Annual Governance Statement 2015/16

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1. Scope of Responsibility

1.1 The Vale of Glamorgan Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for and used economically, efficiently and effectively.

1.2 The Council also has a duty under the Local Government (Wales) Measure 2011 (as amended from time to time) to secure continuous improvement in the exercise of its functions in terms of strategic effectiveness, service quality,

service availability, fairness, sustainability, efficiency and innovation. This builds upon the principles set out by the Welsh Government (WG) under the Wales Programme for Improvement (WPI) which reflected the Assembly's shared vision of public service improvement and local and national accountability and the Wales Programme for Government.

1.3 In discharging its overall responsibilities, the Council is also responsible for ensuring that there is a sound system of internal control which facilitates the effective exercise of its functions and which includes arrangements for the management of risk.

1.4 The Council has approved and adopted a Code of Corporate Governance, which is consistent with the principles of the Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Authority Chief Executives (SOLACE) Framework and incorporates the governance principles and values as set out by the Welsh Government.

2. The Purpose of the Governance Framework

2.1 The governance framework comprises the systems and processes, and cultural values, by which the Authority is directed and controlled and the activities through which it accounts to, engages with and leads the community. It enables the Council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services. This can be represented by the following table which sets out the Council's Assurance Cycle.

TARGET	PLAN	ACTION	REVIEW
What are we seeking to receive assurance on?	**What sources of assurance do we require?**	**How will we organise ourselves to receive adequate assurances?**	**How will we know we are effective:**
Delivery against the Corporate Plan in line with the governance framework,

Delivery of services within budget and in accordance with approved targets and objectives, | Community Strategy, Corporate Plan, Workforce Plan, Human Resources Strategy, Medium Term Financial Plan, Annual Budget, Service Plans, | Cabinet (as the Executive Committee), Scrutiny Committees including Task and Finish Groups, Audit Committee, Standards Committee, Joint Committees, | The eight Corporate priority objectives as set out in the Corporate Plan are achieved.

Annual improvement objectives and associated actions are achieved.

Positive Internal and External Audit Annual |

Management of the Council's key risks, Design and effectiveness of internal control systems, Compliance with laws, regulations, internal policies and procedures, The adequacy of key governance tools e.g. performance management and risk management frameworks, Value for Money including the prevention and detection of Fraud, Direction of travel in relation to previous governance issues.	Team Plans, Chief Officer Appraisals, Personal Development Review System, Internal Audit Annual Plan, External Audit Annual Plan, Other external agencies, Executive and Scrutiny work programme, Audit Committee Work Programme, Corporate Risk Management Group work programme, Information Strategy and Governance Board,	Other Quasi-Judicial Committees e.g. planning and licensing, Corporate Management Team, Statutory Officers, Partnerships, Officer working groups, Local Service Board, Other collaborative arrangements.	Opinion Reports and Letters. Adherence to Financial Strategy and Budget. Controls established and countermeasures identified to mitigate risks to an acceptable level. Monitoring and performance management reports validate action taken in support of priority outcomes. Output from Cabinet and Scrutiny Committees support the principles of good governance. Audit Committee are able to discharge their governance role. Annual Governance Statement.

2.2 The system of internal control is a significant part of the governance framework and is designed to manage the risk of failure to achieve policies, aims and objectives to a reasonable level rather than to eliminate all risk. The system of internal control is an ongoing process designed to identify and prioritise the risks to the achievement of the Council's policies, aims and objectives, to evaluate the likelihood of those risks and the impact should they be realised, and to manage them efficiently, effectively and economically.

2.3 The following paragraphs summarise the governance framework and the system of internal control, which has been in place within the Council for the year ended 31st March 2016 and up to date until the approval of the Annual Statement of Accounts which are presented to the Council's Audit Committee in September 2016. The framework is described to reflect the arrangements in place to meet the core principles of effective governance.

3. The Governance Framework

3.1 CIPFA has identified six principles of corporate governance that underpin the effective governance of all local authority bodies. In addition, WG have set out seven principles and values within their draft "Making the Connections" governance principles and values document. The Council on the 6th May 2009 approved its Code of Corporate Governance which adopted the six principles as defined by CIPFA and SOLACE, incorporating the WG governance principles (shown in italics) as follows:

- Focusing on the Council's purpose and on outcomes for the community and creating and implementing a vision for the local area, *(Putting the Citizen First)*, *(Achieving Value for Money).*
- Members and officers working together to achieve a common purpose with clearly defined functions and roles, *(Knowing Who Does What and Why),*
- Promoting values for the Council and demonstrating the values of good governance through upholding high standards of conduct and behaviour, *(Living Public Service Values),*
- Taking informed and transparent decisions which are subject to effective scrutiny and managing risk, *(Fostering Innovation Delivery),*
- Developing the capacity and capability of Members and officers to be effective, *(Being a Learning Organisation),*
- Engaging with local people and other stakeholders to ensure robust public accountability, (*Engaging with Others*),

3.2 The Vale of Glamorgan Council has used these principles when gathering evidence to gain assurance that governance within the Authority is robust.

3.3 The Council recognises that a key governance challenge that lies ahead is in relation to the capacity and capability to meet new legislative requirements and the challenges this poses for delivering services on reducing budgets. To address this challenge, the Council will ensure that it has appropriate governance mechanisms in place to ensure it is best placed to respond to the requirements of new legislation in a co-ordinated and accountable way.

3.4 Therefore, the Council is currently reviewing the governance framework to ensure that it reflects the requirements of the Well-being of Future Generations (Wales) Act 2015 and any changes recommended by CIPFA and SOLACE to the Code of Corporate Governance.

4. Focusing on the purpose of the Authority and on outcomes for the community and creating and implementing a vision for the local area (*Putting the Citizen First, Achieving Value for Money).*

4.1 The Council aims to deliver high quality services that provide value for money and which are aligned to the needs and priorities of the local community. In accordance with the requirements of the Local Government (Wales) Measure 2011 (as amended from time to time), the Council has prepared a Community Strategy to promote the economic, social and environmental well-being of its

area. Rather than just a Council-owned document, this Strategy has been developed with the Council's partners in the Local Service Board and represents a joint approach for setting objectives to improve the quality of life in the Vale over ten years to 2021.

4.2 With the Community Strategy providing the over-arching framework, the Vale of Glamorgan Council, as a key partner, has a pivotal role to play. The agenda is a complicated one as differing and often conflicting priorities have to be dealt with and decisions reached. In setting its objectives, therefore, the Council must take into account a number of factors including service demands, legislative requirements, community wishes, the agendas of partner organisations, together with the expectations of the Welsh Government and external regulators. This is all encapsulated in the Corporate Plan, a four year document that describes how the Council will contribute to the Community Strategy and provides focus and direction for Elected Members, employees, partner organisations, service users and other stakeholders.

4.3 The Corporate Plan covering the period 2013 – 2017, identifies eight priority outcomes as listed below, each of these outcomes is supported by key actions with delivery dates varying over the life of the plan.

- Citizens of the Vale of Glamorgan can easily access efficiently managed services that are focused around their needs, have confidence in how decisions are made and are proud to live in the Vale.
- Children and young people are engaged and supported and take full advantage of life opportunities available in their local community and beyond.
- Citizens of the Vale of Glamorgan have the skills, knowledge and abilities required to maximise their opportunities.
- The Vale of Glamorgan has a thriving economy supporting cohesive sustainable communities.
- Current and future generations of Vale residents and visitors enjoy the build and natural environments of the Vale of Glamorgan and actively protect and maintain them.
- Vale of Glamorgan residents have access to affordable, good quality suitable housing and housing advice and support.
- Citizens of the Vale of Glamorgan are healthy and have equality of outcomes and, through appropriate support and safeguards, the most vulnerable members of our community maximise their life opportunities.
- Residents and citizens of the Vale of Glamorgan feel safe and are safe within their community.

4.4 The Corporate Plan is underpinned by a set of enabling strategies (these are the Asset Management Plan, Medium Term Financial Plan, Human Resources Strategy, Workforce Plan, ICT Strategy, Customer Relations Strategy, Performance Management Framework and Risk Management Strategy and Register) which together form the Council's overall policy framework for supporting improvement.

4.5 In view of significant new resource and legislative challenges that need to be addressed, the Council is reviewing its Corporate Plan priorities for the medium term to reflect its Reshaping Services Strategy, the Well-being of Future Generations (Wales) Act, the Social Services and Wellbeing Act and Welsh Government's overall proposals for local government.

4.6 During the latter half of 2015/16, the Council undertook a Self-Assessment, the outcome of which was reported to Cabinet on the 8th February 2016. This will be repeated on an annual basis. The Self-Assessment presents a position statement on the Council's performance over the past year in delivering the Council's priorities. Self-assessment of performance is an important way for the Council to identify the capacity and ability to deliver continuous improvement by identifying areas of strength and those requiring particular focus in coming years. The improvement areas identified throughout the assessment have been used to inform the development of a Corporate Improvement Action Plan.

4.7 In addition to the above, the Council was subject to a Corporate Assessment during the latter quarter of 2015-16. The purpose of the Corporate Assessment is to enable the Wales Audit Office (WAO) to provide a position statement on the Council's capacity and capability to deliver continuous improvement. It does, by its nature, examine the Council's track record of performance and outcomes as well as examining the key arrangements that are necessary to underpin improvements in services and functions. The Corporate Assessment seeks to answer the following question: "Is the Authority capable of delivering its priorities and improved outcomes for citizens?" The Council is still awaiting the final report, but early indications are that the results are extremely positive.

4.8 Since March and October 2014 with the formulation of the Youth Cabinet and the appointment of the Youth Mayor respectively, young people throughout the Vale of Glamorgan have had a real voice on issues under consideration by the Council's Cabinet, Scrutiny Committees and at meetings of Full Council. Youth Cabinet Members work directly with Cabinet Members and the Leader of the Council and contribute to consultations relating to all Council Services. The views of young people informed high profile work such as the 5x60 Sports programme, the Council's response to local government reform, the Council's destination action plan, the national curriculum review, the Barry schools transformation project and a review of school transport in the Vale of Glamorgan.

4.9 The Council undertakes annual Service Planning through which regular self-assessment takes place as a means of achieving continuous improvement across both corporate and service related functions. This informs and is informed by the Corporate Plan, the Council's Improvement Plan as well as a Performance Audit Programme which is produced in conjunction with the Council's external regulators. The Council's vision and priorities are reflected in Service Plans and inform the development of service objectives and outcomes. Service Plans include detailed actions and performance targets which contribute towards the achievement of Council priorities. Scrutiny Committees, review the Service Plans on a quarterly basis, including the achievement of set targets and actions. A key factor in the development of the Service Planning

process has been the incorporation of significant changes resulting from the adoption of a Workforce Plan and Human Resources Strategy, together with a focus on outcomes and a rationalisation of the number of plans.

4.10 The Council recognises that there are still improvements to be made including ensuring clear links between the Corporate Plan and the suite of enabling strategies / frameworks. Work has already commenced in reviewing these strategies / frameworks and the Performance Management Framework in tandem with the review of the Corporate Plan.

4.11 The Council has an effective corporate framework for financial planning, financial management and control in place. These arrangements enable the Council to regularly review and challenge financial performance and monitor spend against budgets. Work has been undertaken to ensure that the Council's Medium Term Financial Plan (MTFP) clearly links to the priorities outlined in the Corporate Plan to ensure they are financially viable. The Council has also ensured that the MTFP closely aligns with the business planning cycle. The Capital Programme and Strategy has been set to the year 2019/20 with resources allocated in accordance with Corporate Priority and risk. The annual revenue budget together with the capital programme reflects how the Council's financial resources are aligned to Council priorities. A budget priorities survey was carried out with Vale residents to ascertain how they prioritised the services they used. The services that were rated with the highest level of importance were Primary and Secondary Schools, Refuse Collection and Recycling and Child Health and Disability Support. A number of residents also supported the possibility of alternative forms of service delivery as a way of reducing costs, specifically working more closely with strategic partners and the third sector. , As part of the programme of work, the Wales Audit Office has completed a Financial Resilience Assessment of the Vale of Glamorgan Council on behalf of the Auditor General for Wales. The assessment's aim was to answer the following question:

Is the Vale of Glamorgan Council managing budget reductions effectively to ensure financial resilience?

Taking into consideration whether:

Financial planning arrangements effectively support financial resilience,

Financial control effectively supports financial resilience, and

Financial governance effectively supports financial resilience.

The main focus of the work was on delivery of 2014-15 savings plans, and the 2015-16 financial planning period. Overall the report concludes that "the Council's financial arrangements are effective but savings plans need to be developed in more detail for future years". This conclusion was based on the findings in relation to financial planning, financial control and financial governance arrangements.

4.12 Monthly monitoring reports for the revenue budget and the capital programme are submitted to Scrutiny Committees, with Scrutiny Committee (Corporate Resources) nominated as the lead Scrutiny Committee. Cabinet receive references from Scrutiny Committees including revised estimates and proposed changes to the Capital programme. Chief Officers are responsible for ensuring that expenditure is maintained within approved budgets and undertake ongoing monitoring to achieve this. For the 2015/16 financial year, all Directorates achieved outturn within their overall budget allocation. The Council's Medium Term Financial Plan outlines how the Corporate Plan is to be funded; this has taken place against a backdrop of a significant reduction in public finances.

4.13 Priorities for service improvement have been identified, and there are a range of projects in progress with a view to achieving significant business efficiencies over the coming years. The Council has a number of corporate processes, programmes and projects designed to improve efficiency including the establishment of areas for savings over the next four years. In order to achieve this, the Council will need to investigate alternative forms of service delivery including collaboration with other local authorities, the wider public sector and the third/voluntary sector. The Council has a corporate approach to strategic collaboration and partnership working and fully recognises the potential benefits and the risks that new service delivery models present. The Council already works well with a wide range of partners locally and regionally in order to deliver the identified priorities. This is contributing to reducing duplication in services, achieving cost savings, enhancing the skills of the workforce development, improved services and ultimately, improving outcomes for Vale residents.

4.14 At present the Council is involved in a number of collaborations / partnership arrangements, these include (this list is not exhaustive):-

- The Local Service Board which oversees the delivery of the Community Strategy and has in place agreed partnership and delivery structures which are fit for purpose and accountable, this is now the Public Service Board (PSB),
- Prosiect Gwyrdd for Waste Disposal,
- Central South Education Consortium for school improvement,
- Internal Audit Shared Service,
- Civil Parking Enforcement
- Regulatory Services,
- Leisure Services Management contract with Parkwood Community Leisure (Legacy Leisure) and
- The Regional Adoption Collaboration which involves Cardiff, Merthyr and Rhondda Cynon Taf councils.

4.15 The Council operates a complaints procedure and uses this to identify areas where service quality is not satisfactory, and to take action to improve. As a result, corporate complaints are captured on the Oracle CRM system and this gives an audit trail about how we handle such complaints. The CRM system also provides the Council with management information, such as the number of complaints, the Stage of the complaint (i.e. Stage 1, or 2) and whether the complaint was upheld, partially upheld or not upheld. The Council has

introduced formal reporting to demonstrate what services have learnt from complaints and Directorates have produced Action Plans to implement change. The Council has also refined data collection and management reporting procedures thus ensuring that information is accurate and timely. In addition, formal reporting takes place to Corporate Management Team on a six-monthly basis ensuring that services can demonstrate that they are learning from complaints.

4.16 In May 2009 the Council adopted a Code of Corporate Governance based on best practice as recommended by CIPFA (The Chartered Institute of Public Finance and Accountancy) and SOLACE (The Society of Local Authority Chief Executives). A self-assessment of corporate governance was undertaken by Internal Audit in 2015/16. The outcome of the internal audit was that the Council has embedded corporate governance into all aspects of its key functions. During 2016-17 the Code of Corporate Governance will be reviewed to ensure it continues to be fit for purpose. However, it is expected that the format of the Code will change to align with the Well-being of Future Generations (Wales) Act 2015 and any changes recommended by CIPFA and SOLACE.

4.17 The Council constantly strives to ensure that its functions are exercised with a view to continuous improvement and regard to the principles of economy, efficiency and effectiveness. In particular, the requirements of the Local Government Measure under the Wales Programme for Improvement place a duty on local authorities to pursue service excellence, improvement and efficiency. In order to achieve this, a process of continuous internal review takes place, much of which is governed by the Council's own comprehensive performance management framework and is supplemented by the work of external agencies and regulators. However, the Council recognise that more work is needed to improve how the Council evaluates and reports the outcomes being achieved in response to priorities. This work has already commenced in tandem with the review of the Council's Corporate Plan and proposals have been made to elected members on an approach based on "one scrutiny committee per Corporate Plan outcome".

4.18 A key performance challenge is having the capacity and capability to support services to deliver transformational change in the medium term. To address this, the Council will be focusing on ensuring that there is strong and effective programme management of the Reshaping Services programme and those objectives and targets remain realistic and achievable. This will include, continuing to ensure robust monitoring/planning of budgets takes place, making greater use of integrated approaches to ways of working and digital technology to deliver services in a more efficient and cost effective way.

4.19 The review of the Council's Code of Corporate Governance identified that the Council was able to demonstrate a number of positive indicators under Principle 1 - **"Putting the Citizen First"**, these included:

- A wide range of methods to engage residents and service users in providing feedback on Council services and influencing decision making. These included both focused community consultation and wider ranging customer feedback projects,
- A number of corporate engagement tools such as Vale Viewpoint – the shared LSB Citizens' Panel, the biennial Vale of Glamorgan Council Public Opinion survey and a range of service user groups all designed to capture feedback from residents and service users to inform future service delivery,
- Ongoing work to engage hard to reach groups in partnership with voluntary organisations such as the Vale Older People's Forum and Vale Youth Cabinet and a number of equalities groups operating in the Vale.
- The Public Engagement Framework and good practice guide,
- Endorsement and promotion of the National Principles for Public Engagement Wales,
- Use of Vale of Glamorgan Council website and OneVale contact centre to provide information relating to consultation and engagement in the Vale and as a fully accessible point for customer and citizen engagement,
- Work to develop a comprehensive programme of public engagement to underpin the implementation of the Council's Reshaping Services project.
- Evidence of member engagement with citizens: and links with Community Councils and,
- Two young people have been appointed by the Council to the Lifelong Learning Scrutiny Committee to represent young people on matters affecting young people across the Vale of Glamorgan.

4.20 The review of the Council's Code of Corporate Governance also identified that the Council was able to demonstrate a number of positive indicators for **"Achieving Value for Money"**, these included

- A Corporate focus on delivering efficiencies with targets aligned to the Medium Term Financial Plan and the Budget
- A number of corporate processes programmes and projects designed to improve efficiency for example the space project.
- The Council is involved in a number of collaborations and partnership working and continues to explore further opportunities.

5.   Members and Officers working together to achieve a common purpose with clearly defined functions and roles (*Knowing Who does What and Why).*

5.1   The Council aims to ensure that the roles and responsibilities for governance are defined and allocated so that accountability for decisions made and actions taken are clear. It does this by operating a Leader and Cabinet system of governance as part of a wider policy to strengthen its ability to deliver effective community leadership, democratic renewal and continuous improvement in services. Under this system:

- The Full Council meeting sets the overall budget and policy framework and is a focus for debate about the performance of the Cabinet (Executive),

- Scrutiny Committees advise on policy formulation and hold the Cabinet to account in relation to specific matters. They may also review areas of Council activity which are not the responsibility of the Cabinet or matters of wider local concern. The Cabinet makes decisions within this framework. Decisions may be delegated to individuals in the Cabinet, committees of the Cabinet, officers, area committees, joint arrangements, other authorities, or contracted out,

- Most regulatory decisions continue to be made by committees of the Council (e.g. Planning and Licensing Committee and Shared Regulatory Services) and,

- There is a Standards Committee to promote high standards of conduct and assist Members to observe the Code of Conduct.

5.2 The Constitution is at the heart of the Council's business. It allocates power and responsibility within the Authority, as well as between it and others. It also regulates the behaviour of individuals and groups through codes of conduct, protocols and standing orders. The Council's Constitution is reviewed regularly and provides a clear framework for all officers and elected members decision making, and gives clarity around delegated responsibilities. The revised Constitution was developed via a working group of political group leaders and was approved by Full Council in September 2015 and the final version published in December.

5.3 The Constitution represents a coherent single document that is used as a comprehensive point of reference by individuals and organisations both inside and outside the Council. It comprises Procedures (including financial procedures) and associated material. The overall framework is not subject to frequent change and identifies what is to be done and by whom. Procedures may be subject to more frequent change. Whilst the Constitution is not a statutory document, the Council is satisfied that it is consistent with statute, regulations and guidance. To ensure continued compliance, the Head of Legal Services (who is also the Monitoring Officer appointed under Section 5 of the Local Government and Housing Act 1989) keeps he constitution under constant review. The revised version of the Constitution was presented to and approved by Full Council in September 2015, with the final version published in December 2015.

5.4 More recently the Constitution was amended in April 2016 to incorporate changes to the Member Code of Conduct to give effect to the Local Authorities (Model Code of Conduct) (Wales) (Amendment) order 2016.

5.5 The Council has adopted a Code of Conduct for its elected Members and has arrangements to receive and investigate allegations of breaches of proper standards of conduct which is outlined within the Constitution. The Council also has a Local Dispute Resolution Procedure as well as a Protocol of Standards to support the Members Code of Conduct that are both contained within the Constitution.

5.6 Low level allegations of breaches of the Members Code of Conduct are dealt with in accordance with the Council's Local Dispute Resolution Procedure. During 2015/16 there have been two matters which proceeded to a Stage 3 hearing determination. No censures were issued.

5.7 The Council is committed to improving the way in which it engages with residents and key stakeholders in decision-making. To ensure that the approach to engagement and consultation is undertaken to a high standard and is consistent, the Council has developed a Public Engagement Framework. In addition, the Council continues to allow members of the public to ask questions at planning committee and the ability to watch meetings of the Councils Planning Committee online via webcasting continues. In addition public speaking at Scrutiny Committees was introduced in January 2016.

5.8 All Committees have clear terms of reference and work programmes to set out their roles and responsibilities. The Audit Committee provides assurance to the Council on the effectiveness of the governance arrangements, risk management framework and internal control environment.

5.9 The Council's Managing Director (as Head of Paid Service) led the Council's officers and chaired the Corporate Management Team during 2015/16.

5.10 In accordance with the Local Government (Wales) Measure, the Council has appointed a designated Head of Democratic Services (the role being undertaken by the Operational Manager - Democratic Services) and has established a Democratic Services Committee, which meets on a quarterly basis.

5.11 All staff, including senior management, have clear conditions of employment and job descriptions which set out their roles and responsibilities. Terms and conditions of employment are overseen by the Human Resources Division.

5.12 The Head of Finance, as the Section 151 Officer appointed under the 1972 Local Government Act, carried overall responsibility for the financial administration of the Council. A corporate finance function provides support to departments and determines the budget preparation and financial monitoring process.

5.13 The Monitoring Officer carries overall responsibility for legal compliance and her staff work closely with departments to advise on requirements in this respect.

5.14 The review of the Council's Code of Corporate Governance identified that the Council was able to demonstrate a number of positive indicators for **"Knowing who does what and why"**, these included:

- A Member Development Strategy which provides a framework for supporting elected Members in their numerous roles to enable them to undertake improved scrutiny and challenge of all Council activities.

- A Member Development Programme continues to be provided and is informed by the undertaking of Personal Development Review interviews for members and an annual Training Needs Analysis.
- Constructive working relationships between members and officers,
- CMT is an effective forum for considering corporate and cross-cutting issues and,
- A new procedure for the "sign off" of Cabinet reports has been introduced, with the inclusion of the Head of Legal Services and the Head of Finance as officers who contribute to the signing off of reports to ensure legal and financial implications have been appropriately assessed and are consistent with corporate policy

5.15 The development of collaborative arrangement has and will continue to necessitate the formation and review of appropriate governance arrangements to ensure that functions and roles are clearly defined and that the purpose and objective of the collaboration are met. During July 2015, Cabinet agreed that the Council would contribute towards the development of a business case to support the proposal for developing a Cardiff City Region City Deal and as a result would take an active role in investigating the feasibility of a City Deal for the Cardiff City Region. The Council recognises the opportunities that a Cardiff City Deal could bring in terms of potential increase in economic growth, investment and job creation within the region but it also recognises that there are significant risk in terms of cash-flow and the failure to gain the "buy in" or commitment from all partners to ensure that the City Deal is successful. Robust and sound Governance, Internal Control and Risk Management arrangements will be key factors for success.

6. **Promoting Values for the Council and Demonstrating the Values of Good Governance through upholding High Standards of Conduct and Behaviour (*Living Public Service Values).***

6.1 The Council supports a culture of behaviour based on its statement of values. This guides both how the long-term vision is put into effect and how members and officers behave in their day-to-day work.

6.2 The behaviour of elected members and officers is governed by codes of conduct, which include a requirement for declarations of interest to be completed.

6.3 The Council takes fraud, corruption and maladministration very seriously and has the following policies, which aim to prevent or deal with such occurrences,

- Anti-Fraud and Bribery Policy
- Whistleblowing Policy
- HR policies regarding the disciplining of staff involved in such incidents.

6.4 The Public Services Ombudsman investigates allegations of misconduct by members, with the Standards Committee determining any investigations presented by the Ombudsman, promoting and maintaining high standards of conduct and monitoring the operation of the Member's code of conduct.

6.5 A complaints procedure is in place for the Council to receive and investigate any complaint made against it, including its members and officers and this is overseen by the Council's Complaints Officer. Complaints regarding members are directed to the Public Services Ombudsman and the Monitoring Officer.

6.6 The Council has a clear Whistleblowing Policy and arrangements in place for staff. Whistleblowing arrangements are sound as concluded by the Wales Audit Office in the Council's Annual Improvement Report for 2014-15. The Council has continued to raise awareness of the policy by delivering a programme of training for officers via an e-learning module.

6.7 The Council has developed a Corporate Safeguarding Policy in line with CSSIW and WAO recommendations, however it is recognised that further work is required to ensure this policy is embedded consistently across the organisation.

6.8 The Audit Committee helps raise the profile of internal control, governance, risk management and financial reporting issues within the Council. It enhances public trust and confidence in the financial governance of the Council. The Terms of Reference in place for the Committee are consistent with the core functions as recommended by CIPFA. In accordance with the Local Government (Wales) Measure 2011, the Council has appointed a Lay Member to the Audit Committee who presently holds the position as Vice Chairperson.

6.9 The review of the Council's Code of Corporate Governance identified that the Council was able to demonstrate a number of positive indicators for **"Living public sector values"**, these included:

- The Council having a regularly reviewed Code of Governance and an Annual Governance Statement.
- No issues reported about staff behaviour,
- Audit Committee being well-regarded and,
- A strong public sector ethos among members who are willing to co-operate for the common good of the citizens of the Vale.

7. Taking Informed and Transparent Decisions which are subject to effective scrutiny and Managing Risk (*Fostering Innovation Delivery)*.

7.1 The Council's Constitution sets out how the Council operates and the process for policy and decision-making. Full Council sets the policy and budget framework. Within this framework, the majority of key decisions are made by the Cabinet. Cabinet meetings are open to the public (except where items are exempt under the Access to Information Act).

7.2 All key decisions made by Cabinet are taken on the basis of written reports, including assessments of resource implications (Financial and Employment), Sustainability and Climate Change implications, legal implications (including Human Rights), Crime and Disorder implications, Equal Opportunity implications (including Welsh Language issues), Corporate and Service

objectives and consultation (including ward member consultation) are an integral part of the process.

7.3 The decision-making process is scrutinised by five Scrutiny Committees, which support the work of the Cabinet as Executive and the Council as a whole. They allow citizens to have a greater say in Council matters by holding inquiries into matters of local concern. Scrutiny Committees also monitor the decisions of the Cabinet. They can "call in" a decision that has been made by the Cabinet but not yet implemented. This enables them to consider whether the decision is appropriate. They may recommend that the Cabinet reconsider the decision. They may also be consulted by the Cabinet or the Council on forthcoming decisions and on the development of policy. Any Member also has the right to request the inclusion of items on a relevant Scrutiny Committee agenda. It should be noted that proposals have been made to elected members on an approach based on "one scrutiny committee per Corporate Plan outcome". The Council are confident that this approach will reduce duplication in reporting and ensure that the Council is effectively evaluating the results of cross-service activity in order to provide a clearer picture of the outcomes being achieved.

7.4 Other decisions are made by officers under delegated powers. The authority to make day-to-day operational decisions is detailed within the Scheme of Delegations contained in the Constitution.

7.5 Policies and procedures governing the Council's operations include Financial Regulations, Procurement Policy and Strategy and Risk Management Strategy. Ensuring compliance with these policies is the responsibility of managers across the Council.

7.6 The Council has a well-developed performance management framework linking the Community Strategy to its own Corporate Plan and then through Service and Team Plans down to individual performance as part of a Personal Development and Review System. The financial consequences are considered via the Medium Term Financial Plan, which informs the Corporate Plan and the Annual Budget. This, in turn, informs Service and Team Plans. Further work has been undertaken to integrate workforce planning into this process.

7.7 Whilst Performance Management is fully embedded within the culture of the Council and has driven continuous improvement over the last 10 years, the Council does recognise that there are significant challenges ahead particularly in relation to capacity and capability in supporting services to deliver transformation change in the medium term. To address these challenges the Council will be focusing on ensuring that there is strong and effective programme management of the Reshaping Services programme and those objectives and targets remain realistic and achievable. In addition, the Council has undertaken a Self-Assessment during the latter half of 2015/16 which provides a position Statement on the Council's performance over the past year in delivering the Council's priorities. The Council has reconfigured its Corporate Plan for 2016 – 2020 which sets out how the Council will deliver its vision over the next four years, in the face of increasing challenges. The Plan represents a

significantly different way of working for the Council. The focus is on the delivery of Well-being objectives demonstrating the contribution to the Well-being goals introduced the Well-being of Future Generations (Wales) Act. Not only is the Plan a departure from previous versions structured around Directorates, it also makes provision for new ways of working promoted by the Act. In addition to the range of internal changes to support the delivery of the Corporate Plan and the Act, the Council is planning to reconfigure Scrutiny Committees to the Well-being Outcomes as set out in the Corporate Plan 2016-2020. These will comprise of one Scrutiny Committee per Corporate Plan outcome and it's intended to help reduce duplication in reporting and ensure effective evaluation of cross-service activity.

7.8 The Council has adopted a robust approach to the management of risk through the integration of a risk management strategy into the Authority's performance management framework. Service risks are identified as part of the Service Planning process and are linked, where appropriate, to a Corporate Risk definition assisted by the use of mandatory cross-cutting objectives. Risk management is an important feature of the Council's governance arrangements and it is recognised that successful risk management relies on a corporate approach to ensure that all risks are identified and managed systematically and consistently across the Council. The Risk Management Strategy has been adopted by the Council which sets out the approach to the identification of and responses to strategic and operation risks. The Strategy has recently been refreshed, with roles and responsibilities of both elected members and officers in this respect identified with Cabinet acting as risk "champions" for the Council.

7.9 Risks are viewed from both a Service and Council-wide perspective which allows the key risks to be distilled by the Corporate Risk Management Group into a tangible Corporate Risk Register that has regard to underlying corporate risk themes and reflects the views of senior management across all Services. The Corporate Risk Management Group regularly reviews the controls and implementation of necessary counter-measures to mitigate the risks.

7.10 The Council's Risk Management Strategy also provides essential input to the determination of Council priorities, targets and objectives. All of this serves to inform the development of the Improvement Plan. The Constitution determines whether Cabinet or Council acts as the approving body for these key documents and quarterly monitoring reports are taken to Cabinet and Scrutiny Committees in order to measure performance against Service Plans.

7.11 The financial management of the Council is conducted in accordance with all relevant legislation and it's Constitution. In particular, financial procedure rules relating to Contract Standing Orders, Financial Regulations and Officer Delegations provide the framework for financial control. The Head of Finance has responsibility for establishing a clear framework for the financial management of the Council's affairs and for ensuring that arrangements for their proper administration are made under Section 151 of the Local Government Act 1972. As part of its performance management framework, the Council produces, on an annual basis, a rolling Medium Term Financial Plan

which links the strategic planning process with the budget process and ensures consistency between them. As such, it forms an integral part of the Authority's corporate management framework for performance management and facilitates the allocation of resources to corporate priorities. Chief Officers are responsible for the financial management of their respective services and are supported by training, support and regular financial management information. Monthly financial monitoring reports are produced for both Cabinet and Scrutiny Committees, culminating in the production of the statutory Annual Statement of Accounts.

7.12 The review of the Council's Code of Corporate Governance identified that the Council was able to demonstrate a number of positive indicators for **"Fostering innovative delivery"**, these included:

- Members and officers believe the Council strives to identify more effective and innovative ways of working,
- There is a culture of willingness to challenge existing practices particularly given the current financial situation,
- A good level of risk awareness amongst officers and members,
- A comprehensive Risk Register which is reviewed quarterly by the Corporate Risk Management Group and monitored by CMT, Cabinet and Audit Committee.
- A mechanism for reporting progress against key regulatory recommendations / improvement proposals and.
- A comprehensive Collaborative Working guidance for managers which emphasises good corporate and project governance.

8. Developing the Capacity and Capability of Members and Officers to be Effective (*Being a Learning Organisation).*

8.1 The Council aims to ensure that members and officers of the Council have the skills, knowledge and capacity they need to discharge their responsibilities and recognises the value of well-trained and competent people in effective service delivery. All new members and staff undertake an induction to familiarise them with protocols, procedures, values and aims of the Council.

8.2 There is a Member Development Strategy, which provides a framework for supporting elected members in the numerous roles that they are required to undertake both within, and outside, the Council. The Strategy assists members to develop and strengthen their capacity as confident and effective political and community leaders, who are appropriately self-aware, self-managed, proactive, aware of their impact on others and capable of forming healthy and productive relationships, networks and partnerships. As indicated above, an ongoing Member Development Programme exists and the Strategy itself has been reviewed and submitted to the Democratic Services Committee.

8.3 The Council has also developed a Workforce Plan the purpose of which is to set out the anticipated workforce priorities over the next four years and the actions needed to achieve the change agenda. The Plan is supported by more

detailed plans from each of the Council's main service areas and aims to focus on the common and cross-cutting themes. The themes and objectives within the Plan are congruent with those set out in the Council's Corporate Plan 2013 - 17 and the Medium Term Financial Plan. Service Plans are being developed to incorporate the necessary workforce planning requirements.

8.4 One of the important developments in 2015 has been the development and implementation of the Council's Employee Engagement Strategy. This has been a key part of the Reshaping Services programme and has provided a framework to consult and engage with staff to ensure their involvement in identifying new approaches to service delivery and their contribution in the development of a new "Vale Employment Relationship" and a Staff Charter.

8.5 The Council's Performance Development and Review System (PDRS) process enables the individual to understand how they contribute to achieving the aims of the Council as expressed in the Team and Service Plans. The PDRS process is recognition that plans are delivered by individuals working in teams to achieve objectives – people are the Council's most important asset and resource. PDRS is the foundation stone and integral part of the Council's Performance Management Framework. During 2015 and as a result of a staff survey, the results showed that further work is required to develop the appraisal process to more effectively assess the training needs of staff.

8.6 The review of the Council's Code of Corporate Governance identified that the Council was able to demonstrate a number of positive indicators for **"Being a learning organisation"**, these included:

- The Employee Engagement Strategy
- An embedded PDRS system identifying staff training needs, however, further development is required.
- Training provided for Members,
- Performance management regime effective in bringing together top down and bottom up issues and.
- Transparent lines of communication.

9. Engaging with local people and other stakeholders to ensure robust public accountability (*Engaging with Others*),

9.1 The Council is committed to understanding and learning from the views of the public. Engagement is the process by which views of stakeholders are able to inform and influence policy and service delivery. The Council's planning and decision-making processes are designed to include consultation with stakeholders and the submission of views by local people. The Council's Public Engagement Framework details public engagement activities, which are undertaken by the Council.

9.2 Arrangements for consultation and for gauging local views include the Vale Viewpoint – the joint LSB Citizen's Panel, Community Cabinet events and focused community engagement projects. A range of methods are used to gather Vale residents' views. These range from traditional methods such as

quantitative surveys and focus groups to engagement events involving the use of participative methods and interactive workshops. A public opinion survey is carried out every two years by an independent market research company to provide the Council with feedback on a number of services. All elected members offer surgeries, or equivalent means of providing assistance, for their constituents. The Council's Cabinet now undertakes quarterly Community Cabinet meetings across the Vale to provide residents with the opportunity to speak face-to-face with decision makers. All strategic documents such as the Vale of Glamorgan Community Strategy are planned and written in consultation with a range of relevant stakeholders.

9.3   During 2015/16 the Council has undertaken a number of consultation and engagement projects that have informed service delivery. These include the following (this list is not exhaustive):

- Consultation with pupils, parents, teachers, governors and other stakeholders on the proposal to transform secondary education in Barry. The proposals included a new mixed-sex Comprehensive Community School,
- The expansion of Ysgol Gyfun Bro Morgannwg and Ysgol Gymraeg Nant Talwg.
- Budget Consultations for 2015/16 which also informed the final revenue budget for 2015/16 and the Reshaping Services Change Programme.
- Extensive staff surveys to seek views on four key areas of the new "Vale Employment Relationship" and.
- Council allowing members of the public to ask questions at Planning Committee and public speaking at Scrutiny Committees since January 2016.

9.4   The review of the Council's Code of Corporate Governance identified that the Council was able to demonstrate a number of positive indicators for **"Engaging with others"**, these included:

- Internal and external communication strategy,
- Examples of successful collaborations with other organisations – Prosiect Gwyrdd, Welsh Purchasing Consortium, Social Services joint commissioning, Internal Audit shared service with Bridgend County Borough Council, Shared Regulatory Services, Adoption Collaboration
- Local Service Board becoming a useful mechanism. The five key partnership groups bring together public, private and voluntary agencies, along with representative individuals and groups to make decisions on policy and use of resources.
- A joint Local Service Board incorporating Cardiff Council which can build upon the principles of collaboration.
- Recognition that partnership working is likely to be an important element in managing the increasingly difficult financial position.
- Members of the public are invited to participate in forums and are involved in regular opinion-taking exercises.

10. Review of Effectiveness

10.1 The Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of the effectiveness is informed by the work of Internal Audit and chief officers within the Authority who have responsibility for the development and maintenance of the internal control environment, and also by comments made by the external auditors and other review agencies and inspectorates.

10.2 The review mechanism includes:

- The Cabinet (as Executive) who are responsible for considering overall financial and performance management and receive comprehensive reports on a regular basis. The Cabinet is also responsible for key decisions and for initiating corrective action in relation to risk and internal control issues.

- A Scrutiny function which holds the Cabinet to account. Scrutiny Committee (Corporate Resources) is responsible for maintaining an overview of financial performance including value for money.

- The Audit Committee which provides the focus for reviewing the effectiveness of the system of internal control. This is primarily based upon reviewing the work of Internal Audit and receiving reports from the Council's external auditors. The Committee met regularly throughout the year to provide independent assurance to the Council in relation to the effectiveness of the risk management framework, internal control environment and governance matters. In accordance with the Local Government Measure a lay person has been appointed to the Committee since 2012/13.

10.3   Internal Audit, an independent and objective assurance service to the management of the Vale of Glamorgan Council, completes a programme of reviews throughout the year to provide an opinion on the internal control, risk management and governance arrangements. In addition, the Section undertakes fraud investigation and proactive fraud detection work, which includes reviewing the control environment in areas where fraud or irregularity has occurred. Significant weaknesses in the control environment identified by Internal Audit are reported to senior management, the Audit Committee and the Cabinet as appropriate.

10.4   As part of the normal audit reporting process, recommendations are made and agreed with the relevant chief officers to address any issues that could impact upon the system of internal control. Furthermore, the Operational Manager - Audit as Head of Audit provides regular updates and an annual report to the Audit Committee summarising any significant internal control issues and the Annual Governance Statement itself has been subject to Audit Committee review.

10.5 The Wales Audit Office's Annual Improvement Report is considered by the Corporate Management Team, Cabinet, Corporate Resources Scrutiny Committee and the Audit Committee. Audit Committee also receives the Appointed Auditor's Annual Report, which supports the external audit of the Council's Annual Statement of Accounts. Other external regulatory agencies provide support to specific service areas (e.g. Estyn for Education, CSSIW for Social Care). In addition, the Audit Committee receives regular updates on the implementation of recommendations made by External Audit and other Regulatory Bodies.

10.6 As stated in 4.7 above the Council was subject to a Corporate Assessment which examines whether the Council is capable of delivering its priorities and improved outcomes for citizens. The Assessment was concluded by the WAO at the end of 2015-16 and the Council is awaiting the final report.

10.7 The Corporate Risk Management Group continually review corporate risks and ensure that actions are being taken to effectively manage the Council's highest risks. The results of this process are reported regularly to Audit Committee.

10.8 The Cabinet and Scrutiny Committee functions also provide a further mechanism for review and challenge of any issues that may impact upon the system of internal control. Scrutiny Committees regularly undertake "Task and Finish" groups (such as that set up by the Scrutiny Committee Social Care and Health to examine the potential contribution Assistive Technology could provide in the development of a dementia-supported community in the Vale of Glamorgan to enable people to live independently.

10.9 Internal Audit undertakes a continuous audit of Council services, which are assessed and prioritised according to relative risk. This risk assessment draws upon the corporate and service risks identified as part of the Service planning process and work of the Corporate Risk Management Group. In carrying out its duties, Internal Audit complies with the Public Sector Internal Audit Standards.

11. Significant Governance Issues

11.1 One of the main issues raised and highlighted over the last few years has been the ability of the Council to carry on meeting its service objectives and delivering positive outcomes for its customers and clients in the light of continued reductions in Welsh Government Funding.

11.2 The Council recognises that it is facing unprecedented challenges with continuing year on year reductions in Council funding and the impact this has on the services delivered. At the same time the Council is dealing with increasing expectations and demands on services. The Council has already identified approaching £35 million in savings since 2010 yet, the challenges continue. With diminishing funding impacting on how the Council delivers its services, embarking on an ambitious programme of transformational change makes planning for the future difficult.

11.3 The Council addressed this by undertaking regular Budget reviews and putting in place a financial strategy for the Council which presently runs until 2018. The purpose of this is to ensure:

- A sustainable budget is achieved within predicted funding levels,
- The budget is aligned to the Council's priorities as set out in the Corporate Plan,
- Best value for money is being obtained, i.e. identifying efficiency savings, opportunities for income generation and better use of external grants and.
- Collaborative initiatives and options for alternative service delivery are considered.

11.4 Separate financial strategies have been established for funding education and schools, social services and other services having regard to the relative risks and priorities of each. In total over the next 3 years to 2018-19 savings of £17.072M minimum will need to be achieved. In accordance with the financial strategies agreed, savings targets together with areas for savings have been identified. In addition, the Council continues its Reshaping Services programme in order to fundamentally review the need for and methods of service delivery across all Council services. It is anticipated that 60% of the required savings will be found through the programme and a number of specific services have been identified in two tranches for delivery from 2016 onwards. Further work will be required to ensure that all necessary action has been taken to mitigate any potential impact upon service delivery and clients e.g. consultation and scoping/completion of equality impact assessments.

11.5 Notwithstanding the above, there are certain major projects which form part of the Council's Corporate Risk Register the mitigation of which will be crucial for the Council to continue to manage in the ensuing financial year: Specifically, these are the:

- Reshaping Services,
- Local Government Reorganisation,
- Schools Reorganisation and Investment
- Housing Business Plan
- Waste
- Workforce Needs
- Information Security
- Climate Change
- Welfare Reform
- Local Development Plan
- School Improvement (Joint Education Service)
- Safeguarding
- Integrating Health and Social Care

11.6 The Head of Audit's Annual Opinion report was presented to the Audit Committee at their meeting held on 25th April 2016. The overall opinion has provided reasonable assurance on the adequacy and effectiveness of the Council's systems of governance, risk management and internal control with a moderate risk level. In addition to above, a number of significant control issues were identified during the year but action plans have been agreed with the relevant managers to address the weaknesses identified, the implementation of which is being monitored by the Corporate Management Team. Where weaknesses have been identified they have tended to relate to specific service areas rather than an across the board breakdown in controls.

11.7 However, significant issues have been identified and reported to Audit Committee which relates to the Internal Audit reviews undertaken within Waste Management. The overall findings of the reviews demonstrate that the Council has been exposed to unacceptable levels of risk as regards to the operation of the Waste contracts. Waste contracts were being allowed to be operationally effective without there being a signed, legally binding contract in place. In addition, the timeliness of awarding contracts needs to be effectively project managed to enable mobilisation of contracts to meet contract commencement timetables. As a result of the Internal Audit findings and conclusions, a number of recommendations have been made and a Management Action Plan produced to address the significant control weaknesses identified. The Council's Corporate Management Team is actively overseeing the implementation of a number of these recommendations to improve the overall control environment and the Council's Audit Committee will be kept apprised of future developments. In addition, the Council's Contract Management Guidance and Toolkit is being reviewed and updated and Corporate Management Team has agreed that this will form part of the mandatory training being rolled out on Project Management.

11.8 Early in 2015/16 saw the retirement of the Council's Head of Paid Service – Managing Director / Director of Resources and the Head of Finance/Section 151 Officer which came at a difficult time for the Council in terms of increasing budget challenges, the need for leadership momentum in relation to a range of challenging work programmes and the uncertainty of local government reorganisation. This was identified as a significant governance issue in last year's Annual Governance Statement. The Council appointed both Statutory Officers from within and it was clear from the outset that both newly appointed Corporate Officers were fully aware of the expectations of their roles and have demonstrated that they have the relevant experience and expertise to help manage the Council during a very crucial period of financial uncertainty.

11.9 In addition to these areas the challenge from an audit perspective, as recognised by corporate and senior management, continues to be the financial context in which the Council is required to operate. The impact of delivering the further programme of savings will be substantial, will impact on all areas of the business and is predicated on a range of reasonable but ambitious assumptions. There has been extensive planning and ongoing

consultation on the budget proposals and efficiency targets have been set out in directorate plans and encompassed within the Council's Reshaping Services programme. Whilst the Council is well placed to respond to this challenge, and the Section 151 Officer is of the opinion that the savings whilst extremely challenging are achievable, the scale and pace of required change continues to remain a fundamental risk.

11.10 In a Council of this size and complexity, with its significant savings requirements, there is an inherent risk of breakdown in the systems of control particularly where roles, responsibilities and systems are changing. As the Council continues to experience reduced resources, increased demands on services and new and innovative forms of service delivery there is a need to ensure that the Council's control environment remains robust, proportionate and is as efficient and effective as possible.

Matters arising since the submission of the AGS in July 2016

11.11 Since the production of the draft 2015/16 Annual Governance Statement, the Council has received its Corporate Assessment report. The corporate assessment is designed to answer on key question; whether as a local authority the Council is capable of delivering the priorities we have set ourselves and improved outcomes for Vale citizens. In this respect the report is glowing.

The WAO concluded that: *"The Council has a clear vision of what it wishes to achieve and is making positive changes which should ensure it is well place to continue securing improvements".*

The report is further evidence that, despite increasing pressures on budgets and demands on services, the Council is performing better than ever.

The WAO also found that:

- The Council's vision reflects local needs and national priorities and that senior political and officer leadership is engaging effectively with staff to support change and planning for the future;
- The change agenda is supported by effective leadership, and there are clear lines of responsibility which are securing improvement.
- Effective governance arrangements have secured improvements and that scrutiny arrangements have been refined to evaluate outcomes, with information about the Council's performance being readily available; and
- The human resources service and extensive staff engagement is supporting Council priorities and the change agenda.

11.12 In addition, the Data Unit Wales has released its annual review of the performance of all Councils in Wales. The results show that for the second year running the Vale of Glamorgan Council has been ranked as the highest performing local authority in Wales.

The full report provides a great of detail about the various performance indicators and shows the Vale of Glamorgan Council to be consistently outperforming the majority of Councils in Wales.

What is perhaps most pleasing about the results is that after being ranked top in Wales last year, the Vale of Glamorgan Council did not, as an organisation, become complacent. Instead the Council continued to work hard on improving the services that are of such importance to Vale of Glamorgan residents and improved on performance in more than half of the areas under review.

12   Assurance Summary

12.1 Good governance is about running things properly. It is a means by which the Council shows it is taking decisions for the good of the people of the area, in a fair, open and equitable way. It also requires standards of behaviour which support good decision making both collective and individual in an open and honest manner. It is the foundation for the delivery of good quality services that meet all local people's needs and is fundamental to demonstrating that public money is well spent. Without good governance councils will struggle to improve services.

12.2 From the review, assessment and ongoing monitoring work undertaken, as supported by the work of Internal Audit, we have reached the opinion that, overall, key systems are operating soundly and that with the exception of the contract management arrangements within Waste, (although it is recognised that rigorous scrutiny by the Managing Director, Corporate Management Team and Internal Audit is ongoing), there are no fundamental control weaknesses. We can confirm, to the best of our knowledge and belief, having made appropriate enquiries that this statement provides an accurate and fair view and that any significant issues identified in Section 11 above will being addressed.

Signed: Signed:

D. R. Thomas   N. Moore

Managing Director   *Leader of the Council*

Date: Date: