

Public Document Pack

Date: 18 September 2017
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GOVERNANCE AND AUDIT COMMITTEE

27 SEPTEMBER 2017

A meeting of the Governance and Audit Committee will be held at **7.00 pm on Wednesday, 27 September 2017** in the Council Chamber, Cecil Street, Margate, Kent.

Membership:

Councillor Buckley (Chairman); Councillors: Hayton (Vice-Chairman), Braidwood, Connor, Day, Dexter, Dixon, Edwards, Game, I Gregory, Larkins, L Piper, Taylor-Smith and Venables

A G E N D A

Item No

1. APOLOGIES FOR ABSENCE

2. DECLARATIONS OF INTEREST

'To receive any declarations of interest. Members are advised to consider the advice contained within the Declaration of Interest Form attached at the back of this Agenda. If a Member declares an interest, they should complete that form and hand it to the Officer clerking the meeting and then take the prescribed course of action.'

3. MINUTES OF PREVIOUS MEETING (Pages 3 - 6)

To approve the Minutes of the Governance and Audit Committee meeting held on 28.6.17, copy attached.

4. THE EXTERNAL AUDIT FINDINGS FOR THANET DISTRICT COUNCIL - YEAR ENDING MARCH 2017

Report to follow.

5. LETTER OF REPRESENTATION

Report to follow.

6. QUARTERLY INTERNAL AUDIT UPDATE REPORT (Pages 7 - 30)

7. CORPORATE RISK REGISTER QUARTERLY UPDATE (Pages 31 - 36)

8. THE ANNUAL GOVERNANCE STATEMENT 2016/17 (Pages 37 - 54)

9. REVISED WHISTLEBLOWING CODE (Pages 55 - 64)

10. FINAL STATEMENT OF ACCOUNTS

Report to follow.

Declaration of Interests Form

Item
No

Subject



Please scan this barcode for an electronic copy of this agenda.

GOVERNANCE AND AUDIT COMMITTEE

Minutes of the meeting held on 28 June 2017 at 7.00 pm in Council Chamber, Cecil Street, Margate, Kent.

Present: Councillor John Buckley (Chairman); Councillors Hayton, Braidwood, Campbell, Connor, Dexter, Dixon, Game, I Gregory, Larkins, L Piper, Taylor-Smith and Partington.

1. APOLOGIES FOR ABSENCE

Apologies were received from Councillor Day, for whom Councillor Partington was present.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. MINUTES OF PREVIOUS MEETING

Councillor Gregory proposed, Councillor Game seconded and Members agreed the minutes of the meeting held on 8 March 2017.

4. EXTERNAL AUDIT 2016/17 AUDIT PLAN

Darren Wells, Grant Thornton UK LLP introduced the audit plan, advising that the Plan provided an overview of the planned scope and time scales for the year ending 31 March 2017 audit.

During consideration of the item it was noted that:

- The Council would consider income generation opportunities from renewable energy generation, for example solar panel installations on top of multi-storey car parks.
- Within the 'Understanding your business and key developments' heading, the reference to Manston Airport should be amended to Stone Hill Park.

Members noted the report.

5. ANNUAL INTERNAL AUDIT REPORT

Christine Parker, Head of the East Kent Audit Partnership (EKAP) introduced the report which provided Members with a summary of the impact of the work of the East Kent Audit Partnership (EKAP) for the year up to 31 March 2017.

Councillor Crow-Brown spoke under council procedure rule 20.1.

During consideration of the item, it was noted that:

- EKAP worked with managers to ensure actions resulting from audits were stretching but achievable.
- In some cases, staff turn-over had contributed to the failure to implement audit recommendations. This had been addressed by:

- The allocation of a director as responsible for each audit that achieved limited or no assurance.
 - The regular monitoring of progress to implement incomplete audit recommendations at senior management meetings.
 - The successful employment of permanent staff in roles that had previously had interim or temporary staff in position.
- Since the follow up audit of complaints monitoring, new processes had been implemented that addressed the audit recommendations.
- Trevor Kennett, Head of Operational Services, advised that, open spaces had been impacted by staff turn-over, however there was now a permanent open spaces manager in position who would address the recommendations still incomplete at audit follow up.
- Penny Button, Head of Safer Neighbourhoods advised that all incomplete actions highlighted in the Safeguarding follow up audit had been implemented.

Members noted the report.

6. QUARTERLY INTERNAL AUDIT UPDATE REPORT

Simon Webb, Deputy Head of the EKAP, introduced the report noting that there had been seven internal audit assignments completed during the period; five achieved substantial assurance and two achieved a limited assurance. There had also been nine follow up reviews completed.

During consideration of the item it was noted that:

- Improvements made regarding project management were expected to result in an increased assurance rating when a second follow up review took place later in the year.
- Trevor Kennett addressed Member's concerns that street cleansing remained at limited assurance after follow up review. Mr Kennet advised that:
 - The department accepted all the recommendations made by the EKAP and were working towards their implementation.
 - The Council worked to the DEFRA code, however it was intended that after consideration by the corporate management team, Cabinet would be officially asked to agree to the codes service standards.
 - The permanent staff now in post had a clear understanding of what was required to meet the audit recommendations and the management responses detailed in annex 1 were to be reviewed.
- The Local Code of Corporate Governance was available on the website, and a review of website functionality was underway to make the website easier to use.
- Museums remained at limited assurance after follow up as cataloguing of museum items had not been completed. Rob Kenyon, Director of Community services had been in discussion with the museums and volunteers about what assistance could be offered.

Members noted the report.

7. CORPORATE RISK REGISTER - ANNUAL REVIEW

Tim Willis, Director of Corporate Resources and Section 151 Officer, introduced the report which provided an annual review of corporate risks and included a quarterly update of progress since the last meeting.

During consideration of the item it was noted that:

- The names shown at paragraph 3.1 of the report within the table could be displayed in a more formal format.
- Based on currently available information, the Council was assured that all relevant health and safety standards had been met regarding fire safety at the six tower blocks in the district.

Members noted the report.

8. DRAFT ANNUAL GOVERNANCE STATEMENT 2016/17

Tim Howes, Director of Corporate Governance and Monitoring Officer introduced the report which presented the draft Annual Governance Statement 2016/17 for consideration by the Committee.

During consideration of the item it was noted that:

- No significant issues had been identified.
- If agreed by the Committee, the draft statement would be passed to the external auditors for comment, and then return to the Committee for final sign off.

It was proposed by Councillor Campbell, seconded by Councillor Larkins and Members agreed to accept the draft Annual Governance Statement 2016/17.

9. ANNUAL GOVERNANCE STATEMENT ACTION PLAN QUARTERLY UPDATE

Tim Howes, introduced the report and advised that all the tasks would soon either be ongoing, such as training, or completed.

During consideration of the item it was noted that:

- E-learning participation was monitored electronically and reported to corporate management team meetings.

Members noted the report.

10. ANNUAL TREASURY MANAGEMENT REVIEW 2016/17

Tim Willis introduced the report that provided a summary of the treasury management activity and prudential/treasury indicators for 2015/16.

It was proposed by Councillor Larkins, seconded by Councillor Taylor-Smith and Members agreed:

‘That the Governance and Audit Committee:

- Notes the actual 2016/17 prudential and treasury indicators in this report.
- Approves the annual treasury management report for 2016/17.
- Recommends this report to Cabinet.’

11. DRAFT AUDIT COMMITTEE ASSURANCE STATEMENT

Tim Willis introduced the report which included a draft response to questions posed by the external auditors, Grant Thornton UK LLP.

It was proposed by Councillor Campbell, seconded by Councillor Game and Members agreed:

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'That the committee notes and endorses the responses to the letter from the external auditor.'

Meeting concluded: 8.35 pm

QUARTERLY INTERNAL AUDIT UPDATE REPORT

27th September 2017

Report Author	Head of the Audit Partnership: Christine Parker
Portfolio Holder	Cllr John Townend; Cabinet Member for Financial Services & Estates
Status	For Information
Classification:	Unrestricted.
Key Decision	No

Executive Summary:

This report provides Members with a summary of the internal audit work completed by the East Kent Audit Partnership since the last Governance and Audit Committee meeting, together with details of the performance of the EKAP to the 30th June 2017.

Recommendation(s):

That the report be received by Members.

That any changes to the agreed 2017-18 internal audit plan, resulting from changes in perceived risk, detailed at point 5.0 of Annex1 of the attached report be approved.

CORPORATE IMPLICATIONS

Financial and Value for Money	There are no financial implications arising directly from this report. The costs of the audit work are being met from the Financial Services 2017-18 budgets.
Legal	The Council is required by statute (under the Accounts and Audit Regulations and section 151 of the Local Government Act 1972) to have an adequate and effective internal audit function.
Corporate	Under the Local Code of Corporate Governance the Council is committed to comply with requirements for the independent review of the financial and operational reporting processes, through the external audit and inspection processes, and satisfactory arrangements for internal audit.
Equalities Act 2010 & Public Sector Equality Duty	<p>Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to the aims of the Duty at the time the decision is taken. The aims of the Duty are: (i) eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act, (ii) advance equality of opportunity between people who share a protected characteristic and people who do not share it, and (iii) foster good relations between people who share a protected characteristic and people who do not share it.</p> <p>Protected characteristics: age, gender, disability, race, sexual orientation, gender reassignment, religion or belief and pregnancy & maternity. Only aim (i) of the Duty applies to Marriage & civil partnership.</p>

	Please indicate which aim is relevant to the report.	
	Eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act,	
	Advance equality of opportunity between people who share a protected characteristic and people who do not share it	
	Foster good relations between people who share a protected characteristic and people who do not share it.	
<i>There are no equity or equalities issues arising from this report.</i>		

CORPORATE PRIORITIES (tick those relevant)✓	
A clean and welcoming Environment	
Promoting inward investment and job creation	
Supporting neighbourhoods	

CORPORATE VALUES (tick those relevant)✓	
Delivering value for money	X
Supporting the Workforce	
Promoting open communications	X

1.0 Introduction and Background

- 1.1 This report includes the summary of the work completed by the East Kent Audit Partnership since the last Governance and Audit Committee meeting, together with details of the performance of the EKAP to the 30th June 2017.
- 1.2 For each audit review, management has agreed a report, and where appropriate, an Action Plan detailing proposed actions and implementation dates relating to each recommendation. Reports continue to be issued in full to the relevant member of Senior Management Team, as well as the manager for the service reviewed.
- 1.3 Follow-up reviews are performed at an appropriate time, according to the priority of the recommendations, timescales for implementation of any agreed actions, and the risk to the Council.
- 1.4 An Assurance Statement is given to each area reviewed. The assurance statements are linked to the potential level of risk, as currently portrayed in the Council's risk assessment process. The assurance rating given may be Substantial, Reasonable, Limited or No assurance.
- 1.5 Those services with either Limited or No Assurance are monitored, and brought back to Committee until a subsequent review shows sufficient improvement has been made to raise the level of Assurance to either Reasonable or Substantial. A list of those services currently with such levels of assurance is attached as Appendix 2 to the EKAP report.
- 1.6 The purpose of the Council's Governance and Audit Committee is to provide independent assurance of the adequacy of the risk management framework and the associated control environment, independent review of the Authority's financial and non-financial performance to the extent that it affects the Authority's exposure to risk and weakens the control environment, and to oversee the financial reporting process.
- 1.7 To assist the Committee meet its terms of reference with regard to the internal control environment an update report is regularly produced on the work of internal audit. The purpose of this report is to detail the summary findings of completed audit reports and follow-up reviews since the report submitted to the last meeting of this Committee.

2.0 Summary of Work

- 2.1 There have been seven internal audit assignments completed during the period, of which four concluded substantial assurance, one concluded Reasonable assurance and one resulted in a split assurance which was partially limited. One additional piece of work comprised housing benefit quarterly testing, for which an assurance opinion is not applicable.
- 2.2 In addition, five follow-up reviews have been completed during the period.
- 2.3 For the three month period to 30th June 2017, 69.41 chargeable days were delivered against the planned target of 265.31 days which equates to 26% plan completion.
- 2.4 The financial performance of the EKAP is on target at the present time.

3.0 Options

- 3.1 That Members consider and note the internal audit update report.
- 3.2 That the changes to the agreed 2017-18 internal audit plan, resulting from changes in perceived risk, detailed at point 5.0 of the attached report be approved.
- 3.3 That Members consider (where appropriate) requesting an update from the relevant Director/s to the next meeting of the Committee in respect of any areas identified as still having either limited or no assurance after follow-up.
- 3.4 That Members consider registering their concerns with Cabinet in respect of any areas of the Council's corporate governance, control framework or risk management arrangements in respect of which they have on-going concerns after the completion of internal audit follow-up reviews and update presentations from the relevant Director.

Contact Officer:	Christine Parker, Head of the Audit Partnership, Ext. 7190 Simon Webb, Deputy Head of Audit, Ext 7189
Reporting to:	Tim Willis, Director of Corporate Resources & s151 Officer, Ext. 7617 Ramesh Prashar, Head of Financial Services.

Annex List

<i>Annex 1</i>	East Kent Audit Partnership Update Report – 27-09-2017
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Background Papers

Title	Details of where to access copy
<i>Internal Audit Annual Plan 2017-18</i>	Previously presented to and approved at the 8 th March 2017 Governance and Audit Committee meeting
<i>Internal Audit working papers</i>	Held by the East Kent Audit Partnership

Corporate Consultation

Finance	Tim Willis, Director of Corporate Resources & s151 Officer
Legal	Tim Howes, Director of Corporate Governance

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QUARTERLY INTERNAL AUDIT UPDATE REPORT FROM THE HEAD OF THE EAST KENT AUDIT PARTNERSHIP

1.0 INTRODUCTION AND BACKGROUND

- 1.1 This report provides Members with an update of the work completed by the East Kent Audit Partnership since the last Governance and Audit Committee meeting, together with details of the performance of the EKAP to the 30th June 2017.

2.0 SUMMARY OF REPORTS

Service / Topic		Assurance level	No. of Recs.	
2.1	Land Charges	Substantial	C H M L	0 1 0 0
2.2	Receipt & Opening of Tenders	Substantial	C H M L	0 0 3 1
2.3	EK Services - Housing Benefit Subsidy	Substantial	C H M L	0 0 0 0
2.4	EK Services - Housing Benefit Payments	Substantial	C H M L	0 0 0 1
2.5	EKHR – Payroll & Benefits in Kind	Substantial / Limited	C H M L	0 1 2 0
2.6	Allotments	Reasonable	C H M L	0 0 1 1
2.7	EK Services – Housing Benefit Quarterly Testing (Quarter 4 of 2016-17 and Quarter 1 of 2017-18)	Not Applicable		

2.1 Land Charges – Substantial Assurance:

2.1.1 Audit Scope

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To provide assurance on the adequacy and effectiveness of the procedures and controls established to ensure that the Council maintains an efficient and effective Land Charges function in accordance with prevailing legislation.

2.1.2 Summary of Findings

The Council has a statutory duty under the Local Land Charges Act 1975 to maintain an accurate and up-to-date Register of Local Land Charges affecting land and property. The two main functions of the Land Charges Service are to maintain the register and to provide search information for paying customers. The income level for 2016/17 (£346,912) shows a 8.42% drop against the income received for 2015/16 (£378,823).

The primary findings giving rise to the Substantial Assurance opinion in this area are as follows:

- Processes are well established for inputting in to the register and providing search information to paying customers;
- The samples tested revealed accurate information held on the register;
- Fees and Charges are correctly administered; and
- The insurance arrangements in place are sufficient;

Scope for improvement was however identified in the following areas:

- The Land Charges function should be a cost neutral function in accordance with the 2008 (England)(Charges for Property Searches) Regulations (Section 6.3). To be able to calculate this a regular exercise needs to be carried out to identify the expenditure in providing the land charges function and the estimated income required.
- It has been proposed that the Local Land Charges Register will be taken over by the Land Registry sometime in the next 5 years, consequently project management controls will need to be agreed once discussions regarding the resources and the data transfer commence.

2.2 Receipt & Opening of Tenders – Substantial Assurance:

2.2.1 Audit Scope

To provide assurance on the adequacy and effectiveness of the procedures and controls established to ensure that the Council's procedures for the receipt and opening of tenders is in accordance with Contract Standing Orders and ensures the probity of the tendering procedure.

2.2.2 Summary of Findings

The area under review has some linkage with Corporate Value 1: *Delivering services in the most cost effective and efficient way*. The Council has been almost exclusively using an online e-procurement system for its procurement activities since 2016. The 'Kent Business Portal' is hosted by a company called 'Proactis' and subcontracted to Thanet District Council by KCC along with other district authorities in Kent.

The primary findings giving rise to the Substantial Assurance opinion in this area are as follows:

- Roles and responsibilities are well established;
- System based controls are working effectively;
- The audit trail is extremely strong, in fact two recommendations have been made to reduce the controls in place in order to save money; and
- Segregation of duties is extremely robust.

Scope for improvement was however identified in the following areas:

- Contract Standing Orders need to be reviewed and updated to reflect changes that have arisen due to the roll out of e-tendering;
- The Council do not currently use the full functionality of the Kent Business Portal as they do at other east Kent councils; and
- The form which records the opening of tenders could be improved.

2.3 EK Services – Housing Benefit Subsidy - Substantial Assurance

2.3.1 Audit Scope

To provide assurance on the adequacy and effectiveness of the processes and procedures in place to ensure that the Council completes the Housing Benefit Subsidy return accurately and seeks to maximise the amount of re-imbursement payable to the authority in respect of the Housing Benefit payments which have been made to the benefit claimants within the district

2.3.2 Summary of Findings

Housing Benefit Subsidy is the grant provided by the Department for Work and Pensions (DWP) for the authorities to process and pay housing benefit to claimants across each of the three districts. An annual claim is submitted by each authority to the DWP that is verified and signed off by the external auditors. For 2016/17 the housing benefit subsidy claim for each authority was approximately:

- Canterbury City Council £46.3 million pounds.
- Dover District Council £38.1 million pounds.
- Thanet District Council £64.2 million pounds.

The primary findings giving rise to the Substantial Assurance opinion in this area are as follows:

- Established four weekly processes are in place to monitor the subsidy claim and carry out any adjustments that are needed to ensure that the subsidy figures are fully maximised.
- Supporting guidance and training is in place for the officers responsible for carrying out the four weekly processes and preparing the annual subsidy claim at each of the authorities.
- The 2016/17 subsidy claims have been submitted to the DWP and will be verified by the external auditors.

2.4 EK Services – Housing Benefit Payments – Substantial Assurance

2.4.1 Audit Scope

To ensure that the processes and procedures established by EK Services are sufficient to provide the level of service required by the partner authorities of Canterbury City Council, Dover District Council and Thanet District Council and incorporate relevant internal controls regarding the payments of Housing Benefit.

2.4.2 Summary of Findings

EK Services provides housing benefit services to 37,285 claimants across Canterbury, Dover and Thanet Councils. In 2016/17 a total of £148.8m of housing benefits payments were distributed to claimants and landlords in the private rent sector and public rent sector.

The primary findings giving rise to the Substantial Assurance opinion in this area are as follows:

- Policies and procedures clearly set out roles and responsibilities in respect of housing benefit assessment and payment;
- A sample of 90 payments across the three Councils were correctly administered to a mixture of claimants, landlords and third parties;
- The coding and reconciliation controls were well established and correctly and consistently employed;
- System based controls and management reports were well utilised; and
- No fraud or error was detected during the samples of walkthrough testing or substantive testing carried out.

Scope for improvement was however identified in the following areas:

- The physical security of claim forms stored before they are sent for shredding should be improved at CCC.

2.5 EKHR – Payroll & Benefits in Kind – Substantial Assurance

2.5.1 Audit Scope

To ensure that the payroll service administered by EKHR on behalf of Canterbury, Dover and Thanet Councils, including EK Services is adequately controlled to ensure;

Payroll

that the right people are getting paid the right amounts at the right time. That all statutory requirements such as income tax and national insurance are complied with.

Benefits In Kind

that the correct regulatory requirements are being adhered to in relation to the benefits in kind that are being provided to the officers and members.

2.5.2 Summary of Findings

The payroll process was brought in house in November 2015 when the contract with Kent County Council ended. EKHR provides the payroll service and currently pays on

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average 1770 employees and councillors approximately £2.6 million pounds net salaries for the three authorities each month.

Payroll - Management can place Substantial Assurance on the system of internal controls in operation for payroll processing.

The primary finding giving rise to the Substantial Assurance opinion in this area is as follows:

- Established processes are in place for the monthly payrolls to be carried out in a timely fashion thus ensuring that employees and councillors are paid on time.
- Staff responsible for processing the monthly payrolls have a very good knowledge base of payroll and the supporting legislation and are able to provide responses to questions raised by employees and statutory bodies.
- They have developed good relationships with the managers across the authorities for dealing with payroll issues.

Scope for improvement was however identified in the following areas:

- To assist in performance management the number of payroll errors broken down into those that are due to incorrect information given by managers for processing and those that are due to incorrect payroll processing should be considered.
- The good practice for passwords to be regularly changed is not active for Managers and employees with access to the iTrent self-service system.

Benefits In Kind - Management can place Substantial Assurance on the system of internal controls in operation at Canterbury City Council and EKHR for the processing of the P11d's and other supporting documentation and Limited Assurance for both Dover and Thanet District Councils in respect of ensuring that where applicable the payroll exemptions are now in place.

The primary finding giving rise to the Substantial Assurance opinion in this area is as follows:

- Established processes are in place at Canterbury City Council to ensure that payroll exemptions are reviewed on a regular basis and that P11d information has been submitted when applicable to HMRC.
- East Kent Human Resources have completed and submitted the applicable documentation for the P11d's and Class 1A National Insurance Contributions in respect of Dover District Council.

Scope for improvement was however identified in the following areas:

- The previous audit report in June 2014 highlighted an issue in ensuring that the payroll exemptions are reviewed on a regular basis. Resolution rests with it being determined who will carry this out for both Dover and Thanet councils.

2.6 Allotments – Reasonable Assurance:

2.6.1 Audit Scope

To provide assurance on the adequacy and effectiveness of the procedures and controls established to ensure that the Council is adequately discharging its responsibilities for the provision of allotments within the district.

2.6.2 Summary of Findings

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Section 23 of the Small Holdings and Allotments Act 1908 places an obligation on the borough, district or parish council to provide a sufficient number of allotments for residents who want them.

The act states that if representations are made in writing to the borough, parish or district council by six registered electors who are liable to pay council tax and resident in the borough, parish or district, then the relevant council shall take those representations into consideration and take proceedings under the act. This means that if six or more registered electors request allotments then the council should take this request into consideration.

If the Council cannot acquire a site by agreement, it can consider acquiring the land compulsorily under powers granted in the act for the compulsory purchase of land for allotments.

Paragraph 9 of schedule 29 of the Local Government Act 1972 states that where an area falls within the jurisdiction of both a parish and district council, the responsibility for ensuring sufficient provision of allotment land and if necessary the acquisition of such land is transferred to the parish council.

Thanet District Council is only responsible for the allotments sites in Margate situated Brooke Avenue Garlinge, Dane Valley, Nash Road and Tivoli Road.

The current cost of an allotment is £4.38 per 25 square metres and a £27.18 minimum charge is applied. Water is charged at £1 per 25 Square metres.

The average size of a plot is 250 sq metres although these can be divided down into a half plot of 125 sq metres if required depending on availability.

Existing allotments situated in Birchington, Broadstairs, Ramsgate and Westgate are managed by the Town/Parish councils in those areas.

The primary findings giving rise to the Reasonable Assurance opinion in this area are as follows:

- The Council is discharging its legal responsibilities in this area.
- There is a database of all allotments owned and operated by the Council.
- It is clear from the database which allotments are statutory and which are non-statutory.
- Waiting lists are maintained for each allotment site where required.
- Residency checks are undertaken before allotments are offered to ensure that the applicant is eligible
- The Schedule of fees and charges is formally approved by Council annually and consistently applied.
- Appropriate income billing and collection arrangements are in place which adhere to Financial Procedure Rules.
- Appropriate information is available to residents about allotments on the Council website.
- The Council has an appropriate allotments policy and/or rules for the letting of allotments.
- Applicants are required to complete an appropriate application form.
- Appropriate tenancy leases/letting agreements are in place for each allotment, which are signed by each party.

Scope for improvement was however identified in the following areas:

- The fees and charges for allotments should be reviewed and, if an increase is approved by Members, the appropriate notice of this given to tenants.
- Appropriate inspections of allotment sites should be undertaken and the rules enforced.

2.7 EK Services – Housing Benefit Quarterly Testing (Quarter 4 of 2016-17 and Quarter 1 of 2017-18):

2.7.1 Background:

Over the course of 2016/17 and 2017-18 financial years the East Kent Audit Partnership will be completing a sample check of Council Tax, Rent Allowance and Rent Rebate and Local Housing Allowance benefit claims.

2.7.2 Findings:

For the fourth quarter of the 2016/17 financial year (January to March 2017) and the first quarter of the 2017-18 financial year (April to June 2017) a sample of claims including new and change of circumstances of each benefit type were selected by randomly selecting the various claims for verification.

A fail is categorised as an error that impacts on the benefit calculation. However, data quality errors are also shown but if they do not impact on the benefit calculation then for reporting purposes the claim will be recorded as a pass.

2.7.3 Audit Conclusion:

2016/17 Quarter 4 - For this quarter twenty benefit claims were checked and of these one had a financial error that impacted on the benefit calculation (5%). For 2016/17 a total of eighty benefit claims were checked of which two (2.5%) had a financial error that impacted on the benefit calculation and two (2.5%) had a data quality error.

2017/18 Quarter 1 - For this quarter twenty benefit claims were checked and of these none had a financial error that impacted on the benefit calculation.

3.0. **FOLLOW UP OF AUDIT REPORT ACTION PLANS:**

- 3.1 As part of the period's work, five follow up reviews have been completed of those areas previously reported upon to ensure that the recommendations made have been implemented, and the internal control weaknesses leading to those recommendations have been mitigated. Those completed during the period under review are shown in the following table.

Service/ Topic		Original Assurance level	Revised Assurance level	Original Number of Recs		No of Recs. Not yet implemented	
a)	Business Continuity & Emergency	Reasonable	Reasonable	C H	0 4	C H	0 1

Service/ Topic		Original Assurance level	Revised Assurance level	Original Number of Recs		No of Recs. Not yet implemented	
	Planning			M	4	M	2
				L	7	L	1
b)	Post Implementation Review Phase 1	Not Applicable	Not Applicable	C	0	C	0
				H	5	H	0
				M	1	M	0
				L	0	L	0
c)	Budgetary Control	Substantial	Substantial	C	0	C	0
				H	0	H	0
				M	2	M	1
				L	2	L	2
d)	EK Services – PCI-DSS	Limited	Reasonable / Limited	C	0	C	0
				H	3	H	3
				M	1	M	0
				L	0	L	0
e)	EK Services ICT Disaster Recovery	Substantial/ Reasonable	Substantial/ Reasonable	C	0	C	0
				H	5	H	0
				M	1	M	1
				L	1	L	0

- 3.2 Details of any individual Critical and High priority recommendations still to be implemented at the time of follow-up are included at Appendix 1 and on the grounds that these recommendations have not been implemented by the dates originally agreed with management, they are now being escalated for the attention of the s.151 officer and Members' of the Governance and Audit Committee.

The purpose of escalating high-priority recommendation which have not been implemented is to try to gain support for any additional resources (if required) to resolve the risk, or to ensure that risk acceptance or tolerance is approved at an appropriate level.

- 3.3 As highlighted in the above table, those areas previously reported as having either Limited or No assurance have been reviewed and, in respect of those remaining at below Reasonable assurance, Members are advised as follows:

a) EK Services – PCI-DSS:

Thanet Council are the only Council that has decided to share the PCI-DSS Compliance Officer role. This is a weaker position in terms of governance and control and could affect the Council's consistency and ability to manage PCI-DSS Compliance.

4.0 WORK-IN-PROGRESS:

- 4.1 During the period under review, work has also been undertaken on the following topics, which will be reported to this Committee at future meetings: Local Code of Corporate Governance, Risk Management, Garden Waste & Recycling Income, Service Contract Management.

5.0 CHANGES TO THE AGREED AUDIT PLAN:

- 5.1 The 2017-18 internal audit plan was agreed by Members at the meeting of this Committee on 8th March 2017.
- 5.2 The Head of the Audit Partnership meets on a quarterly basis with the Section 151 Officer or their nominated representative to discuss any amendments to the plan. Members of the Committee will be advised of any significant changes through these regular update reports. Minor amendments have been made to the plan during the course of the year as some high profile projects or high-risk areas have been requested to be prioritised at the expense of putting back or deferring to a future year some lower risk planned reviews. The detailed position regarding when resources have been applied and or changed are shown as Appendix 3.

6.0 FRAUD AND CORRUPTION:

There are no known instances of fraud or corruption being investigated by the EKAP to bring to Members attention at the present time.

7.0 UNPLANNED WORK:

All unplanned work is summarised in the table contained at Appendix 3.

8.0 INTERNAL AUDIT PERFORMANCE

- 8.1 For the three month period to 30th June 2017, 69.41 chargeable days were delivered against the planned target of 265.31 days which equates to 26% plan completion.
- 8.2 The financial performance of the EKAP is on target at the present time.
- 8.3 As part of its commitment to continuous improvement and following discussions with the s.151 Officer Client Group, the EKAP has established a range of performance indicators which it records and measures. The performance against each of these indicators for 2015-16 is attached as Appendix 5.
- 8.4 The EKAP audit maintains an electronic client satisfaction questionnaire which is used across the partnership. The satisfaction questionnaires are sent out at the conclusion of each audit to receive feedback on the quality of the service. Current feedback arising from the customer satisfaction surveys is featured in the Balanced Scorecard attached as Appendix 4.

Attachments

- Appendix 1 Summary of Critical and High priority recommendations not implemented at the time of follow-up.
- Appendix 2 Summary of services with Limited / No Assurances.
- Appendix 3 Progress to 30th June 2017 against the agreed 2017-18 Audit Plan.

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Appendix 4 EKAP Balanced Scorecard of Performance Indicators to 30th June 2017.
Appendix 5 Definition of Audit Assurance Statements & Recommendation Priorities

SUMMARY OF CRITICAL & HIGH PRIORITY RECOMMENDATIONS NOT IMPLEMENTED AT THE TIME OF FOLLOW-UP – APPENDIX 1		
Original Recommendation	Agreed Management Action , Responsibility and Target Date	Manager's Comment on Progress Towards Implementation.
<i>Business Continuity & Emergency Planning – June 2017:</i>		
Compliance with the Councils' Contract Standing Orders needs to be documented.	<p>Ensure this takes place when procuring 2016-2019 SLA.</p> <p>Proposed Completion Date – April 2017</p> <p>Responsibility – Deputy Technical Services Manager</p>	<p>Awaiting Response from Procurement as at mid June 2017.</p> <p>Outstanding.</p>
<i>EK Services – PCI-DSS – August 2017:</i>		
Each Council should review the effectiveness of the cross-directorate governance arrangements in place for 'Information Governance', paying particular attention to the relationship between the PCI-DSS Compliance Officer, the SIRO, the Section 151 Officer and any appropriate Shared Service Senior Officer and ensure further development of the incident reporting process to increase partner insight into risks and identify training needs.	<p><u>Thanet District Council</u> The Council has decided to work towards compliance without appointing a PCI-DSS Compliance Officer. The Council will consider the governance arrangements required to make this work and as part of this the Council will ensure that system administration of the card payment solutions are also considered.</p> <p>Proposed Completion Date September 2016</p> <p>Responsibility - Thanet SIRO</p>	<p><u>Thanet District Council</u> Thanet Council are the only Council that has decided to share the PCI-DSS Compliance Officer role. This is a weaker position in terms of governance and control and could affect the Council's consistency and ability to manage PCI-DSS Compliance.</p> <p>Recommendation Outstanding</p>
Each Council should ensure it has the following controls in place to minimise the risk of non-compliance resulting from a member of staff not following protocols: - <ul style="list-style-type: none"> Regular training for all staff involved in 	<p><u>All Councils</u> SIROs via the CIGG will ensure suitable training is in place for all three Councils and EK Services. All remaining suggested actions will be considered by each of the</p>	<p><u>All Councils</u> The CIGG is now responsible for information risk management. The recommendation contains a number of key controls that need to be in place once each</p>

SUMMARY OF CRITICAL & HIGH PRIORITY RECOMMENDATIONS NOT IMPLEMENTED AT THE TIME OF FOLLOW-UP – APPENDIX 1		
Original Recommendation	Agreed Management Action , Responsibility and Target Date	Manager's Comment on Progress Towards Implementation.
<p>taking payments;</p> <ul style="list-style-type: none"> • Compliance monitoring undertaken by line managers; • Non-compliance reporting protocols to the Senior Information Risk Owner (SIRO) or PCI-DSS Compliance Officer; • Responsibilities of front line staff set out in job descriptions; • Sufficient internal communication channels to communicate standards to staff; • Use of staff briefings to raise awareness. 	<p>SIROs as part of the consideration given to the wider governance arrangements suggested in the recommendation.</p> <p>Proposed Completion Date September 2016</p> <p>Responsibility - 3x SIROs</p>	<p>Council has declared that it is compliant with the standards. However as each of the Councils is still working towards compliance this recommendation remains outstanding.</p> <p>Recommendation Outstanding.</p>
<p>Management needs to a) decide on its Payment system for telephone assisted payments and then install the new system or upgraded system on a supported server as soon as possible; and b) decide how it will mitigate the ICT security risks posed whilst the current version of Adelante sits on an unsupported and unprotected server.</p>	<p><u>Thanet District Council</u></p> <p>The SIRO will work closely with the S151 Officer and a decision will be made in due course.</p> <p>Proposed Completion Date September 2016</p> <p>Responsibility Thanet SIRO</p>	<p><u>Thanet District Council</u></p> <p>The Council has recently decided to proceed with CAPITA to provide its payment system solution.</p> <p>Recommendation in progress.</p>

SERVICES GIVEN LIMITED / NO ASSURANCE LEVELS STILL TO BE REVIEWED – APPENDIX 2			
Service	Reported to Committee	Level of Assurance	Follow-up Action Due
Grounds Maintenance	September 2016	Limited	Work-in-Progress
Officers' Code of Conduct and Gifts & Hospitality	March 2017	Limited	Autumn 2017
Building Control	March 2017	Limited	Autumn 2017
Local Code of Corporate Governance	June 2017	Limited	Autumn 2017
Project Management	June 2017	Limited	Autumn 2017

Agenda Item 6

Annex 1

PROGRESS TO DATE AGAINST THE AGREED 2017-18 AUDIT PLAN – APPENDIX 3

THANET DISTRICT COUNCIL:

Area	Original Planned Days	Revised Budgeted Days	Actual days to 30-06-2017	Status and Assurance Level
FINANCIAL SYSTEMS:				
Car Parking & Enforcement	12	12	0	Quarter 3
Creditors & CIS	10	10	0	Quarter 3
Income	10	10	0	Quarter 3
Insurance & Inventories of Portable Assets	12	0	0	Postponed
RESIDUAL HOUSING SERVICES:				
Right to Buy	8	0	0	See 2016-17 Unplanned work below
GOVERNANCE RELATED:				
Data Protection, FOI & Information Management	14	14	0	Quarter 3
Anti-Fraud & Corruption	10	10	1.52	Work-in-Progress
Performance Management	10	10	0	Work-in-Progress
Risk Management	10	10	0.18	Work-in-Progress
Shared Service Monitoring	10	10	0	Quarter 4
Partnerships	8	8	0	Quarter 4
Scheme of Officer Delegations	8	8	9.69	Work-in-Progress
Corporate Advice/CMT	2	2	3.44	Work-in-progress throughout 2017-18
s.151 Officer Meetings and Support	9	9	3.47	Work-in-progress throughout 2017-18
Governance & Audit Committee Meetings and Report Preparation	12	12	3.76	Work-in-progress throughout 2017-18
2018-19 Audit Plan and Preparation Meetings	9	9	0.14	Quarter 4
CONTRACT RELATED:				
Receipt & Opening of Tenders	8	8	6.04	Finalised - Substantial
SERVICE LEVEL:				
Inward Investment	10	10	0	Quarter 4
S11 Safeguarding Return to KCC	1	1	0	Quarter 3
Pollution, Contaminated Land, Air & Water Quality	10	10	0.18	Work-in-Progress

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Area	Original Planned Days	Revised Budgeted Days	Actual days to 30-06-2017	Status and Assurance Level
Land Charges	8	8	8.74	Finalised - Substantial
Asset Management	10	10	0	Quarter 4
Allotments	8	8	7.85	Finalised – Reasonable
Local Plan	10	10	0	Quarter 4
Your Leisure	12	12	0	Quarter 4
Sports Development	8	8	0	Quarter 3
Waste Vehicle Fleet Management	15	15	1.07	Work-in-Progress
Garden Waste & Recycling Income	10	10	0.18	Work-in-Progress
OTHER :				
Liaison With External Auditors	1	1	0	Work-in-progress throughout 2017-18
Follow-up Reviews	15	15	6.92	Work-in-progress throughout 2017-18
FINALISATION OF 2016-17 AUDITS:				
Days over delivered in 2016-17	0	-19.69	0	
Local Code of Corporate Governance	5	25	0.27	Finalised - Limited
Project Management			1.48	Finalised - Limited
Service Contract Management			9.51	Work-in-Progress
Phones, Mobiles & Utilities			3.83	Work-in-Progress
Right to Buy			1.14	
RESPONSIVE ASSURANCE:				
None to date	0	0	0	
TOTAL	285	265.31	69.41	26% as at 30-06-2017

EAST KENT HOUSING LIMITED:

Review	Original Planned Days	Revised Planned Days	Actual days to 30-06-2017	Status and Assurance Level
Planned Work:				
CMT/Audit Sub Cttee/EA Liaison	4	4	1.15	Work-in-progress throughout 2017-18
Follow-up Reviews	4	4	0.78	Work-in-progress throughout 2017-18

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Review	Original Planned Days	Revised Planned Days	Actual days to 30-06-2017	Status and Assurance Level
Finance Systems & ICT Controls	15	15	0	Quarter 4
Data Protection & Information Management	12	12	0	Quarter 4
Leasehold Services	15	15	0	Quarter 4
Fire Safety	15	15	1.2	Work-in-Progress
Safeguarding Children & Vulnerable Groups	10	10	0.18	Work-in-Progress
Anti-Fraud & Corruption	10	10	0	Work-in-Progress
Risk Management	10	10	0.18	Work-in-Progress
Performance Management	5	5	0	Quarter 4
Complaints Monitoring	10	10	0.18	Work-in-Progress
Single System – Post Implementation Review	10	10	0	Quarter 4
Property Services Improvement Plan	20	20	0	Quarter 3/4
Days under delivered in 2016-17		7.84		
Responsive Assurance:				
Performance Indicator Data Quality	0	0	8.52	
Total	140	147.84	12.19	8.25% at 30-06-2017

EK SERVICES:

Review	Original Planned Days	Revised Planned Days	Actual days to 30/06/2017	Status and Assurance Level
EKS Reviews;				
Housing Benefits Payments	15	15	15.34	Work in progress
DDC / TDC HB Testing	20	20	6.51	Ongoing
Business Rates	20	20	0.20	Quarter 2
Council Tax Reduction Scheme	15	15	0	Quarter 3
ICT – Data Management	15	15	0.17	Quarter 2
ICT – Procurement & Disposal	15	15	0	Quarter 3
EKHR Reviews;				

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Review	Original Planned Days	Revised Planned Days	Actual days to 30/06/2017	Status and Assurance Level
Payroll	15	15	0	Quarter 3
Employee Allowances & Expenses	15	15	0	Quarter 3
Employee Health & Safety	15	15	0	Quarter 4
Other;				
Corporate/Committee	8	8	1.29	Ongoing
Follow up	7	7	4.87	Ongoing
Days under delivered in 2016-17		17.70	17.70	Completed
Finalisation of 2016/17 Audits:				
Housing Benefit Subsidy	18.55		7.23	WIP
ICT Change controls			2.03	Completed – Substantial
ICT Software Licensing			2.50	WIP -Draft Report
EKHR – Payroll & BIK			6.79	Completed - Substantial
Total	160	177.70	46.93	26.15% at 30/06/2017

BALANCED SCORECARD – QUARTER 1

<u>INTERNAL PROCESSES PERSPECTIVE:</u>	<u>2017-18 Actual</u>	<u>Target</u>	<u>FINANCIAL PERSPECTIVE:</u>	<u>2017-18 Actual</u>	<u>Original Budget</u>
	Quarter 1		Reported Annually		
Chargeable as % of available days	83%	80%	• Cost per Audit Day	£	£309.77
Chargeable days as % of planned days			• Direct Costs	£	£385,970
CCC	25%	25%	• + Indirect Costs (Recharges from Host)	£	£10,530
DDC	22%	25%	• - 'Unplanned Income'	£	Zero
SDC	22%	25%	• = Net EKAP cost (all Partners)	£	£396,500
TDC	26%	25%			
EKS	26%	25%			
EKH	8%	25%			
Overall	22%	25%			
Follow up/ Progress Reviews;					
• Issued	22	-			
• Not yet due	17	-			
• Now due for Follow Up	19	-			
Compliance with the Public Sector Internal Audit Standards (PSIAS) (see Annual Report for more details)	Partial	Full			

BALANCED SCORECARD – QUARTER 1

<u>CUSTOMER PERSPECTIVE:</u>	<u>2017-18 Actual</u>	<u>Target</u>	<u>INNOVATION & LEARNING PERSPECTIVE:</u>	<u>2017-18 Actual</u>	<u>Target</u>
	Quarter 1			Quarter 1	
Number of Satisfaction Questionnaires Issued;	16		Percentage of staff qualified to relevant technician level	75%	75%
Number of completed questionnaires received back;	8		Percentage of staff holding a relevant higher level qualification	38%	38%
	= 50%		Percentage of staff studying for a relevant professional qualification	14%	N/A
Percentage of Customers who felt that;			Number of days technical training per FTE	1.48	3.5
<ul style="list-style-type: none"> Interviews were conducted in a professional manner 	100%	100%	Percentage of staff meeting formal CPD requirements (post qualification)	38%	38%
<ul style="list-style-type: none"> The audit report was 'Good' or better 	100%	100%			
<ul style="list-style-type: none"> That the audit was worthwhile. 	100%	100%			

Definition of Audit Assurance Statements & Recommendation Priorities

Assurance Statements:

Substantial Assurance - From the testing completed during this review a sound system of control is currently being managed and achieved. All of the necessary, key controls of the system are in place. Any errors found were minor and not indicative of system faults. These may however result in a negligible level of risk to the achievement of the system objectives.

Reasonable Assurance - From the testing completed during this review most of the necessary controls of the system in place are managed and achieved. There is evidence of non-compliance with some of the key controls resulting in a marginal level of risk to the achievement of the system objectives. Scope for improvement has been identified, strengthening existing controls or recommending new controls.

Limited Assurance - From the testing completed during this review some of the necessary controls of the system are in place, managed and achieved. There is evidence of significant errors or non-compliance with many key controls not operating as intended resulting in a risk to the achievement of the system objectives. Scope for improvement has been identified, improving existing controls or recommending new controls.

No Assurance - From the testing completed during this review a substantial number of the necessary key controls of the system have been identified as absent or weak. There is evidence of substantial errors or non-compliance with many key controls leaving the system open to fundamental error or abuse. The requirement for urgent improvement has been identified, to improve existing controls or new controls should be introduced to reduce the critical risk.

Priority of Recommendations Definitions:

Critical – A finding which significantly impacts upon a corporate risk or seriously impairs the organisation's ability to achieve a corporate priority. Critical recommendations also relate to non-compliance with significant pieces of legislation which the organisation is required to adhere to and which could result in a financial penalty or prosecution. Such recommendations are likely to require immediate remedial action and are actions the Council must take without delay.

High – A finding which significantly impacts upon the operational service objective of the area under review. This would also normally be the priority assigned to recommendations relating to the (actual or potential) breach of a less prominent legal responsibility or significant internal policies; unless the consequences of non-compliance are severe. High priority recommendations are likely to require remedial action at the next available opportunity or as soon as is practical and are recommendations that the Council must take.

Medium – A finding where the Council is in (actual or potential) breach of - or where there is a weakness within - its own policies, procedures or internal control measures, but which does not directly impact upon a strategic risk, key priority, or the operational service objective of the area under review. Medium priority recommendations are likely to require remedial action within three to six months and are actions which the Council should take.

Low – A finding where there is little if any risk to the Council or the recommendation is of a business efficiency nature and is therefore advisory in nature. Low priority recommendations are suggested for implementation within six to nine months and generally describe actions the Council could take.

QUARTERLY RISK UPDATE

Governance & Audit Committee – 27 September 2017

Report Author	Tim Willis, Director of Corporate Resources
Portfolio Holder	John Townend, Cabinet Member – Finance and Estates
Status	For Information
Key Decision	No
Ward:	All

Executive Summary:

This report provides Governance & Audit Committee with an update of corporate risk, in accordance with the Risk Strategy.

Recommendation(s):

To note the report.

CORPORATE IMPLICATIONS

Financial and Value for Money	The way in which the council manages risks has a financial impact on the cost of insurance and self-insurance. The council maintains reserves including a risk reserve, the size of which is commensurate with the financial impact of current and future risks. There are no specific financial implications arising from this report.
Legal	Whilst the corporate risk register includes consideration of legal matters in as far as they relate to risks to the Council, there are no legal implications for the recommendation required by this report.
Corporate	Governance & Audit Committee approved the Risk Management Strategy on 9 December 2015 which includes a requirement to provide regular corporate risk updates to G&A Committee.
Equalities Act 2010 & Public Sector Equality Duty	<p>Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to the aims of the Duty at the time the decision is taken. The aims of the Duty are: (i) eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act, (ii) advance equality of opportunity between people who share a protected characteristic and people who do not share it, and (iii) foster good relations between people who share a protected characteristic and people who do not share it.</p> <p>Protected characteristics: age, gender, disability, race, sexual orientation, gender reassignment, religion or belief and pregnancy & maternity. Only aim (i) of the Duty applies to Marriage & civil partnership.</p>

	Please indicate which aim is relevant to the report	
	Eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act,	
	Advance equality of opportunity between people who share a protected characteristic and people who do not share it	✓
	Foster good relations between people who share a protected characteristic and people who do not share it.	
There are no equality or equalities issues arising from this report. The risk register identifies a number of activities designed to control risks and these will each need to be assessed for equality impact in their own right.		

CORPORATE PRIORITIES (tick those relevant)✓	
A clean and welcoming Environment	
Promoting inward investment and job creation	
Supporting neighbourhoods	

CORPORATE VALUES (tick those relevant)✓	
Delivering value for money	✓
Supporting the Workforce	
Promoting open communications	

1.0 Introduction and Background

- 1.1 Risk Management is a fundamental element of the council's arrangements for ensuring goals are achieved and opportunities are taken up. To this end the council has established its Risk Management Strategy and Process and has assigned responsibility to councillors and officers to ensure that resources are used effectively and all that can reasonably be done, is done, to mitigate risk.
- 1.2 Whilst primary member oversight on risk is provided by G&A Committee, Cabinet also has a member Risk Champion (the Portfolio Holder for Corporate Governance) who promotes risk management and its benefits throughout the council. At staff level, the high-level corporate risk register is regularly considered by Corporate Management Team (CMT) and risk is a permanent item on its agenda. G&A Committee considers changes to the corporate risk register, the reasons for the changes and the actions being taken to mitigate the likelihood and impact of those risks. A view is also taken regarding the extent to which the risks should be tolerated. Looking beyond the corporate level, Heads of Service are responsible for maintaining service-level risks and project managers are responsible for project risks.

2.0 Corporate risk register

- 2.1 A summary of the latest Corporate Risk Register is set out below, together with the risk scores noted by Governance & Audit Committee on 28 June 2017. The scores are arrived at by multiplying the "likelihood" score by the "impact" score, where the maximum score for each is four, so the maximum total score is sixteen.

Description	June 17 risk score	Sept 17 risk score
Limited Resources	12	12
Health and Safety at Work	12	12
Political Stewardship	12	12

Local Plan	12	12
Homelessness	12	12
Information Governance	9	9
Project Management	9	9
Harbour flap gates	9	9
Safeguarding Vulnerable People	8	8
Dreamland operator	9	2

2.2 Each corporate risk is the responsibility of a member of CMT and they manage risk mitigation plans with the aim of reducing the likelihood and/or impact of each risk to a manageable level. As time moves on, the external environment changes and this can have an impact on the effectiveness of mitigating actions as well as on the likelihood and impact of a risk: hence the need to maintain vigilance in respect of mitigation plans as well as new and changing risks.

2.3 It is more difficult to take action to reduce the impact of a risk occurring, than it is to take action to reduce its likelihood. Hence in some cases, the scores after mitigation will remain relatively high.

3. New/escalated and elevated risks

3.1 There are no new or elevated risks for inclusion in the corporate risk register. Corporate Management Team discussed at length the risk of corporate capacity – our ability, primarily at officer level, to deliver the priorities and projects, manage risks and deal with the unexpected. The timing of the discussion arose in light of a corporate restructure that the Chief Executive has indicated is imminent. However, CMT concluded that senior management is well equipped to prioritise workload, and the restructuring would not affect everyone or take a prolonged time. Additionally, CMT will be reviewing its priorities in the coming months.

3.2 The tragic events at Grenfell Tower in West London highlighted the issue of fire safety risks in tower blocks across the country. In response the council has worked with the Department for Communities and Local Government, Kent Fire and Rescue Service and East Kent Housing (EKH) to review fire safety arrangements in the 6 council owned blocks. We have completed a programme of joint inspection, commissioning work where necessary and have checked external wall insulation where this has been fitted. EKH have provided reassurance visits and information to residents and are visiting all tower blocks on a daily basis. The council has provided some additional resources to complete a programme of enhanced fire risk assessments, and has set aside funding to assist with any additional works identified within the tower blocks.

4. Highest-scoring risks

4.1 **Limited Resources:** The high score for Limited Resources reflects the fact that it is one of the few risks that in extremis could result in the council losing control of its own destiny. This, coupled with the challenging and uncertain external financial environment, the savings required in 2017-18 and beyond, and the low level of reserves has resulted in a continuing high overall score.

4.2 The council is establishing a track record of managing its resources, e.g. some £1.2m of budget savings were delivered as part of the 2016-17 budget process; and made a small contribution to reserves in 2016-17 (subject to final accounts sign-off). Plans are

under way to deliver income generation and cost savings projects to fund the £2.7m budget gap in 2017-18 and the 2018-22 Medium Term Financial Strategy.

- 4.3 However, the severity of the impact of the risk becoming manifest (e.g. TDC having to terminate services, make large-scale redundancies and/or be externally governed or managed) has not diminished. The management of this risk is further compounded by the uncertainty created by the changing external environment, e.g. the review of local government funding.
- 4.4 **Health and Safety at Work:** there is a risk that the council and its staff will cause harm as a result of a lack of robust Health & Safety procedures, failure to embed those procedures, and failure to comply with the procedures. Despite the conclusion to the prosecution by the Health and Safety Executive, there remain substantial risks pending the mitigating actions including the implementation of a H&S management system.
- 4.5 **Political Stewardship:** The council was boosted by the positive feedback from a visit in July from the LGA peer review team. However, due to the current position of a minority administration this continues to be a risk to the council especially in the light of the need to approve the local plan. The council continues to pursue opportunities for cross-party working and member training.
- 4.6 **Local Plan:** An unsound plan not based on the available evidence at Inspection risks diminished control over Development Management in the district, no ability to demonstrate 5-year housing land supply, losing Appeals or High Court challenges, costs awarded against the Council. Not progressing the Local Plan could impact investment in the area, investor confidence, and the commitment of partner organisations. Mitigation is to ensure the evidence base is robust and defensible and timeous decision making is maintained, a timeframe and overview process is now established to progress the Plan to examination.
- 4.7 **Homelessness:** Homelessness is increasing, both locally and nationally. This represents a significant risk to the council, increasing the costs associated with securing temporary and emergency accommodation and impact on the outcomes for residents. The council has reviewed and is delivering its homelessness strategy action plan, is regularly monitoring the levels of homelessness and has commissioned new services to address the increasing need for support. The council has also submitted bids for new government funding to support homelessness services locally. This work will continue.

5. De-escalated risks

- 5.1 This risk relates to the Dreamland operator failing. Whilst the operator, SHL, went into Administration last year, it recently exited Administration. SHL as a company is now wholly owned and financed by Arrowgrass, a hedge fund with substantial resources at its disposal. This fact alone does not guarantee the security of SHL, but the evidence suggests that an experienced management team is in place, significant investment has been made in the park and surrounding area and the council has developed strong and healthy links with the company. There are still risks associated with Dreamland – e.g. the risks and costs of ownership and the outstanding CPO compensation – but it is considered that these are manageable.

6.0 Recommendation

- 6.1 To note the report.

Contact Officer:	Tim Willis, Director of Corporate Resources
Reporting to:	Madeline Homer, Chief Executive

Background Papers

Title	Details of where to access copy
G&A report 9 December 2015: Review of corporate approach to risk management	http://democracy.thanet.gov.uk/ieListDocuments.aspx?CId=114&MId=4078&Ver=4
G&A report 7 December 2016: Update report on the corporate risk register	http://democracy.thanet.gov.uk/ieListDocuments.aspx?CId=114&MId=4397&Ver=4

Corporate Consultation

Finance	Tim Willis, Director of Corporate Resources
Legal	Tim Howes, Director of Corporate Governance

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Annual Governance Statement 2016-2017

Meeting -	27 September 2017
Report Author	Director of Corporate Governance and Monitoring Officer
Portfolio Holder	Derek Crow-Brown Cabinet Member for Corporate Governance Services
Status	For Decision
Classification:	Unrestricted
Ward:	All

Executive Summary: To provide Governance and Audit Committee with the Annual Governance Statement 2015-16 and significant issues action plan for approval.

Recommendation(s): Committee consider and approve the Annual Governance Statement for 2016-2017 as revised

CORPORATE IMPLICATIONS

Financial and Value for Money	There are no financial implications arising directly from this report which have not already been accounted for.										
Legal	The Accounts and Audit Regulations and other accounting guidance requires the council to follow prescribed formats in the completion of the Annual Governance Statement.										
Corporate	The Annual Governance Statement is a corporate document and as such should be owned by all senior officers and members of the authority.										
Equalities Act 2010 & Public Sector Equality Duty	<p>Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to the aims of the Duty at the time the decision is taken. The aims of the Duty are: (i) eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act, (ii) advance equality of opportunity between people who share a protected characteristic and people who do not share it, and (iii) foster good relations between people who share a protected characteristic and people who do not share it.</p> <p>Protected characteristics: age, gender, disability, race, sexual orientation, gender reassignment, religion or belief and pregnancy & maternity. Only aim (i) of the Duty applies to Marriage & civil partnership.</p> <table><tr><td colspan="2">Please indicate which aim is relevant to the report.</td></tr><tr><td>Eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act,</td><td>X</td></tr><tr><td>Advance equality of opportunity between people who share a protected characteristic and people who do not share it</td><td>X</td></tr><tr><td>Foster good relations between people who share a protected characteristic and people who do not share it.</td><td>X</td></tr></table>			Please indicate which aim is relevant to the report.		Eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act,	X	Advance equality of opportunity between people who share a protected characteristic and people who do not share it	X	Foster good relations between people who share a protected characteristic and people who do not share it.	X
Please indicate which aim is relevant to the report.											
Eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act,	X										
Advance equality of opportunity between people who share a protected characteristic and people who do not share it	X										
Foster good relations between people who share a protected characteristic and people who do not share it.	X										

	There are no specific equity or equalities issues arising from this report.
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CORPORATE PRIORITIES (tick those relevant)✓	
A clean and welcoming Environment	
Promoting inward investment and job creation	
Supporting neighbourhoods	

CORPORATE VALUES (tick those relevant)✓	
Delivering value for money	x
Supporting the Workforce	x
Promoting open communications	x

1.0 Introduction and Background

- 1.1 The council is required to prepare an Annual Governance Statement (AGS) which must be included within the Financial Statement and should be signed by the Leader and Chief Executive.

2.0 The Current Situation

- 2.1 The Annual Governance Statement reflects the corporate governance environment of the council as detailed in the adopted Local Code of Corporate Governance. In essence, the AGS is the formal statement that recognises, records and publishes the council's governance arrangements.
- 2.2 The AGS is a key corporate document, and the Leader and Chief Executive have joint responsibility as signatories for its accuracy and completeness. In order to ensure that the AGS accurately reflects our Governance Framework, a number of sources of assurance were gathered to feed into the preparation of the document. Following the approval process it will be formally signed as required.
- 2.3 The Draft AGS came before the Governance and Audit Committee in June and was agreed. This was then provided to our External Auditors Grant Thornton, for them to audit. The recommended changes put forward by the auditors (which are accepted) are:

a) Section 7 - Actions Undertaken During 2016/2017

A reduction in the list of actions in section 7 to purely 'governance' matters, this mean excluding all 'service' matters.

b) Section 8 Annual Reports – Governance and Audit Committee and Overview and Scrutiny Panel

This has also been edited heavily

c) Section 9 Improvement Board

This section has been removed since it is no longer relevant.

c) Section 10 Actions to Address the 2014/2015 Significant Governance Issues

There is a typographical error, and this should read 2015/16

3.0 Options

- 3.1 That Members approve the Annual Governance Statement 2016/2017 and the associated action plan.
- 3.2 That Members do not approve the Annual Governance Statement 2016/2017. This is not recommended as the AGS reinforces the council's governance arrangements.

Contact Officer:	Tim Howes, Director of Corporate Governance
Reporting to:	Madeline Homer, Chief Executive

Annex List

Annex 1	Revised Annual Governance Statement
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Corporate Consultation

Finance	Ramesh Prashar, Head of Financial Services
Legal	Tim Howes, Director of Corporate Governance

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Annual Governance Statement 2016/17

1.0 SCOPE OF RESPONSIBILITY

- 1.1 Thanet District Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, that public money is safeguarded and properly accounted for and that funding is used economically, efficiently and effectively. Thanet District Council also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 1.2 In discharging this overall responsibility, Thanet District Council is responsible for putting in place suitable arrangements for the governance of its affairs, which facilitate the effective exercise of its functions and include arrangements for the management of risk.
- 1.3 Thanet District Council has approved and adopted a Local Code of Corporate Governance, which is consistent with the principles of the Chartered Institute of Public Finance and Accountancy (CIPFA) / Society of Local Authority Chief Executives (SOLACE) Framework Delivering Good Governance in Local Government (2016). A copy of the Local Code is available on our website or can be obtained from the council offices, Cecil Street, Margate, Kent, CT9 1XZ. This statement explains how Thanet District Council has complied with the code and also meets the requirements of regulation 4(2) of the Accounts and Audit Regulations 2003 as amended by the Accounts and Audit (Amendment) (England) Regulations 2006 in relation to the publication of an Annual Governance Statement.

2.0 THE PURPOSE OF THE GOVERNANCE FRAMEWORK

- 2.1 The governance framework comprises the systems and processes, and culture and values by which the authority is directed and controlled, together with the activities through which it accounts to, engages with and leads the community. It enables the authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of Thanet District Council's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.
- 2.3 The governance framework has been in place at Thanet District Council for the year ended 31 March 2017 and up to the date of approval of the Statement of Accounts.

3.0 METHODOLOGY FOR PREPARING THE ANNUAL GOVERNANCE STATEMENT

- 3.1 The Annual Governance Statement is prepared using a method similar to that used in previous years, including:
- Managers providing an assurance statement as to the extent and quality of internal control arrangements operating within their departments for the year. The declaration covers a comprehensive list of those systems and procedures which deliver good

governance. Managers are asked to declare any weaknesses in their governance arrangements.

- Directors / Service Managers reviewing the results of those declarations, identifying those issues which are significant or which are common to more than one area and discussing the outcomes with the Portfolio Holder with responsibility for each service area.
- Assurance statements from the Section 151 Officer, Monitoring Officer and the following key areas: performance management, procurement and risk management identifying any governance issues that have arisen and should be addressed in the forthcoming year.
- Statements from the shared service partners we work with on compliance with the governance arrangements in place.
- Reviewing the annual reports from Governance and Audit Committee and Overview and Scrutiny Panel.
- Considering the Internal Audit Annual Report and the Section 151 Officer's report on the effectiveness of the internal audit arrangements in place.
- The council's Governance and Audit Committee considers the draft Annual Governance Statement in June and is afforded the opportunity to give its input to the statement and to consider whether it accurately reflects the council's control environment.
- The Governance and Audit Committee approves the Annual Governance Statement in September and it is signed off by the Chief Executive / Section 151 Officer and Leader of the Council.

4.0 THE GOVERNANCE FRAMEWORK

4.1 There are a number of key elements to the systems and processes that comprise the council's governance arrangements, which are set out below.

4.1.1 There is a clear vision of the council's purpose and intended outcomes for citizens and service users that is clearly communicated.

- The Vision for Thanet was adopted by Council in July 2009. This document sets out the future plans for what Thanet will look and be like in 2030. It was consulted on widely with staff and members, the residents' panel, partners and stakeholders.
- The council identified and communicated its aims and ambitions for Thanet in October 2015 for the next four years when a new Corporate Plan was approved. The plan contains three priorities and three corporate values which are supported by measures of success.

4.1.2 Arrangements are in place to review the council's vision and its implications for the council's governance arrangements.

- The Corporate Plan will be reviewed annually to take into account progress against the priorities and outcomes of the annual budget setting process. Each review will evaluate and determine if there are any implications for the council's

governance arrangements with appropriate amendments being made as necessary.

- 4.1.3 Arrangements exist for measuring the quality of services, ensuring they are delivered in accordance with the council's objectives and that they represent the best use of resources.

Performance progress is tracked through monthly monitoring of key performance indicators, service tasks and projects. Progress against the council's Corporate Plan is reported quarterly to Cabinet. Additionally, monthly service reports summarise all key projects, tasks and performance measures specific to each service. The performance framework is operated on Inphase™, a performance management system.

The Council's data quality framework sets out the Council's requirement that any data used by the authority should be fit for purpose. Fitness for purpose of performance data is assured through the following activity:

- Challenge of measure definition when new indicators are identified through service planning;
- Set up of measures at denominator and numerator level to ensure that calculations are not carried out manually;
- Calculation checking through the data entry process;
- Manager review of data entered by staff;
- Training provided to managers and staff on how to use the data entry and reporting system;
- Challenge through the target setting process;
- Challenge through monthly monitoring of performance data;
- Advice and support provided to staff and managers as requested on the capture and use of management data.

- 4.1.4 The roles and responsibilities of the executive, non-executive, scrutiny and officer functions are clearly defined, with clear delegation arrangements and protocols for effective communication.

Roles and responsibilities for Cabinet, Council, Overview and Scrutiny and all committees of the council, along with officer functions are defined and documented, with clear delegation arrangements and protocols for effective communication within the council's Constitution. The Constitution is regularly reviewed and updated.

- 4.1.5 Codes of conduct defining the standards of behaviour for members and officers are in place, conform to appropriate ethical standards and are communicated and embedded across the council.

Codes of conduct defining the standards of behaviour for members and staff have been developed and communicated and are available (as part of the Council's constitution) on the council's website and intranet site, Thanet Online Matters (TOM). These include Members' Code of Conduct, Code of Conduct for Staff, Anti-fraud and Corruption Policy, member and officer protocols and regular performance appraisals linked to service and corporate objectives.

- 4.1.6 Standing orders, standing financial instructions, a scheme of delegation and supporting procedure notes / manuals which are reviewed and updated as appropriate, clearly define how decisions are taken and the processes and controls required to manage risks.

The council has established policies and procedures to govern its operations. Key within these are the Financial Procedure Rules, Procurement Strategy and Contract Standing Orders, Risk Management Strategy, Codes of Conduct for Members and Officers, Anti-

Fraud and Corruption Policy, Anti-Bribery Policy, Whistleblowing Code and Human Resources policies. Ensuring compliance with these policies is the responsibility of everyone throughout the council. These key controls are subject to periodic review, including that by Internal Audit, and are updated to ensure that they are relevant to the needs of the organisation.

Contract Standing Orders set out the rules governing the procurement process to ensure that value for money is achieved whilst meeting all legal and statutory requirements and minimising the risk of fraud or corruption. The council's Procurement Strategy is a high level view of how to promote effective procurement across the whole organisation. It outlines what good procurement means in Thanet and details the supporting framework. This Strategy is underpinned by the Procurement Code of Practice which is a step-by-step guide for all purchasing activities providing information, advice and guidance for officers responsible for spending the council's money.

A risk management framework has been in place across the council for some years with the objective of embedding effective risk management practices at both strategic and operational levels. The Risk Management Strategy and Process documents are reviewed on an annual basis and approved by the Governance and Audit Committee.

- 4.1.7 The council's financial management arrangements conform to the governance requirements of the CIPFA Statement on the Role of the Chief Financial Officer in Local Government (2010).

The council's financial management arrangements conform to CIPFA standards. The Director of Corporate Resources has statutory responsibility for the proper management of the council's finances. The management of the council's finances within departments is devolved to directors / service managers through the Scheme of Delegation for Financial Authority and Accountability. Directors / service managers further devolve decision making to managers and business unit managers through departmental schemes of management.

The Financial Services Team provides detailed finance protocols, procedures, guidance and training for managers and staff. The structure of the Financial Services Team ensures segregation of duties and all committee reports are reviewed by the appropriate Financial Services staff.

The internal audit function is an independent appraisal process and is provided by the East Kent Audit Partnership, who have direct access to members. They undertake reviews which provide management with a level of assurance on the adequacy of internal controls and of risks to the council's functions / systems. They give sound objectivity as well as benefiting from a large resource-pool which brings with it a good level of robustness. Throughout the year, the internal auditors perform a wide range of reviews covering both financial matters and other more service / output specific objectives, including value for money assessments. The conclusion is a report that is produced for management, which includes an assessment of the level of assurance that can be derived from the system of internal controls related to the service that is reviewed.

- 4.1.8 The core functions of an audit committee are undertaken.

The role of the Governance and Audit Committee is set out in the Constitution and one of its key roles is to provide independent assurance of the adequacy of the risk management framework and the associated control environment. It is a committee comprising council members independent of the executive which oversees the internal audit function and considers all relevant reports of the external auditor.

The terms of reference for the Governance and Audit Committee are prepared in line

with 'CIPFA's Audit Committees – Practical Guidance for Local Authorities' and are reviewed annually whilst undertaking the self-assessment into the committee's effectiveness and achievements against its terms of reference.

- 4.1.9 Arrangements exist to ensure compliance with relevant laws and regulations, internal policies and procedures, and that expenditure is lawful.

The council has in place a Monitoring Officer and Deputy Monitoring Officer. The Monitoring Officer has a duty to report on any actual or likely decision which would result in an unlawful act or maladministration. All decisions to be taken by members are supported by a legal assessment provided by the appropriate officer.

The council has in place a Responsible Finance Officer and Deputy under Section 151 of the Local Government Act 1972. This role ensures lawfulness and financial prudence of decision making, has responsibility for the administration of the financial affairs of the council and provides advice on the scope of powers and authority to take decisions, maladministration, financial impropriety, probity and budget and policy framework issues.

- 4.1.10 Arrangements for whistleblowing and for receiving and investigating complaints from the public are in place and well publicised.

The council has in place a Whistleblowing Code whereby staff and others can report concerns about various sorts of wrongdoing or alleged impropriety. The Whistleblowing Code was approved by Governance and Audit Committee, as part of the council's Anti-Fraud and Corruption Policy. The Code is available on the website and is also proactively communicated to those contracting with the council.

Thanet District Council wants to provide the best service it can to the community and has a Customer Feedback process in place, which includes complaints, compliments, service requests, member contact and comments. Service improvements take place as a direct result of customer feedback received and are published on the council's website and Members' Portal.

- 4.1.11 Arrangements exist for identifying the development needs of members and senior officers in relation to their strategic roles, supported by appropriate training.

Member Briefing sessions are programmed on a regular basis to ensure that members are properly equipped to effectively fulfil their responsibilities in the governance of the council's operations.

As part of the annual appraisal process, training and development needs of staff are identified and a development plan is drawn up to meet those needs.

- 4.1.12 Clear channels of communication with all sections of the community and other stakeholders are in place, ensuring accountability and encouraging open consultation.

The council has increased the level of community input into its decision making processes by increasing the number and variety of opportunities made available to the community. This includes online conversations and feedback as well as focus groups, workshops and the more traditional methods such as postal questionnaires. A greater emphasis is being placed on online consultation and social media.

The council has a well-established and effective consultation function which includes a wide range of consultation methods to ensure that as many groups and individuals as possible are able to participate. Before undertaking any consultation or communication, action plans are completed to detail exactly how key groups will be

targeted. The council delivers an extensive programme of consultations throughout the year.

The council also regularly communicates and consults with residents online via the council website, through social media such as Twitter and Facebook, through local press, via secondary and primary schools, through local forums and organisations.

- 4.1.13 Governance arrangements in respect of partnerships and other group working incorporate good practice and are reflected in the council's overall governance arrangements.

Partnership working is governed by agreements, protocols or memoranda of understanding relevant to the type of work or relationship involved. The council ensures that all are fit for purpose and the council's interests are protected.

5.0 REVIEW OF EFFECTIVENESS

- 5.1 Thanet District Council has responsibility for conducting, at least annually, a review of effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the senior managers within the authority who have responsibility for the development and maintenance of the governance environment, the East Kent Audit Partnership's annual report, and also by comments made by our External Auditors and other review agencies and inspectorates.

- 5.2 The process that has been applied by the council in maintaining and reviewing the effectiveness of the governance framework, includes the following:

5.2.1 The Authority

The Council comprises 56 Members and, as a whole, takes decisions on budget and policy framework items as defined by the Constitution.

5.2.2 The Cabinet

The Cabinet is responsible for the majority of the functions of the authority, within the budget and policy framework set by Full Council. Executive decisions can be taken by the Leader or Cabinet and Cabinet Members or Officers acting under delegated powers, depending upon the significance of the decision being made.

The Forward Plan lists the key decisions to be taken by Cabinet over the forthcoming four months. The plan is updated around the middle of each month to take effect from the 1st of the following month.

5.2.3 The Governance and Audit Committee

The council has an established Governance and Audit Committee, which is independent of the executive function of the council, and is responsible for overseeing internal and external audit, risk management processes and reviewing the adequacy of internal controls.

5.2.4 The Overview and Scrutiny Panel

The Overview and Scrutiny Panel consists of non-executive members and is appointed on a proportional basis, with political groups represented in the same proportion as on Full Council. It does not have any decision-making powers, but monitors the performance of the Leader and Cabinet and scrutinises services and policies throughout

the district (both member and officer).

5.2.5 The Standards Committee

The Standards Committee is established by Full Council and is responsible for promoting and maintaining high standards of conduct amongst councillors. In particular, it is responsible for advising the council on the adoption and revision of the Members' Code of Conduct and for monitoring the operation of the Code.

5.2.6 The Chief Financial Officer

The role of the Chief Financial Officer is a fundamental building block of good corporate governance. The two critical aspects of the role are stewardship and probity in the use of resources; and performance, extracting the most value from the use of those resources.

5.2.7 The Monitoring Officer

The Monitoring Officer has a duty to: report on matters he/she believes are, or are likely to be, illegal or amount to maladministration, be responsible for matters relating to the conduct of Councillors and Officers and keep under review the operation of the Constitution to ensure it is lawful, up to date and fit for purpose.

5.2.8 The Internal Audit function

The internal audit function is undertaken by the East Kent Audit Partnership, which provides this service to not only Thanet District Council but also Dover and Shepway District Councils, and Canterbury City Council. Internal audit is an independent appraisal function, which seeks to provide management with a level of assurance on the adequacy of internal controls and of risks to the council's functions / systems.

5.2.9 Management and officers

The council's internal management processes are reviewed regularly and any changes or updates are communicated through the Heads of Service, Managers' forum and staff development sessions, and any management training that is undertaken.

6.0 REVIEW OF THE EFFECTIVENESS OF THE COUNCIL'S INTERNAL AUDIT ARRANGEMENTS 2016/17

The internal audit function is performed by the East Kent Audit Partnership (EKAP), which provides internal audit services to the councils of Dover, Shepway and Canterbury, as well as to Thanet. As a result of this collaborative approach the partnership is able to be robustly resourced and provides a mechanism for promulgating best practice to the East Kent authorities that use its services.

The auditors are independent to the management of the council and have direct access to the Chair of the Governance and Audit Committee if required. They provide a regular update to the Committee at each of the quarterly meetings, and attend any special meetings that may be convened during the year.

- 6.3 As at 31 January 2017 the Internal Auditors completed 278 days of review equating to 94% of planned completions and are likely to achieve circa 98% to 100% completion by the end of March 2017. The EKAP undertake a regular schedule of follow up audits to ensure that management have implemented the action plans arising from each audit. Members can see full details within the Internal Audit Annual report.

- 6.4 The EKAP have met as a team and considered the Public Sector Internal Audit Standards Checklist for compliance. The results of this self-assessment showed that internal audit is currently working towards full compliance and has agreed an action plan to achieve this.
- 6.5 As part of EKAP's quality monitoring arrangements, following the completion of each audit, a satisfaction questionnaire is completed by the managers of the service that has been audited enabling the officers involved to comment on the conduct and outcome of the audit. This information is used, in part, to inform the self-assessment.
- 6.6 The EKAP Audit Manager and Head of EKAP regularly meet with the Section 151 Officer to monitor performance against the Audit Plan, but also to discuss any matters arising in relation to the performance of the Audit Partnership. Periodically these meetings are attended by External Auditors, so that they are able to gain assurances as to the effectiveness of the process. The Director of Corporate Resources & Section 151 Officer is pleased to be able to provide Members with assurance that in his opinion the Partnership operates to high professional standards, fostering an excellent working relationship with management without fettering the independence needed to be able to take a sufficiently independent perspective.
- 6.7 In addition to which, feedback from the audits and any other matters arising from the work of the partnership are considered at regular meetings that are held between the Section 151 or Deputy Section 151 Officers of each of the partnering councils and the auditors to manage any issues arising from the process. These meetings provide an additional opportunity to assess whether the internal audit function is operating in an effective manner and is compliant with the requirements of the CIPFA code.
- 6.8 Given the consistency of evidence of a quality internal audit service and the assessment outcomes referred to above it is believed that the Council has an effective internal audit function in place providing confidence in the context of their contribution to the council's Annual Governance Statement

7.0 ACTIONS UNDERTAKEN DURING 2016/17

- 7.1 Throughout 2016/17 managers within the council have met on a regular basis through the Heads of Service meetings and Managers Forum, and updates to the following corporate processes, strategies or policies have been communicated, (which are then shared with all staff through Staff Briefing Sessions):
- Annual governance statement
 - Appraisals
 - Closure of accounts
 - Code of conduct
 - Code of corporate governance
 - Complaints and Fol responses
 - Compliance monitoring
 - Decision notices
 -
 - Equalities Impact assessments
 - HR policies
 - Information governance and equalities
 - Local plan
 - Member/Officer Protocol
 - New report template

- Officer Delegations
- Peer Review
- People strategy and organisational plan for change
- Performance monitoring
- Reporting incidents and crimes to the police
- RIPA
- Risk assessments
- Risk management
- Vision
- Whistleblowing

7.2 The following corporate processes, strategy or policy documents were considered and approved by the Governance and Audit Committee:

- Annual audit letter 2015-16
- Annual fraud report
- Annual governance statement 2015-16
- Annual governance statement action plan quarterly update
- Annual internal audit report
- Annual Treasury Management Review 2015/16
- Anti-Fraud and Corruption Policy and Anti-Bribery Policy
- Audit committee assurance statement
- Corporate risk register annual review
- Corporate risk register quarterly update
- Draft annual governance statement 2015/16
- Draft audit assurance statement
- External Audit 2016/17 Audit Plan
- External Audit Findings for Thanet District Council – year ended March 2016
- External Audit Grant Certification Letter 2015/16
- Final Statement of Accounts
- Government report in respect of ERDF grant claim, 2005 – 2008
- Governance Framework and Local Code of Corporate Governance update
- Internal Audit 2017-2018 Audit Plan and Audit Charter
- Internal Audit Quarterly updates
- Mid-year treasury management report
- Quarterly internal audit report update
- Review of Effectiveness of the Council's Internal Audit Arrangements 2016-2017
- Treasury Management Strategy 2017/2018
- Treasury Management updates

7.3 Cabinet considered and approved the following corporate or service related strategy or policy documents:

- Annual review of corporate risk
- Annual Treasury Management Review 2015-16
- Asset disposals
- Budget 2017-18 and Medium Term Financial Plan 2017-2021
- Budget Monitoring Reports
- Budget Strategy 2017-18
- Changes to the 2016-17 capital programme and 2017-18 to 2020-21 capital plan
- Combined safeguarding policy
- Corporate Performance monitoring reports
- Establishment of east Kent services committee and associated arrangements
- Fees and Charges 2017/18
- Final outturn 2015-16

- Single East Kent District Council
- Strategic asset management plan 2017-2021
- Thanet local plan consultation
- Treasury management strategy statement and annual investment strategy 2016-17
- Treasury Management Strategy 2017-18

7.4 The corporate or service related strategy or policy documents detailed below were considered and approved by Full Council:

- Annual Report – Chairman of Governance and Audit Committee
- Annual Report – Chairman of Standards Committee
- Annual Report- Chairman of Overview and Scrutiny Panel
- Annual Treasury Management Review 2015-16
- Appointment of Council's external auditors for 2018-19 and beyond
- Appointment of Independent Persons
- Budget 2017-18 and Medium Term Financial Plan 2017-2021
- Business case single East Kent Council
- Calendar of meetings
- Changes to the 2016-17 capital programme and 2017-18 to 2020-21 capital plan
- Constitutional changes
- Corporate Priorities 2015-2019 – 10/15
- Council Tax 2017-18
- Dispensation under Localism Act 2011
- East Kent services delegations
- Fees and Charges 2017-18
- Member's Allowances Scheme 2017/18
- Mid-Year Treasury Management Report 2016-17
- Pay Policy Statement 2017-18
- Public speaking at meetings
- Reports of the Chairman of the Overview and Scrutiny Panel
- Responsibility for Executive Functions
- Single district statement of intent
- Standards Hearing Decision
- Standing orders re dismissal of chief officers
- Treasury Management Strategy 2017-18
- Urgent individual cabinet member decisions

8.1 **ANNUAL REPORTS – GOVERNANCE AND AUDIT COMMITTEE AND OVERVIEW AND SCRUTINY PANEL**

- 8.1.1 To comply with best practice, the Governance and Audit Committee determined that it would consider annually whether it meets its terms of reference and how it has impacted on the internal control environment.
- 8.1.2 The annual report summarises the work of the Committee for the year and concludes that it has received clear, concise and relevant information, regular training events on topics specific to the business of the Committee, and has done all that it can to meet the aims and objectives for the Committee in the best way that it can.
- 8.1.5 The Chairman and Officers have considered the effectiveness of the Committee. The evidence demonstrating achievement of the Committee's terms of reference is contained in the Annual Report to the Council on the effectiveness of the Committee.

- 8.2 Thanet District Council's Overview & Scrutiny Panel is entitled to make an annual report to the Annual Meeting of Council. This report summarises the key achievements of the Overview & Scrutiny Panel during 2016/17 and indicated the Panels' suggested priorities for 2017/18.
- 8.2.1 The Panel unanimously agreed at the beginning of the 2016/17 to disregard political proportionality when setting out the membership of the working parties/task & finish groups. Each of the sub-group membership was set at eight to have 3 UKIP, 2 Conservative, 1 Labour, 1 Democratic Independent Group and 1 Independent Group. Members established three working parties which were the Corporate Performance Review Working Party, Community Safety Partnership Working Party and Electoral Registration Process Review Task & Finish Group.
- 8.2.2 At the Panel's meeting in December 2016 it was agreed to stand down the Electoral Registration process Review Working Party and replace it with a Dreamland Working Group. It was also agreed that this group would use political proportionality and membership was set at seven to have 4 UKIP, 2 Conservative and 1 Labour.
- 8.2.3 During this municipal year, the Chairman of the Panel presented to Council four reports on the scrutiny activities being undertaken. The main focus of the reports came from the work activities of the Corporate Performance Working Party and Community Safety Working Party.
- 8.2.4 The Panel unanimously agreed at its meeting on 13 December 2016 to implement revised scrutiny arrangements. The arrangements are still relatively new and as yet Democratic Services have yet to receive a request for a scrutiny review; however Democratic Services look forward to receiving requests in the new municipal year.
- 8.2.4 Full Council agreed at its meeting on 14 July 2016 to amend the council's constitution to allow a trial of public speaking at meetings of the Overview and Scrutiny Panel to take place. The trial period covered O&S meetings on 16 August, 25 October, 21 November, 13 December, 26 January and 14 February.
- 8.2.5 The Panel called-in no Cabinet decision in 2016/17

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10. ACTIONS TO ADDRESS THE 2015/16 SIGNIFICANT GOVERNANCE ISSUES

The following section reflects the actions completed to address the 2014/15 Annual Governance Statement recommendations.

1. Information Governance
 - Appoint Information Governance Manager and Officer - Completed
 - Undertake review of readiness for General Data Protection Regulations - Ongoing
 - Create action plan following review - Ongoing
 - Secure appropriate training including e-learning – Ongoing
 - Approve new Information Governance policies - Completed
2. Rationalise assets
 - Complete draft asset management plan - Completed
 - Secure Cabinet approval - Completed
 - Put in place mitigation and control measures around compliance - Completed
3. Delivery of Annual Governance Statement
 - Review and refresh documents in the assurance statements - completed
 - Improve timeliness of assurance statements - Secured
 - Implement Delivering Good Governance in Local Government 2016 Framework - Ongoing
 - Access to policies and e-learning for frontline staff – Subject to website changes
4. Public Sector Equality Duty (PSED)
 - Provide training on evidence of compliance with PSED in decision-making - Completed
 - Put in place programme to review policies - Completed
 - Identify training needs and create training plan - Ongoing

11.0 SIGNIFICANT GOVERNANCE ISSUES

- 11.1 No significant governance issues have been identified from the various assurance statements and other assessments into the council's governance arrangements for 2016/17.

12.0 ASSURANCE SUMMARY

- 12.1 Good governance is about running things properly. It is the means by which the council shows it is taking decisions for the good of the people of the area, in a fair, equitable and open way. It also requires standards of behaviour that support good decision making – collective and individual integrity, openness and honesty. It is the foundation for the delivery of good quality services that meet all local people's needs. It is fundamental to showing that public money is well spent. Without good governance, councils will struggle to improve services.
- 12.2 From the review, assessment and monitoring work undertaken and supported by the ongoing work undertaken by Internal Audit, we have reached the opinion that, overall, key systems are operating soundly and that there are no fundamental control weaknesses.
- 12.3 We can confirm, to the best of our knowledge and belief, and there having been appropriate enquiries made, that this statement provides an accurate and fair view.

Signed by:

Signed by:

Councillor Chris Wells
Leader of the Council
the September 2017

Madeline Homer
Chief Executive
the September 2017

Revised Whistleblowing Code

September Governance and Audit Committee

Report Author	Director of Corporate Governance and Monitoring Officer
Portfolio Holder	Derek Crow-Brown
Status	For Decision
Classification:	Unrestricted
Ward:	All

Executive Summary:

To consider and agree the attached draft whistleblowing code which has been updated to reflect legislative changes.

Recommendation(s):

To adopt the Whistleblowing Code (subject to the agreement of any amendments)

CORPORATE IMPLICATIONS

Financial and Value for Money	There are no direct financial implications from the adoption of this revised Code.	
Legal	The Code has been updated to reflect legislative changes to the Public Interest Disclosure Act 1998 by the Enterprise and Regulatory Reform Act 2013.	
Corporate	It is good practice and a requirement of our Code of Corporate Governance that a process for whistleblowing is in place.	
Equality Act 2010 & Public Sector Equality Duty	Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to the aims of the Duty at the time the decision is taken. The aims of the Duty are: (i) eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act, (ii) advance equality of opportunity between people who share a protected characteristic and people who do not share it, and (iii) foster good relations between people who share a protected characteristic and people who do not share it.	
	Protected characteristics: age, gender, disability, race, sexual orientation, gender reassignment, religion or belief and pregnancy & maternity. Only aim (i) of the Duty applies to Marriage & civil partnership.	
	Please indicate which aim is relevant to the report.	
	Eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act,	✓
	Advance equality of opportunity between people who share a protected characteristic and people who do not share it	✓
	Foster good relations between people who share a protected characteristic and people who do not share it.	✓
The Whistleblowing Code will provide protection from those who disclose breaches of equalities legislation and the PSSED.		

CORPORATE PRIORITIES (tick those relevant)✓	
A clean and welcoming Environment	
Promoting inward investment and job creation	
Supporting neighbourhoods	

CORPORATE VALUES (tick those relevant)✓	
Delivering value for money	✓
Supporting the Workforce	✓
Promoting open communications	✓

1.0 Introduction and Background

1.1.1 The Public interest Disclosure Act 1998 was amended by the Enterprise and Regulatory Reform Act 2013 but those changes have not yet been reflected in the Council's Whistleblowing Code. The attached draft Code includes all the necessary changes.

1.2 The code has been the subject of consultation with Trades Unions and Internal audit.

2.0 The Changes

2.1 The principal changes to the Whistleblowing Code are:

- a) Introducing a requirement that the worker should reasonably believe that the disclosure is 'made in the public interest' and the disclosure should fit one of the categories in the legislation.

This means that disclosures of a personal nature will not be protected. For example a complaint about a workers personal employment contract or other minor matters.

- b) Removing the requirement that disclosures should be in good faith (this is now covered by the public interest test).
- c) Protecting whistle-blowers from victimisation by work colleagues or their employer.

3.0 Options

3.1 The options are to agree the code as drafted, reject the code or make lawful amendments.

Contact Officer:	Tim Howes, Director of Corporate Governance
Reporting to:	Madeline Homer, Chief Executive

Annex List

Annex 1	Draft Whistleblowing Code
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Corporate Consultation

Finance	Ramesh Prashar, Head of Financial Services
Legal	Tim Howes, Director of Corporate Governance

Thanet District Council

Whistleblowing Code

May 2017



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Introduction

Thanet District Council is committed to the highest possible standards of propriety and accountability in the conduct of its activities for the community. Employees are often the first to realise that something wrong may be happening within the Council. This Code is intended to help employees who have serious concerns over any potential wrong-doing within the Council.

What is a whistle-blower?

- You're a whistle-blower if you're a worker and you report certain types of wrongdoing. This will usually be something you've seen at work - though not always.
- The wrongdoing you disclose must be in the public interest. This means it must affect others, e.g. the general public.
- As a whistle-blower you're protected by law - you shouldn't be treated unfairly or lose your job because you 'blow the whistle'.
- You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

What is a worker?

- Permanent or temporary staff
- Interims and agency workers
- Contractors working for the council

Councillors and volunteers are not workers within the limited definition in the law, but can report any wrongdoing to the relevant Director, Director of Corporate Governance or the Director of Corporate Resources.

Complaints that count as whistleblowing

You're protected by law if you reasonably believe that the disclosure is 'made in the public interest' and report any of the following:

- A criminal offence, e.g. fraud, theft or corruption
- Someone's health and safety is in danger
- Risk or actual damage to the environment
- A miscarriage of justice
- Misuse of public funds
- The council is breaking the law, e.g. doesn't have the right insurance
- You believe someone is covering up wrongdoing

Complaints that don't count as whistleblowing

Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your particular case is in the public interest.

If you are aggrieved about your personal position, please use the Council's Grievance Procedure.

Who to tell?

Complaints may be verbal or (preferably) written. Should explain the background and history of the concern and the reason why you are particularly concerned.

As soon as you become reasonably concerned:

- Raise the issue with your line manager (unless they are the potential transgressor), or
- Your Director, the Director of Corporate Governance or the Director of Corporate Resources, or
- If you don't want to report your concern to the council, tell a solicitor or a prescribed person or body (e.g. the ICO, Environment Agency, HSE, SFO etc.) If you tell a prescribed person or body, it must be one that deals with the issue you're raising, e.g. a disclosure about wrongdoing in a care home can be made to the Care Quality Commission. They will be able to advise on their respective procedures.

Making your claim anonymously or confidentially

The Council will not tolerate the harassment or victimisation of anyone raising a genuine concern. However, we recognise that you may nonetheless want to raise a concern in confidence under this Code. If you ask us to protect your identity by keeping your confidence, we will not voluntarily disclose it without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance, because your evidence is needed in court), we will discuss with you whether and how we can proceed.

Workers can make an anonymous disclosure via a dedicated whistleblowing hotline which is 01304 872198.

As concerns expressed anonymously are much less powerful, individuals are encouraged to put their names to all concerns raised. Anonymous disclosure makes it unlikely that a worker would qualify for protection as a whistleblower, this is because there would be no documentary evidence linking the worker to the disclosure for the employment tribunal to consider. Matters raised anonymously may nevertheless be considered at the discretion of the Council. In exercising this discretion, the factors to be taken into account include:

- the seriousness of the issues raised
- the credibility of the concern
- the likelihood of being able to confirm the allegations from other, attributable sources.

How will the council respond?

If the concern is raised verbally, the person receiving the information should put it in writing as soon as practicable to ensure that it properly reflects the concerns that have been raised. The employee must also indicate if the concern is to be treated in confidence. The limit of that confidence will be checked out by the person receiving the information.

Once you have told us of your concern, we will look into it to assess initially what action should be taken. An acknowledgement should be sent to you within two working days. We will tell you who may be handling the matter, how you can contact him/her and whether your further assistance may be needed. If you request it, we will write to you summarising your concern(s) and setting out how we propose to handle it.

If you have any personal interest in the matter, we do ask that you tell us at the outset. Should your concern fall within another policy or procedure of the Council (for example, the Grievance Procedure), we will tell you.

While the purpose of this Code is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else or where it may impede an investigation.

Concerns raised may :

- Be investigated by management, internal audit, or through the disciplinary process
- Be referred to the Police
- Be referred to the external auditor
- Form the subject of an independent enquiry.

What safeguards are there for the employee?

A disclosure to the employer will be protected if the whistle-blower makes a disclosure of information which, in the reasonable belief of the worker making the disclosure, is made in the public interest.

If as a result of a disclosure the Council dismisses or victimises the employee or fails to protect him/her from victimisation from colleagues, the Public Disclosure Act 1998 (as amended) provides that action can be taken against the Council.

However, allegations made maliciously or which are deliberately false will be dealt with under the Council's Disciplinary Procedures

The Council will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect those who raise a lawful concern.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures already taking place concerning the employee.

Every effort will be made to ensure confidentiality as far as this is reasonably practical.

Help will be provided to you in order to minimise any difficulties which you may experience. This may include advice on giving evidence if needed. Meetings may, if necessary, be arranged off-site with you and with you being represented, if you so wish.

How can a concern be taken further?

If you are unsure whether to use this Code or you want independent advice at any stage, you may contact:

- If applicable, your relevant trade union lawyer;
- Other bodies prescribed by the Secretary of State. A complete list of prescribed persons can be found here: [Prescribed people and bodies](#)
- the independent charity Public Concern at Work on 020 7404 6609 or whistle@pcaw.org.uk

Their lawyers can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work.

An employee who is not satisfied with the action taken by the Council and feels it right to question the matter further, may consider the following possible contact points:

- the Council's S151 Officer
- the Council's Monitoring Officer
- Internal Audit and/or the External Auditor
- the employee's trade union
- the Citizens' Advice Bureau and/or law centre/firm
- a government department
- the Local Government Ombudsman
- the Information Commissioner
- the Health and Safety Executive

If you believe that you have been unfairly treated because you have blown the whistle you may decide to take your case to an employment tribunal. The process for this would involve attempted resolution through the Advisory, Conciliation and Arbitration Service (Acas) early conciliation service. www.acas.org.uk/conciliation

Health warning

This Code is intended to provide an avenue within the Council to raise concerns. If an employee takes the matter outside the Council, he/she should ensure that no disclosure of confidential information takes place and should seek advice, as the Public Interest Disclosure Act 1998 (as amended) does not provide blanket protection and could leave employees vulnerable to

disciplinary or other action, if they disclose confidential information in circumstances not covered by the Act.

Recording and Monitoring

Following good practice, we will:

- Record the number of whistleblowing disclosures we receive and their nature
- Maintain records of the date and content of feedback provided to whistleblowers

Contact details

Timothy Howes, Director of Corporate Governance and Monitoring Officer
tim.howes@thanet.gov.uk

Document History

- How often does the Strategy need to be reviewed?
- What happens when the strategy becomes outdated?

Version	Date	Agreed by	Minute ref
	May 2017		

THANET DISTRICT COUNCIL DECLARATION OF INTEREST FORM

Do I have a Disclosable Pecuniary Interest and if so what action should I take?

Your Disclosable Pecuniary Interests (DPI) are those interests that are, or should be, listed on your Register of Interest Form.

If you are at a meeting and the subject relating to one of your DPIs is to be discussed, in so far as you are aware of the DPI, you **must** declare the existence **and** explain the nature of the DPI during the declarations of interest agenda item, at the commencement of the item under discussion, or when the interest has become apparent

Once you have declared that you have a DPI (unless you have been granted a dispensation by the Standards Committee or the Monitoring Officer, for which you will have applied to the Monitoring Officer prior to the meeting) you **must:-**

1. Not speak or vote on the matter;
2. Withdraw from the meeting room during the consideration of the matter;
3. Not seek to improperly influence the decision on the matter.

Do I have a significant interest and if so what action should I take?

A significant interest is an interest (other than a DPI or an interest in an Authority Function) which:

1. Affects the financial position of yourself and/or an associated person; or
Relates to the determination of your application for any approval, consent, licence, permission or registration made by, or on your behalf of, you and/or an associated person;
2. And which, in either case, a member of the public with knowledge of the relevant facts would reasonably regard as being so significant that it is likely to prejudice your judgment of the public interest.

An associated person is defined as:

- A family member or any other person with whom you have a close association, including your spouse, civil partner, or somebody with whom you are living as a husband or wife, or as if you are civil partners; or
- Any person or body who employs or has appointed such persons, any firm in which they are a partner, or any company of which they are directors; or
- Any person or body in whom such persons have a beneficial interest in a class of securities exceeding the nominal value of £25,000;
- Any body of which you are in a position of general control or management and to which you are appointed or nominated by the Authority; or
- any body in respect of which you are in a position of general control or management and which:
 - exercises functions of a public nature; or
 - is directed to charitable purposes; or
 - has as its principal purpose or one of its principal purposes the influence of public opinion or policy (including any political party or trade union)

An Authority Function is defined as: -

- Housing - where you are a tenant of the Council provided that those functions do not relate particularly to your tenancy or lease; or
- Any allowance, payment or indemnity given to members of the Council;
- Any ceremonial honour given to members of the Council
- Setting the Council Tax or a precept under the Local Government Finance Act 1992

If you are at a meeting and you think that you have a significant interest then you **must** declare the existence **and** nature of the significant interest at the commencement of the

matter, or when the interest has become apparent, or the declarations of interest agenda item.

Once you have declared that you have a significant interest (unless you have been granted a dispensation by the Standards Committee or the Monitoring Officer, for which you will have applied to the Monitoring Officer prior to the meeting) you **must:-**

1. Not speak or vote (unless the public have speaking rights, or you are present to make representations, answer questions or to give evidence relating to the business being discussed in which case you can speak only)
2. Withdraw from the meeting during consideration of the matter or immediately after speaking.
3. Not seek to improperly influence the decision.

Gifts, Benefits and Hospitality

Councillors must declare at meetings any gift, benefit or hospitality with an estimated value (or cumulative value if a series of gifts etc.) of £25 or more. You **must**, at the commencement of the meeting or when the interest becomes apparent, disclose the existence and nature of the gift, benefit or hospitality, the identity of the donor and how the business under consideration relates to that person or body. However you can stay in the meeting unless it constitutes a significant interest, in which case it should be declared as outlined above.

What if I am unsure?

If you are in any doubt, Members are strongly advised to seek advice from the Monitoring Officer or the Committee Services Manager well in advance of the meeting.

DECLARATION OF DISCLOSABLE PECUNIARY INTERESTS, SIGNIFICANT INTERESTS AND GIFTS, BENEFITS AND HOSPITALITY

MEETING.....

DATE..... AGENDA ITEM

DISCRETIONARY PECUNIARY INTEREST ☐

SIGNIFICANT INTEREST ☐

GIFTS, BENEFITS AND HOSPITALITY ☐

THE NATURE OF THE INTEREST, GIFT, BENEFITS OR HOSPITALITY:

.....
.....
.....

NAME (PRINT):

SIGNATURE:

Please detach and hand this form to the Democratic Services Officer when you are asked to declare any interests.