

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



Corporate Performance Panel

Agenda

Monday, 31st October, 2022
at 4.30 pm

in the

**Council Chamber
Town Hall
Saturday Market Place
King's Lynn**

Available to view on:

<https://www.youtube.com/user/WestNorfolkBC>



King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX
Telephone: 01553 616200

21 October 2022

Dear Member

Corporate Performance Panel

You are invited to attend a meeting of the above-mentioned Panel which will be held on **Monday, 31st October, 2022 at 4.30 pm** in the **Council Chamber, Town Hall, Saturday Market Place, King's Lynn PE30 5DQ** to discuss the business shown below.

Yours sincerely

Chief Executive

AGENDA

1. Apologies

2. Minutes - TO FOLLOW

To approve the minutes from the Corporate Performance Panel held on 17 October 2022.

3. Declarations of Interest

Please indicate if there are any interests which should be declared. A declaration of an interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the Member should withdraw from the room whilst the matter is discussed.

These declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on any item or simply observing the meeting from the public seating area.

4. Urgent Business Under Standing Order 7 - TO FOLLOW

To consider any business which, by reason of special circumstances, the

Chairman proposed to accept as urgent under Section 100(b)(4)(b) of the Local Government Act 1972.

Call-in of Member Delegated Decision - Council Tax Support Scheme 2023/24: Draft Scheme for Working Age Customers for Consultation - REPORT TO FOLLOW

5. Members Present Pursuant to Standing Order 34

Members wishing to speak pursuant to Standing Order 34 should inform the Chairman of their intention to do so and on what items they wish to be heard before a decision on that item is taken.

6. Chair's Correspondence (if any)

7. Call-in

To be considered as Urgent Business: Call-in of Member Delegated Decision - Council Tax Support Scheme 2023/24: Draft Scheme for Working Age Customers for Consultation - REPORT TO FOLLOW

8. Corporate Business Plan Monitoring Report 1 April - 30 September 2022 (Pages 6 - 24)

9. Cabinet Report: Review of Governance of Council Companies (Pages 25 - 44)

10. Town Deal Board Governance (Pages 45 - 77)

11. Portfolio Question and Answers

To Councillor G Middleton:

"In conclusion, the Portfolio Holder for Business, Culture and Heritage explained that the previous Coastal Pressures Group had identified the pressures faced by residents and stated that the next step as Cabinet Member was for himself to have discussions with Norfolk County Council and ask that the group be set up and that the Borough Council would play an active role."

Members are invited to submit any other questions prior to the meeting.

12. Cabinet Forward Decisions List (Pages 78 - 82)

13. Panel Work Programme (Pages 83 - 94)

To note the Panel Work Programme.

14. Date of Next Meeting

To note that the date of the next meeting of the Corporate Performance Panel will take place on 4 January 2023 at 4.30 pm in the Council Chamber, Town Hall, King's Lynn.

15. Exclusion of Press and Public

To consider passing the following resolution:

"That under Section 100(A)(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act".

16. Exempt Report: Serco Contract (Pages 95 - 98)

17. Exempt Report - H&M Post Evaluation (Pages 99 - 112)

18. Exempt Report: Hunstanton Sailing Club (Annual Update) (Pages 113 - 122)

To receive the annual report from the Council's representative in an observing role.

To:

Corporate Performance Panel: B Ayres, H Humphrey, J Kirk, J Lowe, C Manning, J Moriarty (Chair), C Morley, S Nash, C Rose, A Ryves, Mrs V Spikings and D Tyler

Relevant Portfolio Holders:

Item 7: Councillor S Sandell, People and Communities
Item 8: Councillor S Dark, Leader
Items 9,10,11 Councillor G Middleton, Deputy Leader, Business Culture and Heritage
Item 16: Councillor P Kunes, Environment
Item 17: Councillor A Lawrence
Item 18: Councillor B Long

Officers:

Alexa Baker, Monitoring Officer
Becky Box, Assistant Director, Central Services/Management Team Representative
Barry Brandford, Waste and Recycling Manager
Martin Chisholm, Assistant Director
Lorraine Gore, Chief Executive
Geoff Hall, Executive Director
Jamie Hay, Senior Internal Auditor
Matthew Henry, Assistant Director
Honor Howell, Assistant to the Chief Executive

REPORT TO CABINET

Open/Exempt		Would any decisions proposed :			
Any especially affected Wards	Mandatory	Be entirely within Cabinet's powers to decide		YES	
		Need to be recommendations to Council		NO	
		Is it a Key Decision		NO	
Lead Member: Cllr Stuart Dark E-mail: cllr.stuart.dark@west-norfolk.gov.uk		Other Cabinet Members consulted: All Cabinet members			
		Other Members consulted: Corporate Performance Panel			
Lead Officer: Honor Howell E-mail: honor.howell@west-norfolk.gov.uk Direct Dial:01553 616550		Other Officers consulted: Management Team			
Financial Implications NO	Policy/ Personnel Implications NO	Statutory Implications NO	Equal Impact Assessment If YES: Pre-screening/ Full Assessment NO	Risk Management Implications NO	Environmental Considerations NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)					

Date of meeting: 15 November 2022

Corporate Business Plan Monitoring Report 1 April - 30 September 2022

Summary

The monitoring report has been developed to demonstrate progress against the Council's Corporate Business Plan and contains information on the progress made on the key actions up to the end of September 2022.

There are currently 48 agreed actions in place to progress the Council's Corporate Business Plan. The monitoring report indicates that 29 of the actions are on track, 12 actions are slightly behind, 1 action is significantly behind, 1 action is on hold and 5 actions have been completed.

Additional performance information is available in the Q1 2022/23 corporate performance monitoring report, reviewed at the Corporate Performance Panel on 3 October 2022. The report comprises of a revised suite of indicators agreed by portfolio holders and management team as the key performance measures to monitor key council services and impacts on borough wide issues, all indicators are linked to the Corporate Business Plan priorities.

Recommendation

1. That Cabinet considers and comments on progress against the Corporate Business Plan.

Reason for Decision

To consider progress with the delivery of the Corporate Business Plan for the period 1 April – 30 September 2022.

1. Background

- 1.1 The Council's 2019-2023 Corporate Business Plan was reviewed and approved by Council on 2 December 2021, it sets out the broad framework for the remaining period of the administrative term 2021-2023.
- 1.2 The priority areas the Council will continue to focus on are:
 - Focusing on delivery
 - Delivering growth in the economy and the provision of 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
- 1.3 These priorities are further defined in 12 objectives and 48 key actions that are reflected in directorate plans, service plans and individual targets set during staff appraisals.

2. Monitoring Report

- 2.1 The monitoring report will focus on each of the corporate priorities individually, providing management team and members with an overview on how many actions are on track, slightly behind, significantly behind, on hold or completed.
- 2.2 Assistant Directors are responsible for providing the latest update on progress as well as rating each of the key actions they are responsible for up to 30 September 2022. An overall summary is provided at the end of the report, which over the coming year when additional data is available, will track the movement of the key actions currently in place to support the delivery of the Corporate Business Plan.
- 2.3 In terms of the activities covered by the corporate business plan, the Council is progressing although some aspects are experiencing delays often as a result of externally influenced factors. The monitoring report at Appendix A indicates that 29 of the actions are on track, 12 actions are slightly behind, 1 action is significantly behind, 1 action is on hold and 5 actions have been completed.
- 2.4 A number of actions that could be challenging relate to activities, programmes and projects, where current inflation levels and supply chain challenges are creating very significant levels of risk and uncertainty about our capacity to deliver as planned within available resources, a challenge common to all councils.
- 2.5 Notable aspects of delivery include:
 - 2.5.1 Development of the speculative commercial development units (Phase 1) at the Nar Ouse Regeneration Area Enterprise Zone is progressing well. The Phase 1 units (2 office and 2 light industrial) should achieve completion in October/November 2022, several expressions of interest have been received. Tender documents for Phase 2 are being prepared and the market will be tested during late summer/early autumn 2022.

- 2.5.2 The Tender process for the road infrastructure works at the Nar Ouse Regeneration Area Enterprise Zone Tender has been completed, and the contract awarded. The road (and other) infrastructure works commenced early late August/September 2022 and are programmed to be completed within 40 weeks, weather depending. These infrastructure works will open up a significant tract of commercial development land that will be available for purchase, or lease, by private sector (and other) businesses/developer/investors and potentially facilitate significant investment in the local area.
- 2.5.3 An alternative approach has been taken to updating staff on the Corporate Business Plan. Interviews with managers have been filmed and distributed via the weekly staff update that goes to all council staff. To date, updates have been completed on the councils budget, homelessness and rough sleepers strategy, climate change and the St Georges Guildhall. The videos are proving popular and the subjects covered are brought more to life by staff explaining to staff how they fit with the corporate priorities. Wherever possible press releases and other external communications are being linked to the relevant corporate priority to ensure activities to reinforce key messages and demonstrate the links between agreed priority areas and activities that are taking place.
- 2.5.4 A range of communications activities have been undertaken to support the Council's climate change agenda, including support for the Council sponsored 'Climate Change Expo' held at the Corn Exchange on 21 June, support for the 'solar together' project and the Norfolk Climate Change Partnership website. Activities undertaken to date are consistent with progress towards the overall Climate Change Action Plan.
- 2.6 Important points to flag in terms of delivery are:
- 2.6.1 Work is underway in accordance with the revenue and capital estimates timetable which includes additional workstreams to be undertaken. There has been some delay due to external factors but this will not impact on the timescales for delivery of the budget proposals to Cabinet and Council in February 2023.
- 2.6.2 Opportunities continue to be explored to increase our digital offer to residents. Increased use of web-chat has assisted with managing an increased volume of calls into the contact centre and helps to provide a clear and speedy response to most enquiries received via this format. However, pressure on resources within the CIC and the increased call volumes is impacting on our ability to devote time to developing new approaches further.
- 2.6.3 Whilst a range of approaches are adopted to maximise the potential for recruitment activities to be successful, the current external job market, locally, regionally and nationally, is having an impact due to factors which are outside of our control. We have been able to recruit to the majority of permanent vacancies advertised and wherever possible strategies are used to consider alternative and longer term solutions to harder to recruit roles, such as the development of progression schemes and use of apprentices. However, the capacity issues currently being experienced by teams are therefore ongoing and are likely to impact on progress against agreed priorities for some time.

3 Options Considered

3.1 None.

4 Policy Implications

4.1 The Corporate Business Plan sets the council's policy framework until the next electoral cycle in May 2023 and as such is the council's primary policy document. All other documents and plans will need to take account of this new policy framework when they are being prepared or refreshed.

5 Financial Implications

5.1 There are no direct financial implications of this plan as its implementation is through the existing services, programmes and budget provisions already in place.

6 Personnel Implications

6.1 None.

7 Environmental Considerations

7.1 The corporate business plan includes a specific priority focused on protecting and enhancing the environment including tackling climate change. This will be progressed through the delivery of the council's climate change strategy and action plan and through related plans such as the emerging Local Plan.

8 Statutory Considerations

8.1 None.

9 Equality Impact Assessment (EIA)

9.1 None to report.

10 Risk Management Implications

10.1 Progress with corporate business plan actions provides an input for risk management and may identify emerging risks and evidence improvement/deterioration in risk scores and the delivery of mitigation measures. This will need to be factored into updates of the corporate, directorate and project risk registers.

11 Declarations of Interest / Dispensations Granted

11.1 None.

12 Background Papers

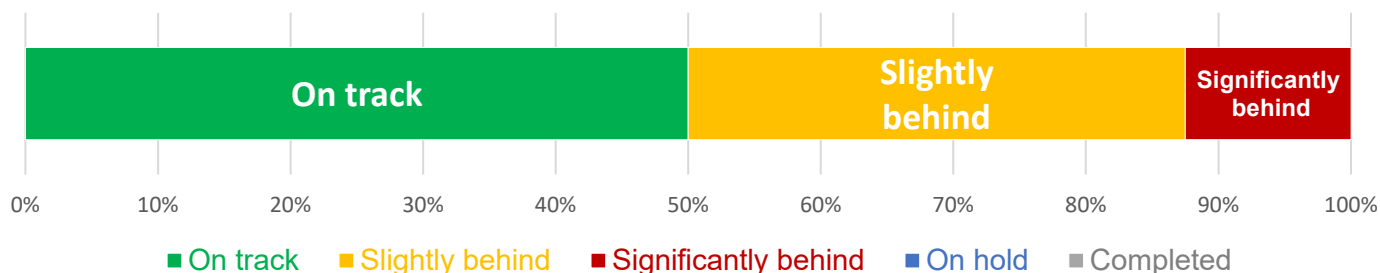
12.1 None.

2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

Focusing on delivery

Current position breakdown of key actions



1.1 Set a Medium-Term Financial Strategy to fund council services by a prudent mix of investment, services and tax income, while maintaining adequate reserves	RAG rating
<ul style="list-style-type: none"> Monitor performance against revenue and capital budgets on a monthly basis to Management Team and Members 	G
<ul style="list-style-type: none"> Report variances and corrective action in a timely manner to Management Team and Members 	A
<ul style="list-style-type: none"> Provide treasury functions for the delivery of the financial plan and advise and support on new projects and initiatives. 	G
<ul style="list-style-type: none"> Prepare revenue and capital estimates and report to Panel/Cabinet in February 2023 as part of the budget and council tax setting process 2023/24. 	A
Progress update provided by Assistant Director	
<p>The outturn report for 2021/22 was presented to Cabinet in August 2022 and a draft Statement of Accounts published on the Council's website on 1 August 2022. Monitoring reports for 2022/2023 suffered a slight delay but is now back on track with June and July reports completed and August currently under review. Redesign of the monitoring report is taking shape with positive feedback and engagement from Management Team, Portfolio Holder for Finance and Audit Committee.</p> <p>The Capital Programme is also being developed to support reporting to Member Major Projects Board. This development work and review will involve some changes to the capital budgets and profiles. This is taking longer to conclude due to the nature and complexity of some of the schemes but is expected to be completed for period 6 monitoring report.</p> <p>Work is now underway in accordance with the estimates timetable which includes additional workstreams to be undertaken. There has been some delay due to external factors but this will not impact on the timescales for delivery of the budget proposals to Cabinet and Council in February 2023.</p>	M Drewery

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

1.2 Develop and increase the range and effectiveness of the Council's approach to communicating and engaging with employees, businesses, local communities and visitors	RAG rating
<ul style="list-style-type: none"> • Develop and implement communications plans for major council projects as required or identified by Leader and Chief Executive • Communicate the new corporate business plan 	G
	G
Progress update provided by Assistant Directors	
<p>Communication plans and activities for the Council's major projects are currently being progressed in line with the stages of project development/delivery. In particular, work in relation to the Nar Ouse Business Park, West Winch growth area, Southern Seafront & Bus Station in Hunstanton and Towns Fund projects have been progressed in the first two quarters.</p> <p>An alternative approach has been taken to updating staff on the Corporate Business Plan. Interviews with managers have been filmed and distributed via the weekly staff update that goes to all council staff. To date, updates have been completed on the Corporate Business Plan, the councils budget, homelessness and rough sleepers strategy, climate change and the St Georges Guildhall. Further updates are planned on West Winch major housing, littering and fly-tipping, tree planting, Levelling Up and the west Norfolk Investment Plan. The videos are proving popular with staff and the subjects covered are bought more to life by staff explaining to staff how they fit with the corporate priorities. Wherever possible press releases and other external communications are being linked to the relevant corporate priority to ensure activities to reinforce key messages and demonstrate the links between agreed priority areas and activities that are taking place. For example, activities to support our local communities has included work to promote services and support for refugees and to communicate information relating to the energy rebate and CIL.</p>	<p>B Box</p> <p>H Howell / B Box</p>

1.3 Be attentive to our customer and community needs	RAG rating
<ul style="list-style-type: none"> • Continue to deliver all statutory services to an appropriate standard within available resources, whilst also responding to the priorities set out in the Corporate Business Plan. • Ensure that effective recruitment, retention and employee development processes are in place so that services are appropriately and effectively resourced and aligned to the delivery of statutory services and the Council's corporate priorities. 	A
	● R
Progress update provided by all Assistant Directors	
<p>Operations and Commercial - Public Open Space have experienced difficulty recruiting and retaining staff, seasonal staff in particular which causes service pressure on delivering necessary outcomes. Service requirements are achieved at a basic level with resources aligned to meet these outcomes. Crematorium & Cemeteries have also seen recent rounds of recruitment provide a lack of suitable candidates resulting in jobs being re-advertised, as pay rates fall behind crematoria and funeral industry standards, staff are leaving to join other funeral companies. Car Parks are also having problems with recruiting Civil Enforcement Officers due to the low pay for the type of work involved.</p>	M Chisholm

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

<p>Resources - All services continue to be delivered. However, Government initiatives are causing significant and additional workload against unrealistic timescales which services are doing their best to accommodate. This inevitably means reprioritising workloads and resources accordingly. ICT are currently experiencing difficulty in recruiting to key posts which is now having some impact on service delivery. External audit of the financial statements is significantly behind schedule with the audit of the financial statements for 2019/20 still ongoing and expected to be completed in Jan/Feb 2023 when the external auditors have available resource. This is having a knock on impact/delay in commencing the audit of the financial statements for both 2020/21 and 2021/22 which in turn, will affect other work priorities and deadlines in the coming months/year. The timetable for the audit of the financial statements is set by the external auditors.</p>	M Drewery
<p>Planning and Environment - Due to the high volumes of planning applications that continue to be received, there is a current backlog of about 3 weeks on the validation of planning applications. Additional staff have been appointed in the validation team and we hope this backlog will soon reduce. Whilst figures for determining planning applications are well above national targets, there is heavy reliance on extensions of time (EOT's), so applications are taking longer than is preferable to determine. At present consultancy planners are helping carry out some of the required workload, and we are trying to recruit extra planners to try to address these issues, although it should be noted the market for suitably qualified staff is extremely challenging. Managers are considering various options to ensure that we can attract suitable staff to the authority. With regards environmental health, air quality, contaminated land and other associated work is on track.</p>	S Ashworth
<p>Central Services - Staff continue to support the effective delivery of statutory services, either directly or indirectly by the provision of appropriate support to services delivering statutory functions. In particular work to recruit a new Executive Director (Place), additional posts for Planning and to create our new in-house Legal Services team are currently being progressed, with the aim of securing high quality candidates in a competitive market. A revised approach to job advertising has been introduced to promote our vacancies more effectively to candidates. Progression schemes, linked to formal professional qualifications/apprenticeships are being developed in a number of areas and a revised progression scheme for Planning professionals has recently been implemented. We have re-launched our management development activities, which had been on hold during the pandemic with a new level 5 management programme commencing in May and a second programme scheduled to commence in January 2023. A level 3 management course has also commenced in partnership with CWA. Wider training provision is now returning to pre-pandemic levels with a particular focus on updating skills and knowledge in relation to statutory areas such as safeguarding and health and safety. During September the Civics and Communications teams have undertaken significant additional work to support the Council's civic responsibilities following the death of Her late Majesty Queen Elizabeth II.</p>	B Box
<p>Health Wellbeing and Public Protection - Statutory services across Housing Options, CSNN, Housing Standards are slightly behind due to covid, supporting Homes for Ukraine and additional pressures arising from cost of living. Recruitment continues to provide significant challenges for all teams. The Food Health and Safety Team are under significant pressure with increased workload from Brexit and food safety inspection catch up post covid. Reliance on contractors to keep service afloat. Care and Repair are seeing significant pressures with a waiting list of 310 clients waiting for assessments, this has been exacerbated by Occupational team resourcing issues within Norfolk County Council.</p>	M Whitmore

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report 1 April – 30 September 2022

<p>Legal and Licensing – Legal services has entered a period of transition during this monitoring period. Notice to terminate has been provided on the agreement with NNDC/eastlaw for the provision of legal services. There is ongoing recruitment of an in-house legal team to help support all other sections of the Council in delivery of their functions, however even in the event of a successful recruitment process, it is unlikely a legal team will be in place until early 2023. There are ongoing issues with NNDC/eastlaw regarding the level of legal support being provided under the agreement with them, which are being addressed, which has heightened the historic resource issues that were already known. This has created an increased legal resource gap, therefore in the meantime alternative external legal resource has been secured to support officers on urgent matters. The Licensing team is continuing to provide an effective service, ensuring that complaints/queries from Ward Members and members of the public are followed up and that there is appropriate engagement with the trades.</p>	A Baker
<p>Regeneration, Housing and Place - Recruitment to key posts for the Towns Fund programme has been challenging and is a risk to completing business cases and delivery. Wider workforce issues that impact on consultants capacity to undertake work on behalf of the council is also a risk.</p>	D Hall
<p>Programme and Project Delivery - Currently able to deliver core services throughout the directorate however, concerns regarding capacity going forward. Recruitment to replace staff loss through progression scheme initiated in corporate projects within budget, and recruitment to employ new contract and procurement officer in progress as part of succession planning / staff retirement.</p>	D Ousby
<p>Property and Projects – Over the past few years the department has faced significant staff resource issues with posts being vacated and these have proven difficult to fill, particularly the professional posts. However, two important/key posts have been successfully filled during 2022 and the team is now prioritising the work programme in order to deal with a backlog of work. In addition to filling these posts with external candidates, the department is developing longer term staff resource resilience by appointing two Higher Level Apprentices who are in the process of attaining their Royal Institution of Chartered Surveyors (RICS) degrees, whilst gaining practical experience in their day-to-day work. The “grow your own talent” approach should help stabilise staff resource issues in the near future. The team continues to support the delivery of statutory and non-statutory services, and the Corporate Business Plan, by the provision of professional property services, and the generation of revenue and capital from the council’s property portfolio. Further challenge has been faced with the various funding streams (Town Deal etc) and it has been necessary to divert and/or allocate staff resources in order to deal with projects related to these funding streams.</p>	M Henry

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

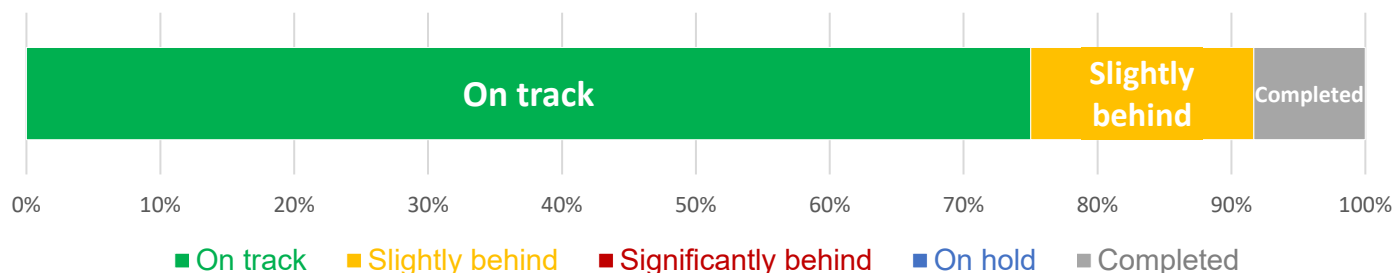
Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

Delivering growth in the economy and the provision of local housing

Current position breakdown of key actions



2.1 Develop our town centres and the rural offering; recognised as great places to live, visit and invest into	RAG rating
• Implement the Town Investment Plan	G
• Develop a business case for projects / programmes that were part of the Heads of Terms agreement from DLUHC	A
• Develop further the West Norfolk Holiday guide in the context of the on-going changes to accessing information digitally	Completed
• Deliver the Council's directly managed commercial programmes	G
• Deliver the Council's directly managed housebuilding programmes	G
• Develop and manage the portfolio of PRS properties managed by West Norfolk Property Limited	A
• Develop affordable homes to be managed by West Norfolk Housing Company Limited	G
• Achieve community benefits through market engagement with Local Suppliers, SMEs & VCSEs - in support of the local economy; and measure the monetary value of social value provided by contractors (through the 2021-2025 Procurement Strategy)	G
Progress update provided by Assistant Directors	
The Business cases have been completed and could be subject to some minor changes as the Local assurance Framework process is completed. The summary documents will be submitted to government in the timescales as agreed. Work was undertaken to review details of projects, and advice was taken on cost inflation and appropriate contingency. Following this a funding gap was evident and a process of prioritisation was undertaken in line with Government guidance. Some projects were re-scoped with additional outcomes identified, and some projects were de-scoped, with one being removed.	D Hall
The West Norfolk Holiday Guide was replaced with 'Where to Stay in West Norfolk' guide which has been published (available at Tourist Information Centre/ Points) and is available on the website visitwestnorfolk.com and an app.	D Hall

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

<p>Development of the speculative commercial development units (Phase 1) at the Nar Ouse Regeneration Area Enterprise Zone is progressing well. The Phase 1 units (2 office and 2 light industrial) should achieve Practical Completion in October/November 2022. Tender documents for Phase 2 are being prepared and the market will be tested during late summer/early autumn 2022. Several expressions of interest expressed for the Phase 1 units and Heads of Terms issued.</p>	M Henry
<p>The Tender process for the road infrastructure works at the Nar Ouse Regeneration Area Enterprise Zone Tender has been completed, and the contract awarded. The road (and other) infrastructure works commenced early late August/September 2022 and are programmed to be completed within 40 weeks, weather depending. These infrastructure works will open up a significant tract of commercial development land that will be available for purchase, or lease, by private sector (and other) businesses/developer/investors and potentially facilitate significant investment in the local area.</p>	M Henry
<p>Housing development schemes on site are on track however, delays in the programme overall expected during Q4 this year.</p>	D Ousby
<p>Measuring monetary / social value of SME / VCSE can only be completed annually in the spending review and depends on the quality of data recorded on the Unit 4 system for all suppliers.</p>	D Ousby

2.2 Deliver the Local Plan	RAG rating
<ul style="list-style-type: none"> • Ensure the close relationship between Local Plan, Corporate Business Plan and other corporate work 	G
<ul style="list-style-type: none"> • Engage with internal departments in Local Plan Review consultation 	G
<ul style="list-style-type: none"> • Take forward strategic transport policies for the Borough 	G
<ul style="list-style-type: none"> • Assist towns and parishes to prepare their own neighbourhood plans 	G
Progress update provided by Assistant Director	
<p>Whilst the actions are on track, there are two vacancies in the policy team which we hope can be filled soon, especially given the forthcoming Local Plan Examination hearings (starting December 2022). At present a consultancy planner is helping carry out some of the required workload.</p>	S Ashworth
<p>The Towns Fund Active and Clean Connectivity Project Business Case is on track, aiming to improve affordability, convenience, reliability and sustainability of travel options to and from places of work and places of interest (especially shops and amenities) and reducing congestion within the town.</p>	D Ousby

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

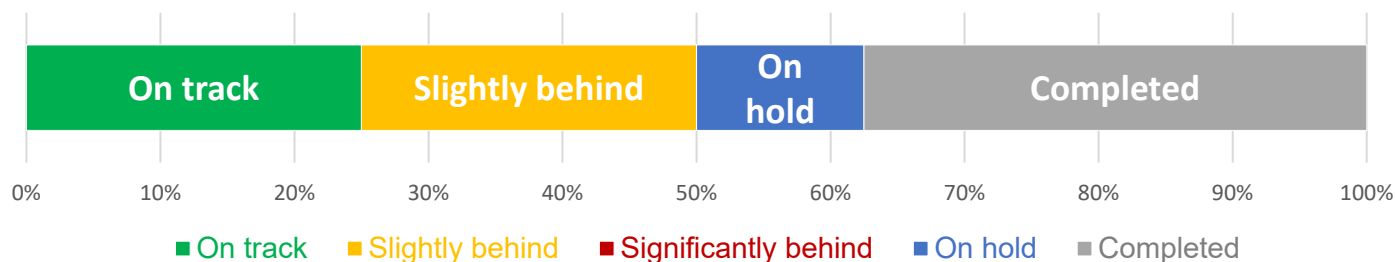
Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

Protecting and enhancing the environment including tackling climate change

Current position breakdown of key actions



3.1 Deliver on our commitment to be carbon neutral by 2035 by implementing the council's carbon reduction strategy and encourage our partners, communities and local businesses to reduce their environmental impact.	RAG rating
• Declare a Climate Emergency	Completed
• Adopt the Climate Change Strategy and Action Plan	Completed
• Increase the number of trees in the district	A
• Increase walking, cycling and sustainable transport	A
• Work in partnership with the Chamber of Commerce to co-ordinate Expo22	Completed
• Continue to provide an active role within the Norfolk Climate Change Partnership	G
• Implement a communications programme to promote the council's activities to address climate change and encourage mitigation and adaptation by residents and businesses	G
• Show leadership by assessing the environmental impact of council procurement (through the 2021-2025 Procurement Strategy)	On hold
Progress update provided by Assistant Directors	
There are 79 agreed actions in place to progress the Climate Change Strategy and Action Plan, currently 21 of the actions are on track, 25 actions are in progress, 2 actions are stalled, 12 actions are awaiting start and 19 actions have been completed. The Refit2 project, utilising a £3.8 million Government grant to help de-carbonise heat generation in council buildings, is nearing practical completion. The newly appointed Senior Climate Change Officer is helping to oversee the work started with BP Pulse with the installation of 26 Fast EV charging points and to agree contracts with BP Pulse to replace the 4 Rapid EV charging points at Hunstanton and King's Lynn.	S Ashworth
The heat and dry weather during the summer has adversely affected a number of the newly planted trees at King's Reach causing a far greater number to fail than would have normally of expected. Where trees have failed they will be replaced as part of the ongoing tree management process. The installation of CCTV has been completed and public information boards are being drawn up.	M Chisholm
The Active and Clean Connectivity Programme is still to be delivered, currently awaiting approval for the final Business Case.	D Ousby

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report 1 April – 30 September 2022

<p>A range of communications activities have been undertaken to support the Council's climate change agenda, including support for the Council sponsored 'Climate Change Expo' held at the Corn Exchange on 21 June, support for the 'solar together' project, the Norfolk Climate Change Partnership website and a range of tree planting activities. Activities undertaken to date are consistent with progress towards the overall Climate Change Action Plan.</p>	<p>B Box</p>
<p>An updated Procurement Strategy is on hold pending the updated National Procurement Policy Statement by central government.</p>	<p>D Ousby</p>

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

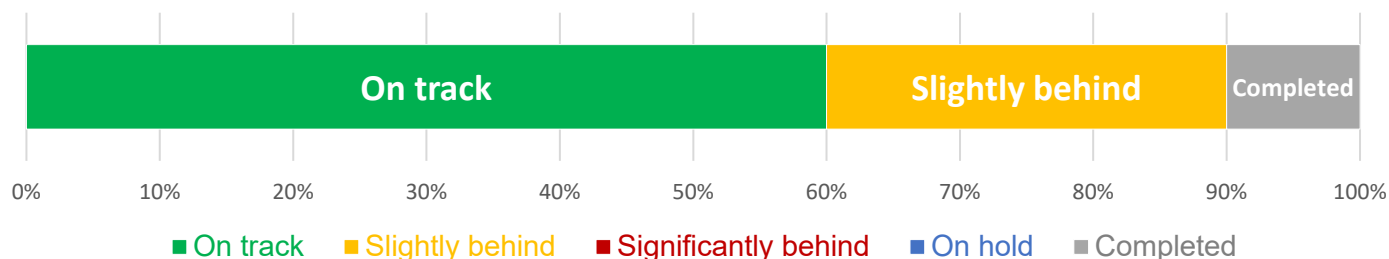
Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

Improving social mobility and inclusion

Current position breakdown of key actions



4.1 Assist our residents to maximise their opportunities by accessing the support and services they are entitled to.	RAG rating
<ul style="list-style-type: none"> Review the Homelessness and Rough Sleepers Strategy following the implementation of 'Everyone In' initiative and the introduction of a number of new accommodation and support services funded by central government through the Next Steps Accommodation Programme and the Rough sleeper Initiative. 	G
<ul style="list-style-type: none"> Support the production of and publish key strategic documents in conjunction with Norfolk County Council that identify needs, gaps in services and strategies to address them. Strategic work is underway with Norfolk County Council in the following areas; <ul style="list-style-type: none"> Older Persons Housing Needs assessment Norfolk Homelessness Prevention Strategy 2021-2025 Support In Safe Accommodation Strategy for Norfolk 2021-2024 	G
<ul style="list-style-type: none"> Deliver a Council Tax Support scheme for working age people in the borough that supports those most in need. 	Completed
<ul style="list-style-type: none"> Improve the digital offer for our residents and service users and consider ways of addressing digital exclusion. 	A
<ul style="list-style-type: none"> To help tackle loneliness and social isolation in adults of all ages. 	G
Progress update provided by Assistant Directors	
<p>The Homelessness and Rough sleeping strategy was reviewed at the end of 2021, and additional actions introduced to reflect emerging issues including new responsibilities in connection with Domestic Abuse. Actions have been identified to address:- future demand pressures arising from households from Ukraine seeking accommodation following an initial period with families or hosts; and Private Rented Sector (PRS) supply issues relating to a trend of PRS landlords leaving the sector and selling properties.</p>	D Hall
<p>Wider family homelessness is increasing and the use of Bed and Breakfast has become necessary even for families. This situation has been more challenging because of some specific issues with time taken for reletting periods by key social housing provider FCH.</p>	D Hall

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report 1 April – 30 September 2022

<p>The Home Office announced its wider asylum dispersal scheme in order to re-settle asylum seekers across all areas of the United Kingdom. We are working with the Home Office and Serco to identify appropriate accommodation opportunities to achieve a target for West Norfolk of 127 bedspaces by December 2023. The pressures of local housing demand particularly in the private rented sector means that the focus will be on creating new stock including renovating vacant commercial buildings in the town.</p>	D Hall
<p>The revised Council Tax Support Scheme 2022/2023 was approved by Council on 25th January 2022 and implemented from 1 April 2022. Work is underway to set out options/proposals for the scheme on 2023/24.</p>	M Drewery
<p>We continue to explore opportunities to increase our digital offer to residents. Increased use of web-chat has assisted with managing an increased volume of calls into the contact centre and helps to provide a clear and speedy response to most enquiries received via this format. However, pressure on resources within the CIC and the increased call volumes is impacting on our ability to devote time to developing new approaches further.</p>	B Box
<p>Lily is working well and supporting those in need, referrals have settled and are well within targets.</p>	M Whitmore

4.2 Ensure the Council participates in a range of initiatives which support the development of skills in and pathways to work for local people.	RAG rating
<ul style="list-style-type: none"> • Support the development of skills intervention projects including the College of West Anglia (CWA) School of Nursing, and the Town's Fund – King's Lynn Youth and Retraining Pledge. 	G
<ul style="list-style-type: none"> • Explore ways of delivering an employment support initiative (possibly through Towns Deal) that could align with the emerging Youth Pledge. 	G
<ul style="list-style-type: none"> • Continue to ensure opportunities for the provision of apprenticeships are maximised, both by the Council as an employer and by supporting local businesses to maximise use of apprenticeship schemes. 	G
<ul style="list-style-type: none"> • Review and re-prioritise/re-focus the Council's improving educational attainment programme in line with identified needs in relation to skills in West Norfolk. 	A
<ul style="list-style-type: none"> • Assist educational agencies / establishments deliver work experience opportunities; enhance links with COWA and schools. 	A
Progress update provided by Assistant Directors	
<p>A local Skills Partnership group has been established to support skills development and break down barriers to enter the labour market. The group is overseeing the delivery of the Towns Fund Youth Training Pledge and School of Nursing but going beyond this to examine opportunities for interventions that could be funded locally by the UK Shared Prosperity Fund (UKSPF) or the Multiply (Adult Literacy).</p>	D Hall
<p>The West Norfolk Investment Plan was submitted to Government within the August deadline following two successful stakeholder engagement sessions. During September a further fund associated with the UK Shared Prosperity Fund was announced. The Rural England Prosperity Fund shares some objectives and some similar interventions with UKSPF but is different and recognises the challenges and differences relating to rural areas.</p>	D Hall

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report 1 April – 30 September 2022

<p>The Council remains committed to the provision of apprenticeship opportunities within it's own workforce with employees currently completing apprenticeships at various levels across all service areas. New opportunities for apprenticeships are being developed on an ongoing basis and progress with existing apprentices is regularly monitored with support provided to ensure that programmes are successfully completed.</p>	<p>B Box</p>
<p>Our improving educational attainment programme is being reviewed, although progress is slow due to other work priorities and the loss of many key contacts over the COVID period. Links are being developed with the project team responsible for the Youth and Retraining Pledge to raise aspirations and work related skills in young people in west Norfolk. Our west Norfolk primary heads network, which was put on hold during the pandemic, relaunched in September and opportunities to re-engage with secondary schools are currently being explored.</p>	<p>B Box</p>
<p>During 2021/22 the Council offered work placements to CWA students undertaking their Public Services course for the first time and plans to expand this during the 2022/23 academic year are already well underway. Links with DWP and other partners to provide information and support in relation to work experience and careers has commenced, but progress is slow due to other workloads.</p>	<p>B Box</p>

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

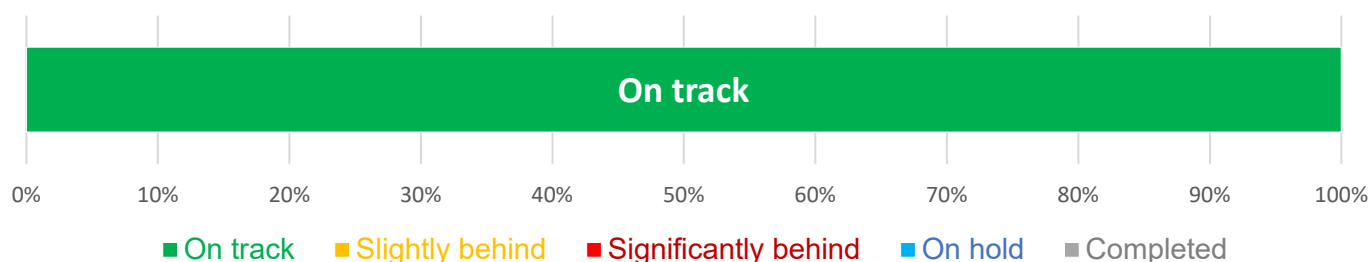
Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

Creating and maintaining good quality places that make a positive difference to people's lives

Current position breakdown of key actions



5.1 Target littering and fly-tipping	RAG rating
<ul style="list-style-type: none"> Work with partners across the county and regionally to deliver the SCRAP fly-tipping campaign 	G
Progress update provided by Assistant Director	
<p>Work on the SCRAP campaign continues with locally produced material released to the press showing progress and explaining how fly-tipped materials can be taken to the tip for free. We have worked with ITV Anglia on their successful launch of their environmental campaign in Hunstanton. A second Clean Neighbourhoods Enforcement Officer has been appointed and is due to start in October 2022.</p>	M Chisholm

5.2 Maintain standards for open and green spaces	RAG rating
<ul style="list-style-type: none"> Engage with the public to enhance the involvement and interest of local residents with regards to areas of Public Open Space 	G
<ul style="list-style-type: none"> Engage with and assist in developing and supporting existing voluntary and community group's including Parish Councils. 	G
<ul style="list-style-type: none"> Continue to develop and improve visual image on key routes into west Norfolk 	G
Progress update provided by Assistant Director	
<p>Public engagement continues through the development and delivery of In Bloom, winning gold in three categories this year.</p> <p>A successful collaboration with Sedgford PC on tree planting has been achieved.</p> <p>Currently developing methodology for improvements of litter picking on key routes with opportunities to improve appearance and bio-diversity in a small number of key locations.</p>	M Chisholm

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

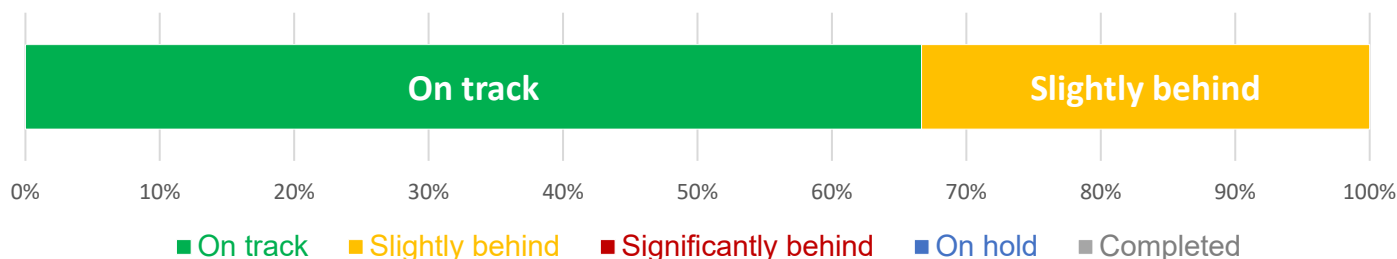
Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

Helping to improve the health and wellbeing of our communities

Current position breakdown of key actions



6.1 Improve and develop the quality of local sport and leisure facilities	RAG rating
• Work with partners on local projects to improve health and physical activity levels	G
• Support the development of health & well-being schemes to encourage activity.	G
• Consider Playstreet initiatives and specific health programmes for targeted groups.	G
• Work with NHS and Active Norfolk on a borough/county wide approach to exercise referral as well as implement a Cancer Rehab programme delivered from the new Wellbeing Centre at QEH.	G
Progress update provided by Assistant Director	
<p>The new Health and Wellbeing Partnership is now in place with the first two formal meetings successfully held. The Lily Careline Manager and Assistant Director also attend meetings in respect of Inactivity and Health Inequalities. The new ICS model will present significant opportunities to align health with local priorities.</p> <p>Current schemes/initiatives</p> <ul style="list-style-type: none"> ○ working with the Queen Elizabeth Hospital (QEH) to provide employer subsidised memberships with over 420 now sold. ○ Man v Fat Football now has over 120 players seeing a combined weight loss of over 1000kg ○ All to Play For Football supporting men with mental health conditions taking place weekly in partnership with Wellbeing, Mind and 856 Foundation. ○ Funding secured from Adrian Flux, 856 Foundation and Anglia Ruskin University to support a new role to focus on improving physical activity participation in North Lynn. ○ Cancer Care programme established in partnership with QEH is being delivered from the Cancer Wellbeing Centre at QEH. ○ Task and Finish group set up for West Norfolk to implement the Active NoW exercise referral scheme. ○ QEH Pain Management Clinic, QEH Diabetic Team, NHS Health Check Service and NHS Wellbeing Surgery Coordinator are new referral partners for the AWN Wellness Referral Scheme. 	M Whitmore

Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

2022/23 Corporate Business Plan Monitoring Report 1 April – 30 September 2022

6.2 Reduce crime and anti-social behaviour	RAG rating
<ul style="list-style-type: none"> Work with partners to tackle anti-social behaviour, fear of crime and to deal with neighbourhood nuisance/public health issues 	A
<ul style="list-style-type: none"> Provide technical knowledge and expertise to help develop proposals which benefit the town economically whilst conforming with current codes of practice on good design for noise control and ensuring opportunities for Crime and ASB are designed out. 	A
Progress update provided by Assistant Director	
<p>Generally on track however, as reported in 1.3 significant pressures in supporting other corporate work (eg Homes for Ukraine Welfare Visits etc) has given rise to additional pressures. Enviro-crime work is progressing well following additional investment in this area of the service.</p>	M Whitmore

Rating definition

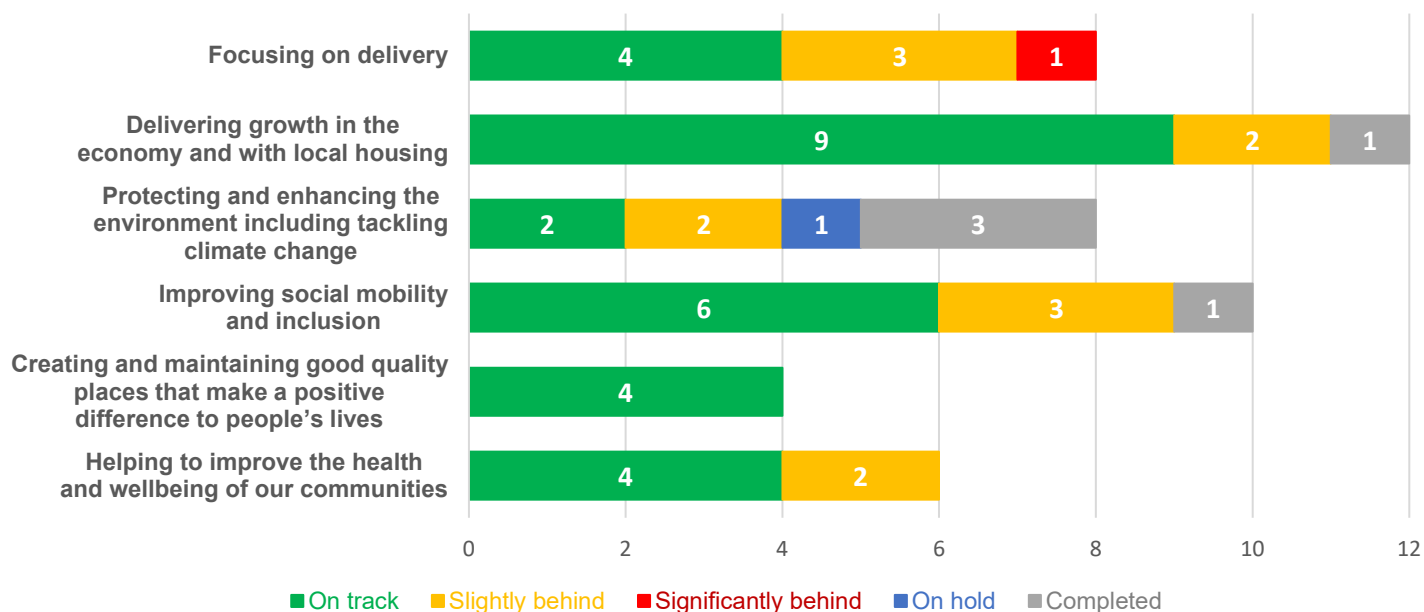
Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

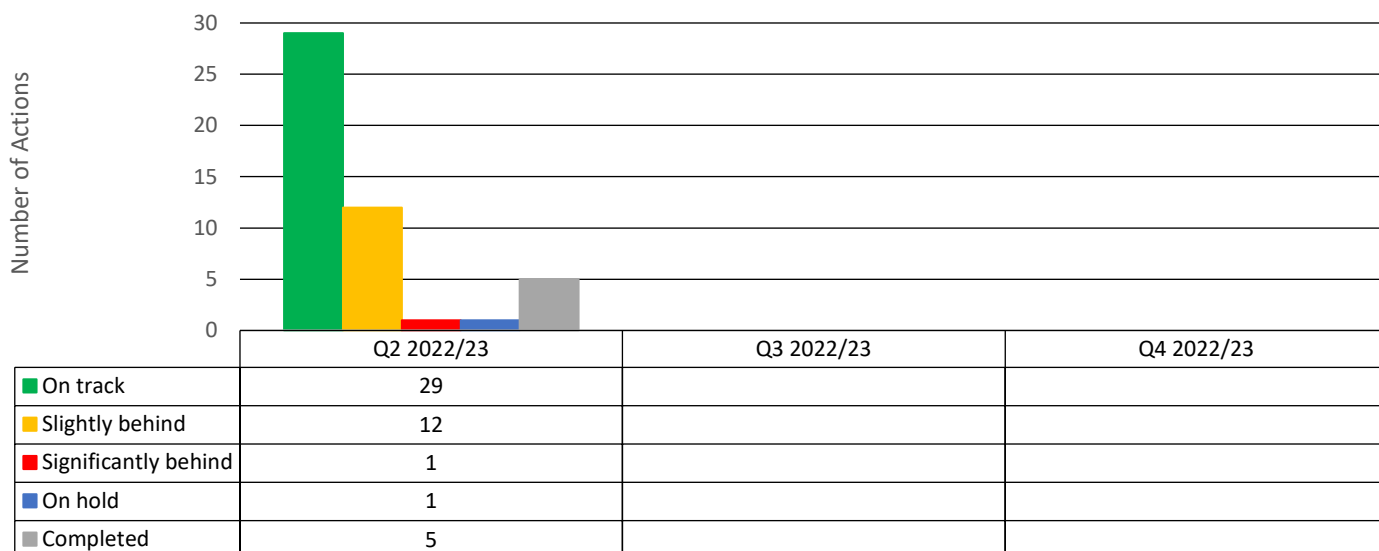
2022/23 Corporate Business Plan Monitoring Report

1 April – 30 September 2022

Overall position breakdown of key actions



Breakdown of key actions



Rating definition

Slightly behind - Minor slippages in timescales but corrective action is anticipated to achieve the agreed completion date.

Significantly behind - Serious slippages in timescales but despite intended corrective action some or all of the outputs may not be achieved by the original completion date.

POLICY REVIEW AND DEVELOPMENT PANEL REPORT

REPORT TO:	Corporate Performance Panel		
DATE:	20 October 2022		
TITLE:	Governance Review of the Council's Companies		
TYPE OF REPORT:	Scrutiny		
PORTFOLIO(S):	Portfolio for Business, Culture & Heritage		
REPORT AUTHOR:	Alexa Baker, Monitoring Officer		
OPEN/EXEMPT		WILL BE SUBJECT TO A FUTURE CABINET REPORT:	Yes

REPORT SUMMARY/COVER PAGE

PURPOSE OF REPORT/SUMMARY:
To place before Members the report to Cabinet in relation to the governance review of the Council's companies, due to be considered by Cabinet on 15 November 2022.
KEY ISSUES:
Members are directed to the attached Cabinet report for full details of the key issues.
OPTIONS CONSIDERED:
Members are directed to the attached Cabinet report for full details of the options.
RECOMMENDATIONS:
<ol style="list-style-type: none"> 1. To consider the recommendations contained within the attached Cabinet report 2. Formulate recommendations to Cabinet on whether the recommendations within the Cabinet report are supported, rejected or supported with amendments.
REASONS FOR RECOMMENDATIONS:
To scrutinise recommendations being made for an executive decision.

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards No	Discretionary	Be entirely within Cabinet's powers to decide YES			
		Need to be recommendations to Council NO			
		Is it a Key Decision NO			
Lead Member: Cllr Graham Middleton E-mail: cllr.graham.middleton@west-norfolk.gov.uk		Other Cabinet Members consulted: N/a			
		Other Members consulted: N/a			
Lead Officer: Alexa Baker, Monitoring Officer Direct Dial: 01553 616270		Other Officers consulted: Lorraine Gore, Chief Executive Michelle Drewery, section 151 officer Becky Box, Assistant Director for Central Services			
Financial Implications YES	Policy/ Personnel Implications YES	Statutory Implications YES	Equal Impact Assessment NO	Risk Management Implications YES	Environmental Considerations NO

Date of meeting: 15 November 2022

GOVERNANCE REVIEW OF THE COUNCIL'S COMPANIES

<p>Summary</p> <p>This report sets out proposed actions to improve the governance arrangements surrounding the Council's three operating wholly owned trading companies: Alive West Norfolk, West Norfolk Housing Company Limited and West Norfolk Property Limited, following a governance review.</p> <p>The primary recommendation is the creation of a 'Shareholder Committee', which is proposed to be a decision-making sub-committee of Cabinet, which shall exercise the function of Shareholder. This will involve holding the companies to account against their business plans and approving governance documents in the Shareholder capacity. This will be a Council body which all Members may attend under their Standing Order 34 rights and its decisions will be subject to the scrutiny call-in procedure.</p> <p>To allay concerns around conflict of interest, it is proposed that for two out of the three companies, Members should be no longer act as directors, so that the Member role is fulfilled through the Shareholder function and holding the directors to account via the Shareholder Committee. The report details the reasoning for holding back at this stage on the third company for now.</p> <p>To improve openness and transparency, it is also recommended that a 'Shareholder data room' be created through Mod Gov which will contain all relevant documents pertinent to the Council's Shareholder function, which Members will have full access to, on a confidential basis (where required).</p>
--

Recommendations

- 1) Cabinet hereby establishes a sub-committee to be known as ‘the Shareholder Committee’ and sets the terms of reference as shown in Appendix 1 to this report as the terms of reference for the Shareholder Committee. Cabinet delegates full authority to the Shareholder Committee to carry out its terms of reference.
- 2) Authority is delegated to the Chief Executive in consultation with the Leader to enter Service Level Agreements between the Council and each of its wholly owned companies in respect of all support provided by the Council to that wholly owned company.
- 3) The Corporate Governance Action Plan attached at Appendix 2 be approved.

Reason for Decision

To improve the governance of the Council’s wholly owned companies.

1. Purpose of Report

- 1.1 The purpose of this report is to set out proposed actions to improve the corporate governance of the Council’s wholly owned trading companies. The report sets out an action plan to take forward recommendations arising out of the governance review that has been undertaken.

2. Background/Current Position

- 2.1 This Council has three wholly owned operating trading companies:

- i. Alive West Norfolk (limited by guarantee) (“AWN”)
- ii. West Norfolk Housing Company Limited (limited by shares) (“WNHC”)
- iii. West Norfolk Property Limited (limited by shares) (“WNP”)

- 2.2 Summary details of the companies are set out at Appendix 3, but for the ease of reference, the companies are engaged in the following:

- i. AWN: Operation of sports and arts facilities
- ii. WNHC: Renting and operating of Housing Association real estate (company is a registered social housing provider)
- iii. WNPL: Other letting and operating of own or leased real estate

- 2.3 The Council’s owner/shareholder function is an executive function and presently sits within the Portfolio for Business, Culture & Heritage.

- 2.4 The board of directors of each company is made up of current or former Cabinet Members and senior officers, with WNHC also having independent non-executive director appointments to the board.

- 2.5 The Council’s Chief Executive is recorded at Companies House as the company secretary to WNHC and WNPL (a legacy appointment). There is no Company Secretary appointed for AWN.

- 2.6 Bespoke Articles of Association have been adopted for all three companies. They are not as aligned with each other as they could be.
- 2.7 There is no Shareholder Agreement between the Council and AWN or WNP. There is no mandatory requirement for these to be in place, however they are a mechanism by which robust governance requirements can be adopted and monitored.
- 2.8 The governance documents in relation to WNHC are more advanced. There is a Shareholder Agreement, Intragroup Agreement, Board Terms of Reference, Chair role description and Director Services Agreement.
- 2.9 The Council has been providing each of its companies with back office support, for example company secretarial work, finance, HR, etc. The extent of this back office support has developed on a piecemeal basis and has not been properly captured into formal agreements.
- 2.10 There have been no changes to officer job descriptions to set out the requirements of them to act as a company Director and how this interfaces with their Council officer role.
- 2.11 The Agendas and Minutes of the companies' board meetings are published and accessible to Members, however Members are not permitted to attend company board meetings under the Standing Order 34 rights as the companies are private limited companies and are not 'Council bodies' under the Constitution.

3. Governance actions

The Shareholder Function:

- 3.1 The Shareholder function is an executive function, and therefore the responsibility for the exercise of the shareholder function sits with the Council's Executive – the Leader and Cabinet. The Council's owner/shareholder function presently sits within the Portfolio for Business, Culture & Heritage.
- 3.2 For the ease of reference, the term 'Shareholder' in this report is intended to cover AWN which is a company limited by guarantee.
- 3.3 Going forwards, it is proposed that a Shareholder Committee be established which will be a sub-committee of Cabinet with authority and decision-making powers delegated by Cabinet to exercise the shareholder function. The proposed Terms of Reference for this sub-committee are set out at Appendix 1.
- 3.4 The Shareholder Committee would be responsible for approving the companies' governance documents, business plans, holding directors to account against the delivery of the business plans and the Shareholder Agreement and determining the shareholder reserved matters that are set out in the Shareholder Agreement (see below examples).
- 3.5 Recommended Shareholder reserved matters are as follows (this is not intended to be an exhaustive list):
 - i. approval and modification of the company business plan;
 - ii. appointment and removal of the directors;
 - iii. varying the Articles of Association;
 - iv. relevant staff recruitment and remuneration (including directors);
 - v. changes in ownership or membership of a company;
 - vi. acquisition/disposal of other entities or an ownership stake in another entity;

- vii. acquisition and disposal of assets by the company (utilising a cap if required);
- viii. approval of borrowing;
- ix. termination/winding up of the company.

3.6 The Shareholder Committee is proposed to consist of three Cabinet Members, covering the Portfolios for Finance, Property and People and Communities. The list of the Shareholder functions are set out within paragraph 4 of the proposed Terms of Reference at Appendix 1.

3.7 The Shareholder Committee will be supported by officers internally within the Council who do not have responsibility for acting as directors (or in any other capacity) for the companies.

Roles of Other Council Bodies:

Audit Committee

3.8 Audit Committee has recommended revising its terms of reference (awaiting Full Council approval) to include:

Receive assurance that there is sound system of internal control and risk management process in place for each of the Councils Local Authority Trading Companies.

Policy Review and Development Panels

3.9 The Shareholder Committee will be holding the companies to account against their business plans, delivery and performance. The Council's scrutiny function will include holding the Shareholder Committee to account in ensuring the effective exercise of the shareholder function, and assessing whether the Council's interests and investment in the companies are protected.

3.10 The appropriate panels may scrutinise the decision making of the Shareholder Committee, including via the call-in procedure. The Panels may add items to their agendas within their remit which involve the Council companies, to include requiring directors of the companies to attend meetings and provide information, however for effective public administration there should not be a duplication of the companies being required to account to the Shareholder Committee and the scrutiny panels in the same way. Scrutiny's primary role with regards to the Council companies will be to scrutinise the Shareholder Committee's performance in carrying out the shareholder function.

The Company Board of Directors:

3.11 It is essential to good governance that all those involved in a corporate structure clearly understand their respective roles and responsibilities, and those of others within the corporate structure.

3.12 Appointed company directors are responsible for (not intended to be an exhaustive list):

- i. Acting in the statutory role of a company director with fiduciary duties to the company;
- ii. Acting in the best interest of the company;
- iii. The day-to-day operational control and running of the company;
- iv. Development of new business opportunities within the parameters of the agreed business plan;
- v. Staff terms and conditions;
- vi. The development and implementation of its internal procedures;
- vii. Running the company in accordance with the governance documents and business plan;
- viii. Developing and delivering new business plans at the regularity required in the governance documents;

- ix. Regular reporting on progress of the business plan to the Shareholder;
- x. Accounting to the Shareholder for the performance of the company.

3.13 The Statutory duties imposed on a director under the Companies Act 2006 are as follows:

- i. act within their powers;
- ii. promote the success of the company;
- iii. exercise independent judgment;
- iv. exercise reasonable care, skill and diligence;
- v. avoid conflicts of interest;
- vi. not accept benefits from third parties.

The duty under S.172 of the Companies Act 2006 to promote the success of the company is an overarching duty. This must be considered by directors in all decisions that are made for the company

3.14 The question that arises for every Council setting up and maintaining a wholly owned company is the extent to which its officers and Members are placed on the Board of Directors. CIPFA guidance on Local Authority owned companies states as follows at page 49:

The law does not prohibit or restrict appointments of officers or members to non-executive director positions for a local authority company, but it is good practice to have some 'distance' between key authority decision makers and company decision makers in terms of personnel.

3.15 When a Member or an officer acts as a director of a wholly owned local authority company, there is an overriding duty to always act in the best interests of the company. This creates a more pressing conflict for Members because their public law duty to the Council can never be avoided or delegated. Where Members do act as Directors, checks and balances can be put in place to manage and mitigate potential and actual conflicts, and the Member Code of Conduct continues to apply. Members therefore run the risk of challenges to their actions and decisions as directors of the company through the standards regime, as well as potential liability under the Companies Act 2006.

3.16 In contrast, officers' relationship with the Council is contractual, and their terms and conditions of employment can be amended to set out that they are required to act as director, and where they so act, the officer must put set aside their contractual duty to the Council and must put the interests of the company first.

3.17 Best practice is that the Council's statutory officers should not serve as directors on the boards of the Council's companies, as they need to keep their discretion unfettered to fulfil their roles within the Council as shareholder.

3.18 To make clear the respective roles and responsibilities as regards the Shareholder Committee, it is therefore proposed in the Action Plan at Appendix 2 as follows:

- i. AWN change the composition of its Board of Directors to: Managing Director of AWN, two Council Officers not holding a statutory post and two independent non-executive directors;
- ii. WNPL change the composition of its Board of Directors to: three Council Officers not holding a statutory post and two independent non-executive directors;
- iii. That AWN and WNPL create a non-voting Shareholder representative seat on their respective Boards (intended to take effect once the changes at i) and ii) have been made).

- 3.19 These proposed changes would need to be set out in amended governance documents, the approval of which is proposed to be delegated to the newly created Shareholder Committee. It would be for the Shareholder Committee to approve the skills appraisal and personal specification for the identified independent non-executive director roles.
- 3.20 As WNHC has registered status from the Regulator of Social Housing, which included submission of its governance documents, it is not proposed to alter the make up of this company's board structure yet until all governance improvements emanating from the Action Plan have been implemented, in order to provide assurance when seeking approval for future changes from the Regulator.
- 3.21 The Shareholder Committee ought to begin carrying out its shareholder functions as soon as possible, in line with the Action Plan, to bring about the governance improvements required. It is recognised that the recruitment of independent non-executive directors with the relevant and appropriate skillset is a process that will take some time. This will mean (for the interim) Cabinet Members taking decisions on the Shareholder Committee in relation to companies on which other Cabinet Members sit as Directors. This interim position will need to be managed by carrying out an immediate conflict of interest assessment, identifying the checks and balances that can be put in place to mitigate the risks and perceived risks and providing targeted training to those Members and officers that are affected.
- 3.22 The proposed non-voting Shareholder representative is recommended to be a Cabinet Member who would attend the company Board meetings as an observer, to participate in discussions and advance the shareholder's position. This will support the continuation and sharing of knowledge and experience around the companies that current Cabinet Member Directors have built up over their tenure in post. The Shareholder representative is not a Director and would not count for quorum purposes or be able to vote on Board resolutions. The Shareholder representative would be expected to attend Shareholder Committee meetings in this capacity, to relay to the Shareholder Committee their observations at the Board meetings.
- 3.23 Directors of the Council companies are not currently remunerated and it is not proposed to change this. Any future changes would be a decision reserved to the Shareholder within the governance documents. Members would not in any event be entitled to receive more than the equivalent of Member allowances, with their Member allowance being duly reduced by the same amount. Officers are not entitled to receive separate remuneration from the Council companies. Remuneration is therefore only really engaged with respect to independent non-executive directors on the board of directors.

Governance Documents

- 3.24 Key to good governance are the documents which set the parameters in which the companies are to operate.
- 3.25 There is a Shareholder Agreement in place with WNHC but not AWN or WNPL.
- 3.26 The Shareholder Committee can, through a Shareholder Agreement, set out the performance levels required for the companies and set out how the relationship between the Council and the companies will work. Securing alignment of the governance documents with all the companies, so

far as is possible, will promote consistency for the Shareholder Committee to carry out their role with all companies.

3.27 It is therefore proposed that the following be undertaken:

- i. Shareholder Agreements be agreed between the Council and AWN and WNPL respectively;
- ii. Updated Articles of Association to reflect and support the content of the Shareholder Agreement and align all three companies' governing documents so far as possible;
- iii. Minor clarificatory changes to the governance documents for WNHC;
- iv. Refreshed business plans for AWN and WNPL;
- v. The formalising of support services provided to the companies by the Council, under service level agreements.

Company Secretary

3.28 The company secretary function is an important role akin to that of a local authority Monitoring Officer. Duties should encompass company and Companies House administration, statutory and regulatory compliance, corporate governance, supporting the directors in ensuring they are complying with their duties and liaising with the shareholder.

3.29 It is proposed that one of the first decisions of the newly created Shareholder Committee be to select a new Company Secretary for all companies, proposed to be a member of the Council's legal team (not the Monitoring Officer) under the provisions of the Service Level Agreements proposed to be entered into, or an external provider suitably qualified in providing this role.

Shareholder Documents

3.30 In order to provide a centralised location where all Members can locate documents relevant to the Council's Shareholder function, it is proposed that a 'data room' be created in Mod Gov which will contain current and historic business plans, signed Shareholder Agreements, Articles Association, agendas and minutes of company board meetings, etc

4. Other options considered

Shareholder function

4.1 There are several ways in which the Cabinet can exercise its shareholder function. The Cabinet, as a whole, may exercise the shareholder function, the Cabinet may delegate the function or certain shareholder decisions to an individual cabinet member or to an officer of the Council.

4.2 A shareholder advisory committee could be established which would advise the Portfolio Holder delegated to carry out the executive function, prior to the taking of a decision This would not be a formal sub-committee of the Cabinet and given its advisory capacity, would have no decision-making authority.

4.3 The composition of a shareholder advisory committee, its remit and terms of reference would be for the Cabinet to decide. The shareholder advisory committee could comprise of elected members from the Council's administration and other groups, as well as external non-members with sector specific expertise who would act in a similar capacity to independent non-executive directors appointed to the companies' boards and who would be recruited in a similar way.

4.4 A Shareholder Advisory Committee is not considered to be appropriate for the Council's wholly owned companies, as this adds another layer of meetings before decisions are taken at the executive level. Additionally, this does not absolve the Portfolio Holder of the duty to make their

own decisions rather than just following the Advisory Committee's recommendations. It is therefore considered that the Shareholder function is best met by a Shareholder Committee, rather than requiring the decision making of the shareholder function to be taken ultimately by one person.

The Company Board of Directors

- 4.5 Consideration has been given to replacing the current executive Cabinet Members with non-Cabinet Councillors, aka 'back-benchers'. This would be more in line with CIPFA's stated good practice to keep some 'distance' between key authority decision makers and company decision makers, however would not remove the Member conflict issue entirely in terms of not being able to delegate or fetter their duty to the Council.
- 4.6 In the event that recruitment of suitable independent persons to fulfil the identified seats on the Board of Directors of AWN and WNPL is not successful, it is proposed that the matter be taken to the Shareholder Committee to determine whether the seats should be opened up to 'back-benchers'.

5. Policy implications

- 5.1 Bolstering the Shareholder function will serve to enable the Council to set the strategic direction of its companies in line with the Council's own policies, the Corporate Business Plan, Capital programme, etc.
- 5.2 The publication of non-statutory guidance by CIPFA provides a notable model to compare with the council's current arrangements and inform work to enhance the current governance framework.

6. Financial Implications

- 6.1 The recommendations will ensure that the Council can operate within standards of best practice and ensure that the Council's strategic objectives are being met across companies in which it has a financial interest in.
- 6.2 The recommendations will have implications for the Council and its subsidiary companies. The companies will be able to operate more effectively and will be accountable to the Council in its role as Shareholder.
- 6.3 Having improved and more robust corporate governance arrangements in place will help improve the underlying financial viability of the Council. The recommendations will allow an approach which will provide clarity on what is expected from the Council's companies such as key deliverables, supplemented with reports on financial and operational performance. This will result in provision of up to date and consistent information to support the Council when setting the budget and carrying out other financial responsibilities such as monitoring and year end financial reporting.
- 6.4 The UK Corporate Governance Code 2018 makes reference to the benefits of clear relationships and integrated business objectives between companies in a group arrangement.
- 6.5 There are likely to be some costs associated with implementing the recommendations. The review of SLA's will result in confirmed arrangements for support services and the associated charges to each company. The Council's financial plan will need to be updated to reflect these. It should be noted that the companies have the autonomy to consider whether these services can be provided more economically from alternative external providers. Other costs may be associated with

consideration of remuneration as set out in section 3.23. Again, these will need to be reflected in the financial plan if required. The impact in the current financial year is likely to be minimal and will be met within budget.

7. Personnel Implications

- 7.1 The proposed revisions to the roles of Officers acting as Directors of the Council's wholly owned companies will be managed in accordance with the normal procedures for revising terms and conditions of employment and job descriptions, including consultation with individual employees as appropriate. Any changes to the Council's organisational structure to support the revised governance structure for Council owned companies will also be implemented in accordance with normal procedures for managing organisational changes.
- 7.2 Council officers have previously supported the recruitment of independent members for the WHNC Board, and this experience can be utilised to assist with similar recruitment activities for AWN and WNPL as required.
- 7.3 Officer time will be required for the development and ongoing management of service level agreements detailing the support services provided to the three Council companies to support the revised governance arrangements.

8. Statutory Implications

- 8.1 The companies are controlled companies under Part V of the Local Government and Housing Act 1989 and therefore must comply with the requirements thereto.
- 8.2 Section 1 of the Localism Act 2011 provides local authorities with the power to do anything an individual may do, subject to a number of limitations. This is referred to as the 'general power of competence'. A local authority may exercise the general power of competence for its own purpose, for commercial purpose and/or for the benefit of others. In exercising this power a local authority is still subject to its general duties (such as fiduciary duties it owes to its rate and local tax payers) and to the public law requirements to exercise the general power of competence for proper purpose.
- 8.3 The Local Government Act 2003 sets out various powers relating to trading, borrowing and investing.
- 8.4 The Companies Act 2006 sets out the comprehensive governance regime under which the Council's companies are required to operate.
- 8.5 The proposed Shareholder Committee meetings will be held in public (subject to exemption provisions under Schedule 12 A of the Local Government Act 1972) and will operate within the relevant Standing Orders in the Council's Constitution, including the call in provisions.
- 8.6 The Cabinet has the authority to create the Shareholder Committee and adopt its terms of reference.

9. Equality Impact Assessment

- 9.1 Public authorities are required to have due regard to the aims of the Public Sector Equality Duty (Equality Act 2010) when making decisions and setting policies.

9.2 The decisions recommended are not considered to have an impact under the Equality Act 2010, as the recommendations are to improve internal governance structures rather than impact on the service provision to the end user.

10. Risk Management Implications

10.1 The corporate risk register currently includes a risk relating to AWN not performing against its business plan. This report proposes an enhanced relationship with regular oversight of the performance of all wholly owned companies by a shareholder committee and additional assurance by Audit Committee of company arrangements relating to matters such as risk management and business continuity.

10.2 Improving the governance of the Council companies and the way in which the Council undertakes its shareholder role will support and promote the effective risk management for the Council. The Shareholder Committee and Audit Committee will be assessing the risk management surrounding the Council companies within the remit of their Terms of Reference.

11. Declarations of Interest / Dispensations Granted

11.1 Cabinet members who are board directors of the Council companies are recommended to declare this interest.

12. Environmental considerations

12.1 No direct implications. The company business plans could include specific objectives and targets regarding environmental issues such as carbon reduction.

Background documents

- Local Authority Owned Companies: A Good Practice Guide, May 2022, CIPFA

**TERMS OF REFERENCE OF THE BCKLWN SHAREHOLDER COMMITTEE
SUB-COMMITTEE OF CABINET**

1. Definitions

Council Companies	means the private limited companies in which BCKLWN is the majority shareholder/owner
Governance Documents	means, as the context requires, the Articles of Association, Business Plan, Shareholder Agreement and/or Intragroup Agreement
Shareholder Function	Means the functions set out in paragraph 4 of these terms of reference (and for ease of reference is intended to equally apply to any company limited by guarantee)

2. Overview

- 2.1 The Shareholder Committee is a sub-committee of Cabinet, the purpose of which is to fulfil the Council’s Shareholder Function in relation to the Council Companies, this being an executive function.
- 2.2 The Shareholder Committee will exercise the Council’s Shareholder Function in any company, limited by shares or guarantee, wholly owned by the Council for the purposes of service provision and/or trading activities.
- 2.3 The Shareholder Committee will exercise the functions delegated to it by Cabinet as set out in paragraph 4 below

3. Composition & Operation

- 3.1 The Shareholder Committee shall comprise as follows:

	Member	Status
1.	Portfolio Holder for Finance	Voting
2.	Portfolio Holder for Property	Voting
3.	Portfolio Holder for People and Communities	Voting

- 3.2 Members of the Shareholder Committee can only be substituted by other Cabinet Members who are not Directors of the Council Companies.
- 3.3 The Shareholder Committee shall appoint its own Chair and Vice-Chair annually at the first meeting of the municipal year.
- 3.4 Quorum is three voting Members.
- 3.5 A Shareholder Committee meeting shall be held no less than 4 times per annum.
- 3.6 The Chief Executive, Section 151 Officer and Monitoring Officer (or their nominees) will support the Shareholder Committee.
- 3.7 Any decisions made by the Shareholder Committee must be notified to the Company Directors as soon as reasonably practicable following such decision being taken.
- 3.8 Advisors may be invited to attend the Shareholder Committee as required.

4 Functions delegated to the Shareholder Committee

The Shareholder Committee will have responsibility for the following:

- 4.1 Any decisions identified as being reserved to the Shareholder within the Governance Documents, subject to paragraph 4.3 below.
- 4.2 Any decisions that the Shareholder is required by legislation to make, subject to paragraph 4.3 below.
- 4.3 In respect of paragraphs 4.1 and 4.2, decisions may be taken provided that where a proposed recommendation is outside the Council's budgetary or policy framework, the Shareholder Committee will consider the recommendation and provide a recommendation to Full Council.
- 4.4 Approval of the Business Plan for each of the Council Companies on an annual basis.
- 4.5 Holding each of the Council Companies to account for their performance against the respective Business Plan.
- 4.6 Approval of Shareholder Agreements with the Council Companies, including any variations thereto.

- 4.7 Responsibility for holding the Council Companies to account for compliance with the respective Shareholder Agreements.
- 4.8 Reviewing the Governance Documents on an annual basis with a view to making any changes to improve governance and/or performance requirements of the Council Companies.

5 Scrutiny of the Shareholder Committee

- 5.1 All decisions of the Shareholder Committee are subject to the call-in arrangements set out in the Council's Standing Orders.
- 5.2 The Review and Development Panels may otherwise scrutinise the performance of the Shareholder Committee and require that it reports to them on the status and progress in relation to any of the Council Companies and how the Shareholder Function is being performed.
- 5.3 Audit Committee are to receive assurance that there is sound system of internal control and risk management process in place for each of the Council's companies.

6 Review

- 6.1 The Shareholder Committee will review the Terms of Reference annually

Governance review action plan

Recommendation	Action	Delegation	Target Date
Cabinet establish a shareholder sub-committee	<ul style="list-style-type: none"> • Terms of reference adopted • Appoint to committee • Schedule meetings • Inaugural committee meeting 	Cabinet decision CE/ED under Scheme of Delegation	November 2022 January 2023
Review existing Member Directors potential conflicts of interest and implement action plan to manage conflicts	<ul style="list-style-type: none"> • Implement plan to ensure appropriate checks and balances are in place to mitigate risk of Member Directors being placed in a position of conflict for all companies 	CE/ED/MO under Scheme of Delegation	January 2023
Training for Member and Officer Directors and Members who are appointed to outside bodies	<ul style="list-style-type: none"> • On recognising, mitigating and managing any actual and potential conflicts of interest • Duties as directors 	CE/ED/MO under Scheme of Delegation	January 2023
Change regarding company secretary function	<ul style="list-style-type: none"> • Head of paid services ceases in the role of company secretary to WNHC and WNP. • Such support is provided by the Council's in-house legal team or an appropriate external provider. 	Shareholder Committee	January 2023
Review Loans provided to WNHC and WNP against the impending subsidy control legislation.	<ul style="list-style-type: none"> • West Norfolk Housing Company Ltd • West Norfolk Property Ltd 	MO/s151 officer under Scheme of Delegation	January 2023

Governance review action plan

<p>Review and formalise support services provided by the Council to the companies under service level agreements</p>	<ul style="list-style-type: none"> • A review is undertaken of the support services required by each of the companies and any support they currently received from the Council. Any support provided to the Council should be fully costed and recovered in full from the companies to show the true cost of operating those companies. • Formalising of support services provided to the companies by the Council, under service level agreements. • The Council's support service provision is provided for in the companies' governance documents, to be reviewed at least annually. 	<p>CE under Cabinet delegated authority</p> <p>Shareholder Committee</p>	<p>January 2023</p>
<p>Creation of a Shareholder data room for relevant officers and all Members</p>	<ul style="list-style-type: none"> • Create data room in Mod Gov of all relevant Shareholder function documents 	<p>CE/ED under Scheme of Delegation</p>	<p>January 2023</p>
<p>Amendments to job descriptions and contracts of employment for job roles required to take office as a Director of a Council company and provision of conflict of interest guidance for officers</p>	<ul style="list-style-type: none"> • HR to lead on consultation and review of JDs for officers that are required to fulfil a directorship as part of their role and provide guidance and training to officers on managing conflicts of interest. 	<p>CE/ED under Scheme of Delegation</p>	<p>March 2023</p>
<p>Company directors</p>	<ul style="list-style-type: none"> • Ascertain the status of the indemnification and insurance of their directors. • Governance documents to make express provision for the companies to indemnify and insure their directors. • Appointment of directors is confirmed in a letter of appointment. • Directors enter into a contract for services with the relevant company. 	<p>Shareholder Committee</p>	<p>March 2023</p>

Governance review action plan

<p>Preparation and completion of common template governance documents and refreshed business plans.</p>	<p><u>Alive West Norfolk</u></p> <ul style="list-style-type: none"> • Shareholder governance agreement • Refreshed business plan • Revised Articles of association 	<p>Shareholder Committee</p>	<p>April 2023</p>
	<p><u>West Norfolk Housing Company Ltd</u></p> <ul style="list-style-type: none"> • Revised Shareholder governance agreement • Refreshed business plan • The definition of “Group” in the Intragroup Agreement between the Council and WNHC is clarified and revised to only cover housing-related activities. 	<p>Shareholder Committee</p>	<p>April 2023</p>
	<p><u>West Norfolk Property Ltd</u></p> <ul style="list-style-type: none"> • Shareholder governance agreement • Refreshed business plan • Articles of association 	<p>Shareholder Committee</p>	<p>April 2023</p>
<p>Implementing changes in the composition of the companies’ boards as set out in the governance documents</p>	<p><u>Alive West Norfolk</u></p> <ul style="list-style-type: none"> • No BCKLWN councillors on Board • No statutory officers on Board • AWN board – 2 officers, 2 independent directors plus AWN Managing Director. <p><u>West Norfolk Property Limited</u></p> <ul style="list-style-type: none"> • No BCKLWN councillors on Board • No statutory officers on Board • WNP board – 3 officers, 2 independent directors 	<p>Shareholder Committee</p>	<p>June 2023</p>
<p>Shareholder</p>	<p>Alive West Norfolk and West Norfolk Property Limited to have a non-</p>	<p>Shareholder</p>	<p>June 2023</p>

Governance review action plan

representative role on company boards, as required by governance documents	voting Shareholder representative seat on their respective Boards, such requirement to be formalised within Shareholder Agreements.	Committee	
--	---	-----------	--

APPENDIX 3. SUMMARY DETAILS OF THE COUNCIL'S COMPANIES

Alive West Norfolk (Company Number 11802914)

Incorporated:	1 February 2019
Company Form:	Private limited company; limited by guarantee
Business:	Operation of arts facilities Operation of sports facilities
Directors:	Deborah Gates – BCKLWN Executive Director Cllr Brian Long – BCKLWN Portfolio Holder for Corporate Services Cllr Graham Middleton – Deputy Leader and Portfolio Holder for Business, Culture and Heritage Cllr Elizabeth Nockolds Lorraine Gore – BCKLWN Chief Executive
Secretary:	None recorded
Member/owner:	BCKLWN

West Norfolk Housing Company Limited (Company Number 10368299)

Incorporated:	9 September 2016
Company Form:	Private limited company; limited by shares
Business:	Renting and operating of housing association real estate:- The development and management of social housing in and around King's Lynn and West Norfolk Regulator of Social Housing Registration Nr. 5057
Directors:	Cllr Brian Long – BCKLWN Portfolio Holder for Corporate Services Cllr Richard Blunt – BCKLWN Portfolio Holder for Development and Regeneration Anita Goddard-Gill–Deputy Assets Manager of Broadland Housing Association (a Registered Provider) Duncan Hall – BCKLWN Assistant Director Regeneration, Housing and Place Ray Harding – Retired (former BCKLWN CEX) Ray Johnson - Retired
Secretary:	Lorraine Gore – BCKLWN Chief Executive
Shareholder:	BCKLWN

West Norfolk Property Limited (Company Number 11305604)

Incorporated:	12 April 2018
Company Form:	Private limited company; limited by shares
Business:	Other letting and operating of own or leased real estate
Directors:	ClIr Brian Long – BCKLWN Portfolio Holder for Corporate Services ClIr Richard Blunt – BCKLWN Portfolio Holder for Development and Regeneration ClIr Adrian Lawrence – BCKLWN Portfolio Holder for Property Duncan Hall – BCKLWN Assistant Director Regeneration, Housing and Place Ray Harding – Retired (former BCKLWN CEX)
Secretary:	Lorraine Gore – BCKLWN Chief Executive
Shareholder:	BCKWLN

POLICY REVIEW AND DEVELOPMENT PANEL REPORT

REPORT TO:	Corporate Performance Panel		
DATE:	31 October 2022		
TITLE:	Towns Fund Management & Governance Arrangements		
TYPE OF REPORT:	Update		
PORTFOLIO(S):			
REPORT AUTHOR:	Jamie Hay / Mike Tweed		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	No

REPORT SUMMARY/COVER PAGE

PURPOSE OF REPORT/SUMMARY:
A request was received by Internal Audit to undertake a review of the Towns Fund management and governance arrangements, in particular the Towns Deal Board (TDB).
KEY ISSUES:
<p>The contents of this report forms part of the overall Internal Audit of the Towns Fund which was initially due to be undertaken in quarter 4 as per the agreed Internal Audit Plan for 2022/23. This element of the audit was brought forward following this request and the full audit will form part of the progress report to be taken to Audit Committee later this year. The following areas have been covered under this element of the audit:</p> <ol style="list-style-type: none"> 1. The TDB has met the set-up requirements set by Government since its inception. 2. Membership of the TDB is representative of the stakeholders and partnerships involved in the Towns Fund projects. 3. Regular meetings of the TDB take place to monitor the progress of each project. 4. Meetings of the TDB are minuted with evidence that issues identified are addressed in an action plan and resolved. 5. Transparent decision making takes place within the TDB. 6. Members of the TDB are required to submit declarations of interest on an annual basis to the BCKLWN Monitoring Officer (MO) and advise the MO of any changes within 28 days, so that the Register of Members' Interests (held on the Vision King's Lynn website) can be maintained. 7. Members of the TDB are required to notify the MO of any gifts and hospitality that they may receive, so that this can be recorded in the Register of Gifts & Hospitality (held on the Vision King's Lynn website).
OPTIONS CONSIDERED:
This report is for information as per the request and comments can be referred to Internal Audit for consideration as part of the overall audit of the Towns Fund.
RECOMMENDATIONS:
Please see the attached report and consider the contents, should you wish to pass comments on it please refer these through to Internal Audit for consideration within the Internal Audit Report of the Towns Fund that is scheduled for quarter 4 of the 2022/23 Internal Audit Plan. This will be fed through to Audit Committee as part of the full year progress report for 2022/23 towards the beginning of the next financial year.
REASONS FOR RECOMMENDATIONS:
N/A

REPORT DETAIL

1. Introduction

The Towns Fund is a £3.6 billion fund investing in towns as part of the government's plan to level up the country's regions. In June 2021, King's Lynn was awarded a £25m Town Deal by government to deliver a range of programmes and projects that will result in economic productivity through urban regeneration, planning and land use, skills and enterprise infrastructure and connectivity. The £25m Town Deal award was based upon the **Town Investment Plan (TIP)** which was submitted to government in October 2020 and subsequently updated in February 2021. On 24th August 2021, Cabinet endorsed seven projects agreed by the Town Deal Board under the Town Deal for Kings Lynn, in the Council's capacity as the accountable body.

The **King's Lynn Town Deal Board (KLTDDB)** was established in January 2020 to support the development of the TIP for King's Lynn and identify and agree the funding priorities for a potential Town Deal. The TIP provides the vision and strategy for the framework for planning and implementing the regeneration of King's Lynn over the next ten years.

Central government, as part of the funding conditions, set out that the accountable body (BCKLWN) must establish a Town Board and also stipulated the required membership of the board. BCKLWN let a contract to a firm of management consultants, Metro Dynamic, who facilitated the first few sessions of the establishing and setting up of the Town Board.

The aim of the KLTDDB is to create an effective public-private partnership which brings together the agencies, organisations and business interests with a commitment to the physical regeneration and delivery of the TIP. The KLTDDB has the long term role of overseeing the development of business cases and delivery of the Town Deal by 31st March 2026 and identifying priorities in the TIP for future funding opportunities. The role of the KLTDDB is to:

- develop and agree an evidence-based TIP;
- develop a clear programme of interventions to improve the town's economic growth;
- ensure effective co-ordination between the activities and actions of the agencies and organisations involved in the development and delivery of the TIP; to serve in an advisory capacity to the lead Council (BCKLWN);
- to maintain an overview of the planning, development and delivery of development projects, providing a collective, co-ordinated response to issues, challenges and risks;
- to provide regular updates to partner committees, Boards and Towns Fund team;
- overseeing each step of agreeing a Town Deal, and overseeing compliance with the Heads of Terms Agreement with government;
- agree in principle the Town Deal with government and the Lead Council;
- identify future funding opportunities that align with the vision and priorities set out in the TIP, and work together to secure additional funding;
- to monitor and review the progress of the programme and effectiveness of the actions.

The membership of the KLTDB is made up of representatives from BCKLWN and Norfolk County Council, the local MP, and representatives from local organisations (such as the New Anglia Local Enterprise Partnership (LEP), Chambers of Commerce, College of West Anglia, Queen Elizabeth Hospital), community organisations (such as Community Action Norfolk) and local businesses.

The role of BCKLWN with regards to the Towns Fund is to:

- be the Lead Council and accountable body for the Towns Fund;
- be the main point of contact and liaison with the Department for Levelling Up, Housing & Communities (DLUHC, formerly known as MHCLG) in preparation and negotiation of the Town Deal;
- work in partnership with other government bodies to ensure the TIP aligns with county and regional strategic plans;
- identify and engage the Board in other funding opportunities that would help to deliver the aims and objectives of the TIP;
- define the area the KLTDB will represent on a map;
- uphold the Nolan Principles;
- ensure decisions made by the KLTDB are in accordance with good governance principles;
- publish the KLTDB's governance structure and ways of working, such as a statement on how the Board will engage with stakeholders and agree decisions over time.

In addition, BCKLWN is responsible for:

- supporting the process of developing a good TIP;
- providing technical expertise for business case development;
- developing agreed projects in detail and undertaking any necessary feasibility studies;
- helping develop detailed business cases;
- developing a delivery team, delivery arrangements and agreements;
- liaising with potential private investors in identified local projects and schemes;
- signing the Head of Terms Agreement with government;
- monitoring and evaluating the delivery of individual Towns Fund projects;
- submitting regular monitoring reports to the **Towns Hub**;
- receiving and accounting for the Towns Fund funding allocation; BCKLWN remains the accountable body for all monies received through capacity funding and any other funding that will be allocated from the Towns Fund and will set out how this money is spent.

BCKLWN Cabinet, the Regeneration & Development Panel, Corporate Performance Panel (CPP), and other relevant Panels and Committees, will receive reports on the progress of activities in line with the Council's Constitution.

The **Towns Hub** consists of the central towns team within the Cities & Local Growth Unit (CLGU) in DLUHC, towns-focused colleagues in CLGUs regional teams, and the Towns Fund Delivery Partnership. The central towns team in DLUHC is responsible for ultimately receiving and evaluating the TIPs and business cases and facilitating the signing off of the Heads of Terms. The Towns Fund Delivery Partner Town Coordinators supplement government's role by providing technical support to LAs to develop their TIP and business cases.

The **Town's Fund Steering Group** is a collaborative partnership of key stakeholders. It is responsible for co-ordinating, commissioning and developing the TIP and project business cases under the direction of the Board, ensuring alignment with local, regional, and national strategy. The following groups liaise with the Towns Fund Steering Group:

- West Norfolk Transport & Infrastructure Steering Group – informs priority interventions to be appraised as part of the investment planning process;
- Skills Working Group – as above;
- TIP Project Team – to inform and develop priority interventions;
- Youth Forum
- St. George's Guildhall Complex & Creative Hub Advisory Group
- Guildhall Complex & Creative Hub Task Group
- St. George's Guildhall Complex & Creative Hub Community & Stakeholder Group
- Town Centre Repurposing & Public Realm Group.

The **Kings Lynn Town Deal Local Assurance Framework** (KLTDLAF) (approved by Cabinet in August 2021) sets out the governance and decision-making structure of the KLTDDB in relation to the Towns Fund. Sub-groups have been established to develop the detail of each project business case and to report progress to the KLTDDB. The Board will approve each business case, ensuring that they align with the TIP and have been developed with engagement with local communities and businesses. The Board will receive reports on progress, key milestones and any issues/risks identified during the development of the business cases.

The **Town Deal Programme Board** (a BCKLWN led board consisting of senior managers from BCKLWN, NCC and LEP, and chaired by the BCKLWN Chief Executive) is responsible for approving business cases on behalf of the accountable body and monitor and manage the delivery of the Town Deal. It will be supported by a **Programme Delivery Team** based in the Regeneration Service Area. As at August 2021, the following Towns Fund projects had been approved by government which the KLTDDB could prioritise for funding under the signed Heads of Terms offer:

- Town Centre Repurposing
- Kings Lynn Youth & Retraining Pledge
- Town Centre Public Realm
- St. George's Guildhall Complex refurbishment
- Active & Clean Connectivity
- Riverfront Regeneration
- Multi User Community Hub (MUCH).

The **Town Fund Delivery Plan** will set out the resources, programme and key milestones for each intervention which the Town Deal Programme Board will monitor progress against.

The KLTDDB will oversee the development of full business cases for each of the TIP projects. The business case development will be carried out by a Project Manager supported by the Programme Delivery Team. The process will be managed by the Town Deal Programme Manager who will provide progress reports to the KLTDDB. Independent appraisal of the business cases will be carried out prior to submission to government; once a project has been approved by the DLUHC, it will move onto the delivery stage. BCKLWN will be responsible for the day to day delivery and making operational decisions. The KLTDDB will be responsible for strategic programme decisions and overseeing delivery of the

programme, monitoring and evaluating each project and compliance with Head of Terms Agreement with government.

As at 8th June 2022, as reported to Cabinet, of the above seven projects within the Town Deal, two have had business cases completed, submitted and agreed by government, allowing delivery to commence in March 2022. These are the Youth & Retraining Pledge and the Public Realm project. The remaining five projects have not yet had the business case process completed; Cabinet were asked to approve adjustments to funding profile and the number of projects to be submitted as final business cases. Four of the projects (MUCH, Guildhall, Active & Clean Connectivity and Riverfront Regen) had proposed changes and revised TD allocations made against each one; the remaining project (**Town Centre Re-Purposing**) was removed from the programme, with some of its funding, outcomes and outputs reallocated to the MUCH project.

Updates at key points for projects reaching appropriate stages have been taken to the relevant Policy Review & Development Panels (R&D and CPP); Member briefings were given on all Town Deal projects in Feb 2022 and on governance arrangements/process in March 2022. The TD Programme Board, chaired by the Chief Executive, has received regular updates on progress and to ensure that the KLTDLAF is being complied with. The KLTDDB meet every month to ensure programme oversight and management.

As reported to Cabinet on 8th June 2022, the total TDF programme cost is £37,056,707, with £25m funding from the Town Deal Fund, and the remaining £12,056,707 in “match funding”, covering the following six projects:

- Youth Re-Training Pledge – total project cost £479,967 (£442,000 from TDF and £37,967 from match funding).
- Multi-User Community Hub (MUCH) – total cost £12,400,000 (£7,400,000 TDF and £5,000,000 match).
- St. George’s Guildhall & Creative Hub – total cost £12,174,091 (£8,097,181 TDF and £4,076,910 match).
- Active & Clean Connectivity – total cost £6,267,625 (£4,232,876 TDF and £2,034,750 match).
- Riverfront Regeneration – total cost £5,004,023 (£4,178,943 TDF and £825,080 match).
- Town Centre Public Realm – total cost £327,000 (£245,000 TDF and £82,000 match).
- Included within the TDF of £25m are programme management costs of £404,000.

The **Towns Fund Delivery Partner “Match Funding Guidance”** states that typically, the TFDP would anticipate co-funding sitting alongside Towns Fund monies to deliver the interventions proposed, and where this co-funding equals the contribution made by the Towns Fund this would be denoted as “match funding”.

2. Proposal

To note the contents of this report and forward any comments to Internal Audit to form part of the overall reporting of the internal audit of the Towns Fund due in quarter 4 of the 2022/23 annual internal audit plan.

3. Issues for the Panel to Consider

None.

4. Corporate Priorities

The Towns Fund and its related projects encompass the Corporate Business Plan's "vision", **West Norfolk is a place where:**

- businesses and people can flourish
- communities are active and healthy
- residents and visitors can access fulfilling cultural, leisure and sporting activities
- a good quality of life and environment are available to all

As part of our vision, we're committed to ensuring equality for all residents of and visitors to west Norfolk, and to its employees.

The Towns Fund and its related projects furthermore encompass all 6 of the Corporate Business Plan priorities and objectives:

1. Focusing on delivery

- set a Medium-Term Financial Strategy to fund council services by a prudent mix of investment, services and tax income, while maintaining adequate reserves
- develop and increase the range and effectiveness of the Council's approach to communicating and engaging with employees, businesses, local communities and visitors
- be attentive to our customer and community needs

2. Delivering growth in the economy and with local housing

- develop our town centres and the rural offering; recognised as great places to live, visit and invest into
- deliver the Local Plan

3. Protecting and enhancing the environment including tackling climate change

- deliver on our commitment to be carbon neutral by 2035, or earlier, by implementing the council's carbon reduction strategy and encourage and collaborate with our partners, communities and local businesses to reduce their environmental impact

4. Improving social mobility and inclusion

- assist our residents to maximise their opportunities by accessing the support and services they are entitled to
- ensure the Council participates in a range of initiatives which support the development of skills in and pathways to work for local people

5. Creating and maintaining good quality places that make a positive difference to people's lives

- target littering and fly-tipping.
- maintain standards for open and green spaces.

6. Helping to improve the health and wellbeing of our communities

- improve and develop the quality of local sport and leisure facilities.
- work with our partners to improve community cohesion and reduce crime, the fear of crime and anti-social behaviour

5. Financial Implications

None.

6. Any other Implications/Risks

None.

7. Equal Opportunity Considerations

None.

8. Environmental Considerations

None.

9. Consultation

None.

10. Conclusion

Internal Audit to make the relevant recommendations resulting from the Towns Fund audit and establish agreed actions and deadlines with relevant responsible officers.

11. Background Papers

A wide range of documentation has been reviewed to form this report and the wider internal audit of the Towns Fund. Attached are the findings and recommendations (Appendix A) as well as a compliance checklist against the Towns Fund Guidance (Appendix B).

Findings, Risks and Recommendations

Summary of Key Control Issues and Risks

The key control issues (*and risks*) identified in the audit review are:

- The TDB Terms of Reference do not refer to some elements of the role and responsibility of the TDB as set out in the Government's Towns Fund Guidance at 4.10, such as undertaking Environmental Impact Assessments (EIAs) and complying with the Equality Act (*the TDB fail to meet the Government's requirements*).
- The role and responsibilities of the Lead Council acting as the Accountable Body (BCKLWN), as listed in the TDB Terms of Reference, do not refer to the Government requirement that the Lead Council undertake EIAs or Public Sector Equalities Duties, as per the Towns Fund Guidance at 4.10 (*the TDB fail to meet the Government's requirements*).
- The Towns Fund Guidance and Prospectus require that all tiers of local government should be represented on the TDB. However, the TDB does not include representatives from those local Parish Councils which lay within the Town Deal Boundary Map (*the TDB fail to meet the Government's requirements*).
- The Towns Fund Guidance says that it is important to ensure a balance of views are heard and to create opportunities for fresh perspectives and challenge, so membership could extend to those with other specific expertise, such as clean growth (4.9). However, only one of the local businesses has any connection to clean growth (*the TDB fail to meet the Government's requirements*).
- An Action Plan/Log is not used to record agreed actions arising from TDB meetings. From review of the TDB minutes, there is a lack of evidence of all actions being implemented (*Issues arising during TDB meetings are not identified and resolved*).
- From review of the TDB Board Members' declaration of interests, one Member's completed form could not be accessed, and another Member's declaration form was more than a year old. Under the Code Of Conduct, each Board Member is required to update their declaration of interests form on an annual basis. (*TDB Board Members declaration of interests are out of date*).
- On occasion, there is a delay of several months between the TDB Board Member completing their declaration of interests form and it being received by the Monitoring Officer (*TDB Board Members declaration of interests are out of date*).
- The TDB's Register of Member's Interests, as published on the Vision King's Lynn website, is out of date and has not been updated to reflect the current membership of the TDB (*TDB Board Members' declaration of interests is out of date*).
- Lack of evidence of gifts or hospitality being declared by TDB Board Members. Members are not required to submit an annual declaration relating to gifts and hospitality (*gifts and hospitality not being declared by Members*).
- A Register of Gifts & Hospitality for the TDB is not held, due to Members not declaring any gifts or hospitality (*no record maintained of gifts and hospitality offered or received by Members*).

Findings, Risks and Recommendations

Summary of Key Recommendations

The following recommendations are made:

- The TDB's Terms of Reference should be updated to include all of the Government's requirements included in the Towns Fund Guidance, such as undertaking EIAs and complying with the Equality Act.
- The TDB's Terms of Reference relating to the role of the Lead Council and Accountable Body should be revised to include reference to undertaking EIAs and Public Sector Equalities Duties.
- In accordance with the Government's Towns Fund Guidance and Prospectus, the TDB should include representatives from those local Parish Councils which lay within the Town Deal Boundary.
- Consideration should be given to expanding the number and range of local businesses included as TDB Board Members and including at least one more business with experience in clean growth.
- An Action Log/Plan should be maintained recording all actions identified at TDB meetings; it should include the agreed action, the officer responsible, the due date and the date the action was implemented.
- All TDB Board Members should be required to submit a declaration of interests form on an annual basis to the Monitoring Officer.
- TDB Board Members should be reminded of the need to submit their completed declaration of interests form to the Monitoring Officer promptly so that their declaration of interests can be updated in a timely manner.
- The TDB's Register of Members' Interests should be updated.
- A Register of Gifts & Hospitality for the TDB should be maintained by the Monitoring Officer.

Findings, Risks and Recommendations

Rec. no.	Finding / Risk	Recommendation
1.	<p><u>Finding</u> The Towns Fund Guidance, published in June 2020, details the set-up requirements set by Government. Paragraphs 4.5-4.14 detail the requirements for “Running a Town Deal Board”. It states that the TDB is responsible for producing the Town Investment Plan (TIP), putting forward suitable projects which align with the objectives of the Towns Fund, and for overseeing compliance with the Heads of Terms Agreement with Government.</p> <p>It is noted that the TDB Terms of Reference does not refer to the following which are included as part of the role and responsibility of the TDB in the Towns Fund Guidance (paragraph 4.10):</p> <ul style="list-style-type: none"> • embedding arrangements in local plans and undertaking Environmental Impact Assessments and fulfilling duties on public authorities under the Equalities Act, in particular, and the public sector equality duty; • ensuring communities voices are involved in shaping design and decision making; • ensuring diversity in its engagement with local communities and businesses. <p><u>Risk</u> The TDB fails to meet the Government’s set up requirements.</p>	<p>The TDB’s Terms of Reference should be revised to include the following (as per the Towns Fund Guidance issued by Government):</p> <ul style="list-style-type: none"> • embedding arrangements in local plans; • undertaking Environmental Impact Assessments; • fulfilling duties on public authorities under the Equalities Act and the public sector equality duty; • ensuring local communities are involved in shaping design and decision making at each phase of development; • ensuring diversity in its engagement with local communities and businesses.
2.	<p><u>Finding</u> The role and responsibilities of the Lead Council acting as the Accountable Body (BCKLWN), as listed in the TDB Terms of Reference, do not refer to the Government requirement that the Lead Council undertake any required Environmental Impact Assessments or Public Sector Equalities Duties (as per the Towns Fund Guidance, paragraph 4.10).</p> <p><u>Risk</u> The TDB fails to meet the Government’s set up requirements.</p>	<p>The TDB’s Terms of Reference relating to the role of the Lead Council and Accountable Body should be revised to include reference to undertaking any required Environmental Impact Assessments and/or Public Sector Equalities Duties (as per the Towns Fund Guidance issued by Government, paragraph 4.10).</p>

Findings, Risks and Recommendations

Rec. no.	Finding / Risk	Recommendation
3.	<p><u>Finding</u> The Government's Towns Fund Guidance and Prospectus require that all tiers of local government should be represented on the TDB. However, the TDB does not include representatives from those local Parish Councils which lay within the Town Deal Boundary Map.</p> <p>From review of the Town Deal Boundary Map posted on the Vision King's Lynn website, it is noted that the Town Deal Boundary covers an area larger than just the Non-Civil Parish of King's Lynn. It includes the Parishes of North Wootton, and at least parts of the Parishes of North Runcton, West Winch and Wiggshall St. Germans. The TDB Board membership includes representatives of local government from BCKLWN and NCC but does not include any representation from any of the local Parish Councils which lay within the Town Deal Boundary.</p> <p><u>Risk</u> The TDB fails to meet the Government's set up requirements.</p>	<p>In accordance with the Government's Towns Fund Guidance and Prospectus, the TDB should include representatives from those local Parish Councils which lay within the Town Deal Boundary.</p>
4.	<p><u>Finding</u> The Government's Towns Fund Guidance says that it is important to ensure a balance of views are heard and to create opportunities for fresh perspectives and challenge, so membership could extend to those with other specific expertise, such as clean growth (4.9).</p> <p>Of the original 18 local businesses included as members of the TDB, when it was set up in 2020, only one, Greenworld, could be said to have connections to the "clean growth" agenda. Currently, only four local businesses are represented on the TDB.</p> <p><u>Risk</u> The TDB fails to meet the Government's set up requirements.</p>	<p>Consideration should be given to expanding the number and range of local businesses included as TDB Board Members and including at least one more business with experience in clean growth.</p>
5.	<p><u>Finding</u></p>	<p>An Action Log/Plan should be maintained recording all actions identified at</p>

Findings, Risks and Recommendations

Rec. no.	Finding / Risk	Recommendation
	<p>Issues identified during the course of TDB meetings are recorded in the minutes. Where necessary, an action is recorded in the minutes (in bold) identifying the action required and the officer responsible for implementing the action. However, from review of the TDB minutes, it is noted that a due date by when the action should be implemented by is not included. Actions from previous meetings are recorded as Matters Arising in the minutes; an Action Plan/Log is not used to record agreed actions. From reading through the minutes, it is not clear whether all of the identified actions arising from previous meetings have actually been implemented.</p> <p><u>Risk</u> Issues arising during the course of TDB meetings are not identified and resolved.</p>	<p>TDB meetings. It should include the agreed action, the officer responsible, the due date and the date the action was implemented. This would make it easier to track the progress of agreed actions and ensure that all actions are implemented.</p>
6.	<p><u>Finding</u> From review of the TDB Board Members' declaration of interests on the Vision King's Lynn website, it was noted that the declaration form submitted by one Member could not be accessed, and another Member's declaration form was more than a year old. Under the Code Of Conduct, each Member of the TDB is required to update their declaration of interests form on an annual basis.</p> <p>Guidance for the completion of the declaration of interest form is contained within the form itself. Furthermore, members of the board have now been notified to contact the Monitoring Officer if they are unsure about the requirements of the form. The forms were based upon the Borough Council forms already in place (as per 2.19 of the Towns Fund Prospectus – November 2019)</p> <p><u>Risk</u> TDB Board Members declaration of interests on the Vision King's Lynn website are out of date.</p>	<p>All TDB Board Members should be required to submit a declaration of interests form on an annual basis to the Monitoring Officer.</p>
7.	<p><u>Finding</u> It is noted that on occasion there is a delay of several months between the TDB Board Member completing their declaration of interests form and it being received</p>	<p>TDB Board Members should be reminded of the need to submit their completed declaration of interests form to the Monitoring Officer promptly so that their declaration of interests on the Vision King's Lynn website can be</p>

Findings, Risks and Recommendations

Rec. no.	Finding / Risk	Recommendation
	<p>by the Monitoring Officer.</p> <p><u>Risk</u> Vision King's Lynn website is not updated in a timely manner with TDB Board Members' declaration of interests.</p>	updated in a timely manner.
8.	<p><u>Finding</u> The TDB's Register of Member's Interests, as published on the Vision King's Lynn website, is out of date and has not been updated to reflect the current membership of the TDB. The register records the date when the completed declaration form was received by the Monitoring Officer from each Member. The latest date on the register stated that a completed declaration of interest form was received on 11/12/20. IA notified the Monitoring Officer that the register is out of date, who then agreed to update the register for the current membership.</p> <p><u>Risk</u> TDB Board Members' declaration of interests are out of date.</p>	The TDB's Register of Members' Interests should be updated to reflect the current membership of the TDB.
9.	<p><u>Finding</u> There is no evidence of gifts or hospitality being declared by TDB Board Members since the inception of the Board. TDB Board Members are not currently required to submit an annual declaration relating to gifts and hospitality.</p> <p><u>Risk</u> TDB Board Members fail to notify the Monitoring Officer of any gifts or hospitality offered or received.</p>	TDB Board Members should be reminded of the requirement to inform the Monitoring Officer of any gifts or hospitality offered or received. To assist in raising awareness of the need to declare gifts and hospitality, the Monitoring Officer should require TDB Board Members to submit an annual declaration return relating to gifts and hospitality.
10.	<p><u>Finding</u> Discussion with the Monitoring Officer identified that the TDB does not have a Register of Gifts & Hospitality; one has not been set up because the Monitoring Officer has not received any notification from TDB Board Members of gifts or hospitality having been offered or received.</p>	A Register of Gifts & Hospitality for the TDB should be maintained by the Monitoring Officer.

Findings, Risks and Recommendations

Rec. no.	Finding / Risk	Recommendation
	<u>Risk</u> No record maintained of gifts or hospitality received by TDB Board Members.	

Management response to Appendix A:

No	Recommendation	Response
1	<p>The TDB's Terms of Reference should be revised to include the following (as per the Towns Fund Guidance issued by Government):</p> <ul style="list-style-type: none"> • embedding arrangements in local plans (where appropriate); • undertaking Environmental Impact Assessments; • fulfilling duties on public authorities under the Equalities Act and the public sector equality duty; • ensuring local communities are involved in shaping design and decision making at each phase of development; • ensuring diversity in its engagement with local communities and businesses. 	<p>Whilst these were not included in the Town Board Terms of reference, these have, where appropriate, still been carried out as part of the development of the business cases.</p> <p>It will be a matter for the Town Board to determine if they wish to revise their terms of reference, taking account of the position that we are now entering delivery phase.</p>
2	<p>The TDB's Terms of Reference relating to the role of the Lead Council and Accountable Body should be revised to include reference to undertaking any required Environmental Impact Assessments and/or Public Sector Equalities Duties (as per the Towns Fund Guidance issued by Government, paragraph 4.10).</p>	<p>Whilst not stated explicitly in the Terms of Reference, these have been undertaken by the Borough Council where required on a Project.</p> <p>It will be a matter for the Town Board to determine if they wish to revise their terms of reference, taking account of the position that we are now entering delivery phase.</p>
3	<p>In accordance with the Government's Towns Fund Guidance and Prospectus, the TDB should include representatives from those local Parish Councils which lay within the Town Deal Boundary.</p>	<p>The decision taken at the time was that including representation at Parish level would have, due to the position of King's Lynn being unparished, resulted in a distorted misrepresentation on the Board from parishes outside King's Lynn town (but within the Town Deal boundary) and the clear direction being given from Central Government was to not</p>

		<p>have too much public sector representation on the Board compared to the private sector.</p> <p>The Towns Fund guidance made clear that it was up to each town to develop a Town Board that was relevant to their context rather than having to take everything on board as a blueprint, recognising that each town will have a different situation.</p> <p>It will be a matter for the Town Board to determine if they wish to amend their membership at this stage, taking account of the position that we are now entering delivery phase.</p>
4	<p>Consideration should be given to expanding the number and range of local businesses included as TDB Board Members and including at least one more business with experience in clean growth</p>	<p>Extensive engagement, supported by the external consultant, was carried out to attract as many private sector businesses to the Board as possible, but ultimately, we were in the hands of those who wished to participate. There was more private sector representation on the Board initially. A review of the board makeup was undertaken, led by the Chair following engagement with Chairs of other Town Boards and it was determined that the size of the Board should be downsized due to poor attendance and lack of engagement, to create a core remaining group who fully committed and engaged on taking the Town Deal forwards.</p> <p>The current Town Board has had facilitated sessions with a towns fund governance advisor funded by Central Government, to review the functioning of the Town Board, and has received extremely positive feedback on the effectiveness of the King's Lynn Town Board compared with those elsewhere in the country.</p>
5	<p>TDB meetings. It should include the agreed action, the officer responsible, the due date and the date the action was implemented. This would make it easier to track the progress of agreed actions and ensure that all actions are implemented.</p>	<p>These have been captured so far in the Matters Arising document but agree an Action Log would be a preferred option. This ultimately is a decision for the Towns Board.</p>

6	All TDB Board Members should be required to submit a declaration of interests form on an annual basis to the Monitoring Officer.	The last time forms were asked to be refreshed was March/April 2022. The governance documents require that Towns Board members <u>review</u> their forms on an annual basis and notify of any changes – therefore if there are no changes then there will be no new form. Any changes to require a new form on an annual basis would have to be approved by the Towns Board.
7	TDB Board Members should be reminded of the need to submit their completed declaration of interests form to the Monitoring Officer promptly so that their declaration of interests on the Vision King’s Lynn website can be updated in a timely manner.	There are standing DOI sections on all meeting agendas at which Members are reminded of their DOI obligations, the Monitoring Officer attends most Towns Board meetings for the purpose of providing any advice on such matters. We do therefore consider the Towns Board Members well reminded of their DOI obligations and the last time forms were asked to be refreshed was March/April 2022.
8	The TDB’s Register of Members’ Interests should be updated to reflect the current membership of the TDB	Agreed and this has been actioned
9	TDB Board Members should be reminded of the requirement to inform the Monitoring Officer of any gifts or hospitality offered or received. To assist in raising awareness of the need to declare gifts and hospitality, the Monitoring Officer should require TDB Board Members to submit an annual declaration return relating to gifts and hospitality.	Training has been added to the 30 September Town Board on gifts & hospitality and will include capturing any historic gifts/hospitality.
10	A Register of Gifts & Hospitality for the TDB should be maintained by the Monitoring Officer.	A Register of Gifts & Hospitality will be created after the training with Town Board.

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
4.5	Town Deal Boards are responsible for producing Town Investment Plans, including putting forward suitable projects which align with the objectives of the Towns Fund, and for overseeing compliance with the Heads of Terms Agreement with government.	<p>As stated in the TDB ToR, the role of TDB is:</p> <ul style="list-style-type: none"> • developing an evidence-based TIP; • planning, developing and delivering projects in accordance with the Towns Fund; • overseeing compliance with the Heads of Terms Agreement with government. 	Met	N/A
4.7	A Town Deal Board should operate in a transparent and objective way for the benefit of the town it represents. We set out here and at Annex D governance requirements – this should fit within and complement existing arrangements for governance, assurance, audit etc. in the local authority and does not need to be wholly separate.	<p>The Kings Lynn Town Deal Local Assurance Framework (LAF) (approved by Cabinet in August 2021) sets out the governance and decision-making structure of the TDB in relation to the Towns Fund. Sub-groups have been established to develop the detail of each project business case and to report progress to the TDB.</p> <p>The Board will approve each business case, ensuring that they align with the TIP and have been developed with engagement with local communities and businesses. The Board will receive reports on progress, key milestones and any issues/risks identified during the development of the business cases.</p>	Met	N/A
4.8	The Town Deal Board's membership should reflect the diversity of the town and surrounding area. The Towns Fund and particularly the board had to be set up by the end of January 2020, the Towns Fund Guidance was not issued until June 2020, prior to this the project team in consultation with Metro Dynamics set the Town's Deal Board membership as per the Towns Fund Prospectus published in November 2019. The Towns Fund Prospectus stated that membership of Town Deal Boards must comprise:	<p>The original membership of the TDB, as taken from the Register of Declaration of Interests from Dec 2020, included representatives from the following organisations:</p> <ul style="list-style-type: none"> • private sector chair (the CTO of Merxin); • Local government – three BCKLWN councillors and the Chief Executive; an NCC councillor; • local MP; 	Partially Met	In accordance with the Government's Towns Fund Guidance and Prospectus, the TDB should include representatives from those local Parish Councils which lay within the Town Deal

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
63	<p>2. Towns Fund Prospectus states 2.21:</p> <p>2.21 Town Deal Boards must include:</p> <ul style="list-style-type: none"> • Other tiers of Local Government: We expect all tiers of local government to be a part of the Town Deal Board: <ul style="list-style-type: none"> - Town and parish councils: Town and parish councils have an important role to play in convening stakeholders and providing localised perspective, as they are closely connected to the communities they serve. - Upper-tier authorities: bring crucial understanding of the important role towns play within the wider regional economy – as well as strategic leadership and powers that will be of value to the partnership. - Mayoral Combined Authorities and Combined Authorities: provide a strategic overview of an area and many hold powers that will be critical to delivering the Towns Fund e.g. transport. • Members of Parliament: The MP (or MPs) representing the town should be invited to engage in the process of designing and agreeing the Town Investment Plan. • Local businesses and investors: Driving economic growth and building productivity will require entrepreneurship and investment from business. It will therefore be essential to draw on their leadership and capability to help 	<ul style="list-style-type: none"> • Local Enterprise Partnership – New Anglia LEP; • Communities – AWN, Community Action Norfolk, Freebridge Community Housing; • Business Improvement District – Discover King's Lynn; • Government Bodies – NHS, DWP; • Anchor Institutions – College of West Anglia, QEH, Norfolk Museum Service; • Local Business Representatives – a total of 18 representatives from local businesses; • Business Network Organisations – Norfolk Chamber of Commerce. <p>There were a total of 37 representatives on the original Board. The membership was refreshed and updated in October and November 2021, following which the membership was reduced to the current number of 16. This includes four members representing local businesses, down from 18.</p> <p>The ToR is largely representative of local stakeholders / partnerships, in accordance with the Government's Towns Fund Guidance and Prospectus, with the exception of having an appropriate level of local government representation:</p> <ul style="list-style-type: none"> • local government members, BCKLWN Council officers, NCC members and the local MP are largely representative of local tiers of government. However, the TDB does not include 		Boundary.

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
64	<p>understand challenges and develop the key proposals. Existing investors currently active in the area also have an important role to play; their experience of driving development in specific regions should be drawn on to identify the best uses of public and private funds. We expect to see representation on Town Deal Boards through large employers and SMEs.</p> <ul style="list-style-type: none"> • Local Enterprise Partnerships (LEPs): LEPs bring a strong specialism in economic development strategy, business engagement, and the local skills system – through Skills Advisory Panels – ensuring Town Investment Plans are informed by local economic strategies e.g. Strategic Economic Plans and Local Industrial Strategies. • Communities: Each town will decide how best to involve their local community, building on the MyTown campaign. Communities should have a meaningful role in decision-making for the future of their town, and Town Deal Boards should draw on the local knowledge and insight that communities can provide on the barriers to driving local growth and productivity. We expect this to be achieved by including community representatives from prominent local civic and faith organisations in the governance structure, such as representatives from local community forums, voluntary and community sector organisations, or Councils of the Voluntary Sector. • Communities are more likely to work to implement solutions, and be able to take 	<p>representatives from those local Parishes which lay within the Town Deal Boundary Map.</p> <ul style="list-style-type: none"> • LEP, Chambers of Commerce, Discover King's Lynn, College of West Anglia, and QEH are representative of relevant local organisations. • Community Action Norfolk and the Diocese of Norwich are representative of community organisations. • Merxin, Greenyard Frozen, Uptech and Hawkins Ryan Solicitors are representative of local businesses. 		

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
65	<p>advantage of the economic opportunities resulting from government investment if they engaged early and throughout the process of designing and delivering the Town Investment Plan.</p> <p>Although 2.14 – 2.15 of the Towns Fund Prospectus (November 2019) outlines:</p> <p><i>The Lead Council should define the area the Town Deal Board will represent on a map. As a default, this should use the boundaries defined by the Office for National Statistics in their recent article. This is important so that local communities and other bodies understand where the area of benefit will be. We expect that the geographical area should be continuous.</i></p> <p><i>Any changes to the ONS boundaries will need to be discussed with government to ensure it includes, as part of the area, the town that was originally selected.</i></p> <p>2.22 Town Deal Boards may also include (either in their governance structure or in their engagement activity):</p> <ul style="list-style-type: none"> • Business Improvement Districts (BIDs): where they exist, BIDs work to improve commercial areas through additional services. They have close relationships with their business members and play a strategic role in place shaping • Jobcentre Plus: provide information on working 			

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
09	<p>with people furthest from the labour market, and work closely with the voluntary and third sector to support people into work</p> <ul style="list-style-type: none"> • Anchor institutions: have strong convening power, as well as a significant role in the local economy. They may include: <ul style="list-style-type: none"> - The wider business community - Universities and Further Education colleges - Academies and Schools - Hospitals - Development corporations - Local sports teams - Cultural and creative institutions - Housing sector including housing developers and housing associations • Arms-length bodies and other non-departmental government agencies: Such as Homes England, the Environment Agency, and the Historic England have expertise in delivering interventions, and existing place-based networks across the country, which can bring local expertise, as well as the ability to engage with issues at a regional level. • Other private investors and developers: national or international private investors and developers should be engaged early to understand their requirements for investment and identify the best use of public and private funding. <p>The town of King's Lynn itself is a non-civilised parish, as such the</p>			

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
	<p>boundary for the funding is different to the non-civilised parish of King's Lynn boundary. The original town is included with the Towns Fund boundary, as well as parts of the local parishes of North Wootton, North Runcton, West Winch and Wiggshall St. Germans.</p> <p>Further to this the Towns Fund Prospectus, November 2019 states:</p> <p>2.25 While we recognise that each place is different, Town Deal Boards should appoint a Chair. Where appropriate we expect this Chair to be from the private sector.</p> <ul style="list-style-type: none"> • 			
4.9 67	<p>It will be important to ensure a balance of views are heard and to create opportunities for fresh perspectives and challenge, so membership could extend to those with other specific expertise, such as clean growth.</p>	<p>Of the original 18 local businesses included as members of the TDB, when it was set up in 2020, only one, Greenworld, could be said to have connections to the "clean growth" agenda. Currently, only four local businesses are represented on the board.</p>	Partially Met	<p>Consideration should be given to expanding the number and range of local businesses included as board members, and including at least one more business with experience in clean growth.</p>
4.10	<p>All Town Deals will need to have an Accountable Body which will be a council through which funding will flow. The Lead Council for the Town Deal (the Unitary Authority, Metropolitan Council, District Council or Borough Council for the town) will determine the appropriate Council to act as the Accountable Body (the Lead Council may take on this role or nominate an upper tier Authority where more suitable). Lead Councils have a seat on the board and take responsibility for ensuring that decisions are made by the Town Deal Board in accordance with good governance principles.</p>	<p>BCKLWN are the Lead Council for the Town Deal and also act as the Accountable Body.</p>	Met	N/A
4.10	Town Deal Board Roles & Responsibilities - The Town Deal Board	As detailed in the ToR, the role of the TDB is to:	Partially	The TDB ToR should be

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
68	<p>will sign off each stage of a Town Investment Plan and Town Deal. The Board is responsible for:</p> <ul style="list-style-type: none"> • Upholding the Seven Principles of Public Life (the Nolan Principles) • Developing and agreeing an evidence-based Town Investment Plan • Establishing a clear programme of interventions • Embedding arrangements in local plans (where appropriate) and undertaking Environmental Impact Assessments and fulfilling duties on public authorities under the Equalities Act, in particular, and the public sector equality duty. • Coordinating resources and engaging stakeholders • Ensuring communities' voices are involved in shaping design and decision making at each phase of development • Ensuring diversity in its engagement with local communities and businesses • Helping develop detailed business cases • Overseeing each step of agreeing a Town Deal, and overseeing compliance with the Heads of Terms Agreement with government. 	<ul style="list-style-type: none"> • develop and agree an evidence-based TIP; • develop a clear programme of interventions to improve the town's economic growth; • ensure effective co-ordination between the activities and actions of the agencies and organisations involved in the development and delivery of the TIP; to serve in an advisory capacity to the lead Council (BCKLWN); • to maintain an overview of the planning, development and delivery of development projects, providing a collective, co-ordinated response to issues, challenges and risks; • to provide regular updates to partner committees, Boards and Towns Fund team; • overseeing each step of agreeing a Town Deal, and overseeing compliance with the Heads of Terms Agreement with government; • agree in principle the Town Deal with government and the Lead Council; • identify future funding opportunities that align with the vision and priorities set out in the TIP, and work together to secure additional funding; • to monitor and review the progress of the programme and effectiveness of the actions. <p>The TDB ToR includes a section on Board Member Conduct which states that all members shall follow the Nolan Principles.</p>	Met	<p>revised to include the following (as per the Towns Fund Guidance issued by Government):</p> <ul style="list-style-type: none"> • embedding arrangements in local plans; • undertaking Environmental Impact Assessments; • complying with the Equalities Act; • ensuring local communities are involved in shaping design and decision making at each phase of development; • ensuring diversity in its engagement with local communities and businesses.
4.10	Town Deal Board Chair Roles & Responsibilities:	The TDB ToR details the role of the TDB Chair. The role of	Met	N/A

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
69	<ul style="list-style-type: none"> • Upholding the Seven Principles of Public Life (the Nolan Principles) • Leading the Board in achieving its objectives, maintaining an overview of activity, and championing and supporting partnership working • Ensuring that decisions are made by the Board in accordance with good governance principles • Signing the Head of Terms Agreement with government. 	<p>the Chair is to lead the TDB in shaping the vision for the town as well as defining the strategy and steps that need to be taken to achieve that vision. The key responsibilities of the post are to:</p> <ul style="list-style-type: none"> • Provide strategic and dynamic leadership for the Board; • Lead the Board in developing and then implementing the Town Investment Plan; • Ensure that all sectors on the Board are actively engaged; • Run meetings effectively and fairly ensuring the Board adheres at all times to high standards of ethics and governance; • Exert a casting vote in Board Decisions if circumstances so require; • Upholding the Seven Principles of Public Life (the Nolan Principles); • Signing the Head of Terms Agreement with Government. 		
4.10	<p>Lead Council (acting as or with the Accountable Body) Role & Responsibilities:</p> <ul style="list-style-type: none"> • Upholding the Seven Principles of Public Life (the Nolan Principles) • Developing a delivery team, delivery arrangements and agreements • Ensuring that decisions are made by the board in accordance with good governance principles 	<p>The role of BCKLWN with regards to the Towns Fund is to:</p> <ul style="list-style-type: none"> • be the Lead Council and accountable body for the Towns Fund; • be the main point of contact and liaison with the Department for Levelling Up, Housing & Communities (DLUHC, formerly known as MHCLG) in preparation and negotiation of the Town Deal; • work in partnership with other government 	Partially Met	The TDB ToR relating to the role of the Lead Council and Accountable Body should be revised to include reference to undertaking any required Environmental Impact Assessments

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
70	<ul style="list-style-type: none"> • Ensuring transparency requirements are met – through publication of information on their website or a Town Deal specific website (where further reference is made in this guidance to publication on a Lead Council's website this includes Town Deal specific websites) • Developing agreed projects in detail and undertaking any necessary feasibility studies • Undertaking any required Environmental Impact Assessments or Public Sector Equalities Duties • Helping develop detailed business cases • Liaising with potential private investors in identified local projects and schemes • Signing the Head of Terms Agreement with government • Monitoring and evaluating the delivery of individual Towns Fund projects • Submitting regular monitoring reports to Towns Hub • Receiving and accounting for the Town's funding allocation. 	<p>bodies to ensure the TIP aligns with county and regional strategic plans;</p> <ul style="list-style-type: none"> • identify and engage the Board in other funding opportunities that would help to deliver the aims and objectives of the TIP; • define the area the KLTDDB will represent on a map; • uphold the Nolan Principles; • ensure decisions made by the KLTDDB are in accordance with good governance principles; • publish the KLTDDB's governance structure and ways of working, such as a statement on how the Board will engage with stakeholders and agree decisions over time. <p>In addition, BCKLWN is responsible for:</p> <ul style="list-style-type: none"> • supporting the process of developing a good TIP; • providing technical expertise for business case development; • developing agreed projects in detail and undertaking any necessary feasibility studies; • helping develop detailed business cases; • developing a delivery team, delivery arrangements and agreements; • liaising with potential private investors in identified local projects and schemes; • signing the Head of Terms Agreement with government; • monitoring and evaluating the delivery of 		and/or Public Sector Equalities Duties.

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
71		<p>individual Towns Fund projects;</p> <ul style="list-style-type: none"> submitting regular monitoring reports to the Towns Hub; receiving and accounting for the Towns Fund funding allocation; BCKLWN remains the accountable body for all monies received through capacity funding and any other funding that will be allocated from the Towns Fund and will set out how this money is spent. <p>The TDB ToR includes a section on Board Member Conduct which states that all members shall follow the Nolan Principles.</p>		
4.11	<p>The Town Deal Board should have suitable governance arrangements that allow members to provide robust challenge, hold delivery partners to account and ensure that the benefits of the Town Deal are achieved. The governance arrangements should cover:</p> <ul style="list-style-type: none"> Roles and responsibilities of the Board Transparency of decision making Details of how the Board will engage with the relevant partners and the community How decisions will be scrutinised How the Board intends to follow the local authority best practice for Committee and Board Secretariat and Governance. 	<p>The Kings Lynn Town Deal Local Assurance Framework (LAF) (approved by Cabinet in August 2021) sets out the governance and decision-making structure of the TDB in relation to the Towns Fund. Sub-groups have been established to develop the detail of each project business case and to report progress to the TDB. The Board will approve each business case, ensuring that they align with the TIP and have been developed with engagement with local communities and businesses. The Board will receive reports on progress, key milestones and any issues/risks identified during the development of the business cases.</p> <p>A requirement of the Town Deal is to implement a Local Assurance Process for the development and sign-off of individual business cases, to be signed-off by S151 Officer and TDB Chair. The purpose of the LAF is to:</p> <ul style="list-style-type: none"> enable accountable decision making 	Met	N/A

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
72		<ul style="list-style-type: none"> • ensure value for money • provide for effective monitoring and evaluation. <p>The LAF outlines the role and responsibilities of:</p> <ul style="list-style-type: none"> • TDB • Town Deal Programme Board • Town Deal Programme Manager • Programme Delivery Team. <p>The LAF includes the ToR and membership of the TD Programme Board.</p> <p>The LAF outlines the governance arrangements relating to the TIP, Heads of Term Agreement, Project Business Cases and the delivery of the TD projects. The LAF states that the TD Programme Board is made up of senior managers, responsible for ensuring that the programme aligns to the wider business of the Council and its policies and procedures. There is representation from specialist areas like legal, finance and communications, they act on behalf of the accountable body and will scrutinise the performance of the TD programme to ensure compliance with Council, MHCLG and Town Fund policies and processes.</p>		
4.12	The membership and governance arrangements (including minutes of meetings and decision logs) of the Town Deal Board should be published on the Lead Council's website.	The membership and governance arrangements (including the agendas and minutes of TDB meetings) are published on the Vision King's Lynn website.	Partially Met	An Action Log/Plan should be maintained recording all actions

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
		<p>Issues identified during the course of TDB meetings are recorded in the minutes. Where necessary, an action is recorded in the minutes (in bold) identifying the action required and the officer responsible for implementing the action. However, a due date by when the action should be implemented by is not included. Actions from previous meetings are recorded as Matters Arising in the minutes; an Action Plan/Log is not used to record agreed actions. From reading through the minutes, it is not clear whether all of the identified actions have been implemented.</p>		<p>identified at TDB meetings. It should include the agreed action, the officer responsible, the due date and the date the action was implemented.</p>
Annex D 3	<p>Annex D provides further detail on the governance expectations, this includes information on the requirements relating to management of conflicts of interest and the publication of information. Annex D includes:</p> <ul style="list-style-type: none"> • Roles and responsibilities; • Code of Conduct & Conflicts of Interest; (see below) • Transparency (see below). <p>Roles and Responsibilities</p> <p>It is important that there are clear roles and responsibilities for oversight of the Town Deal. The Town Deal Board should have a document, published on the Lead Council's website, which clearly sets out the roles and responsibilities and the governance and decision making processes for the Town Deal Board. This should include:</p> <ul style="list-style-type: none"> • Remit of the Board including terms of reference; • Board membership and roles; • Chair/vice-chair term and responsibilities; 	<p>Roles & Responsibilities</p> <p>The TDB ToR, published on the Vision King's Lynn website, details the following:</p> <ul style="list-style-type: none"> • Remit of the Board including terms of reference; • Board membership and roles; • Chair/vice-chair term and responsibilities; • Board structure including sub-committees and reporting arrangements; • Accountable Body arrangements. 	Met	N/A

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
	<ul style="list-style-type: none"> Board structure including sub-committees and reporting arrangements; Accountable Body arrangements. 			
Annex D 74	<p>Code of Conduct & Conflicts of Interest</p> <ul style="list-style-type: none"> All Town Deal Board members should sign up to a code of conduct based on the Nolan Principles. There should be clear processes in place for managing conflicts of interests (both commercial, actual, and potential) in decision making, and this must apply to all involved with the work of the Town Deal Board. The Lead Council should provide guidance on the pecuniary and non-pecuniary interests individuals must declare, outline the process that Board members must follow for declaring interests and explain the process for requesting an exemption. Town Deal Board members should then complete a declaration of interests which will then be held by the Lead Council. This can be in a format already used by the Lead Council or a template can be requested from the Towns Hub named contact. All Board Members should take personal responsibility for declaring their interests before any decision is considered. The Lead Council must record action taken in response to any declared interest. A register of gifts and/or hospitality should be maintained by the Lead Council. 	<p>Code of Conduct & Conflicts of Interest</p> <p>The TDB Code of Conduct, dated April 2021, includes the following:</p> <ul style="list-style-type: none"> the role of the TDB. the Nolan Principles. It states that "in accordance with the Towns Fund Prospectus, when acting in a Board Member capacity, members must be committed to behaving in a manner that is consistent with the 7 Principles of Public Life to achieve best outcome for our residents and maintain public confidence in the actions of the Board". Conflicts of Interests – BCKLWN will maintain a register of interests; all Board Members must complete and return a register of interest form when joining the Board; forms will be published on the BCKLWN website. Board Members must keep the entries in their register of interests up to date by notifying the MO of any changes within 28 days. Board Members must review their form annually and provide notification of any changes. Register of Gifts & Hospitality – Board Members must register in the Register of Members Gifts & Hospitality, held by the MO, any gift or hospitality received or offered in connection with their official duties as a Board Member and the source 	Partially Met	<p>Register of Members' Interests should be updated to reflect the current membership of the Board.</p> <p>All Board Members should be required to submit a declaration of interests form on an annual basis.</p> <p>Board Members should be reminded of the need to submit their completed declaration form to the MO promptly so that their declaration of interests on the VKL website can be updated in a timely manner.</p> <p>A Register of Gifts & Hospitality should be maintained.</p>

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
75		<p>of the gift/hospitality within 28 days of receiving it. Acceptance by Board Members of hospitality through attendance at relevant events, conferences and other Board related activity is acceptable where it is clear the hospitality is corporate rather than personal.</p> <ul style="list-style-type: none"> • Complaint's procedure. • Whistleblowing Policy. <p>Current TDB Members' declaration of interests are up to date and are published on the Vision King's Lynn website, with two exceptions. The declaration form submitted by one Member could not be accessed, and another Member's declaration form was more than a year old.</p> <p>It is noted that on occasion there is a delay of several months between the TDB Board Member completing their declaration of interests form and it being received by the Monitoring Officer.</p> <p>The TDB Register of Member's Interests as published on the Vision King's Lynn website is out of date and has not been updated to reflect the current membership of the TDB. The register records the date when the completed declaration form was received by the MO from each member. The latest date on the register stated that a completed declaration of interest form was received on 11/12/20. IA notified the MO that the register is out of date; the MO has agreed to update the register for the current membership.</p>		<p>Board Members should be reminded of the requirement to inform the MO of any gifts or hospitality offered or received.</p>

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
76		<p>Review of the Board minutes identified that Members' interests where they relate to items under discussion are declared at the start of each Board meeting. For example, the minutes of the meeting on 08/04/22, under section 2 of the agenda (Declarations of Interest) listed the declarations of interest by three Members.</p> <p>At the same meeting, it was agreed that spouses should have their interests also recognised.</p> <p>An action was that each Member to reconfirm that their declaration of interests is up to date or resubmit their revised form as soon as possible.</p> <p>No evidence of gifts or hospitality having been declared by Board Members since the inception of the Board. Discussion with the MO identified that a Register of Gifts & Hospitality does not exist; one has not been set up because the MO has not received any notification from Members of gifts or hospitality having been received.</p>		
Annex D	<p>Transparency</p> <p>In line with the principles of public life, it is important that there is transparency around the operation of the Town Deal Board. Transparent decision making is supported by the publication of information on the Lead Council's website; the following standards are expected to be applied:</p> <ul style="list-style-type: none"> A documented decision-making process outlining the voting rights of the Board to be published; 	<p>Transparency</p> <ul style="list-style-type: none"> The King's Lynn Town Deal LAF details the decision making process followed by the board; Profiles of Board Members are published on the Vision King's Lynn website; TDB ToR states that Board agenda papers are required to be published on the VKL website at least five working days prior to each board meeting; 	Met	N/A

BCKLWN Compliance with Towns Fund Guidance (June 2020) regarding the set-up of a Town Deal Board

Ref. no.	Government's Towns Fund Guidance (June 2020)	Operation of the BCKLWN Town Deal Board (TDB)	Level of Compliance	Recommendations
77	<ul style="list-style-type: none"> • Profiles of Board Members to be published; • All Board papers to be published on the Lead Council's website in advance of the meeting (within 5 clear working days); • To promptly publish draft minutes of meetings on the Lead Council's website following the meeting (within 10 clear working days); • To publish final minutes on the Lead Council's website, once approved by the Board (within 10 clear working days); • Any conflicts of interest reported to be formally noted within the published minutes; • It is important that the Town Deal Board abides by Lead Council governance and finance arrangements when considering private reports, with the default position being that all papers are open to the public. 	<ul style="list-style-type: none"> • TDB ToR states that draft board minutes are required to be circulated promptly to Board Members after each meeting; • TDB ToR states that final board minutes are published on the VKL website once approved. • Any declared conflicts of interest are noted in the Board minutes; • The default position is that all papers are open to the public, unless they contain "exempt" information. 		

FORWARD DECISIONS LIST

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
15 November 2022						
	Staff Pay Award	Key	Council	Leader Exec Dir – D Gates		Public
	Review of Governance of Council Companies	Non	Cabinet	Leader Chief Executive		Public
	Balloon and Lantern report	Non	Cabinet	Corporate Services and Environment Asst Director – M Chisholm		Public
	Corporate Business Plan Monitoring	Non	Cabinet	Leader Asst to C Ex		Public
78	Options for Kaset Skate Park at Lynnsport	Non	Council	Community Asst to C Ex		Private Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
	Waste Contract – Reinvesting Performance Deductions	Non	Cabinet	Environment and Climate Change Asst Director G Hall		Private Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)

	NEWS Partnership	Non	Cabinet	Environment and Climate Change Asst Director G Hall		Part Public & Part Private - Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
--	------------------	-----	---------	--	--	--

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
17 January 2023						
67	West Winch Framework Masterplan	Key	Council	Development and Regeneration Asst Dir – S Ashworth		Public
	Council Tax Support Scheme 2023/24 (including NoM 11/22)	Key	Council	Finance Asst Dir – M Drewery		Public
	Southgates Regeneration Area Development Brief and Next Steps	Key	Council	Development and Regeneration Asst Dir – D Hall		Public
	Levelling up Government response and actions	Key	Council	Business Culture & Heritage Asst Director – D Hall		Public
	Southend Road Hunstanton	Key	Cabinet	Development and Regeneration Asst Dir – D Ousby		Private - Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
	Lynnsport One	Key	Council	Regeneration & Development Asst Dir Companies & Housing Delivery – D Ousby		Private - Contains exempt Information under

						para 3 – information relating to the business affairs of any person (including the authority)
	Asset Management – Land and Property	Key	Cabinet	Property Asst Dir Property and Projects		Private - Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
	Changes to Council Tax Charges for Long Term Empty Properties and Second Homes for 2024/2025	Key	Council	Finance Asst Dir – M Drewery		Public
08	Recommendations from the Urban Wildlife Informal Working Group	Non	Cabinet	Environment and Climate Change Asst Dir – S Ashworth	Informal Working Group Agendas and Minutes	Public
	Freedom of the Borough - amendments	Non	Council	Leader Chief Executive		Public
	Custom and Self Build Site – Stoke Ferry	Non	Cabinet	Regeneration and Development Assistant Director - D Hall		Public
	Shared Prosperity Fund Update	Non	Cabinet	Business, Culture and Heritage Assistant Director D Hall		Public
	Meeting Arrangements	Non	Cabinet	Chief Executive – L Gore Leader		Public
	Contract for credit card transaction services	Key	Cabinet	Finance Asst Dir – Resources		Private Contains exempt Information under para 3 – information relating to the

						business affairs of any person (including the authority)
	LUF – Oasis – Update and Site Approval	Non	Cabinet	Leader Asst Dir – D Ousby		Part Public and part Private - Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
7 February 2023						
	Budget	Key	Council	Finance Asst Director – M Drewery		Public
	Capital Programme	Key	Council	Finance Asst Director – M Drewery		Public

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
7 March 2023						

Date of	Report title	Key or	Decision Maker	Cabinet Member and Lead	List of	Public or Private
----------------	---------------------	---------------	-----------------------	--------------------------------	----------------	--------------------------

meeting		Non Key Decision		Officer	Background Papers	Meeting
18 April 2023						

Items to be scheduled

	Notice of Motion 7-21 – Councillor Kemp – Equalities	Non	Council	Leader Asst Dir B Box		Public
	Procurement Strategy	Non	Cabinet	Finance Asst Dir – D Ousby		Public
	Review of Planning Scheme of Delegation (summer 23)	Non	Council	Development and Regeneration Asst Dir – S Ashworth		Public

CORPORATE PERFORMANCE PANEL WORK PROGRAMME 2022/2023

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
16 June 2022	Appointment of Vice-Chair			To appoint a Vice-Chair for the Municipal Year 2022/2023.
16 June 2022	Call-in (if any)			
16 June 2022	Nominations to Outside Bodies and Partnerships – Hunstanton Sailing Club	Appointment as an Observer to an Outside Body		To appoint a representative as an observer role only.
16 June 2022	Review of New Waste Collection Contract Performance – Stage 2 – Review of the legal and technical contract performance for year 1 of the contract.	Councillor Request	B Brandford/ M Chisholm	
16 June 2022	Tourism – Harmful or Helpful? A review of key qualitative and quantitative factors influencing the future growth of Tourism resourcing, processes and benefits – do our residents benefit from our approach to promoting tourism in West Norfolk	Review	D Hall	Item put forward by Councillors Moriarty and Devereux

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
16 June 2022	Full Review of Performance Indicators 2021/2022	Review	G Greaves	
16 June 2022	Scheme of Delegation/ Planning Sifting Panel	Cabinet	S Ashworth	
16 June 2022	Resourcing - Development Management Team (Planning)	Cabinet	G Hall	
16 June 2022	Hunstanton Promenade Waste Water – Update	Update	M Henry	
16 June 2022	Portfolio Holder Question and Answer Session			Questions to be submitted in advance of the meeting.
16 June 2022	Cabinet Forward Decisions List			
16 June 2022	Panel Work Programme			
16 June 2022	Exempt: KLIC Repayment Plan	Quarterly Update	M Henry	Quarterly Update
18 July 2022 – MEETING CANCELLED				
12 September 2022 – MEETING CANCELLED				

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
3 October 2022	Matters Arising	Standing		The Panel are invited to submit any matters arising prior to the meeting.
3 October 2022	Call-in (if any)			
3 October 2022	Call in of Officer Delegated Decisions		A Baker	Request from the Chair
3 October 2022	Town Deal Board (Governance)		J Hay	Details set out in email from Councillor Moriarty dated 17 March 2022
3 October 2022	Q1 2022/23 Corporate Performance Monitoring Report	Monitoring	G Greaves	
3 October 2022	Notice of Motion from Council 14 July 2022: Menopause Workplace Pledge	Notice of Motion from Council referred to CPP		A discussion to be held on the views of the Panel.
3 October 2022	Portfolio Holder Question and Answer Session			Questions to be submitted in advance of the meeting.
3 October 2022	Cabinet Forward Decisions List			
3 October 2022	Panel Work Programme			
3 October 2022	Exempt: KLIC Repayment Plan	Quarterly Update	M Henry	Quarterly Update
3 October 2022	Exempt: Update on Crofters	Councillor	M Henry	(Chair of CPP)

		Request		
DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
17 October 2022	Matters Arising	Standing		The Panel are invited to submit any matters arising prior to the meeting.
17 October 2022	Call-in (if any)			
17 October 2022	Formal Complaints against the Borough Council 1 April 2021 - 31 March 2022 The number of compliments received also to be included in the report.	Annual	H Howell	For information only
17 October 2022	Report from the Informal Working Group – Review of the Corporate Complaints Policy		H Howell	
17 October 2022	Corn Exchange Cinema – Report Open (To include information requested by Councillor Morley) Appendix Exempt	Review	H Howell	
17 October 2022	Cabinet Report – Microsoft Enterprise Agreement	Cabinet Report	R Godfrey	To consider the report and make any appropriate recommendations to Cabinet

17 October 2022	Portfolio Question and Answer Session			
DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
17 October 2022	Cabinet Forward Decisions List			
17 October 2022	Work Programme			
31 October 2022	Matters Arising	Standing		The Panel are invited to submit any matters arising prior to the meeting.
31 October 2022	Call-in (if any)			
31 October 2022	Corporate Business Plan Monitoring Report 1 April – 30 September 2022	Monitoring	G Greaves	
31 October 2022	Governance of Council Bodies	Cabinet	A Baker	
31 October 2022	Town Deal Board Governance/ – Terms of Reference		A Baker	
31 October 2022	Portfolio Holder Question and Answer Session			Questions to be submitted in advance of the meeting.
31 October 2022	Panel Work Programme			
31 October 2022	Exempt Report: Post Evaluation Review of H & M	Post Evaluation Review	M Henry	To undertake a review of the project

31 October 2022	Exempt Report: Serco Contract	Councillor Request	B Brandford/ M Chisholm/ G Hall	
DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
31 October 2022	Exempt Report: Hunstanton Sailing Club (Prior to receiving the update, the Panel to determine if the item should be discussed as an exempt report)	Annual Update	Borough Council's Appointed Representative	The Panel to receive an annual report from the Borough Council's representative.
4 January 2023	Matters Arising	Standing		The Panel are invited to submit any matters arising prior to the meeting.
4 January 2023	Call-in (if any)			
4 January 2023	Annual Update Communications	Annual Update	S Clifton/ J Hillard/ A Howell	
4 January 2023	Meeting Arrangements Informal Working Group Report		L Gore	
4 January 2023	Council Tax Support – Final Scheme for 2023/2024		J Stanton	

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
4 January 2023	Hunstanton Advisory Group:	Councillor Request	A Baker	Request from Councillor Moriarty. Elected councillors have no idea what exactly this body is, how it is composed, where its minutes might be found, where it fits in the constitution, what powers it has, what money it has, what elections have been held, what remit it has - we know nothing about it. Yet it features in the local press as an important Consultee for major investments in the town.
4 January 2023	Hunstanton Promenade Waste Water – Update	Update	M Henry	
4 January 2023	Review of New Waste Collection Contract Performance – Stage 2 – Review of the legal and technical contract performance for year 1 of the contract.	Update	B Brandford/ M Chisholm	Further Update following 16.06.22 meeting
4 January 2023	Full Review of IDC to include the appointment of Members, standing orders relating to the investigation of discipline of statutory officers and terms of reference for that Committee.	Councillor Request	B Box	Request from Councillor Nash

68

DATE	OF	TITLE	TYPE	OF	LEAD	OBJECTIVES	AND	DESIRED
------	----	-------	------	----	------	------------	-----	---------

MEETING		REPORT	OFFICER	OUTCOMES
4 January 2023	West Norfolk Climate Change Partnership chaired by the Borough Council to meet any of its terms of reference over the first 28 months of its existence	Councillor Request	L Gore	Request from Councillor de Whalley
4 January 2023	Changes to Council Tax Charges for Long Term Empty Properties and Second Homes for 2024/2025	Cabinet	J Stanton	
4 January 2023	Cabinet Report: Update Safeguarding Policy	Cabinet	B Box	
4 January 2023	Cabinet Report: Review of the Unreasonable Complainants Policy	Cabinet	A Baker	
4 January 2023	Cabinet Forward Decisions List			
4 January 2023	Portfolio Holder Question and Answer Session			Questions to be submitted in advance of the meeting.
4 January 2023	Panel Work Programme			
4 January 2023	Exempt: KLIC Repayment <u>Plan</u>	Quarterly Update	M Henry	Quarterly Update

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
4 January 2023	January 2021 to December 2021 Report on use, or non-use of RIPA Powers	Update	M Chisholm	
27 February 2023	Matters Arising	Standing		The Panel are invited to submit any matters arising prior to the meeting.
27 February 2023	Call-in (if any)			
27 February 2023	Scrutiny – to look at the compulsory statutory guidance and practice elsewhere	Councillor Request	A Baker	Request from Councillor Moriarty
27 February 2023	Q3 2022/23 Corporate Performance Monitoring Report	Monitoring	G Greaves	
27 February 2023	Q3 2022/23 Corporate Business Plan Monitoring Report	Monitoring	G Greaves	
27 February 2023	Portfolio Holder Question and Answer Session			Questions to be submitted in advance of the meeting
27 February 2023	Cabinet Forward Decisions List			
27 February 2023	Panel Work Programme			

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
5 April 2023	Matters Arising	Standing		The Panel are invited to submit any matters arising prior to the meeting.
5 April 2023	Call-in (if any)			
5 April 2023	Council Season Car Parking Badges - Rules, cost, numbers and use and abuse	Councillor Request	M Chisholm	Request from Councillor Moriarty
5 April 2023	Provide a summary of the issue the performance of the council owned businesses, West Norfolk property, West Norfolk housing and Alive Leisure, and any other 100% owned or partially owned business which operate independently of the Council	Councillor Request	M Drewery	Request from Councillor Morley
5 April 2023	Statement of Community Involvement	Councillor Request	S Ashworth	
5 April 2023	Portfolio Holder Question and Answer Session			Questions to be submitted in advance of the meeting
5 April 2023	Cabinet Forward Decisions List			
5 April 2023	Panel Work Programme			
5 April 2023	Exempt: KLIC Repayment Plan	Quarterly Update	M Henry	Quarterly Update

--	--	--	--	--

Forthcoming Items – Date to be advised

Guidance in respect of Council Tax Support Scheme ahead of when it is presented to Council for approval – J Stanton (Chair confirmed requirement of report to include the financial calculation, the no of households that would receive this support and their house bandings, the Councils plans to manage the Collection Fund and the sums expected by its preceptors, the rationale for selecting this demographic as the only segment of householders that need hardship support)

January 2021 to December 2021 Report on use, or non-use of RIPA Powers – J Hay to advise of date once gone through democratic process.

Feedback from Councillor Blunt on the enforcement issues discussed on 13 April 2022 - Councillor R Blunt to advise of date.

Annual Employment Monitoring Report – B Box – Requirements of the Panel to be discussed at sifting meeting on 6 October 2022.

Report on Rent Arrears – as agreed at the meeting on 3rd October – Matthew Henry

Notice of Motion – Menopause Workplace Pledge – two separate reports to come back to Panel. One setting out services and initiatives for staff and one dealing with Legislation and Policies for Councillors.

Councillor Requests

Councillors A Ryves – Council Owned Companies – Please provide a summary of the issue the performance of council owned businesses, West Norfolk property, West Norfolk Housing and Alive Leisure and any other 100% owned or partially owned business which operate independently. Email from Chief Executive (5 April 2022) stating Councillor Ryves in agreed that his item be deferred until the governance report has been considered – **Currently on Cabinet Forward Decision List for 15 November 2022.**

Councillor J Moriarty – Relationship with the Shakespeare Trust in relation to the Guildhall. (Item to be scheduled following outcome of the HLF bid.

Items Post May 2023

January 2022 to December 2022 Report on use, or non-use RIPA powers (Annual Report) – **July 2023**

Performance of the Corn Exchange Cinema – N Gromett - **July 2023**

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Agenda Item 16

Document is Restricted

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Agenda Item 17

Document is Restricted

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

Document is Restricted

Document is Restricted

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted