Norwich City Council Annual Governance Statement 2023-24

Introduction by the Leader and Chief Executive

Good governance is important and at the heart of what we do. It is the responsibility of all at Norwich City Council – whether councillors or officers, or those making decisions or scrutinising them, to ensure they are doing the right things in the right ways.

Our Annual Governance Statement is an opportunity for us to reflect on how we operate, the practices we have put in place and how we have worked to strengthen our governance systems. The Annual Governance Statement focuses upon four fundamental areas:

1) How we work to comply with good practice

2) How we have strengthened our governance systems over the past year

3) How we obtain assurance to know our systems are operating effectively

4) Those areas we have identified that require further development.

In this report, we identify some of the key developments which have occurred over the past year and up to the date when the statement of accounts is signed. This includes the creation of a new corporate plan, developed in consultation with our partners and the people we serve to inform our priorities for the future.

The statement is prepared drawing upon a range of evidence, including the work of the Council's external and internal auditors; assurance statements prepared by our services; decisions, strategies and plans produced by the Council in the past year, other inspections or reports relevant to the Council during the year and looking ahead for emerging developments impacting on the sector.

It is recognised that there are areas that we can develop, which is key to being an organisation that is focused upon improvement, but nonetheless we believe that when combined with the Council's broader code of corporate governance, this statement demonstrates that the governance arrangements for Norwich City Council are fit for purpose and working effectively.

Each year, across the country there are examples where failings in governance have contributed to Councils failing to provide services to those, they serve in the way they should. We hope that you find this a useful position statement to understand the governance framework that the Council has in place to ensure that we are working to serve the people of Norwich well.

Signed:

MICHAEL STONARD   **LOUISE RAWSTHORNE**

Mike Stonard   Louise Rawsthorne
Leader of the Council   Chief Executive
Date:24th February 2025   Date:24th February 2025

Background and Oversight of the Governance Framework

We understand that all at Norwich City Council are responsible for good governance.

The Chartered Institute for Public Finance and Accountancy (CIPFA) provides guidance to Councils on good governance, particularly through their publication of the Delivering Good Governance in Local Government Framework. The Council has developed a local Code of Corporate Governance which is aligned to this framework, the council's evaluation of how it meets the principles set out in the code is attached at Appendix A. This establishes the overall arrangements the Council has in place to ensure good governance.

The council and its members are responsible for ensuring that there is good sound governance in place which incorporates standard of internal control. The Governance is underpinned by 7 principles as out in the CIPFA/Solace publication "Delivering Good governance in local government Framework 2016". The principles are: -

A – behaving with integrity and in accordance with our core values;

B – being open and ensuring effective engagement takes place;

C – working together to achieve our intended outcomes;

D – setting goals for economic, social, and environmental benefits and achieving them;

E – growing our capacity – including our leadership and the people who work with us;

F – managing risks and performance through robust internal control and strong financial management; and

G – implementing good practice in transparency, reporting and audit – delivering effective accountability.

The meetings of all Councillors and Cabinet are the most significant decision-making bodies in the authority. As such, it is important that they uphold, and are seen to uphold good governance principles. Ways in which this is demonstrated include:

a) Council approving the budget, which has been subject to public consultation and is accompanied by a statement from the Council's Chief Finance Officer confirming the robustness of the proposed budget estimates and the adequacy of reserves;

b) Council receiving reports from the Scrutiny and Audit Committees on how they have performed during the year to fulfil the responsibilities that Council places on them;

c) Council adopting changes to improve the Constitution following recommendations from the Constitution Working Party

d) Cabinet reviewing quarterly assurance reports which identify how the Council is performing against its financial and non-financial targets;

e) Cabinet receiving updates on significant projects and programmes such as Towns Fund and the Housing Compliance programme;

f) Shareholder panels overseeing company performance.

g) Agreeing forward plans for all committees and making these publicly available.

h) All committee reports including independent comments from the Chief Finance Officer and the Monitoring Officer on the financial and legal implications of the decisions being taken.

This Annual Governance Statement fundamentally provides an opportunity to evaluate the effectiveness of corporate governance arrangements over the past year. It has been drawn together through:

a) Reviewing decisions and actions taken by the Council in the past year

b) Reviewing the outcomes of audits and other inspections and incorporation of their opinions

c) Feedback and review of services by the Council's officers, whether via risk management, budget management, performance management, service reviews or audit recommendations.

d) Review by the Council's Executive Leadership Team.

1) How we work to comply with good practice

The CIPFA framework sets out the core principles that all Councils should seek to follow. The Council has a code of corporate governance which sets out in detail each of the core principles and how the Council complies with these. In this annual governance statement, we set out examples of the steps we have taken over the past year to develop our compliance with each principle, as follows,

Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

The Council is responsible for approving the budget, developing key polices and ensuring that constitutional decisions are adhered to. The Council elects its members on a one third majority three years out of four.

The Council's constitution continues to be reviewed and updated, with the Financial Regulations due to be considered by the Audit Committee later in 2024 following a comprehensive re-drafting in 2023/24. Subject to Member approval, the new regulations will reflect best practice, drawing upon the example of other local authorities and the development of practice and procedure in recent years reflective of lessons learnt from those local authorities that have encountered governance failings and financial management challenges. The chief executive officer alongside the work of audit, scrutiny and the standards committee support and ensures that high standards are maintained and promoted amongst members.

Several policies and codes of practice have been reviewed and updated during 2023/24, including but not limited to the following,

- Anti-Money Laundering Policy
- Whistleblowing Policy
- Anti-Fraud & Corruption Policy
- Code of Corporate Governance

Ensuring openness and comprehensive stakeholder engagement

There was a comprehensive programme of stakeholder engagement undertaken to support the development of the We Are Norwich - A community-led plan which was

specifically designed to reflect the views and priorities of the diverse communities of Norwich. This process has subsequently led to the adoption of the new vision for **Norwich: A fair and thriving city, full of ambition**, alongside five priorities,

- **An open and modern council**
- **A prosperous Norwich**
- **A fairer Norwich**
- **A climate responsive Norwich**
- **A future-proof Norwich**

A key objective in producing the new community-led corporate plan 2024-2029, was to put the people of Norwich front and centre of its development. This saw an intensive programme of citywide resident and stakeholder engagement take place across Norwich from October through December 2023. Over 900 individuals and organisations were engaged as part of this process, including Norwich residents and tenants' groups, councillors and officers, voluntary sector and community organisations, and local businesses and business networks.

Consultation activities included:

- Stakeholder interviews
- Workshops
- Panel discussions.
- Focus groups.
- Street outreach.
- Online surveys.

The consultation was designed to provide the council with meaningful strategic insights into the priorities and needs of all people across the city, including all groups identified in the council's new Equality, Diversity, and Inclusion Strategy. Examples of how this was implemented included focusing street engagement interviews in the more deprived, Mile Cross and Earlham areas and holding roundtable sessions and one-to-one interviews with voluntary and community organisations representing the experiences and needs of disabled people, women experiencing domestic violence, refugees, people experience housing and financial vulnerability, young people, older people, people using food banks and faith groups.

The new community-led plan sets out the guiding principles that will inform everything the council does as an organisation. They underpin all its priorities (as set out in the community-led plan) and are central to the way we must work to get the best outcomes for the city. They are:

- Be unashamedly ambitious for Norwich.
- Do the basics well on the services we provide.
- Listen to the city.
- Focus on the climate in all that we do.
- Put equality and inclusion front and centre of all our thinking.
- Use evidence to inform the services we provide.

- Work in partnership.

Listening to the city and working in partnership are key to the council's ongoing success, with an iterative consultative approach to work and services being adopted going forwards and a commitment to work with communities and partners to ensure the right solutions are developed to address local and wider community concerns.

As part of the recent peer review of Norwich City Council, engagement was an area that was identified for further development. The council has taken feedback on board and actively sought ways to enhance engagement opportunities with key stakeholders, recognising that the ability to adapt to the changing needs of our residents, communities and businesses will be integral to becoming an open and modern organisation.

One way this has been taken forward is through our community conversations workstream, which continues to progress as a partnership project alongside The Shoebox CIC, one of our VCSE partners. This sees six community connectors employed by The Shoebox, working alongside the council's three conversation officers and our wider community enabling team. Through conversation and building community connection in three of the more deprived parts of the city, they seek to understand what is important to residents and support the growth of community assets in direct response to local need.

The council currently consults widely on projects, policies and strategies ranging from play area redevelopments to budget consultations to EDI policies. It uses *Get Talking Norwich*, its engagement and consultation platform as its primary means of engagement and where resources allow, it undertakes to do face-to-face consultation events and engagement. The council is continuing to improve its consultation and is currently undertaking a piece of work to develop organisation wide principles of consultation. These will be focused on open, honest, and accessible consultations giving clarity over which decisions stakeholders can influence and a pathway for how these voices can affect change.

The council recognises that while consultation is effectual, it is part of a broader engagement framework. Its community conversations programme has seen it work in three of the more deprived areas of the city since 2022. In these areas, officers have open conversations and can feedback what is important to residents, what the assets are in neighbourhoods and what issues residents face. Its community conversations insights hub collates these trends and both internal services and external partners can see them and request further data. This information can be used to formulate projects, services and policies in the pre-consultation stage ensuring that services are well targeted to the communities they serve.

Rolling out more regular liaison with tenants within the commercial property portfolio is also underway to improve customer relations and support service improvement.

Defining outcomes in terms of sustainable economic, social, and environmental benefits

As an outcome-focussed community-led plan, 'We are Norwich' signals an entirely new way of thinking and working for the council, with a strategic focus on delivering the outcomes the council and Norwich communities want to achieve. This will enable the organisation to shift away from measuring outputs in isolation towards developing a

comprehensive performance monitoring framework that measures the outcomes being realised in the communities we serve.

Going forwards, the council will use the feedback and intelligence from its extensive corporate plan engagement programme to develop a robust business planning process and to completely review its corporate performance framework, ensuring its priorities, plans and measures of success reflect what the city wants from its council.

Using the iterative approach to consultation mentioned above, it will engage all areas of the council, and stakeholders across the local community and through its City Vision 2040 partnership, to define the outputs needed to deliver the plan's outcomes over the following five years, and it will seek to reshape the organisation aligning resources and priorities through its business plan, so enabling it to be in the best possible shape to deliver for Norwich.

Determining the interventions necessary to optimise the achievement of intended outcomes.

Further work is planned in 2024/25 to map budgets onto the intended outcomes to ensure and support financial planning and investment in line with priorities.

Developing the entity's capacity, including the capability of its leadership and the people within it

There has been a concerted recruitment process to secure capacity and capability at the Executive Leadership Team and the Senior Leadership Team levels, which has been successful in providing both energy and experience to support the delivery of the council's objectives.

Managing risks and performance through robust internal control and strong public financial management

The council has continued to produce quarterly assurance reports, to provide senior management and cabinet with oversight of the financial and non-financial performance of the organisation.

Risk Management has continued to be managed in a structured manner, with quarterly reviews of both departmental and the corporate risk registers. Further development of the organisations understanding and management of risk, including understanding its appetite for risk, is being taken forward in 2024 alongside its insurance advisors, Gallaghers.

Implementing good practice in transparency, reporting and audit to deliver effective accountability.

Its new community-led corporate plan 2024-2029 'We are Norwich' launched in April this year, and we are now developing a new business planning process and performance framework that will enable it to realise the plan and monitor its progress.

This new and agile business planning process will be translated into an annual corporate business plan, which will:

- Set out the most important actions the council needs to take, both in its role as primary service provider as well as collaboratively with others, to start delivering *We Are Norwich.*

- Include milestones and measures to ensure is the council is working towards the outcomes set out in *We Are Norwich*

- Be aligned with its budget setting process, to ensure it has the resources to deliver *We Are Norwich.*

- Be developed and assessed with partners and stakeholders to ensure the measures are correct, and the outcomes are felt by intended beneficiaries.

- Be aligned to delivery of its Medium-Term Financial Strategy.

The new Corporate Performance Framework will specify a range of performance measures, baselines, and targets, allowing the council to evaluate and monitor how well it is working towards delivery of the successes (outcomes) set out in the plan.

Through this new process and framework, the council will identify and mobilise the appropriate infrastructure and resources to effectively become an evidence-based decision-making organisation that consistently monitors and evaluates its activities (outputs) and impacts (outcomes). It will also allow the council to realise opportunities to change culture and behaviours and incorporate the new guiding principles, set out in the community-led corporate plan, *We are Norwich*.

2) How we have strengthened our governance systems over the past year

Executive and Senior Leadership Team Recruitment

A successful recruitment programme has been undertaken during 2023/24 and subsequently, which has seen the arrival of several key appointments at Executive Director, Director, and Head of Service levels across the council. These include Exec. Director for Housing and Communities; Exec. Director of Resources; Director of Property (Housing); Head of Building Safety and Compliance; Head of Legal and Governance (Monitoring Officer). This has strengthened the resilience and capacity of management which in turns also supports improved governance, through fresh perspectives, experience brought from alternative settings and the enhanced leadership arising from permanent appointments. Where recruitment and retention challenges have continued to be experienced, interim resources have needed to be used, but resilience has been achieved through longer term contracts.

Tracking of Outstanding Audit Recommendations

The process of monitoring the implementation of audit recommendations has been overhauled during 2023/24, which has produced a significant improvement in outcomes and supported enhanced engagement and reporting upon delivery all the way from service delivery through to reporting progress to Members.

Enhancement of digital capacity through an Enterprise Resource Planning (ERP) system and Asset Management System.

The implementation of the Unit4 ERP system brings together Human Resources and Finance information in a joined-up manner within a single system database, which will

support better decision making and internal control going forwards, whether in terms of day-to-day management and administration of staffing issues such as staff transferring between positions or the oversight of pay awards, through to strategic planning of resources to support the delivery of the We Are Norwich plan and the associated financial planning.

A Phase Two of this programme of work is now underway to insource the payroll service, further enhancing the governance and internal control of operational and strategic planning. Phase Three will see further exploration of opportunities to deliver additional efficiencies and joined up working, whether via automation of business processes or for example, by incorporating additional elements of procurement management within the ERP core services.

A comprehensive Asset Management system is also being implemented in a phased manner, which will ensure that there will be a "single version of the truth" in relation to both tangible and intangible fixed assets in future. Once fully implemented this will have benefits for Property Services in their on-going and planned coordinated management of assets, which will dovetail with the information held on the Balance Sheet and reflected within the annual Statement of Accounts.

Project Management Office capacity and capability following best practice principles.

Strategic projects are managed in accordance with good practice methodology, including clear terms of reference for Programme and Project Boards covering areas as diverse as Assets & Development, Capital Programme, service improvement projects, digitalisation projects etc. underpinned by a new Design Authority challenge process and regular progress monitoring. Details and compliance with project governance good practice are brought together under a dedicated hub within the intranet, that provides a shared repository for all associated documents, agendas, action plans, decisions etc.

Election

The Council elects one third of its Members three years out of four and last year saw the local election in May 2023. In May 2024 the local election took place alongside the Police and Crime Commissioner elections in Norwich, with a General Election also taking place in July 2024.

An increased level of postal votes is being seen, and together with the implementation of voter ID this has increased the workload of the election team considerably.

The council's returning officer has placed adequate resources to ensure the successful, safe, effective, and efficient delivery of elections with clear leadership and personnel in place.

Statutory changes to the Procurement Act

The Procurement Act 2023, which is due to come into force from late 2024, will significantly change the way local authorities procure goods and services. The Act is likely to place tighter legislative controls and prescribed level of required transparency across the whole procurement processes including: -

- The codification of the National Procurement Policy Statement (NPPS) which allows the government to set wider policy objectives to which it expects public procurement to contribute.
- Mandatory publishing of contract details including the performance of the contract through a set of Key Performance Indicators (KPIs) for larger contracts.

The council thorough its procurement team will deliver bespoke training courses alongside a clear and consistent framework for delivery.

3) How we obtain assurance to know our systems are operating effectively

Internal Audit

Internal audits are undertaken according to an annual risk-based plan throughout the year by an independent internal audit service, Eastern Internal Audit Services (EIAS), a consortium hosted by South Norfolk Council which provides an internal audit service to Councils in Norwich and Norfolk and provides our Head of Internal Audit role. The Head of Internal Audit reports on progress and issues arising to the Audit Committee. In addition to which the Head of Internal Audit also provides an annual report, containing their annual opinion on the adequacy and effectiveness of governance, risk management and internal control at the Council, which reflects upon the year completed and highlights any issues or concerns arising from the audit activities over the previous year. In 2023/24 the Head of Internal Audit has reported 4 limited reports, relating to Housing Repairs & Voids, Disabled Facilities Grants, Private Sector Housing and the processes for Starters, Movers & Leavers. The improvement in tracking of the implementation of audit recommendations, alongside other developments such as the implementation of the new ERP and the project management good practice will support the required improvement and monitoring of these services going forward.

In addition, the annual report and opinion is actively used to improve the performance and governance of services moving forward. The publication of this report and the annual opinion has been delayed by the timing of the General Election and therefore is not currently available but will be available when the AGS is finalised.

External Audit

The Council's external auditors are responsible for reviewing the Council's statement of accounts and providing a value for money opinion on the Council and the Council's Housing Benefit Subsidy Claim. The external auditors operate to an agreed work programme that is reviewed by the Council's Audit Committee.

The external auditors have recently concluded their work on the 2021/22 and 2022/23 value for money opinion at the council and it is anticipated that this will shortly be presented to the audit committee.

The external auditors are in the process of undertaking their work in relation to 2023/24 including value for money and are anticipated to report their opinion in September 2024 in relation to the draft Statement of Accounts for 2023/24. This will see a return to the practice which has been on hold in recent years because of a national market failure that has been the subject of intensive discussions and planning by the Government in conjunction with professional and sector stakeholders including the Local Government

Association and Financial Reporting Council (FRC) and the Chartered Institute of Public Finance & Accountancy (CIPFA) and National Audit Office (NAO) amongst others.

Audit Committee

The Audit Committee is tasked by the Council to scrutinise the Council's arrangements for governance and audit matters. Examples of the work undertaken by the Committee during the year to support delivery of its role include,

- Annual Report of the Audit Committee – this allows the committee to review and report upon its work during the previous year, linked to best practice approaches identified by the Chartered Institute of Public Finance & Accountancy (CIPFA).
- Learning lessons from failings in other authorities – a report outlining how the Council learns from the experiences of others, and particularly what can be learnt to avoid the failings of other Councils.
- Regular review of risk registers.
- Review of Cyber Assurance.
- The appointment of an independent member of the committee with experience and expertise in matters relating to the Audit Committee's terms of reference. Work is also progressing with the recruitment of an additional independent member for the audit committee.

External Regulators

In January 2024 the Regulator for Social Housing confirmed that the issues which saw them work closely with the council on overdue and follow-up safety checks across some council properties, had been resolved. The regulators involvement came after the city council carried out an internal review of compliance work in 2021 when the council identified some cases where safety checks, and some follow-up work, had not taken place as they should have. This work related to electrical, fire and water safety in council homes. During the council's review, it self-reported to the Regulator for Social Housing which resulted in a notice being published by the regulator relating to the various safety checks in council properties. [Housing regulator gives city council the all-clear on safety checks in council homes](#)

The council continues to ensure that its accreditation to collect electronic card payments in a secure way is maintained in accordance with the relevant standards. The Payment Card Industry Data Security Standard (PCI DSS) is an information security standard designed to reduce payment card fraud by increasing security controls. Public Services Network (PSN) is the standard to allow the council to share Government data (e.g. DWP). Compliance is overseen by the council's data controller and in March 2024 they reported that accreditation had been maintained with no significant data breaches in the previous (Q4 2023) quarter.

Following the latest review several additional actions have been identified for inclusion in the action plan set out later in this document.

Statutory Officers
The Council's statutory officers have specific personal duties to raise concerns about activities within the Council or report failings in governance. This includes the Chief Executive, the Monitoring Officer, and the Chief Finance Officer. This group meets monthly to consider and review any issues of concern relating to governance and will

commission additional work, investigations, and remedial action wherever necessary or appropriate.

Operational & Strategic Boards

Officers have established several boards to support the delivery of operational and strategic outcomes during 2023/24, both in recognition of best practice and because of feedback from audit activities. These include the Capital Board, the Assets & Development Board, the Transformation Board alongside project specific boards and steering groups, each responsible for ensuring that risks, delivery, resources, and outcomes are managed, monitored, and controlled appropriately.

The work of partners and in partnership with others

Recognising the strategic importance of partnership working, a review of the Norwich 2040 City Vision partnership has commenced and is progressing at pace, in close consultation with key strategic partners and stakeholders.

A broader review of the council's strategic partnerships is also underway with a view to extending leadership of place to a wider cohort of senior managers and officers. The aims of the review include ensuring:

- Each partnership is identified as either strategic or operational.
- There is a business need for the council's involvement with clear links to its corporate priorities and the City Vision.
- The council's level of involvement and any responsibilities are clearly understood, including across decision making and commissioning.
- Each partnership has two identified owners, one being a member of SLT and another appropriate designated lead officer to ensure consistent representation.
- Partnership owners have a defined role and set of responsibilities.

Peer Review

Following on from the LGA Peer Review in the previous year, progress was reviewed, and a report published in March 2024, which reflected progress against each of the recommendations within the original Peer Review.

[Corporate Peer Challenge Progress Review Report March 2024 (PDF)](#)

4) Information Governance

This section of the AGS provides an outline of Norwich City Council's Information Governance (IG) compliance. IG is the framework within which the Council's accountability, standards, policies, and procedures are developed, implemented, and maintained to ensure that data information processed by, or on behalf the Council, is done so lawfully, appropriately, and securely. This includes data protection and privacy, statutory information requests, and records management.

In line with our recently revised Information Risk Management Policy, and the recommendations of Internal Audit, this statement will be provided annually, and it is logical that a summary appears in the AGS.

To ensure executive oversight of data protection and wider information risk management the Council designates a Senior Information Risk Owner (SIRO). In May 2024, the Executive Leadership Team (ELT) designated a new SIRO, Emily Yule – the Executive Director of Resources.

The Council has in place policies that outline the roles, responsibilities and requirements of employees, councillors, and stakeholders when processing data and information. This includes our Data Protection Statement, Information Risk Policy, IT User Security Policy, Records Management Policy, and our Appropriate Policy Document.

These policies are supplemented by a suite of procedures and guidance providing further detail on processes and expectations. This includes our Information Security Incident Response Plan, Information Request procedures, Clear Desk Guidance, Confidential Waste Guidance, and Information Storage Guidance.

As set out in our Information Risk Policy, the Council requires all officers to undertake Information Governance training at least once every two years. In October 2023 we launched a new mandatory e-learning course replacing the previous one launched in October 2021.

The latest figures show competition by 94.3% of employees with a further 1.1% in progress. Efforts continue to increase the completion figure to more than our internal target of 98%.

As part of the Council's member development programme, newly elected members are invited to attend 'An Introduction to Information Governance' session delivered by the Data Protection Officer via Teams. These sessions are recorded, then the recording and the slide deck used are made available to members on e-councillor. The last session held was on 18 May 2023.

To bolster the e-learning, the Information Governance Team provide additional training sessions to service areas upon request. Additionally, sessions may be scheduled at the direction of the Data Protection Officer to mitigate against any emerging concerns or changes to high-risk data processing.

The Council has in place an Information Security Incident Plan for the internal reporting and management of potential personal data breaches. Internal breach reporting procedures are made known to all officers and elected members though training and the Council's Intranet.

Incidents Logged

The below figures include incidents arising from the Council's own processing of personal data, and any third-party incidents made by any joint-controller processing or processing undertaken on our behalf by data processors or sub-processors.

In the financial year 2023-24, 117 instances were referred to the Information Governance Team for investigation. Of these, 6 were identified as not an incident.

This figure is comparable to:

- 126 incidents referred in 2022-23; of which 16 were not an incident; and

Not all personal data breaches need to be reported to the ICO as per the regulator's guidance, only those resulting in a 'high risk' to a data subject require a data controller to self-report.

In the financial year 2023-24, the Council has self-reported twice to the ICO.

- IC-238874-T0X5. In October 2023, the Council reported that a sub-processor used by a Council supplier experienced a ransomware cyber-attack. The ICO determined that no further action was required.
- IC-287548-R8G1. In February 2024, the Council reported that document containing sensitive information about a service user had been inadvertently shared with a third-party and efforts to confirm its deletion had been unsuccessful.

Data Protection and Subject Access Request Performance

In the financial year 2023-24, the Council received 188 valid requests. Of these, 77 (41%) were received from Shelter seeking copies of a person's housing file.

All requests have been responded to; 187 (99.5%) received an on-time response. This exceeds the internal target of 95%.

ICO Complaints

Three requests (1.6%) resulted in complaints to the ICO. Of these 1 was not upheld, 1 was partially upheld and 1 was upheld.

Individual Right Requests

In addition to the right of access, data subjects have data rights as set out in Articles 16-22 of the UK General Data Protection Regulation. In the financial year 2023-24 the Council received 2 requests for 'data erasure' Both requests received an on-time response.

Freedom of Information & Environmental Information Regulations

Any person has the right to seek information from a public authority; requests relating to environmental matters are processed under the Environmental Information Regulations 2004 (EIR), most other requests are processed under the Freedom of Information Act 2000 (FOI). Such legislation does not cover the disclosure of personal data, such requests instead fall under the UK GDPR please see the 'Data Protection Requests' section above.

The KPI for FOI/EIRs to be send within 20 working-days has increased this year. In 2022-23 the target was 90%, it was agreed by the CEO, SIRO and SLT to step this up to 92.5% from April 2024 and then 95% from October 2024. This increase ensures that the Council's own target reflects the standards expected by the regulator.

In the financial year 2023-24, the Council received 847 valid requests. Of these, the Council provided an on-time response to 818 requests (96.6%). To date, 7 requests remain open/unanswered. Along with the seven open requests, 22 other requests were responded to after the deadline.

Tribunal Decision EA/2022/0238

In September 2023, the Council received a decision from the General Regulatory Chamber - First-tier Tribunal in the case of EA/2022/0238: James Packham vs Information Commissioner and Norwich City Council. In this matter, the requester challenged an ICO decision (IC-144775-N0F5) in which the regulator had judged the Council's response to an FOI/EIR from 2021-22 to have been appropriate.

The Tribunal overturned the decision of the ICO. In line with the Tribunal's ruling, the Council issued a revised response with 35 days from the date the decision was promulgated.

New RIPA Policy

In August 2023, the Council's Senior Leadership Team (SLT) approved a revised RIPA Policy. In the financial year 2023-24, the Council has not considered any requests for the use of covert surveillance or covert human intelligence sources. The regulator for RIPA is the Investigatory Powers Commissioner's Office (IPCO). They undertake three-yearly inspections of local authority compliance.

In January 2024, the Council was audited; the outcome noted that 'significant improvements have been made since your last inspection' and that the Council's response 'provides your assurance that ongoing compliance will be maintained'.

5) Those areas we have identified that require further development.

The following action plan sets out progress against previously agreed actions from 2023 and earlier Annual Governance Statements and incorporates additional areas relating to the current year under review where further work is considered necessary to improve the governance of the council or address specific concerns.

2023 Action Plan Outstanding Matters – Updates Position

Issues & challenges identified	Lead Officer	Target implementation date	Update
Housing Compliance Implementation of the housing compliance improvement plan to deliver improvement in the performance of compliance inspections.	Executive Director of Communities & Housing	The Health and Safety Compliance Board was established to monitor this programme of work. The remaining items on the compliance improvement plan were completed in Q4 2023.	**Complete** The Regulator for Social Housing withdrew the statutory Regulatory Notice in December 2023 following a successful third-party audit of the council's management of building safety and compliance. New governance arrangements are now in place to oversee building safety and compliance as a BAU activity, to prevent reoccurrence. Senior appointments, with responsibility in this area, have been made in 2023/2024 to the posts of Head of Building Safety and Compliance, Director of Property (Housing) and Executive Director for Communities and Housing.
Scheme of Delegation Undertake a review of the Council's scheme of	Monitoring Officer	The results of the review will be subject of a report to	In progress. The Scheme of Delegation and the Financial Regulations

Issues & challenges identified	Lead Officer	Target implementation date	Update
delegation to ensure there is clarity on levels and authorities in decision making		Cabinet and Full Council during 2024.	are currently being reviewed, whilst the Contract Procedures will be updated in line with the changes arising from the Procurement Act 2023, which will have a material impact upon the regulations applicable to public sector procurement.
Enforcement Policies Undertake a review of the Council's policies and actions in relation to enforcement, including the corporate enforcement policy, CCTV policy and Regulatory of Investigatory Powers (RIPA)	Executive Director for City and Development Services	31 December 2022	**Completed** The Corporate Enforcement Policy was published in July 2023. Corporate Enforcement Policy (PDF)
Corporate Performance Measures Following the adoption of the new Community-led Plan, undertake a review of the Council's key performance measures to ensure these are aligned to the corporate plan	Executive Leadership Team	December 2024	In progress. The new community-led plan 2024-2029 entitled 'We are Norwich' launched in April this year; it replaces the previous corporate plan 2022-26. The council is now developing a new business planning process and performance framework that will enable it to realise the new plan and monitor its progress. A new Corporate Performance Framework will be developed

Issues & challenges identified	Lead Officer	Target implementation date	Update
			as part of this; it will specify a range of performance measures, baselines, and targets, allowing the council to evaluate and monitor how well it is working towards delivery of the outcomes set out in its new plan. This will be translated into an annual Corporate Business Plan. New target implementation date is February 2025, albeit some elements will be piloted ahead of this date.
Staff Development and Wellbeing The Council is undertaking a range of actions to support staff development and wellbeing including the development of a workforce strategy to support the organisation in its longer-term resource planning.	Senior Leadership Team Head of HR and OD	31 March 2023	In progress. A Workforce strategy is in development and is being overseen by the Health and Wellbeing Board, alongside their more general focus on staff welfare matters.
Health and Safety The Council needs to ensure that the actions identified within the Internal Audit review of Health and Safety are implemented.	Executive Director for City and Development Services	31 March 2023	**Completed** We have now implemented 3 of the audit recommendations with 4 ongoing as part of the health and safety

Issues & challenges identified	Lead Officer	Target implementation date	Update
The Council is planning to review its health and safety policy, with a view to subsequent implementation of emerging actions.			management review process and will be completed by the end of quarter 4. The two low priority recommendations have been discussed with HR&OD and are now complete. Our work to strengthen the Council's Health and Safety environment includes the creation of a dedicated SharePoint page AskH&S for all matters relating to health and safety, implementation of risk assessment training for all managers, reviewing the provision of general health and safety training for all line managers and CLT and creation of an online reporting form for accident and incident recording.
Environmental Services The council needs to ensure that the actions identified within the Internal Audit review of Environmental Services are implemented.	Executive Director for City and Development Services	30 September 2023	**Completed** As reported to the audit committee all recommendations have been implemented.

Issues & challenges identified	Lead Officer	Target implementation date	Update
Capital Programme Management and Accounting The council needs to ensure that the actions identified within the Internal Audit review of capital programme management and accounting are implemented.	Senior Leadership Team	31 July 2023	**Completed** The primary focus of the recommendations was on how the Council monitors delivery of its capital programme. New processes including the creation of the Capital Board and Asset Management Board have been implemented.
Commissioning and Partnerships The Council has committed to undertaking a review of its approach to commissioning and working in partnerships.	Executive Director for Communities	31 December 2022	In progress This work has started but is yet to be concluded; revised target date to be reflected in corporate plan refresh.
Ethical Data Governance Policy Sitting above existing policies relating to information and data management, the Council is seeking to develop an ethical data governance policy outlining how data should be used in a responsible fashion, supporting transparent and fair use with appropriate authorisations.	Interim Director of Transformation	31 October 2023	**Completed**

Issues & challenges identified	Lead Officer	Target implementation date	Update
Equality, Diversity, and Inclusion Strategy To develop a new Equality, Diversity, and Inclusion Strategy	Interim Director of Transformation	2024	**Complete Equality, Diversity, and Inclusion Strategy 2024/27 –** *(due to be published July 2024).* Underpinning this strategy and aligning with and delivering against the *A Fairer Norwich* priority within the council's new community-led plan 2024/29, a new EDI Action Plan is in development. **Due to be published in December 2024**, the Action Plan will review the council's core objectives (as per its public sector equality duty) and consider both pipeline projects and new workstreams that focus on the core aims of the EDI Strategy and the outcomes highlighted within the community-led plan. **An equalities audit is planned for completion by 31 March 2025.** Equality Information Report 2024 (PDF)

Issues & challenges identified	Lead Officer	Target implementation date	Update
Financial Procedure Review Accompanying the constitution, the Council has a set of detailed financial procedures outlining how transactions should be undertaken. This document has not been reviewed for some time.	Interim Chief Finance Officer	31 July 2023 Revised target December 2024	In Progress Now that the Financial Regulations have been reviewed, work has begun on updating the Financial Procedures which underpin them.
Commercial Debt Policy The Council's approach to collection of commercial debt has not been reviewed for some time. It is intended to undertake this review during the year.	Interim Chief Finance Officer	2024	In Progress A project has begun to review, revise and update debt management business processes and practice. This is working with all service departments, seeking to standardise and cross-reference practice and standards. This work will then underpin a broader debt management approach including the reporting of performance as part of the budget management process, incorporating updates and forecasts in relation to aged debt management, debt write-offs and the bad debt provision.

Issues & challenges identified	Lead Officer	Target implementation date	Update
Counter-fraud, whistleblowing, and money laundering policies. The suite of policies the Council uses to support its approach to reducing the risk and incidence of fraud in the organisation, including whistleblowing and money laundering, will be subject to review during the year	Interim Chief Finance Officer	31 March 2024	**Completed**

New Actions for 2023/2024

Issues & challenges identified	Lead Officer	Target implementation date	Update
Company Governance. In April 2023, following a request for a cashflow advance and indication of a deterioration in financial and other performance measures a review of NCSL the Councils wholly owned company was instigated.	CEO/ MD and Board of NCSL	Improvement Plan September 2023 Business Plan December 2023	In progress Additional board members were appointed with relevant skills (Financial/ housing repairs). An independent review was undertaken of the company and its performance. A governance review was undertaken by Local Partnerships and reported to the Shareholder Panel. An Interim MD was appointed along with an enhanced management team (Finance Director/ Operations Managers). An improvement plan was received as requested and considered by the company Board and Shareholder Panel. The Business Plan was evaluated by Shareholder Panel, comments made and is due to be considered by Scrutiny and Cabinet in July 2024.

Issues & challenges identified	Lead Officer	Target implementation date	Update
			Financial performance for 2023/24 has improved as have other performance metrics.
Company Trading Environment. With the current economic climate and the on-going potential challenges for Local Government the Council needs to establish the level of financial risk it is exposed to. The Council therefore concluded that it needed to review how effectively it is delivering housing developments via Lion Homes to ensure that it is adopting the optimum solution whilst minimising risks.	CEO/ Major Projects Director	July 2024	In progress

The council has commissioned 31Ten an independent company with significant experience in the review of LA housing companies to review the business plan of the company generally and specifically the business case for the imminent development at Ber Street. |
| **Regulatory Services** The Council is a regulatory authority for Houses in Multiple Occupation and their licensing under the Housing Act 2004. During 2023/24 management became aware of non-compliance in their HMO Licensing activities. These issues were immediately addressed, and considerable progress has been made. | Executive Director Development and City Services | December 2024 | In progress

A range of actions have been set in a broader review of processes and introducing a new system to support effective licensing and enforcement. |

Issues & challenges identified	Lead Officer	Target implementation date	Update
Cyber Threats All democratic governments during election years should expect increased interference from hostile nation states. Artificial intelligence (AI) will almost certainly make cyber-attacks against the UK more impactful because threat actors will be able to analyse exfiltrated data faster and more effectively and use it to train AI models. AI will almost certainly increase the volume and heighten the impact of cyber-attacks over the next two years. AI lowers the barrier for novice cyber criminals, hackers-for-hire, and hacktivists to carry out effective access and information gathering operations. This enhanced access will likely contribute to the global ransomware threat over the next two years.	Head of Customers IT and Digital Infrastructure Security and Support Manager. Information Governance Manager	April 2025	In progress Move towards a position where we "assume compromise" of devices and architect solutions to make it as difficult as possible for threat actors to exfiltrate data and move laterally across network. Research expansion of Indicator of Compromise detection with distributed honeypots, ransomware canaries; host-based firewalls on devices to reduce opportunity for lateral movement; enhancing System Event Monitoring based on emerging threats. Make it difficult for threat actors to remain undetected, focussing on detection. Isolate vulnerable devices to reduce the impact of an incident. Assess the Cyber Assessment Framework (CAF) which provides guidance for government

Issues & challenges identified	Lead Officer	Target implementation date	Update
			bodies responsible for vitally important services to enhance our services.
Oversight of the cost of interim and agency staff The cost of temporary staffing arrangements has been identified as an area where more focussed oversight is required. The council has in place interims for valid reasons including the need for specialist support to projects and to cover key posts where recruitment has been unsuccessful; however, the cost of those temporary arrangements and their length of tenure indicates that the council may not be achieving value for money.	Chief Executive	December 2024	In progress The successful recruitment to several key posts is allowing interim staff to leave the organisation following a suitable handover period. Regular oversight at the most senior level in the organisation is also leading to further challenge on the need for temporary staff. Clear exit strategies are being developed to reduce the number and therefore the overall cost of those temporary arrangements over the course of the year. The issues leading to the need for temporary staffing are also being explored to understand the need for additional recruitment and retention measures.

Issues & challenges identified	Lead Officer	Target implementation date	Update
Livestock Market The council is under an obligation to use its reasonable endeavours to secure an alternative site for the Livestock Market. Currently legislation requires this to be within the Norwich City boundary; however, the lack of suitable sites means that the council is seeking to amend the act through a private bill to allow it to be held outside the city's boundary. Failure to successfully achieve the change will expose the council to a range of financial and other risks in keeping the existing market maintained and needing to continue to seek alternative provisions in line with the agreement with the freeholder and according to the Act.	Director of Major Projects	November 2024	In progress A public consultation is scheduled to commence in July 2024 which will inform a decision to be made by full council in relation to the proposal to lodge a private bill in November 2024 to make changes to the 1988 Norwich Act.
Nutrient Neutrality (NN) The council's ability to determine planning applications, which result in an increase in overnight accommodation, continues to be adversely impacted by NN. The Council has its own approved scheme and	Executive Director Development and City Services	October 2024	In progress The Council operates its own retrofit scheme to generate credits. However, this only will generate credits sufficient for a proportion of all housing to proceed and Cabinet have agreed to focus these credits

Issues & challenges identified	Lead Officer	Target implementation date	Update
continues to evaluate whether it should join the Norfolk Environmental Credits Ltd (NEC) joint venture partnership. Stalled development presents several financial and reputational risks to the council.			on a few key regeneration priorities. Work continues to evaluate the joint venture company's business case and other options for delivering relevant credits to unlock planning applications in the city area.
Anglia Square redevelopment Following the withdrawal of Weston Homes from delivery of the approved scheme the future of the site and in particular the council's desire to see wholescale redevelopment of that area is under threat. Failure to achieve redevelopment as envisaged has the potential to impact on other sites in the city and has wider issues for the council.	Director of Major Projects	December 2024	In progress The owner has marketed the site however there are concerns that a plan for comprehensive redevelopment will not be forthcoming from that sale. The council continues to liaise with the site owner and Homes England to explore the options for the required public sector subsidy that would be necessary to deliver the redevelopment scheme.
Information Governance The Council plans to further strengthen our existing IG framework through the implementation of a 'Data and Information Strategy' and a 'Data Ethics Policy'.	Information Governance Manager SIRO – Executive Director Resources	April 2025	In progress It is our intention to finalise and publish both documents in the financial year 2024-25.

Issues & challenges identified	Lead Officer	Target implementation date	Update
Construction issues with property in the City In late 2023 condition survey work picked up that a building in the City Centre which the Council had recently taken ownership of had issues with its construction which resulted in it being contrary to building regulations.	Executive Director Development and City Services	April 2025	In progress Measures were undertaken in early 2024 to address immediate deficiencies and appropriate regulatory authorities are now content with the state of the building in the medium term. Further work is ongoing on establishing and costing the full programme of works to permanently rectify all issues with the building.

Appendix A

Norwich City Council: Code of Corporate Governance (Link to Code of Corporate Governance)

Principle A - Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
Behaving with integrity	• Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation. • Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These should build on the Seven (Nolan) Principles of Public Life. • Leading by example and using these standard operating principles or values as a framework for decision making and other actions. • Demonstrating, communicating, and embedding the standard operating principles or values through appropriate policies and processes which are reviewed regularly to ensure that they are operating effectively	• The Council's constitution sets out the rules that the Council, its staff, and Councilors follow. • The constitution includes codes of conduct for both Councilors and staff. • The Council has adopted procedures for dealing with conduct issues raised in relation to Councilors and there are similarly procedures in relation to issues raised relating to staff. • The Council has adopted Anti-Fraud and Corruption and Whistleblowing Policies • The Council has a register of key policy documents which identifies when these require review. • The Council has provided training to Councilors and staff on a wide range of ethical matters	• The Council has recently seen significant changes in its leadership. It will need to ensure it provides support to the individuals to enable them to fulfil their roles effectively. • The Council is undertaking a review of its culture to understand how it can develop to serve the people of Norwich. • The Council will continue to monitor emerging legislation, in particular new legislation especially in the light of a changed government following the July 2024 General Election. • The council will continue to review progress in regulatory services where previous issues were identified.

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
Demonstrating strong commitment to democratic values	• Seeking to establish, monitor and maintain the organisation's ethical standards and performance. • Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation. • Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values. • Ensuring that providers of services on behalf of the organisation act with integrity and in compliance with high ethical standards expected by the organisation.		
Respecting the rule of law	• Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations. • Creating the conditions to ensure that the statutory officers, other key post holders and members can fulfil their responsibilities in accordance with legislative and regulatory requirements. • Striving to optimise the use of the full powers available for the benefit of citizens, communities, and other stakeholders.		

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	• Dealing with breaches of legal and regulatory provisions effectively • Ensuring corruption and misuse of power are dealt with effectively.		

Principle B - Ensuring openness and comprehensive stakeholder engagement

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
Openness	• Ensuring an open culture through demonstrating, documenting, and communicating the organisation's commitment to openness • Making decisions that are open about actions, plans, resource use, forecasts, outputs, and outcomes. The presumption is for openness. If that is not the case, a justification for the reasoning for keeping a decision confidential should be provided. • Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear. • Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/ courses of action	• The public segment of committee meetings is webcast to facilitate engagement with interested parties. • Records of Council meetings including decisions made, as well as decisions made by officers, are available on the Council's website. • The Council undertakes an open budget consultation, ensuring that all potentially interested parties can provide their views. • The Council uses a range of platforms to inform and engage with citizens including the quarterly Citizen magazine, website, and social media. • The Council has developed the Get Talking Norwich platform to aid citizen participation in consultations, provide a platform for updates and seek feedback from users.	• Implementation of the Citizen Participation Strategy. • The Council will be reviewing its approach to consultation and engagement, taking on board feedback from the corporate peer review.
Engaging comprehensively with institutional stakeholders	• Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so	• An independent member is appointed to the audit committee and a second is being recruited.	

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	• that outcomes are achieved successfully and sustainably. • Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively. • Ensuring that partnerships are based on: - trust - a shared commitment to change - a culture that promotes and accepts challenge among partners - and that the added value of partnership working is explicit	• The council has held the position of chair for both the Scrutiny and Audit committees for opposition members. • The Council maintains a database of users who wish to be engaged in consultations on specific topics. • In relation to local planning, the Council participates in the Greater Norwich Growth Board, which supports the delivery of local planning in the Greater Norwich area through engagement with key public sector partners and the Local Enterprise Partnership. The Statement of Community Involvement explains how the Council will engage with the community in its future planning for the area. • The Council encourages democratic engagement in its committees and decision-making meetings and has introduced livestreaming to support further engagement. • The Council has complaints policies in place that are consistent with relevant ombudsman frameworks	
Engaging stakeholders effectively, including individual citizens and service users	• Establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes. • Ensuring that communication methods are effective, and that members and officers are clear about their roles regarding community engagement. • Encouraging, collecting, and evaluating the views and experiences of communities, citizens, service users and organisations of different		

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	backgrounds including reference to future needs • Implementing effective feedback mechanisms to demonstrate how their views have been considered. • Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity. • Taking account of the interests of future generations of taxpayers and service users		

Principle C - Defining outcomes in terms of sustainable economic, social, and environmental benefits

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
Defining outcomes	• Having a clear vision which is an agreed formal statement of the organisation's purpose and intended outcomes containing appropriate performance indicators, which provides the basis for the organisation's strategy, planning and other decisions. • Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer. • Delivering defined outcomes on a sustainable basis within the resources that will be available. • Identifying and managing risks to the achievement of outcomes • Managing service users' expectations effectively regarding determining priorities and making the best use of resources.	• The Council has an agreed corporate plan which sets out its vision for the city and includes clear actions and performance indicators for how its vision will be delivered. • The corporate plan considers the views and considerations of the Norwich 2040 vision, a stakeholder steering group tasked to take a longer-term view of the city. • The latest Corporate Plan is outcomes focused and reflects a broad engagement across the city involving more than 900 interactions. • The Council has a range of agreed strategies and policies that support delivery of the corporate plan. • The quarterly assurance reports detail how the Council is performing against its financial and non-financial targets, and an assessment of risks to achieving outcomes. • The Council's Medium Term Financial Strategy is subject to regular review and	• The council is developing a new business planning approach based on the implementation of the new Corporate Plan and having a strong, outcomes focused, approach. • The council's underpinning principles set out as part of the Corporate Plan includes the need to consider the environment in all that the council does. • The Council is developing a new Equality, Diversity and Inclusion strategy which will be brought forward for approval during the year.
Sustainable economic, social, and environmental benefits	• Considering and balancing the combined economic, social, and environmental impact of policies, plans and decisions when taking decisions about service provision • Taking a longer-term view about decision making, taking account of risk, and acting transparently where		

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	there are potential conflicts between the organisation's intended outcomes and other factors such as the political cycle or financial constraints. • Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social, and environmental benefits, through consultation where possible, to ensure appropriate trade-offs. • Ensuring fair access to services, taking full account of the access needs of disabled and vulnerable people.	consideration to understand the Council's future resources. • The Council has established processes for undertaking and considering the outcomes of equality impacts when making decisions and receives an annual equality statement to evaluate its impact in improving equality. • The Council has an agreed biodiversity strategy.	

Principle D – Determining the interventions necessary to optimise the achievement of the intended outcomes

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
Determining Interventions	• Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and including the risks associated with those options. Therefore, ensuring best value is achieved however services are provided. • Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required to prioritise competing demands within limited resources available including people, skills, land, and assets and bearing in mind future impacts.	• Decisions are subject to a robust review process prior to determination in line with the Council's scheme of delegation. • The Council uses set templates for report writing and decision making, which require authors to consider a range of factors including financial, legal, social and equality impacts when making decisions and feedback from consultation undertaken. • The Council has agreed corporate timetables for the reporting of performance and establishing the budget. These are widely communicated to staff. • The corporate plan is used to inform Directorate Planning, with each directorate having its own plan they are expected to deliver. The Directorate Plan is channeled into individual performance targets. • The Council has developed its approach to forming the	• The new approach to business planning and implementing the Corporate Plan will have a strong outcomes-based focus. • External expertise has been procured to understand and shape the business planning process on an outcomes-based accountability model. • The contribution of partners and the synergies that come from shared objectives has been recognised as part of the business planning approach form2025/26 and later years.
Planning Interventions	• Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities, and targets. • Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered. • Considering and monitoring risks facing each partner when working collaboratively including shared risks		

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	• Ensuring arrangements are flexible and agile so that the mechanisms for delivering outputs can be adapted to changing circumstances. • Establishing appropriate key performance indicators (KPIs) as part of the planning process to identify how the performance of services and projects is to be measured. • Ensuring capacity exists to generate the information required to review service quality regularly. • Preparing budgets in accordance with organisational objectives, strategies, and the medium-term financial plan. • Informing medium- and long-term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy.	budget, with savings and growth proposals subject to robust appraisal to ensure their feasibility using the design authority. • The Council has an agreed 40-year HRA business plan.	
Optimising Achievement of Intended Outcomes	• Ensuring the medium-term financial strategy integrates and balances service priorities, affordability, and other resource constraints. • Ensuring the budgeting process is all-inclusive, considering the full cost of operations over the medium and longer term.		

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	• Ensuring the medium-term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period for outcomes to be achieved while optimising resource usage. • Ensuring the achievement of 'social value' through service planning and commissioning. The Public Services (Social Value) Act 2012 states that this is "the additional benefit to the community…over and above the direct purchasing of goods, services and outcomes"		

Principle E – Developing the entity's capacity, including the capability of its leadership and the individuals within it

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
Developing the entity's capacity	• Reviewing operations, performance use of assets on a regular basis to ensure their continuing effectiveness. • Improving resource use through appropriate application of techniques such as benchmarking and other options to determine how the authority's resources are allocated so that outcomes are achieved effectively and efficiently. • Recognising the benefits of partnerships and collaborative working where added value can be achieved. • Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources.	• The Council has a staff performance management framework to provide a formal evaluation of performance on a 6-monthly basis, supplemented by regular 1-1 meetings. • The Constitution clearly establishes roles and responsibilities for members and levels of decision-making responsibilities. • The Council develops a member development programme on an annual basis and actively promotes national and regional development opportunities to Councilors. • The Council has an e-learning system and a range of corporate development activities available to staff. • The Council aims to attract staff from a diverse range of backgrounds. This is subject to monitoring and reporting, as well as learning to understand how the Council can be more effective in recruiting candidates.	• The Council is seeking to develop a formal workforce strategy, to develop a clearer framework for its long-term resource planning. • The Council is undertaking a review of its culture to understand how it can develop to serve the people of Norwich. • The Council has been undertaking a service review process to evaluate the level of resources allocated to service areas. • The Council is currently implementing a suite of IT tools which are aimed to support more efficient working and support better data management. This includes a new master data management system, SharePoint and finance and HR system. • The Council is planning to undertake a review of its approach to partnerships and commissioning.
Developing the capability of the entity's leadership and other individuals	• Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early in the relationship and that a shared understanding of roles and objectives is maintained. • Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body.		

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	• Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure whereby the chief executive leads the authority in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other's authority Developing the capabilities of members and senior management to achieve effective shared leadership and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks by: - ensuring members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged; - ensuring members and officers have the appropriate skills, knowledge, resources, and support to fulfil their roles and responsibilities and ensuring that they can update their knowledge on a continuing basis;	• The Council has agreed a wellbeing strategy for staff. This is overseen by a wellbeing group who organize and promote events to support staff wellbeing.	

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	- ensuring personal, organisational, and system-wide development through shared learning, including lessons learnt from governance weaknesses both internal and external; - identifying and developing talent within the Council's workforce; and - developing succession planning. • Ensuring that there are structures in place to encourage public participation. • Taking steps to consider the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections. • Holding staff to account through regular performance reviews which take account of training or development needs. • Ensuring arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing.		

Principle F – Managing risks and performance through robust internal control and strong public financial management

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
Managing Risk Risk Management Policy and Strategy (PDF)	• Recognising that risk management is an integral part of all activities and must be considered at all stages of decision making. • Implementing robust and integrated risk management arrangements and ensuring that they are working effectively. • Ensuring that responsibilities for managing individual risks are clearly allocated.	• The Council considers quarterly assurance reports which integrate financial and non-financial performance, and risks to give a holistic view of performance. • The Council has an agreed corporate risk strategy. Risks are communicated through the corporate and directorate level risk register. Each are reviewed on a quarterly basis. • Risk assessment is a required part of business planning and decision making and incorporated into templates. • The Council has business continuity plans in place which are subject to periodic testing. This is supported by a steering group who oversee developments in business continuity and ensure they are reflected in corporate planning. Following business continuity events, review sessions are held to inform improvements to processes.	• The Council has been strengthening its controls in relation to contract management including provision of training and additional guidance to staff. • The Council has been participating in a review commissioned by DLUHC through Local Partnerships to develop guidance to local authorities on contract management and will be seeking to understand how its arrangements can be developed following the publication of the guidance. • The Council has implemented a new Enterprise Resource Planning system, replacing its existing finance and HR system. • Further development of the ERP system including inclusion of payroll functionality and exploiting
Managing Performance Performance Reporting	• Monitoring service delivery effectively including planning, specification, execution, and post implementation review. • Making decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the organisation's financial, social, and environmental position and outlook. • Ensuring an effective scrutiny function is in place which encourages constructive challenge and debate on policies and objectives before, during and after decisions are made thereby enhancing the organisation's performance.		

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	• Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement. • Ensuring there is consistency between specification stages (such as budgets) and post implementation reporting.	• The Council has robust project management documentation to ensure consistency and standardisation of approach, risk management and reporting. • The Council has transferred its internal audit service to the Eastern Internal Audit Services, to help provide long term resilience. • The Council's Internal Audit Service reports the outcome of its work to Executive Leadership Team and Audit Committee. The Internal Audit Service is monitored to ensure compliance with the Public Sector Internal Audit Standards.	the reporting capabilities of the system are planned. • The Council will be implementing a new master data management system. This will support the Council in ensuring the consistency and accuracy of its data. • The council is undertaking a review of its financial procedures and its approach to management of debt. • The council is arranging additional training on risk management, risk appetite definition and the recording and management of risk. Gallaghers – the council's insurance broker is providing the required training.
Robust Internal Control	• Aligning the risk management strategy and policies on internal control with achieving the objectives • Evaluating and monitoring the authority's risk management and internal control on a regular basis. • Ensuring effective counter fraud and anti-corruption arrangements are in place. • Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor. • Ensuring an audit committee or equivalent group or function which is independent of the executive and accountable to the governing body: - provides a further source of effective assurance regarding arrangements for managing	• The Council's Scrutiny Committee establishes its own work programme annually and receives training on its role. It can elect to pre-scrutinise policies and documents and has the right to call-in cabinet decisions. The Scrutiny Committee examines the Council's budget, corporate plan and its company business plans.	

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
	risk and maintaining an effective control environment; and - that its recommendations are listened to and acted upon	• The Council's Audit Committee oversees financial governance. It receives risk reports, reports from internal and external auditors and the accounts. It undertakes an annual self-assessment exercise. It has an appointed independent person to provide expert oversight.	
Managing Data	• Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data. • Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring.	• The Council has established a Treasury Management committee to provide specific oversight to treasury strategy and performance. • The Council has processes in place to ensure the safe storage of data. Data sharing is subject to sharing agreements and impact assessments undertaken where data use changes.	
Strong public financial management	• Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance. • Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls.	• The Executive Leadership Team receives quarterly reports on compliance with information governance standards and monthly reports on complaints and FOI requests. • The Council has secured its compliance with the PSN and PCI DSS information security standards.	

Principle G – Implementing good practices in transparency, reporting and audit to effective accountability

Sub Principles	Demonstrating good governance	How the Council complies	Areas for development
Implementing good practice in transparency	• Writing and communicating reports for the public and other stakeholders in an understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate. • Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand.	• The Council has established report templates which are subject to robust review before publication. • The Council is required to produce the annual statement of accounts and annual governance statement. Statement of accounting policies are presented to the Audit Committee to review. • The statement of accounts and annual governance statements sits alongside the quarterly assurance reports, which enable members and senior management to take a robust evaluation of corporate performance. • This framework is subject to consideration by the Audit Committee, with the Annual Governance Statement serving as a demonstration of the Council's commitment to good governance. • The Council has undertaken significant work to strengthen its oversight of its wholly	• We will continue to encourage increased use of electronic means to access committee meetings including papers and the Council's YouTube channel. • Due to the national issues with external audit of accounting information, the council's Statement of Accounts has not been signed off for 2021/22 and 2022/23. • A draft value for money opinion has been received for 2021/22 and 2022/23 but it is likely that a disclaimer opinion will be provided for previous years SoA (subject to legislation).
Implementing good practice in reporting	• Reporting at least annually on performance, value for money and the stewardship of its resources. • Ensuring members and senior management own the results. • Ensuring robust arrangements for assessing the extent to which the principles contained in the Framework have been applied and publishing the results on this assessment including an action plan for improvement and evidence to demonstrate good governance (annual governance statement) • Ensuring that the Framework is applied to jointly managed or shared		

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	service organisations as appropriate. • Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other similar organisations.	owned companies. This includes the introduction of shareholder panels, which meet quarterly to evaluate how the companies are performing against their own performance targets and business plans. Business plans are subject to annual approval by the Cabinet (including pre-scrutiny).	
Assurance and Effective Accountability	• Ensuring that recommendations for corrective action made by external audit are acted upon. • Ensuring an effective internal audit service with direct access to members is in place which provides assurance regarding governance arrangements and recommendations are acted upon. • Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations. • Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement. • Ensuring that when working in partnership, arrangements for accountability are clear and that the need for wider public accountability has been recognised and met.	• The Council's internal audit arrangements are outlined above. Internal Audit have direct reporting access to the Audit Committee. • The Council welcomes peer challenge. In 2023 a corporate peer review was undertaken by the Local Government Association with actions being incorporated into the Corporate Plan refresh. • A follow up to the peer review was undertaken a year later to confirm the progress being made on implementing recommendations made. • The Council has undertaken work to strengthen its contract management arrangements, which has been reflected above.	