 'limited assurance' rating. There were no instances of 'no assurance' reports being issued. However the KLIC lesson Learnt review highlights a number of weaknesses to be considered as covered in point 10.3.19.

11.4 The council's external auditors review the activities of the authority, approve the annual accounts and certify grant claims (where required). Conclusions and significant issues arising are detailed in various reports from the auditors. Their 'Audit Results Report – ISA (UK and Ireland) 260' and the Annual Audit Letter were considered by Audit Committee on 16 December 2019 and 17 September 2018 respectively. These reports from the external auditors refer to the 2017/18 financial year (the latest available) and they confirmed that the council had put in place proper arrangements to secure value for money in its use of resources, and that the financial statements gave a true and fair view of the financial position of the council as at 31 March 2019.

- A member/officer protocol is in place and forms part of the council's constitution.
- The Monitoring Officer's annual report covering the 2018/19 year provides an overall opinion on the adequacy and effectiveness of the governance framework. The report stated that the systems of internal control administered by the Monitoring Officer including the Code of Conduct and the Council's Constitution, were adequate and effective during the year between April 2018 and March 2019 for the purposes of the latest regulations
- Additionally, it is the responsibility of the statutory officers to report to council on any issues concerning the review of the effectiveness of internal control arrangements. One issue occurred during 2018/19 which required the full council to exercise its role (see point 10.3.19).

11.5 To summarise this section: a review of the council's overall governance arrangements for the 2018/19 year has been undertaken; the review highlighted one issue affecting governance or internal control during the year. Arrangements outlined in sections 4 to 10 are in place and operating as planned.

12. Areas of special interest in terms of governance

12.1 Leisure arrangements – Alive West Norfolk

12.1.1 The council's leisure and arts facilities have been operated and managed through an independent trust and wholly owned local authority company since 1 September 2014. A review undertaken in 2018/19 lead to a decision being taken at a special

cabinet meeting on 17 October 2018 to move to a new delivery model in 2019/20. A wholly owned council company (Alive West Norfolk) has been established that will be responsible for the delivery of leisure services across the borough. An officer project board has been supporting the transition with the new model aimed to be in effect from 1 July 2019.

12.2 Legal arrangements

12.2.1 The council's legal service continues to be delivered via a delegated agreement on an annual, rolling basis, with Eastlaw (the in-house legal team at North Norfolk District Council). The agreement is designed to provide resilient and quality legal services to the borough council and includes provision of a Monitoring Officer; one of the council's designated statutory posts. Eastlaw provide the client role for commissioned legal services, as well as providing general advice and support for processing Freedom of Information Act 2000 requests and the General Data Protection Regulation 2016.

12.3 West Norfolk Housing Company Limited (WNHC) (Company number 10368299)

12.3.1 In August 2016, Cabinet resolved[2] to set up a wholly owned local authority company the main purpose of which is to help meet the council's statutory housing duties, by holding property that will be purchased and / or leased from the council in order to create and provide affordable housing. The company became a registered provider of social housing in 2018. It operates on a not for profit basis. The council has appointed members and officers to serve as company directors. The company reports to Cabinet.

12.3.2 WNHC is helping to secure investment in new affordable homes in the borough to meet identified need. Broad Street is an ambitious scheme that has transformed underused office space in King's Lynn town centre into temporary accommodation for couples and families who are, or have been threatened with being homeless opened in 2018/19. The accommodation is managed by Broadland Housing Association.

12.4 West Norfolk Property Limited (Company number 11305604)

12.4.1 The 2017 Annual Governance Statement set out governance arrangements for this vehicle to hold new private rented sector stock in the borough. The company, limited by shares, operates primarily to generate new revenue from housing stock developed and held on sites developed by the council. The council has appointed members and officers to serve as company directors. The company reports to Cabinet. A Business Plan and Intra Group Agreement were agreed by Cabinet in June 2018.

12.5 West Norfolk Wins (local lottery)

12.5.1 The first lottery draw for West Norfolk Wins took place on 26 May 2018. The introduction of a local lottery requires two licences approved by the Gambling Commission. These are held by the Deputy Chief Executive (Section 151 Officer) and the Chief Executive. In addition Norfolk Community Foundation to provides an independent due diligence review of the approval of good causes.

[2] 2 August 2016

12.5.2 West Norfolk Wins has raised £34,000 for the local community.

12.6 Officer Major Projects Board

12.6.1 The council has a range of projects that are identified within the approved capital programme. In addition to this, there is a multitude of other projects that are being worked on by a variety of officers. To support the management of the council's property projects, an officer board has been established. The board includes executive directors and officers involved in capital funded property projects. The monthly board meetings consider project briefs, business cases, project progress, risk and reports to Management Team.

12.6.2 Following the publication of the Internal Audit report "KLIC Lessons Learnt" in March 2019, the Officer Major Projects Board will establish a reporting mechanism to enable the Audit Committee to monitor major projects and identify any steps or action required. A programme of reviewing each of the current large scale projects will also be undertaken.

13. Known changes in the 2019/20 year

13.1 Embedding the new risk management framework
Roll out briefings on the revised risk management framework. Align risk register with new corporate business plan and prepare 6 monthly risk updates to Management Team and Audit Committee.

13.2 Governance framework for the council's companies
Review the governance framework of the council's wholly owned companies.

13.3 To embed arrangements for record management and processing
Assurance work regarding GDPR.

13.4 Assurance work regarding the Annual Governance Statement
To support the Internal Audit review of the council's approach to develop the annual governance statement.

13.5 Development of council appointed directors
To provide company director training for directors appointed to its companies.

13.6 Development of an updated corporate business plan
Following the May 2019 elections, refresh the corporate business plan for 2019-2023.

13.7 Review of the performance management framework
Review the performance management framework to ensure it is aligned with the new corporate business plan.

13.8 Implementation and embedding of the new financial ledger
To implement and embed the new financial ledger software's operational processes.

13.9 Management restructure

To implement the approved restructure.

13.10 Policy outlining approaches to the council's housing regulatory function
To develop a policy that outlines the council's approach to regulation with its housing functions.

13.11 Homelessness and rough sleeper strategy and stakeholder group
To develop a homelessness and rough sleeper strategy.

13.12 Joint waste contract
To procure a joint waste collection contract in collaboration with Breckland and North Norfolk district councils.

13.13 CIL governance
To design the governance structure for the Community Infrastructure Levy.

13.14 Creation of Alive West Norfolk and closedown of Alive Management Limited
To establish the new council owned leisure company, Alive West Norfolk (company number 11802914) and close down Alive Management Limited.

13.15 Preventing Fraud and Corruption
To support joint working with Department of Work and Pensions and participate in the Norfolk Counter Fraud Hub.

13.16 KLIC Lessons Learnt Report
To support the independent inquiry into the partnership with NWES and respond to the report findings. To support the Audit Committee Task Group with its work regarding the Major Projects Board and 'KLIC Lessons Learnt Review'.

13.17 Member development needs
Delivery of member induction programme and identification of development needs.

14. Action Plan

14.1 In the Annual Governance Statement for 2017/18, an action plan for 2018/19 was set out to deal with governance issues identified during the review for that year and is attached at Appendix B.

14.2 The action plan for 2019/20 is attached at Appendix C.

15. Assurance summary

15.1 From the review undertaken, the assessment and ongoing monitoring work completed[3] and supported by the verification work undertaken by Internal Audit, we have reached the opinion that key systems are operating soundly and that there are no fundamental weaknesses.

15.2 No system of internal control could provide absolute assurances against material misstatement or loss; this statement is intended to provide reasonable assurance. We

[3] By the Audit Committee during 2018/19

are satisfied that an on-going process for identifying, evaluating and managing key risks exists. These risks are reflected in the audit plan, the Corporate Risk Register and are the subject of separate reports during the course of the year.

15.3 We propose over the coming year to take steps to address matters identified to further enhance our governance arrangements. We are satisfied that the steps outlined at Appendix C will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review.

Signed:

Cllr Brian Long	Lorraine Gore	Cllr Angie Dickinson
Leader of the Council	Chief Executive	Chair of the Audit Committee
Date:	Date:	Date:

Appendix A - Evidence list; How the principles of corporate governance have been adhered to during the 2018/19 year

Policies, Strategies, Rules & Codes	Processes and Frameworks	Key documents	Functions
• Anti-Fraud and Anti-Corruption Strategy • Capital Strategy • Code of Conduct • Computer usage policy • Constitution • Data Quality Strategy • Efficiency Plan • Employment rules • Equality policy • Financial Plan • Financial procedure rules and standing orders (within Constitution) • Financial regulations • Health and Safety Policy • Information Governance Policies • Medium Term Financial Strategy • Member/Officer protocol • Members' allowances scheme (Constitution) • Members' code of conduct (Constitution) • Officers' code of conduct (Constitution) • Pay policy statement • Procedure rules (contracts, employment, meetings) (Constitution) • Procurement regulations • Procurement strategy • Protocol on member / officer relations (Constitution) • Prudential Code	• Benchmarking • Budget consultation • Budget process • Business continuity framework • Car Park Management • Civil Parking Enforcement • Competency frameworks • Complaints process • Corporate Business Plan • Customer Care Standards • Customer feedback process • Environment policy • Environmental Statement • EQIA policies • Equality Monitoring • Extended Managers Meetings • Health and Safety policy • Induction process (member and officer) • Internal Audit Strategic Plan • Job evaluation process • Legal Services • Managing performance (people) framework (including appraisal process) • Meeting timetable • Member allowances publication • Member training • MRF Partnership Care & Repair	• Agendas & Minutes • Alive Trust/Management • Annual audit letters • Annual Directorate Plans • Annual Governance Statement • Assurance Statements • CCTV Operating Manual • CNC Building Control • Committee reports, agendas and minutes • Complaints reports • Consultation register • Corporate Risk Register • Council tax booklet • Council website • Delegation Agreement & SLA • Employee Handbook • Enforcement Policy • External inspection / review reports • Harassment Procedure • Internal Affairs • Intranet • JNC terms & conditions • Job descriptions/specs • Key decisions (within Constitution) • Law & governance • Local Plan • Members Bulletin • Neighbourhood Development Plans	• Audit Committee • Community Information Points • Democratic Services • External audit (and other reviews) • Finance service • Functions and responsibilities of senior officers and councillors (within Constitution) • Head of Paid Service • Health and Safety Officer • ICT Development Group • Independent remuneration panel • Internal Audit • Local Government Ombudsman (report) • Management Team • Monitoring Officer • Monitoring Officer report • Officer Major Projects Board • Policy Development and Review Panels • Policy, Performance and Personnel Services • PR/Communication • S151 officer • Social media • Standards Committee • Statutory reports • Terms of reference for committees (Constitution) • Website • Weekly CEO/Leader meetings

• Risk Management Strategy • Safeguarding Policy • Scheme of Delegation (within Constitution) • Statement of Community Involvement • Travelling abroad with Council devices policy • Terms of reference for task groups • Treasury Management Policy statement • Whistleblowing policy • Workforce learning and development	• MT/Union meetings • Officer membership of professional bodies • Performance Management (business) framework • PRP targets • Risk management process • Scrutiny framework (Constitution) • Senior Staff Salary publication • Staff Briefing • Training for chairmen and vice-chairmen	• Publication Scheme (FOI) • Quarterly Performance Reports • Record of decisions • Register of interests • Report templates • Salary scales • Senior management remuneration report • Service level agreements • Service plans • Standard timetable for circulation of agendas • Statement of Accounts • Statement of Internal Control (part of AGS) • Timetable of council meetings • Training programmes • Transparency publications • West Norfolk Partnership • Workforce development and Plans • Working Protocol	

Appendix B - Action plan for the 2018/19 year

Item		Action	Responsible Officer	Target Date	Status
1	Code of Corporate Governance	Review Code of Corporate Governance and gain Council approval to demonstrate good governance.	Chief Executive	December 2018	Completed. Considered by Audit Committee in March 2019, approved by Cabinet in August 2019 and by Council in September 2019.
2	Scrutiny changes	Implementation of recommendations from Scrutiny review 2017/18.	Executive Director, Central and Community Services	March 2019	Completed. All implemented for early 2018. Task Group has asked to review again after a further 12 months
3	Baseline Personnel Security Standard	Completion of review.	Executive Director, Central and Community Services	March 2019	Review of BPSS is ongoing linked to review of provision of GCSX accounts. Adjustments have been made to ensure the Council remains able to complete the full BPSS checks for staff using the PSN.
4	Business Continuity	Testing arrangements and refresh of the business continuity plan.	Executive Director, Environment & Planning	March 2019	Completed. The policy and strategy documents have been combined with the threat cards to produce a corporate business continuity plan. METIS18 delivered training on the new plan to extended management team and other appropriate officers.
5	Corporate policies	Implement new arrangements including update to intranet, refresh of policy register and application of template to policies developed during 2018/19.	Executive Director, Central and Community Services	March 2019	Completed. Insite updated in May 2018 to include the tiered policy register and guidance. Articles published in Internal Affairs and Members Bulletin. Policies updated in 2018/19 include: • Equality Policy • Health, Safety and General Welfare Policy • Risk Based Verification Policy for Housing Benefit and Council Tax support • Risk Management Policy • Document Retention Policy
6	Cultural prospectus	Consideration of governance issues regarding new arrangements to access funding.	Executive Director, Commercial Services	March 2019	Completed. A Cultural Board has been established, this is chaired by BCKLWN. Representatives include Norfolk County Council's Arts and Museums Service, the Arts Council, national portfolio organisations and local

Item		Action	Responsible Officer	Target Date	Status
					stakeholders. The board meets quarterly.
7	General Data Protection Regulations	Roll out of training programme and completion of e-learning package.	Chief Executive	March 2019	• Governance structure now in place for GDPR, quarterly meetings • Eastlaw has provided training to Members • Deputy SIRO will attend external training course early 2019 • Information Asset Owners (Service Managers) and Information Asset Assistants have now been identified for each service area and training will be provided in 2019 using an external trainer • Currently less than 50% of Council employees have completed the e-learning package. Deputy SIRO to discuss with Personnel to consider options to encourage staff to complete.
8	Service manager development programme	Completion of programme by Cohort 2	Executive Director, Central and Community Services	Summer 2018	Completed. All four delegates in the second cohort of the Level 7 Management programme successfully completed their qualification by summer 2018.
9	Review of Ward Boundaries (Review by Local Government Boundary Commission for England)	Ensure active participation in the final stage of the review in order to ensure the best possible evidence based outcome for West Norfolk	Executive Director, Central and Community Services	December 2019	Completed. Boundary Commission have published their decision – the Council responded to some of their decisions with disappointment. New wards prepared for May elections.
10	Equalities Policy	Delivery of implementation plan including training for officers and members.	Executive Director, Central and Community Services	March 2019	All actions on implementation plan for new policy have been completed. Work on new training programme has been slightly delayed due to staffing changes within Personnel Services but will be progressed in 2019.
11	Retention and Disposal Policy and Schedule	Update the Retention and Disposal Policy and Schedule.	Chief Executive	March 2019	Completed. Policy and schedule approved by Cabinet in March 2019.
12	Data Quality Policy Statement and Strategy	Review of policy and strategy to ensure conformity with the GDPR and emerging UK legislation.	Executive Director, Central and Community Services	March 2019	Complete. The policy and strategy have been reviewed and approved under delegated powers.
13	Review Of Contract	Undertake a review Of	Deputy Chief	March	It has been agreed to combine

Item		Action	Responsible Officer	Target Date	Status
	Standing Orders	Contract Standing Orders and roll out updated digital content and training for officers.	Executive	2019	the review of Contract Standing Orders with the implementation of the new financial system. Project implementation commenced November 2018 and aims to complete in July 2019.
14	Health, Safety and General Welfare Policy	Review the policy to consider legislative and procedural changes.	Executive Director, Environment & Planning	May 2018	Completed. The HSW Policy was updated and agreed by Council in May 2018, a signed copy is available on Insite and a link to the document was circulated through Internal Affairs.
15	West Norfolk Housing Company Limited	Review the governance arrangements for West Norfolk Housing Company Limited with an objective of being a not for profit organisation.	Chief Executive	June 2018	Completed. West Norfolk Housing Company is now a not for profit company and has secured registration as a Registered Provider with Homes England, one of the first Local Authority Housing Companies to do so.
16	Public Services Network (PSN) compliance	Ensure PSN compliance during 2018/19 including progressing any actions identified as a result of the 2018 audit	Executive Director, Central and Community Services	April 2019	We have continued to achieve compliance during 2018/19, and are preparing for the next Audit during April 2019.
17	Payment Card Industry (PCI) compliance	Respond to issues identified during the 2017 PCI audit	Executive Director, Central and Community Services	October 2018	Completed. All issues have been dealt with from the 2017/18 audit. The next audit will take place in February 2019.

Appendix C - Action plan for the 2019/20 year

Item		Action	Responsible Officer	Target Date
1	Embedding the new risk management framework.	Roll out briefings on the revised risk management framework. 6 monthly risk updates to Management Team and Audit Committee.	Executive Director, Central and Community Services	March 2020
2	Governance framework for the council's companies.	Review the governance framework of the council's wholly owned companies.	Chief Executive	March 2020
3	Assurance work regarding GDPR.	To embed arrangements for record management and processing.	Chief Executive	March 2020
4	Assurance work regarding the Annual Governance Statement.	To support the Internal Audit review of the council's approach to developing the annual governance statement.	Executive Director, Central and Community Services	March 2020
5	Training for the council's appointed directors on the role and responsibilities of a company director.	To provide company director training for directors appointed to its companies.	Chief Executive	March 2020
6	Development of an updated corporate business plan.	Following the May 2019 elections, refresh the corporate business plan for 2019-2023.	Chief Executive	March 2020
7	Review of the performance management framework.	Review the performance management framework to ensure it is aligned with the new corporate business plan.	Executive Director, Central and Community Services	March 2020
8	Implementation and embedding of the new financial ledger.	To implement and embed the operational processes of the new financial ledger software.	Deputy Chief Executive	March 2020
9	Management restructure.	To implement a management restructure to support succession planning.	Chief Executive	March 2020
10	Procurement strategy/regulations training	Roll out training for the new procurement strategy.	Deputy Chief Executive	March 2020
11	Recommendations from Internal Audit review of "Ethical culture".	To implement priority recommendations from the Internal Audit of "Ethical culture".	Chief Executive	March 2020
12	Digital exclusion strategy/policy.	Develop a digital exclusion policy/strategy.	Executive Director, Central and Community Services	March 2020
13	Develop revised media protocols.	To develop revised social media protocols.	Executive Director, Central and Community Services	March 2020
14	Public Services	Ensure PSN compliance during	Executive	March 2020

Item		Action	Responsible Officer	Target Date
	Network (PSN) compliance	2019/20 including progressing any actions identified as a result of the 2018 audit.	Director, Central and Community Services	
15	Policy outlining approaches to the council's housing regulatory function.	To develop a policy that outlines the council's approach to regulation with its housing functions.	Chief Executive	March 2020
16	Homelessness and rough sleeper strategy and stakeholder group.	To develop a homelessness and rough sleeper strategy.	Chief Executive	March 2020
17	Development of waste contracts for residual, recycling, garden and food waste streams.	To procure: • A joint waste collection service in collaboration with Breckland and North Norfolk district councils. • A food waste treatment service. • A garden waste treatment service.	Executive Director, Commercial Services	March 2020
18	CIL governance.	To design the governance structure for the Community Infrastructure Levy.	Executive Director, Environment and Planning	March 2020
19	Creation of Alive West Norfolk and closedown of Alive Management Limited.	To establish the new council owned leisure company, Alive West Norfolk and close down Alive Management Limited.	Deputy Chief Executive	March 2020
20	Norfolk Fraud Hub	To support joint working with DWP and participate in the Norfolk Counter Fraud Hub.	Deputy Chief Executive	March 2020
21	Payment Card Industry (PCI) compliance.	To respond to issues identified during the 2018 PCI audit.	Deputy Chief Executive	March 2020
22	Independent inquiry into partnership with NWES	To support the independent inquiry into the partnership with NWES and respond to the report findings.	Chief Executive	March 2020
23	Audit Committee Task Group regarding major projects and KLIC lessons learnt review	To support the Audit Committee Task Group with its work regarding the Major Projects Board and 'KLIC Lessons Learnt Review'.	Chief Executive	March 2020
24	Major Projects Member Board	To establish a member board to provide assurance that the council's major projects programme is run in accordance with the Major Projects (Officer) Board terms of reference.	Chief Executive	March 2020
25	Member development needs	Delivery of member induction programme and identification of development needs.	Chief Executive	March 2020
26	Equalities training programme	Development of a training programme to support the equalities	Executive Director, Central	March 2020

Item		Action	Responsible Officer	Target Date
		policy.	and Community Services	
27	Review the council's governance model	To review and examine alternative governance models to the current Strong Leader and Cabinet model.	Chief Executive	March 2020
28	Review of King's Lynn Area Consultative Committee.	To review the continuing operation of the King's Lynn Area Consultative Committee (KLACC).	Executive Director, Environment and Planning	June 2019

Appendix D – Alternative ways of providing services

Partnerships/joint working

- College of West Anglia via Lynnsport
- Improving Educational Attainment Steering Group
- King's Lynn Area Consultative Committee
- Kings Lynn Business Improvement District
- Lily
- New Anglia LEP
- Norfolk Arts Forum Executive
- Norfolk Business Rates Pool
- Norfolk Coast Partnership Management Group
- Norfolk Community Safety Partnership
- Norfolk Community Safety Scrutiny Sub-Panel
- Norfolk Counter Fraud Hub
- Norfolk Health and Wellbeing Board
- Norfolk Health Overview and Scrutiny Committee
- Norfolk IHAT strategy group (Integrated Housing Adaptations Team)
- Norfolk Joint Museums and Archaeology Committee
- Norfolk Local Authority Tourism Group
- Norfolk Parking Partnership
- Norfolk Parking Partnership Joint Committee
- Norfolk Police and Crime Panel
- Norfolk Rail Policy Group
- Norfolk Records Committee
- Norfolk Resilience Forum
- Norfolk Waste Enforcement Group
- Norfolk Waste Partnership
- Norfolk, serious and organised crime group
- North Norfolk and Breckland district councils – waste and recycling contract procurement
- Operational Partnership Team (community safety)
- Wash East Coastal Management Strategy Stakeholder Forum
- West Norfolk and King's Lynn Girls School Trust
- West Norfolk Chamber of Commerce Council
- West Norfolk Community Transport Project
- West Norfolk Partnership
- West Norfolk Tourism Forum

Wholly owned council companies

- Alive West Norfolk
- West Norfolk Housing Company Limited
- West Norfolk Property Limited

Contracted out services

- Waste and recycling collection - Kier
- West Norfolk Wins lottery – Gatherwell Limited
- Leisure, culture and sports development services – Alive Leisure
- Payroll – Bedford Borough Council

Shared services

- Internal Audit Manager – Fenland District Council

Services we provide for other councils

- On and/or off street parking services/administration in Great Yarmouth, South Norfolk, North Norfolk, Breckland and Broadland areas
- CCTV - Breckland, Norfolk County Council and Great Yarmouth
- Management of Disabled Facilities Grants – Breckland and Fenland district councils
- Strategic housing – Breckland District Council
- Careline Services – North Norfolk District Council
- Procurement – Boston Borough Council

Glossary of terms

Annual Governance Statement (AGS)	The Annual Governance Statement which describes how corporate governance arrangements have been working for a period of time indicated. It is a public report by the council on the extent to which it complies with its own local governance code, including how it has monitored the effectiveness of its governance arrangements in the year, and on any planned changes in the coming period.
Audit Committee	The Audit Committee considers the council's governance arrangements and ensures that the financial affairs of the council are properly conducted.
Budget	The estimate of income and expenditure for a set period of time, for the council this covers the financial year 1 April until 31 March each year and includes all the financial resources allocated to different services and projects.
Capital Programme	This identifies agreed capital schemes, showing the total cost of schemes and the projected phasing of those schemes over current and future financial years.
Code of conduct	The Code sets the standards and behaviour expected of councillors and co-opted members.
Code of Corporate Governance	The Code of Corporate Governance describes the arrangements in place to ensure that the council conducts its business in accordance with the law and proper standards and that public money is safeguarded, properly accounted for and used economically, efficiently and effectively.
Constitution	The council's constitution contains the standing orders, scheme of delegation, financial regulations and contracts procedure rules. The constitution also contains the policies for anti-fraud and corruption, anti-bribery and whistleblowing.
Corporate Business Plan	This document details the vision, priorities and objectives of the organisation.
Corporate Risk Register	This is a formal record of the major risks facing the council and the mitigating actions to reduce the risk.
Data Protection Act 2018	The Data Protection Act 2019 and associated General Data Protection Regulations which came into force in May 2018. This strengthens the regulatory environment for data owners, controllers and processors and aligns legislation with other European countries.
Data Protection Officer	A Data Protection Officer (DPO) is a role required by GDPR. Data Protection Officers are responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements.
Extended Management Team	Comprises the Chief Executive, Executive Directors, Assistant Directors and Service Managers.
Governance	Governance is about how local government bodies ensure that they are doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner. It comprises the systems and processes, cultures and values, by which local government bodies are directed and controlled and through which they account to, engage with and where appropriate, lead their communities.
Head of Paid Service	The most senior officer with overall responsibility for the management and operation of the council. Also known as the Chief Executive.
Internal Audit	This is an independent, objective assurance and consulting activity designed to add value and improve the council's operations.
Licensing Committee	Committee of councillors that undertake all licensing and gambling functions, powers and duties conferred on the council under the Licensing Act 2003 and the Gambling Act 2005.
Local Plan	A Local Plan sets out the local planning policies and identifies how land is used, determining what will be built where. Once a local plan

	becomes adopted it provides the framework for development within an area.
Management Team	Comprises the Chief Executive and Executive Directors.
Medium Term Financial Strategy	The council's key financial planning document. It aims to provide the council with an assurance that the spending plans are affordable over the medium term (five years). The MTFS includes a five year budget forecast that is reviewed annually as part of the budget setting process.
Monitoring Officer	The officer charged with ensuring that everything that the council does is fair and lawful.
Performance Indicators	A measurable value that demonstrates how effectively the organisation is achieving against its key objectives
Planning Committee	Committee of councillors that sit as the local planning authority to determine planning applications (not delegated to officers).
Policy Framework	The plans and strategies, which have been adopted by the Full Council in accordance with which the Leader of the Council, Cabinet, policy development panels, committees and officers must operate.
Risk Management	This is an important part of both corporate governance and performance management. It allows the council to avoid problems and failures, rather than just reacting to them when they arise. It helps the council to identify where it needs to focus its efforts and resources, to exploit more opportunities and suffer fewer failures.
Scheme of delegation	This sets out how the Cabinet and full Council have delegated their executive and non-executive powers.
Section 151 Officer	The officer responsible for the administration of the financial affairs of the council (under section 151 of the Local Government Act 1972). Also known as the Chief Finance Officer.
Statement of Accounts	The Statement of Accounts show, in financial terms, the performance of the council for the year indicated. It is a statutory publication produced in accordance with legislative requirements and the Chartered Institute of Public Finance and Accountancy (CIPFA) Code of Practice on Local Authority Accounting in the United Kingdom.