

Borough Council of
**King's Lynn &
West Norfolk**



DRAFT

Annual Governance Statement 2022

For the 2021/22 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. The code will be reviewed in 2024/25 or sooner if guidance requires.
- 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.

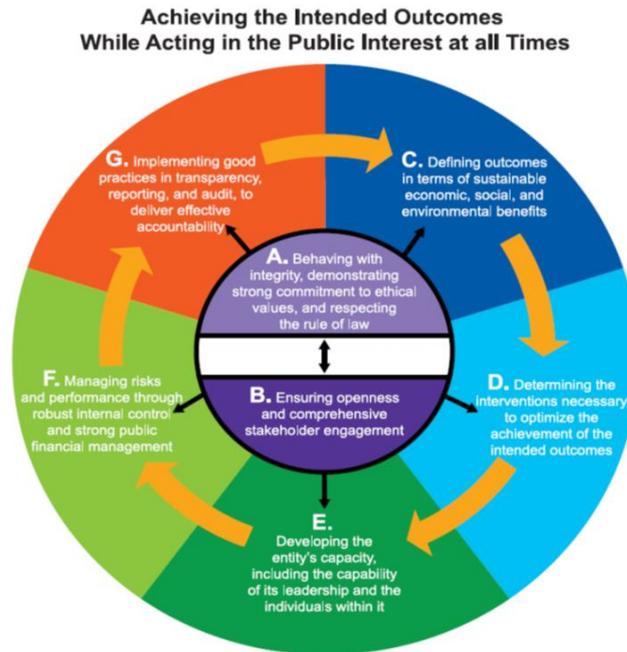
2. The purpose of the governance framework

- 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 2022 and remains in place to date.

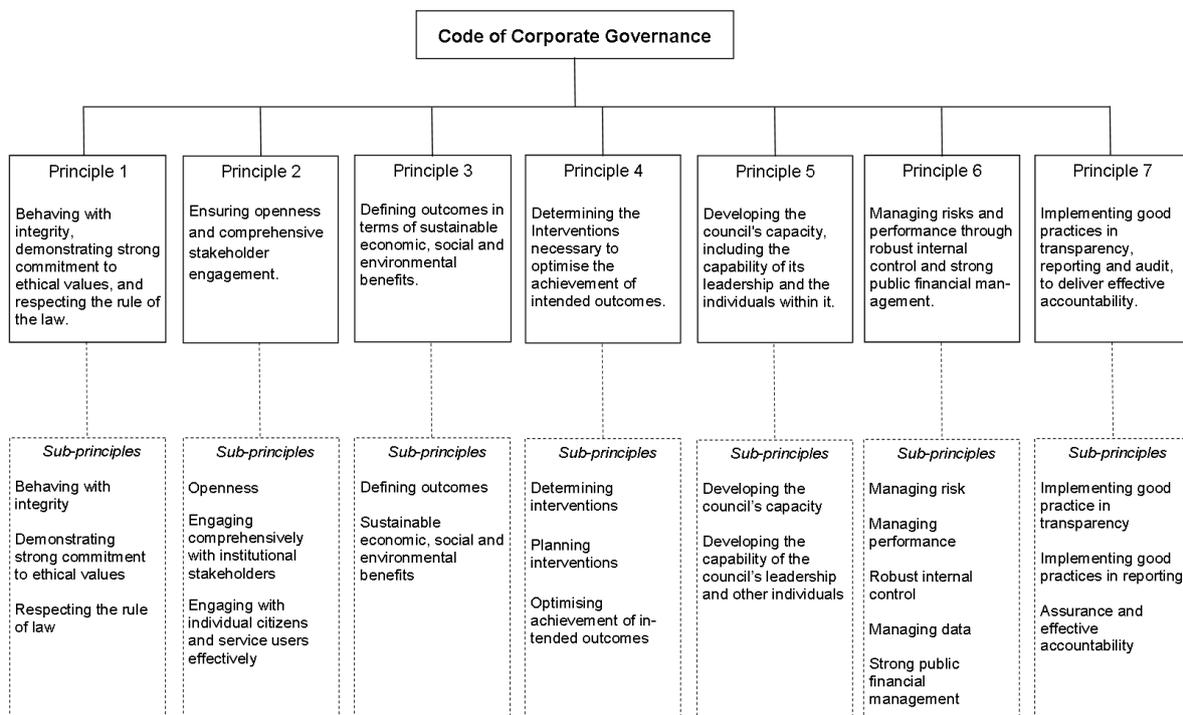
3. Key principles of our governance framework

- 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:

CIPFA¹/ SOLACE²: 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 C lists the types of evidence that will demonstrate how the principles of corporate governance have been upheld during the 2021/22 year.

¹ CIPFA: [The Chartered Institute of Public Finance and Accountancy](#)

² SOLACE: [Society of Local Authority Chief Executives and Senior Managers](#)

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.
- 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 The Monitoring Officer is provided through the council's arrangements with [Eastlaw](#) for the provision of legal services and provides advice on legal compliance. A review of legal services in 2022 resulted in a decision to bring services inhouse and a Monitoring Officer has been recruited.
- 4.1.6 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.
- 4.1.7 The council's [Standards Committee](#) met five times during 2021/22.
- 4.1.8 Several registers are in place covering interests and gifts/hospitality.
- 4.1.9 A [whistleblowing policy](#) is in place and provides protection for individuals raising concerns.

- 4.1.10 A complaints policy is in place and 55 complaints regarding behaviour/conduct were recorded in 2021/22 compared with 52 complaints in 2017/18, 46 complaints in 2018/19, 23 complaints in 2019/20 and 23 in 2020/21.
- 4.1.11 The council has in place key documents which communicate the standards of behaviour required of members and all council staff (officers). Relevant policies are published on the council's intranet or on the personnel system CIPHR and where required published on the council's website.
- 4.1.12 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.
- 4.1.13 The [Performance Management Framework](#) also describes how staff performance, including conduct, is managed. All employees have detailed job descriptions and person specifications.
- 4.1.14 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.
- 4.1.15 To enhance support for elected member, a dedicated email inbox was introduced in September 2020. This provides a mechanism for members to raise queries and for officers to corporately coordinate responses. The account is: Member.Enquiries@West-Norfolk.gov.uk

4.2 Demonstrating strong commitment to ethical values.

- 4.2.1 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.
- 4.2.2 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.
- 4.2.3 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.
- 4.2.4 There were no identified cases of corruption or misuse of power in 2021/22.
- 4.2.5 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.
- 4.2.6 Other related policies include the Disciplinary and Dismissal Procedure, Anti-Fraud and Anti-Corruption Policy.
- 4.2.7 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.

- 4.2.8 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 statutory officers – Head of Paid Service, Monitoring Officer and Section 151 officer monitor and ensure adherence.
- 4.3.2 The Council has enhanced its financial management capacity in 2021/22 with the appointment of a deputy S151 officer and a project accountant.
- 4.3.3 Initiatives are reviewed by regular meetings of the [Management Team](#) in order to ensure compliance and that spend is legal.
- 4.3.4 Statutory compliance is tested through the work programme of [Internal Audit](#). The work programme is agreed by Management Team and reported to [Audit Committee](#). From June 2021, the council’s Audit Manager is provided by Eastern Internal Audit Services.
- 4.3.5 Job descriptions and person specifications refer to specific requirements to discharge duties regarding specific legislation.
- 4.3.6 The council is also compliant with CIPFA’s Statement on the Role of the Chief Financial Officer in Local Government (CIPFA, 2015).
- 4.3.7 The following policies, strategies and governance documents were approved in 2021/22:

Document	Approval	Date
Norfolk Green Infrastructure (GI) and Recreational impact Avoidance and Mitigation Strategy (RAMS)	Cabinet	15 Jun 2021
Anti-Fraud and Anti-Corruption Policy and Strategy	Cabinet	15 Jun 2021
Councillor Community Grant Scheme	Cabinet	3 Aug 2021
King’s Lynn Town Deal Heads of Terms	Cabinet	24 Aug 2021
Climate Change Strategy	Cabinet	21 Sep 2021
Norfolk Flood Risk Strategy	Cabinet	21 Sep 2021
Corporate Business Plan 2021-23	Cabinet	16 Nov 2021
Members Major Projects Board Terms of Reference	Cabinet	16 Nov 2021
Statement of Principles, Gambling Act 2005	Cabinet	16 Nov 2021
Capital Strategy and Treasury Management Strategy	Council	9 Feb 2022

- 4.3.8 The council remained 'Payment Card Industry (PCI) Compliant' in 2021/22.
- 4.3.9 There were 20 data breaches in 2021/22 (11 in 2020/21, 6 in 2019/20 and 4 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.
- 4.3.10 Each service manager is required to submit an annual data quality sign off sheet.
- 4.3.11 The list of Cabinet responsibilities was amended in June 2021 and the scheme of delegation was correspondingly revised.

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 and prior scrutiny by policy review and development panels.
- 5.1.4 The Annual Governance Statement and Statement of 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.
- 5.1.8 Following the expiry of the powers granted by Section 78 of the Coronavirus Act 2020, Cabinet agreed interim meeting arrangements in August 2021 and reviewed in October 2021.
- 5.1.9 Decision making protocols are set out in the Constitution.

- 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.
- 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. Cabinet bolstered the Communications Service with two additional staff in August 2021.
- 5.2.3 Engagement is developed on a bespoke basis. A number of consultation activities engaged a wide variety of stakeholders in 2021/22 including:

Consultation	Date	Purpose
Rail to river improvements planned for King's Lynn	Jan 2022	Plans to improve a route connecting rail to river in King's Lynn have been unveiled (Rail to River – Vision King's Lynn (visionkingslynn.co.uk) - and the public are being invited to help to shape the artwork on the route.
Neighbourhood planning referendum in Castle Acre	Jan 2022	A referendum on the area's Neighbourhood Planning Referendum.
Young people and local business surveys to shape the future of King's Lynn.	Oct 2021	Opportunity for 16-25's, to share their views on what they'd like to see in the town, what is missing, plus their thoughts on career opportunities in King's Lynn. A survey is running especially for business owners, people thinking of setting up on their own, or individuals who are looking to take a hobby to the next stage to share their thoughts on pop-up spaces for the town
Representations sought on Local Plan ahead of formal examination	July 2021	Representations from anyone interested in the development of the borough through to 2036 are being sought on the Borough Council of King's Lynn & West Norfolk's Local Plan Review Draft.
Opportunities Downham Market	May 2021	Consultation, engagement and communications around plans, investment

		and potential improvements for the town.
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- 5.2.4 [Norfolk Resilience Forum](#) (a group of public services, emergency services, utility companies, armed forces and key voluntary groups) has continued with its response to Covid-19 and the Council has been an active contributor to the core groups and sub-groups.
- 5.2.5 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, for example 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.
- 5.2.6 The council, as a responsible authority³, is a member of Norfolk Community Safety Partnership with a district based multi-agency Operational Partnership Team and [Norfolk Community Safety Scrutiny Sub Panel](#).
- 5.2.7 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.
- 5.2.8 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. The Norfolk Climate Change Partnership is chaired by the council's Chief Executive.
- 5.2.9 A joint waste collection service with neighbouring councils in North Norfolk District Council and Breckland District Council commenced on 1 April 2021 and is delivered by Serco.
- 5.2.10 Regeneration is a corporate priority and, given the Enterprise Zone and other regeneration interests, the council actively engages with the NALEP Steering Group.
- 5.2.11 King's Lynn was awarded £25m from the Government's Towns Fund and the investment is directed by a [Town Deal Board](#) responsible for:
- developing and agree an evidence based Town Investment Plan
 - developing a clear programme of interventions
 - coordinating resources and influencing stakeholders
- 5.2.12 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.

³ Crime and Disorder Act 1998

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.

- 5.2.13 Other partnerships are of a contractual nature, such as the delivery of leisure services via [Alive West Norfolk](#) and these are listed in Appendix D.
- 5.2.14 The council has established 3 wholly owned companies which are detailed in section 12 of the Annual Governance Statement. A governance review has been commissioned in September 2021 and is due to report in 2022 pending the publication of guidance by CIPFA.

5.3 *Engaging with individual citizens and service users effectively.*

- 5.3.1 Following a change in Council leader, the Corporate Business Plan was revised in November 2021 and continues to set 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 The coronavirus pandemic began to impact upon the council from February 2020 and interrupted the usual business planning process. The council has moved between response and recovery as the virus impacted upon the country. [A Covid 19 recovery strategy](#) was initially developed but later affected by changes to national and local responses required by the Norfolk Resilience Forum.
- 5.3.4 Impacts on equality are required for all reports and equality impact assessments are considered where required by the Equality Policy.
- 5.3.5 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 tackling social isolation evident in [Care and Repair](#) and [Lily](#).
- 5.3.6 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.
- 5.3.7 Members of the public are also able to [ask questions](#) on a topic or service within the council's control at full council meetings.
- 5.3.8 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.
- 5.3.9 The council uses a variety of corporate communication 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 campaigns such as Covid-19, Census 2021 and to support tourism. Results all methods of communication are fed back into the organisation. The council also monitors

feedback from residents and service users through compliments and complaints received.

5.3.10 During 2021/22, the council continued to be an active partner in the [Wash East Coastal Management Strategy Stakeholder Forum](#). 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.

5.3.11 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.

5.3.12 Our digital transformation work in 2021/22 resulted in:

- The successful launch of web chat, allowing Council Information Centre advisors to manage ‘multiple’ chats at the same time; 7,217 were completed in 2021/22 compared with 8,024 chats (2020/21) and 3,652 (2019/20).
- Working closely with the Housing team to improve the digital services provided
- Fly-tipping form integration with IDOX Uniform, Open Process and Report-it, preventing repeat reports and updating multiple systems.

5.3.13 Customer feedback from contact with the Council Information Centre in 2021/22 indicated:

	2019/20	2020/21	2021/22
% of customers who think our digital services are excellent	66	77	70
% of customers who were overall satisfied	97	99	97

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 2021-23 outlines six priorities:

- Focusing on delivery
- Delivering growth in the economy and with local housing
- Protecting and enhancing the environment including tackling climate change
- Improving social mobility and inclusion
- Creating and maintaining good quality places that make a positive difference to people’s lives
- Helping to improve the health and wellbeing of our communities

6.1.2 The 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.

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

- 6.1.4 Progress against the Covid-19 recovery strategy indicators was monitored quarterly by Management Team and reported to Corporate Performance Panel.
- 6.1.5 The council's Management Team 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.
- 6.1.6 The corporate risk register is routinely updated and considers risks to the achievement of the corporate business plan. Reports are considered by Management Team and Audit Committee.
- 6.1.7 Budget reports are provided on the intranet. All budget holders are involved in the budget setting process.

6.2 *Sustainable economic, social and environmental benefits.*

- 6.2.1 Discussions regarding capital investment 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 and Member Major Projects Board.
- 6.2.2 Briefings, portfolio updates, sifting meetings and meetings between the Chief Executive and council leadership are examples of the range of dialogue to support decision making. .
- 6.2.3 Reports to committees and Management Team provide a record of decision making and related background information.

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 to prioritise competing demands within the confines of a balanced budget.
- 7.1.3 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.
- 7.1.4 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.
- 7.1.5 [Contract Standing Orders](#) reflect best practice in order to obtain best value and to guard against corruption, discrimination and breaches of public procurement regulations.

- 7.1.6 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.
- 7.1.7 The 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.
- 7.1.8 Corporate contract support is provided by the procurement team who also actively manage a number of centralised contracts.

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, directorate plans and strategies. Key performance indicators are identified by service managers, directors and portfolio holders and provide the basis of quarterly reports to Corporate Performance Panel.
- 7.2.4 The Medium Term Financial Plan is aligned with the corporate business plan. Annual budget setting guidance is issued to service managers to inform service planning. Monthly budget monitoring reports provide an indication of progress.
- 7.2.5 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 The council's shift towards digital services progressed well during 2021/22 with improved take up of My Account, use of online integrated forms and the online help function. The Revenues and Benefits customer portal 'MyRevenues' allows customers to self-serve via the council's website, accessing real time data about their council tax, business rates accounts and benefit claims, and completing integrated forms.
- 7.3.2 The website is fully responsive and works well across a wide range of devices.
- 7.3.3 The total number of MyRevenues users has increased by a further 33% during 2021/2022 to 17,695 users, driven in part by the pandemic and the various support schemes made available online to individuals and businesses. High levels of take up demonstrate the ease of use and benefit that being able to access information and complete forms at a time convenient to the customer has enabled. Many Revenues

and Benefit forms integrate directly with our back office system, and use of these forms continues to increase.

- 7.3.4 The council continues to encourage take up of digital services by providing self-service facilities at the King's Court offices.
- 7.3.5 The council's financial ledger underpins its internal system of financial control and system development continued into 2021/22. 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.
- 7.3.6 Financial management processes and procedures are set out in the council's financial regulations.
- 7.3.7 Contract Standing Orders encourage services to consider social value particularly in larger value contracts where social value issues such as 'use of local apprenticeships' and 'use of local sub-contractors' are used as award criteria.
- 7.3.8 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.
- 7.3.9 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.

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. 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 Reviews often draw upon benchmarking information and research into notable practice at other local authorities to inform option development.
- 8.1.4 Examples of benefits from collaborative working are evident in waste management, parking enforcement, community safety, cultural and regeneration activities, strategic housing, climate change and the response to Covid-19.

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 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 perform well.
- 8.2.3 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 political leaders have been with the council for many years and that relationship has provided a strong foundation for broader leadership of the organisation.
- 8.2.4 The scheme of delegation, Standing Orders and financial regulations are reviewed periodically and typically triggered by legal and organisational changes such as restructures.
- 8.2.5 Other examples of activities to enhance capability include:
- Using efficient systems and technology to provide effective support e.g. roll out of Office 365 and Microsoft Teams, Zoom and YouTube.
 - Telephony via the Microsoft Teams software.
 - Implementing appropriate human resource policies and ensuring that they are working effectively e.g. trial of absence management approach.
- 8.2.6 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 various Covid-19 meetings under the Norfolk Resilience Forum.
- 8.2.7 Member development needs are identified through use of a periodic questionnaire and are also identified during the year as matters arise.
- 8.2.8 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 briefings are run throughout the year. The Audit Committee has received specific briefings / training throughout the year.
- 8.2.9 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 recognised trade unions.

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 periodically reviewed with updates reported to Management Team and Audit Committee.
- 9.1.2 All committee reports contain a section on risk.
- 9.1.3 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.
- 9.1.4 The council's Covid-19 incident response continued throughout 2021/22 where the local and national focus has moved between response and recovery and national measures were introduced and then rescinded..
- 9.1.5 The [Major Projects Member Board](#) continued throughout the year to provide assurance that the council's major projects programme is run in accordance with the Major Projects (Officer) Board Terms of Reference.
- 9.1.6 The council's internal audit team have 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 a Performance Management Framework aligned with the corporate business plan. Performance targets and actions are cascaded through directorate, service, team meetings and 1:1s.
- 9.2.2 A data quality assessment takes place at year end supported by checks through the year.
- 9.2.2 Through reviews by external auditors, external agencies, Internal Audit 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.

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 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.
- 9.3.4 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. A referral system is in place between the council and the Department for Work and Pensions if housing benefit fraud is suspected.
- 9.3.5 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. There are regular attendances from a range of senior officers including the Assistant Director - Resources (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.
- 9.3.6 During 2018/19, the council began to explore ways to enhance the oversight of its wholly owned companies. This work continued into 2020/21 and, whilst delayed by Covid 19 and awaited CIPFA guidance, will ultimately strengthen oversight of company performance and business plans.
- 9.3.7 Effective arrangements are in place for the discharge of the Monitoring Officer, Head of Paid Service and Section 151 roles. There are periodic meetings of the 3 statutory officers to consider governance issues.
- 9.3.8 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.
- 9.3.9 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 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. Given national concerns regarding the impact of EU transition upon data sharing an audit was undertaken of ICT systems and data sharing arrangements. There were no significant issues identified although this continues to be monitored as the EU's data adequacy judgement is time limited.

- 9.4.3 Corporate training for GDPR was provided in 2019/20 and informed the corporate preparation of privacy notices, records of processing activity and the review of the authority's document retention and disposal policy.
- 9.4.4 A new Data Protection e-learning course was launched in Autumn 2020 and was compulsory for all staff to complete.

9.5 *Strong public financial management.*

- 9.5.1 CIPFA describe 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.
- 9.5.2 The council's arrangements fully comply with the principles described: the current chief financial officer was recruited in March 2020 and is the Assistant Director of Resources and reports to an Executive Director.
- 9.5.3 Budget monitoring reports are provided and published on the intranet for all staff and councillors to view. An annual budget briefing is provided by the Assistant Director Resources and open to all staff.
- 9.5.4 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. As per 9.1.2 for managing risk, all committee reports contain a section on financial implications for consideration.

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.
- 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.
- 10.1.4 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:

Information	Purpose	Frequency
Annual financial statements	To indicate how financial resources have been used.	Annually with more frequent budget monitoring reports.
Appropriate approvals	To provide a record of decisions made.	As and when decisions are made.
Records of decisions made under delegated powers	To provide a record of decisions made.	As and when decisions are made.
Procurement and spending	To provide a record of expenditure and organisations in receipt of council funding.	Quarterly records of payments to suppliers over £500. Quarterly reports for Tenders, Contracts and Purchase Orders
Performance against key performance indicators	To provide a record of progress made by the council in the delivery of its objectives.	Reported quarterly to Corporate Performance Panel.
Lessons learnt reports	To provide a record of learning activities and areas for improvement.	As and when required from projects.
Annual governance statement which follows the best practice recommended by CIPFA/Solace.	To provide a view on how the council has complied with its Code of Corporate Governance.	Annually with drafts considered by Audit Committee and Management Team.
Risk management updates	To provide a record of major risks facing the council and how it is responding to them.	6 monthly updates considered by Audit Committee and Management Team.
Progress on the corporate business plan and updates on key objectives	To provide a record of priorities and progress made by the council in delivering them.	Reported quarterly to Corporate Performance Panel.
Agendas, minutes and	To provide a record of decisions and information	In line with meeting

Information	Purpose	Frequency
reports	used to reach those decisions.	schedules.

10.2.2 Attention is given to the way in which these documents are written so that they provide the necessary information to meet transparency requirements and support scrutiny without being too onerous to produce and for readers to understand.

10.3 Assurance and effective accountability.

10.3.1 The Internal Audit process helps to drive improvement.

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 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.

10.3.4 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.

10.3.5 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.

10.3.6 During the 2021/22 year, the council worked in partnership with Norfolk County Council to support the King's Lynn Town Deal Board, development of the Town Investment Plan and related projects.

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

10.3.8 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.

10.3.9 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 2021/22 conformed to the requirements outlined in the CIPFA Statement on the Role of the Head of Internal Audit.

- 10.3.10 The Head of Internal Audit is provided via Eastern Internal Audit Services following Fenland District Council's termination of the previous shared arrangement.
- 10.3.11 The council's external auditor during 2021/22 was Ernst & Young.
- 10.3.12 A standalone Audit Committee is in place providing increased opportunity for effective assurance about the adequacy of financial and operational management and reporting.
- 10.3.13 Training has been provided during 2021/22 to the members of the Audit Committee in key areas. An example is for the annual accounts.
- 10.3.14 A Member Major Projects Board provides additional oversight of the operation of the Officer Major Projects Board. The Board met through 2021/22 and has reviewed its terms of reference.

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 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 the Internal and External Auditors 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 2021/22 which was considered by Audit Committee on 20 June 2022. The report states in the Audit Manager's opinion, that:

“The overall opinion in relation to the framework of governance, risk management and control at Borough Council of King's Lynn and West Norfolk is reasonable.”

11.3 The Audit Manager's Annual Report and Opinion 2021/22 presented to Audit Committee on 20 June 2022 stated:

Overall, in 2021/22 a total of 15 Internal Audit assurance audit have been carried out. A total of 14 of these have resulted in a positive assurance grading. As stated within the opinion statement, Internal Audit recommends that the two high, and one medium recommendation raised from the Limited Alive West Norfolk (AWN) audit report are highlighted within the Council's Annual Governance Statement until they are complete. The recommendations are summarised as follows:

- A suite of new SLA's and agreed set of KPI's should be developed for the relevant Service Areas included in the previous SLA. These need to be developed at the earliest possible opportunity and reported to the AWN Board and Council if required.
- Responsible officers from finance and AWN to consider the SLA fees and charges going forward, including any additional costs with a view to amending these to the appropriate values. Budgets should be amended and reflect actual, and agreed, costs rather than expected costs.
- When the Management Agreement is next due for review, consider if it is appropriate for member involvement in decisions of AWN.

In addition to the above-mentioned actions, we recommend that any outstanding medium recommendations from previous limited assurance reports and any high priority recommendations raised that remain unresolved are reflected in the Council's AGS until they have been verified as complete. The following recommendations apply:

Planning Control 2020/21 – Limited Opinion Medium Recommendation

- Fees and charges on the website need to be amended to show the correct costs for each area of the service to the customer.
-

Alive West Norfolk 2019/20 – Substantial Opinion High Recommendation

- Retention schedules need to be introduced for AWN once records and retention processes have been agreed.

Child Protection 2019/20 – Substantial Opinion High Recommendation

Property Services to follow the risk assessment procedures set out within the Safeguarding Policy for “High” and “Medium” risk rated tenants and provide the relevant safeguarding information within the Tenant Information Pack.

The council may also wish to disclose that it is committed to reducing the significant number of outstanding internal audit recommendations. This will ensure that good governance can be demonstrated by mitigating the risks that have been identified by internal audit work in a timely manner.

11.4 The Audit Manager has also completed a review of the effectiveness of the Audit Committee itself. The result will be reported to Cabinet in x and concluded that the committee is performing effectively and the council is meeting its requirements under the Accounts and Audit Regulations 2015.

11.5 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 will be considered by the Audit Committee on x. These reports from the external auditors refer to the 2021/22 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 2022].

- A member/officer protocol is in place and forms part of the council’s constitution.
- 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.

12. Areas of special interest in terms of governance

12.1 Leisure arrangements – [Alive West Norfolk](#)

12.1.1 A wholly owned council company (Alive West Norfolk) has been established that is responsible for the delivery of leisure and cultural services across the borough.

12.2 Legal arrangements

12.2.1 The council’s legal service continued to be delivered via a delegated agreement on an annual, rolling basis, with [Eastlaw](#) (the in-house legal team at North Norfolk District Council). Cabinet agreed on 15 March 2022 to bring the service in-house.

12.3 [West Norfolk Housing Company Limited \(WNHC\)](#) (Company number 10368299)

12.3.1 In August 2016, Cabinet resolved⁴ 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.

⁴ 2 August 2016

12.3.2 WNHC is helping to secure investment in new affordable homes in the borough to meet identified need.

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 previously agreed by Cabinet in June 2018. Following agreement of [Cabinet in January 2019](#), the company articles were amended.

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. Norfolk Community Foundation provide an independent due diligence review of the approval of good causes.

12.5.2 The Borough Council is a member of the Lotteries Council, the Gambling Commission and Gamble Aware. Gamble Aware funds research, prevention and treatment services to help reduce gambling harm. Gatherwell are the administrator for West Norfolk Wins and have extensive experience in administering council lotteries. The Gambling Commission also requires the council to undertake an annual independent security audit.

12.6 [King's Lynn Town Deal Board](#)

12.6.1 The council's role is to organise the Board and make the governance and decision making structures of the Town Deal Board public. The Government has set out specific requirements about who the Board must include. The council is represented on the Board by two cabinet members.

12.6.2 A Local Assurance Framework sets out the process for decision making. Over the course of 2022/23, a number of business cases to progress elements of the Town Investment Plan will be considered for approval by the Town Deal Board prior to submission to the government. The business cases are required to meet Treasury Green Book standards and require related due diligence. This work will involve the council in various ways including potential land, property and asset matters, scrutiny and oversight, consideration of financial matters and monitoring/evaluation.

13. Known changes in the 2022/23 year

13.1 [Embedding the new risk management framework](#)

The policy and strategy are due to be refreshed and the register will be aligned with the corporate business plan and rationalised. Reviews will be increased from two to three times per year. Related training for members and officers required to promote the policy and the application of the strategy.

- 13.2 Governance framework for the council's companies
Complete the review of the governance framework of the council's wholly owned companies and provide company director training for directors appointed to its companies.
- 13.3 To embed arrangements for record management and processing
Assurance work regarding GDPR.
- 13.4 Ongoing development of the financial ledger
To further embed and develop the financial ledger software's operational and reporting processes.
- 13.5 Preventing Fraud and Corruption
To support joint working with Department of Work and Pensions and participate in the Norfolk Counter Fraud Hub.
- 13.6 Member development needs
Delivery of member induction programme and identification of development needs.
- 13.7 Bringing Legal Services in-house
To transfer the function from Eastlaw including related staff recruitment and data transfer.
- 13.8 Outstanding medium recommendations from previous limited assurance reports and any high priority recommendations
To progress the following recommendations:
- Planning Control 2020/21 – Limited Opinion Medium Recommendation
 - Alive West Norfolk 2019/20 – Substantial Opinion High Recommendation
 - Child Protection 2019/20 – Substantial Opinion High Recommendation
- 13.9 Town Deal Board governance
To support the effective governance of the Town Deal Board, Local Assurance Framework, business case development and ongoing monitoring/evaluation.

14. Covid-19 response

- 14.1 The Covid-19 pandemic required the council to act swiftly to support the local community and protect the safety of its staff, councillors and customers. The first wave in late 2019/20 had minimal impact on the governance arrangements however, the ongoing scale of the subsequent response to later waves and national measures into 2021/22 resulted in a rapid move to virtual meetings, increased flexible working arrangements, redeployment of staff, reductions in some services due to social distancing, related Covid 19 safe working practices and national guidance and reduced scope for policy development.
- 14.2 Alongside partners on the Norfolk Resilience Forum, every effort has been made to maintain a business as usual approach and to maintain the delivery of key services to residents. During the required lockdown period, the council was able to consider

urgent matters and decisions through its urgent decision procedure rules and arrangements. Legislative changes have enabled remote meetings and the council responded quickly and effectively to this with meetings recommencing following the Government's announcement and all committees were operational. The majority of staff were required to work from home, where possible, which has proven to have worked effectively, with no significant disruption to critical services or information security breaches. Other teams, such as those in enforcement, were refocused to support the provision of Covid-19 safe activities across the borough and the vaccination programmes.

- 14.3 The response also required the development of new functions involving the processing of new Government grants and rate reliefs to businesses and support services for vulnerable residents.
- 14.4 Despite the breadth and pace of the response, Covid-19 has not led to any significant weakness in the Council underlying governance arrangements in 2021/22.
- 14.5 Although the national restrictions were gradually removed in the latter part of 2021/22, it is essential that the council focuses on the likely impact that the crisis, and its aftermath, will have on income levels both now and potentially into the future. The council is aware of issues that could affect its financial position such as reduced income streams arising from commercial investments, properties and services, delays and arrears in payments for chargeable services and ongoing Covid-19 related additional costs to support safe working practices such as PPE and sanitizing materials.

15. Ukraine Crisis

- 15.1 The invasion of Ukraine by Russia on 24 February 2022 triggered a humanitarian crisis. Councils prepared to assist and help new arrivals from Ukraine settle in the UK and to support communities who wish to offer assistance to those fleeing the devastating conflict. Council support will be central in helping families settle into their communities and access public services.
- 15.2 The Government launched a Homes for Ukraine Scheme in March 2022. A broad range of support has been developed and summarized on the Council's [website](#).

16. Cost of living crisis

- 16.1 Inflation has emerged as a significant issue in many economies and has been exacerbated by Covid-19, the war in Ukraine and rising interest rates. The Bank of England is forecasting a UK recession in 2023.
- 16.2 The fall in 'real' disposable incomes has an impact upon council services and the community it serves. In addition to national measures, the council will develop a local response in 2022/23.

17. Action Plans

- 17.1 In the Annual Governance Statement for 2020/21, an action plan for 2021/22 was set out to deal with governance issues identified during the review for that year and is attached at Appendix A.
- 17.2 The action plan for 2022/23 is attached at Appendix B.

18. Assurance summary

- 18.1 From the review undertaken, the assessment and ongoing monitoring work completed⁵ 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.
- 18.2 No system of internal control could provide absolute assurances against material misstatement or loss; this statement is intended to provide reasonable assurance. We 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.
- 18.3 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 B 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 Stuart Dark MBE
Leader of the Council
Date:

Lorraine Gore
Chief Executive
Date:

Cllr Ian Devereux
Chair of the Audit Committee
Date:

⁵ By the Audit Committee during 2019/20

Appendix A - Action plan for the 2021/22 year

Item		Action	Responsible Officer	Target Date	Update – October 2022
1	Internal Audit	Agreement with Eastern Internal Audit Services for the provision of Internal Audit Services	Assistant Director - Resources	June 2021	Interim arrangement in place until final agreement signed in November 2021. New arrangements implemented and working well.
2	Waste contract monitoring systems	Implementation of new systems related to: Waste collection contract Garden waste contract	Waste & Recycling Manager	Mar 2022	April 2022 updated software system for waste management became live and is working as expected.
3	Care and Repair contract monitoring systems	Implementation of new systems relating to Care and Repair contract	Assistant Director –	Mar 2022	Process developed and includes a performance measure for each contract. New monitoring role created to support the system administration and to be recruited to in autumn 2022.
4	High Street Heritage Action Zone	High Street Heritage Action Zone, HAZ Project officer recruitment and programme management	Assistant Director – Regeneration, Housing and Place	Mar 2022	High Street HAZ programme did not proceed as Heritage England withdrew the funding offer. The HAZ programme is in the process of being formally closed.
5	Housing Delivery Test – Action Plan	Implementation of actions falling within 2021/22	Assistant Director - Environment & Planning	Mar 2022	The latest HDT was formally announced in January 2022, and was passed (96%), therefore no further action was required.
6	Community Infrastructure Levy	12 month review of Community Infrastructure Levy proposed governance and spending arrangements	Assistant Director - Environment & Planning	November 2022	Revised governance arrangements were agreed by Cabinet on 2 August 2022 and will be implemented for future applications in 2023.
7	Public Services Network (PSN) compliance	Ensure PSN compliance during 2021/22 including progressing any actions identified as a result of the 2020 audit.	Assistant Director - Resources	March 2022	PSN compliance across Local Authorities is being reviewed by Central Government currently. However, we still retain the major element of an ICT health check and are in the process of bringing in National Cyber Security Centre approved CHECK assessors for 2022.
8	Governance framework for the	Review the governance framework of the council's wholly owned	Chief Executive	March 2022	Report received from Anthony Collins Solicitors July 2022 and under consideration by Cabinet. Review was delayed

Item		Action	Responsible Officer	Target Date	Update – October 2022
	council's companies.	companies.			pending publication of relevant guidance by CIPFA in May 2022. Company governance review action plan to be considered by Cabinet on 15 November 2022.
9	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 2021	See line 8 above. Will follow from Cabinet's decisions.
10	Assurance work regarding the Annual Governance Statement.	To support the Internal Audit review of the council's approach to developing the annual governance statement.	Assistant to the Chief Executive	March 2022	Ongoing. Amendments made to the AGS for 2021 and 2022.
11	Embedding of the new financial ledger.	To implement and embed the operational processes of the new financial ledger software.	Assistant Director - Resources	March 2022	The new financial system went live in April 2020 just as the initial Covid restrictions were put in place. A number of issues emerged on the system which took time and resource to resolve. Training has been focussed on specific areas and is now being more widely delivered (with a training development programme being devised and modules to support it). Other system development work is being considered as part of an improvement plan.
12	Norfolk Fraud Hub	To support joint working with DWP and participate in the Norfolk Counter Fraud Hub.	Assistant Director - Resources	March 2022	<p>Some FraudHub members are currently having difficulties in resourcing fraud areas. The lead sponsor, Norfolk County Council, has recently agreed to a further 2 financial years funding of the FraudHub. However, there has been no recent meeting held with the Norfolk FraudHub Steering Group. This is due to the impact from the pandemic and other workstreams continuing as a result of it. Funding has been agreed through the lead sponsor to continue with the Single Person Discount (SPD) review project for the current financial year 2022/2023.</p> <p>DWP joint working has now resumed following the Covid-19 pandemic and the redeployment of many of the DWP investigation Team. Contact has recently been received</p>

Item	Action	Responsible Officer	Target Date	Update – October 2022	
				on a case for joint working purposes.	
13	English Devolution and Local Recovery White Paper	To consider the white paper on English Devolution and Local Recovery.	Chief Executive	March 2022	White Paper revised and The Levelling Up and Regeneration Bill was published on 11 May 2022. Two bids submitted for Levelling Up funding for the geographic borough; one by BCKLWN and another by Norfolk County Council.
14	Develop revised media protocols.	To develop revised social media protocols.	Assistant Director – Central Services	March 2022	Rescheduled to December 2023 to link with the review of practices after the forthcoming borough elections.
15	Equalities training programme	Development of a training programme to support the equalities policy.	Assistant Director – Central Services	March 2022	Programme development and delivery rescheduled to March 2023.
16	Service level agreements	To review service level agreements covering: <ul style="list-style-type: none"> • Alive West Norfolk • EastLaw 	Assistant to the Chief Executive	March 2021	Ongoing and included within the company governance review action plan to be considered by Cabinet on 15 November 2022.
		To review service level agreements covering: <ul style="list-style-type: none"> • Norfolk Museum Service 	Assistant Director - Regeneration, Housing and Place	March 2021	Aspects reviewed but not the SLA in the round – needs to be completed and included in the AGS action plan for 2022/23.

Appendix B - Action plan for the 2022/23 year

Item		Action	Responsible Officer	Target Date	Update – October 2022
1	Executive and Scrutiny Protocol	12 month review of protocol.	Assistant Director - Legal Services & Licensing	Mar 2023	Ongoing.
2	Community Infrastructure Levy	12 month review of Community Infrastructure Levy proposed governance and spending arrangements	Assistant Director - Environment & Planning	Nov 2022	Revised governance arrangements were agreed by Cabinet on 2 August 2022 and will be implemented for future applications in 2023.
3	Public Services Network (PSN) compliance	Ensure PSN compliance during 2021/22 including progressing any actions identified as a result of the 2020 audit.	Assistant Director - Resources	Mar 2023	PSN compliance across Local Authorities is being reviewed by Central Government currently. However, we still retain the major element of an ICT health check and are in the process of bringing in National Cyber Security Centre approved CHECK assessors for 2022.
4	Governance framework for the council's companies.	Review the governance framework of the council's wholly owned companies.	Chief Executive	Mar 2023	Report received from Anthony Collins Solicitors July 2022. Review was delayed pending publication of relevant guidance by CIPFA in May 2022. Company governance review action plan to be considered by Cabinet on 15 November 2022.
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	Mar 2023	See line 4 above.
6	Assurance work regarding the Annual Governance Statement.	To support the Internal Audit review of the council's approach to developing the annual governance statement.	Assistant to the Chief Executive	Mar 2023	Ongoing. Amendments made to the AGS for 2021 and 2022. The length of the draft AGS 2022 is comparably shorter than previous documents.
7	Ongoing development of the new financial ledger.	To enhance and develop the operational processes of the new financial ledger software.	Assistant Director - Resources	Mar 2023	The new financial system went live in April 2020 just as the initial Covid restrictions were put in place. A number of issues emerged on the system which took time and resource to resolve. Training has been focussed on specific areas and is now being more widely delivered (with a training

Item	Action	Responsible Officer	Target Date	Update – October 2022	
				development programme being devised and modules to support it). Other system development work is being considered as part of an improvement plan.	
8	Norfolk Fraud Hub	To support joint working with DWP and participate in the Norfolk Counter Fraud Hub.	Assistant Director - Resources	Mar 2023	<p>Some FraudHub members are currently having difficulties in resourcing fraud areas. The lead sponsor, Norfolk County Council, has recently agreed to a further 2 financial years funding of the FraudHub. However, there has been no recent meeting held with the Norfolk FraudHub Steering Group. This is due to the impact from the pandemic and other workstreams continuing as a result of it. Funding has been agreed through the lead sponsor to continue with the Single Person Discount (SPD) review project for the current financial year 2022/2023.</p> <p>DWP joint working has now resumed following the Covid-19 pandemic and the redeployment of many of the DWP investigation Team. Contact has recently been received on a case for joint working purposes.</p>
9	Develop revised media protocols.	To develop revised social media protocols.	Assistant Director – Central Services	Mar 2023	Rescheduled to December 2023 to link with the review of practices after the forthcoming borough elections.
10	Equalities training programme	Development of a training programme to support the equalities policy.	Assistant Director – Central Services	Mar 2023	Programme development and delivery rescheduled to March 2023.
11	Legal Services	To transfer the function from Eastlaw including related staff recruitment and data transfer.	Assistant Director - Legal Services & Licensing ; Assistant to the Chief Executive	Mar 2023	Assistant Director for Legal & Licensing appointed. Recruitment commenced.
12	Town Deal	To enhance the Local Assurance Framework and governance related to the King's Lynn Town Deal	Assistant Directors: Regeneration, Housing and Place;	Mar 2023	Engagement with panels and Cabinet on draft business cases. Compliance with DLUHC annual assurance requirements. LAF reviewed by Cabinet

Item		Action	Responsible Officer	Target Date	Update – October 2022
		Board.	Legal Services & Licensing; Resources.		on 10 August 2022. Internal Audit review of Towns Fund management and Governance Arrangements undertaken in September 2022. Ongoing advice from Monitoring Officer to Town Deal Board on governance matters including conflicts of interest matters.
13	Risk management training	Provision of training for officers and members to embed the refreshed risk management framework.	Assistant to the Chief Executive	Mar 2023	Cabinet agreed a refreshed policy and strategy on 26 September 2022. Training approach to be developed and implemented.
14	Outstanding medium recommendations from previous limited assurance reports and any high priority recommendations	To progress the following recommendations: <ul style="list-style-type: none"> • Planning Control 2020/21 – Limited Opinion Medium Recommendation • Alive West Norfolk 2019/20 – Substantial Opinion High Recommendation • Property Services- Child Protection 2019/20 – Substantial Opinion High Recommendation 	Assistant Director - Environment & Planning Senior Information Risk Officer Assistant Director – Property and Projects	Mar 23 Mar 23 Mar 23	Updates required.
15	Cost of living crisis	Development of a local response to the cost of living crisis.	Assistant to the Chief Executive	Mar 23	Officer working group being established. Council Tax Energy Rebate distributed including a discretionary payment for vulnerable people. Promotion of Solar Together Norfolk to encourage residents to install solar PV/batteries as a way of reducing energy bills in the longer term in addition to reducing carbon emissions. “Beat your Bills” events held across the borough.

Appendix C - Corporate Governance has been weaved through all functions of the Council including but not limited to those listed in this table.

Policies, Strategies, Rules & Codes	Processes and Frameworks	Key documents	Functions
<ul style="list-style-type: none"> • Anti-Fraud and Anti-Corruption Strategy • Capital Strategy • Code of Conduct • Computer usage policy • Constitution • Data Protection Policy • Data Quality Policy & Strategy • Efficiency Plan • Employment rules • Equality policy • Financial Plan • Financial procedure rules and standing orders (within Constitution) • Financial regulations • Health, Safety & Welfare Policy • ICT policies • Information Governance Policies • Information Risk Policy • Medium Term Financial Strategy • Member/Officer protocol • Members' allowances scheme (Constitution) • Members' code of conduct (Constitution) • Members Code of Good Practice for Planning • 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 • Record Retention and Disposal Policy • Risk Management Policy & 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 	<ul style="list-style-type: none"> • 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 • Disciplinary / Grievance procedures • 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 • 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 	<ul style="list-style-type: none"> • 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 • Fraud Response Plan • Harassment Procedure • Internal Affairs • Intranet • JNC terms & conditions • Job descriptions/specs • Key decisions (within Constitution) • Law & governance • Local Plan • Members Bulletin • Neighbourhood Development Plans • Publication Scheme (FOI) • Quarterly Performance Reports • Record of decisions • Register of Disclosable Pecuniary 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 	<ul style="list-style-type: none"> • 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 • Member Major Projects Board • 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

Appendix D – Governance is also embedded in our Joint , Contracted in and/or out Partnership Working. The list of such Partners are contained in this table.

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
- King’s Lynn Town Deal Board
- Lily
- New Anglia LEP
- Norfolk Arts Forum Executive
- Norfolk Business Rates Pool
- Norfolk Climate Change Partnership
- 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
- Norfolk Strategic Housing Partnership
- 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

- Alive West Norfolk - Leisure, culture and sports development services
- Bedford Borough Council – Payroll processing
- Eastlaw – Legal services
- Gatherwell Limited - West Norfolk Wins lottery
- Serco - Waste and recycling collection
- Lovell Partnerships Ltd - Major Housing Contract
- 17 contractors - Care and Repair aids and adaptations work
- Herefordshire Housing Ltd - Careline alarm monitoring contract (expired March 2021)
- Lifeline 24 Ltd - Careline alarm monitoring contract (1 April 2021)

- Greenworld Sales Ltd - Garden waste composting (April 2021)
- Eastern Internal Audit Services - Internal Audit Management (June 2021)

Shared services

- Internal Audit Manager – Fenland District Council (expired June 2021)

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 District Council (ended March 2021) and Fenland District Council
- 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 2018 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.