



ANNUAL GOVERNANCE STATEMENT

2022

To be Approved by
Corporate Governance and Audit Committee
3rd October 2022

1 - INTRODUCTION AND ASSURANCE STATEMENT

- 1) Leeds City Council is obliged¹ to ensure it has a sound system of internal control which facilitates the effective exercise of its functions and the achievement of its aims and objectives; ensures that the financial and operational management of the authority is effective; and includes effective arrangements for the management of risk.
- 2) We have conducted a review of the effectiveness of our system of internal control². The review reflects formal reporting to council and executive committees, and enquiries made of officers with relevant knowledge, experience and expertise. The review has been undertaken in consultation with the council's Head of Paid Service, Monitoring Officer and Chief Finance Officer.
- 3) We confirm, to the best of our knowledge and belief, and there having been appropriate enquiries made, that this Annual Governance Statement provides an accurate and fair view.
- 4) We are satisfied that in the period from April 2021, our framework of internal control has continued in place at the council for the year ended 31 March 2022 and up to the date of approval of this Annual Governance Statement. We have concluded that, overall, key systems are operating soundly, and that there are no fundamental control weaknesses³. We are satisfied that where improvements have been identified, actions are in place with appropriate arrangements to monitor them.

Victoria Bradshaw	Cllr Paul Wray	Cllr James Lewis
Chief Officer Financial Services & Section 151 Officer	Chair of Corporate Governance and Audit Committee	Leader of Council

¹ Regulation 3 of the Accounts and Audit Regulations 2015

² Undertaken in accordance with Regulation 6 of the Accounts and Audit Regulations 2015, and proper practice as set out in the Chartered Institute of Public Finance and Accountancy (CIPFA) Code of Practice: Delivering Good Governance in Local Government (2016)

³ Whilst supporting the council's arrangements for risk management, the governance framework cannot eliminate all risk to the achievement of policies, aims and objectives and we note that this review can therefore only provide reasonable and not absolute assurance of effectiveness. Similarly, this review provides assurance that we have in place appropriate processes to ensure transparency and democratic oversight in decision making but does not necessarily mean agreeing with all decisions made.

2 - OUR GOVERNANCE FRAMEWORK

Local Code of Corporate Governance

- 5) Our governance arrangements seek to ensure that our resources are used to achieve defined outcomes for the citizens and communities in the Leeds area.
- 6) Our local Code of Corporate Governance is framed around seven principles.

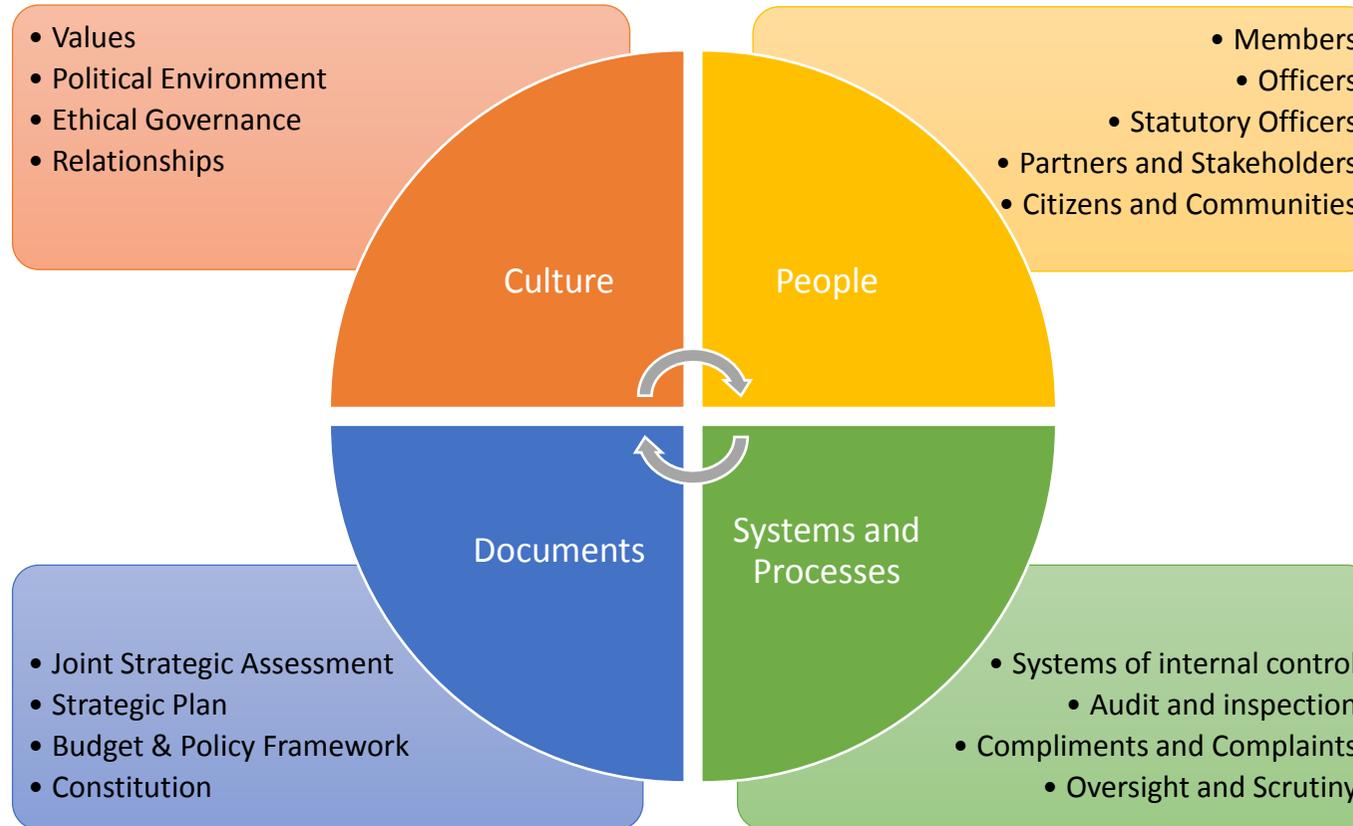


- 7) These governance principles are supported by commitments which enable us to direct and control our activity to achieve our Best City Ambition: Tackling Poverty and Inequality. They bring together the systems, processes, and values and behaviours in place across the council by which we plan and deliver services to the citizens of Leeds in a way that shows how the council:
 - Does the right things in the right way;
 - Is open, and transparent about what it does and how and why it does it;
 - Engages with citizens, partners, and stakeholders to plan and deliver outcomes; and
 - Is held to account.

2 - OUR GOVERNANCE FRAMEWORK

8) We have in place a variety of arrangements through which we give effect to our Code of Corporate Governance. These governance arrangements are a combination of the culture, people, documents, and systems and processes which together direct and control the council's activities, as demonstrated at Figure 1 below.

Figure 1 Governance Arrangements



2 - OUR GOVERNANCE FRAMEWORK

Culture

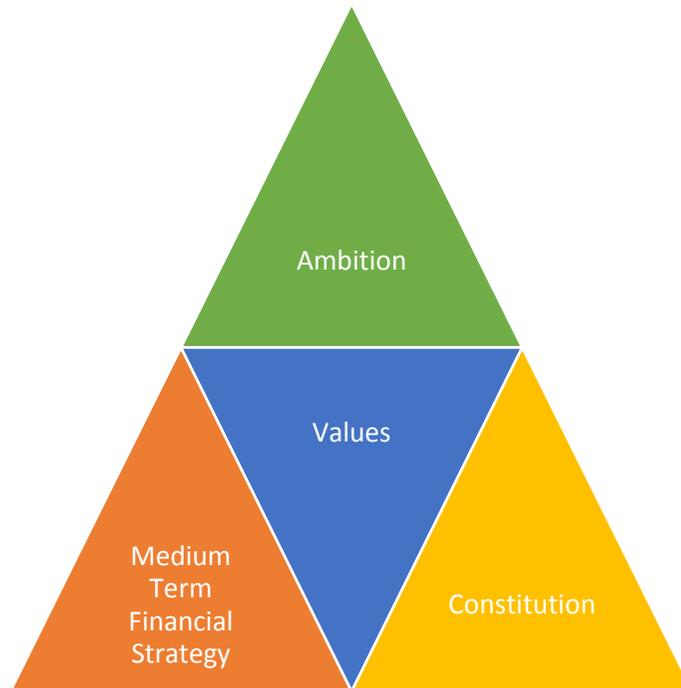
9) Our culture is framed by our five values.



- 10) Our values are articulated, communicated and embedded through defined behaviours. These behaviours are evidenced through our relationships within the council; with our partners and stakeholders; and with citizens and communities.
- 11) We have Codes of Conduct for Members and officers which, together with a number of supporting protocols, set out clear expectations of behaviour. There are clear arrangements in place for both Members and officers to make declarations of interests and of gifts and hospitality.
- 12) Our ethical governance arrangements are supported by a robust suite of counter fraud and corruption arrangements, including a whistle blowing policy under which Members, officers and the public can report concerns.
- 13) We recognise the need for continual growth and development of both Members and officers and we have clear arrangements in place to access training and development opportunities appropriate to the role and aspirations of individuals.
- 14) We recognise the unique nature of the political environment in local government and expect a relationship of mutual trust and respect between all Members and officers.
- 15) Our political environment is characterised by an approach of cross party engagement through which we ensure that all our decisions are subject to rigorous oversight and robust challenge.
 - As Executive Members, Opposition Members on Executive Board provide meaningful challenge to Executive decision making.
 - Our scrutiny function is delivered in line with the seven conditions for success identified in our Vision for Scrutiny at Leeds, set out in Article 6 of our Constitution. Scrutiny Board Chairs are drawn from both administration and opposition political groups.
 - Clear and embedded arrangements for the publication of key decisions enable effective democratic oversight of decisions taken by officers.
 - Regular performance reporting in relation to key strategies ensures effective accountability of those in operational control.

2 - OUR GOVERNANCE FRAMEWORK

Documents



16) Our Joint Strategic Assessment (JSA) was updated in 2021, providing a detailed understanding of the citizens and communities in the Leeds area, and the challenges and opportunities as we emerge from the Covid-19 pandemic. This understanding is then used to underpin our strategic framework.

17) Our Best City Ambition, adopted in February 2022, highlights the city's mission to tackle poverty and inequality, and sets out the three pillars approach which flows through the city and council's wider strategic framework including through the Health and Wellbeing Strategy, Inclusive Growth Strategy and forthcoming Climate Mitigation and Adaptation Strategy.

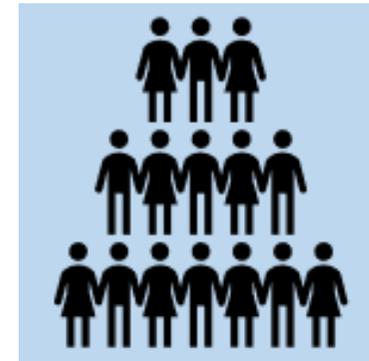
18) The Team Leeds approach set out in the Best City Ambition provides an important set of principles for partnership working in the city, informed by engagement with partners and delivered by many across the city. It defines some important characteristics of a team Leeds way of working – including being evidence-led, working with strengths and asset-based models, and adopting co-production and co-design with the citizen as standard. The approach, which is already well understood, provides useful check and challenge to ensure we are applying it consistently and going further where we can.

- 19) We recognise that the council's role in leading the Best City Ambition can only be delivered through a sound understanding of the organisation's longer term financial sustainability, enabling decisions to be made that balance the resource implications of the council's policies against financial constraints.
- 20) Through the adoption of budget principles in respect of capital and revenue budgets, we have ensured a robust and accountable approach to budget management, closely aligned to the principles of CIPFA's Financial Management Code (2019).
- 21) We recognise that the current and future financial climate present a significant risk to the council's priorities and ambitions, and that the council's financial position must be robust, resilient and sustainable with a sufficient level of reserves available to deal with any future unforeseen circumstances. Our five year Medium Term Financial Strategy, which is updated annually, is supported by our financial management systems, and underpins our sustainable approach.
- 22) Our budget is set annually and monitored regularly to ensure delivery of our strategic objectives.
- 23) Our Constitution, which is reviewed annually, is published in the library on our website.

2 - OUR GOVERNANCE FRAMEWORK

People

- 24) Our People Strategy 2020-25 sets out our commitment to best leadership and management and to best employee experience. Working through application of our Values this strategy underpins our approach to recruitment, work life, development, progression and exit.
- 25) Officer remit and accountability is clearly structured, communicated and monitored through delegation and sub-delegation arrangements, appraisal objectives and regular supervision.
- 26) Statutory officers are designated (as set out in Article 12 of our Constitution), and there are protocols in place in our Constitution to ensure that the Monitoring Officer and Chief Finance (S151) Officer are afforded the resources, access and opportunities required to fulfil their roles.
- 27) We have well established arrangements for information management and governance overseen by the Senior Information Risk Owner (SIRO), Data Protection Officer (DPO) and Caldicott Guardian.
- 28) In addition, each Director is appointed as Proper Officer for matters within their remit in accordance with the Functions of Full Council set out in the Constitution.
- 29) Our relationship with partners, stakeholders and citizens is characterised by our values which embrace openness, engagement, transparency, and accountability.
- 30) The council's services are accessible through face to face, telephone and digital channels. The council's values are routinely demonstrated in our interactions with customers; who receive a high quality, efficient and effective service when they contact us; and there are robust processes in place to receive and act upon customer feedback.
- 31) We are focussed on the needs of our communities, and use a variety of methods, including our Citizen's Panel to communicate and engage with our citizens and communities, to plan and deliver the right services in the right ways to achieve value for money.
- 32) As outlined in the Team Leeds approach and our values, we have a well-developed culture of partnership working in collaboration with public, private and third sector organisations across the city, and at regional and national level.



2 - OUR GOVERNANCE FRAMEWORK

Systems & Processes

- 33) We operate a strong leader and cabinet governance model. Arrangements for delegation of council functions to committees and officers are set out alongside the Leader's executive arrangements in the Constitution to ensure clear arrangements for open, transparent and accountable decision making.
- 34) Decision making, financial arrangements and procurement activity are bound by clear rules of procedure which focus our resources to the achievement of our strategic outcomes and are rooted in legal compliance.
- 35) Budget management and monitoring is a continuous risk based process which operates at a number of levels throughout the council. Directors have responsibility for delivering directorate budgets whilst named accountable budget holders, supported by finance officers, manage, monitor and forecast income and expenditure against budgets. All Directorates have contingency plans in place to help to manage unforeseen variations against the budget.
- 36) Our arrangements for treasury management comply with CIPFA's Code of Practice on Treasury Management and the Prudential Code.
- 37) We monitor progress against our strategic ambitions through a series of Key Performance Indicators (KPIs), with supporting performance monitoring taking place at Directorate level to identify any weakness in performance in order that appropriate effective action can be taken to bring performance in line with targets.
- 38) We have established arrangements for risk and resilience which work to identify, mitigate, and manage risk at corporate, directorate, service and project level. We recognise that whilst risk management supports the delivery of our strategic ambitions, this framework cannot eliminate all risk to the achievement of policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness.
- 39) We have established arrangements for overview and scrutiny and have appointed five scrutiny boards with remits defined in Article 6.
- 40) Our activity is outcome focussed, and systems and processes are reviewed regularly to ensure that they are up to date and fit for purpose to deliver our strategic outcomes for citizens and communities in Leeds.



3 - HOW WE HAVE REVIEWED OUR GOVERNANCE FRAMEWORK

Assurance approach

- 41) We have used the three lines of assurance model (set out at Figure 2 below) to provide substantial assurance that our governance framework is operating soundly with no fundamental weaknesses. The model has also enabled us to identify opportunities for improvement which we have captured in the action plan set out in part 5 of this Statement.
- 42) Whilst our governance framework cannot eliminate all risk to the achievement of policies, aims and objectives, our review provides reasonable assurance of the effectiveness of our arrangements.

First line of assurance - operational and managerial oversight

- 43) We seek confirmation from those with operational and managerial responsibility that our system of internal control is effectively embedded.
- 44) Our Survey of Internal Control invited responses from officers with managerial responsibility at tier 4 and above. The survey focussed on our seven Corporate Governance principles and was designed to identify the extent to which managers believe staff in their service have relevant knowledge and skills and comply with those controls appropriately and proportionately to their individual roles and responsibilities. Survey respondents were invited to comment on arrangements which were working well and to identify any perceived weakness, as well as suggesting opportunities for improvement.
- 45) Quantitative and qualitative analysis of survey responses will be undertaken to provide assurance that from an operational perspective, governance arrangements appear to be embedded and effective. Opportunities for further improvement which are identified will be referred to the owner of specialist oversight in relation to the relevant system of internal control for further consideration.

Second line of assurance - specialist oversight and compliance

- 46) Those with specialist oversight and compliance responsibility provide assurance that arrangements are up to date, fit for purpose, embedded and routinely complied with.
- 47) We have developed the Cycle of Internal Control (described in Figure 3 below) which underpins each of our systems of internal control and recognises that arrangements should be defined and documented; clearly communicated, effectively embedded; meaningfully monitored; and reviewed and refined. Throughout this cycle we seek to ensure that risks are identified, assessed, and appropriately managed.
- 48) The second line of assurance is developed through the formal reporting of control arrangements to council and executive committees and supported by additional enquiries made to officers with specialist knowledge and responsibility.

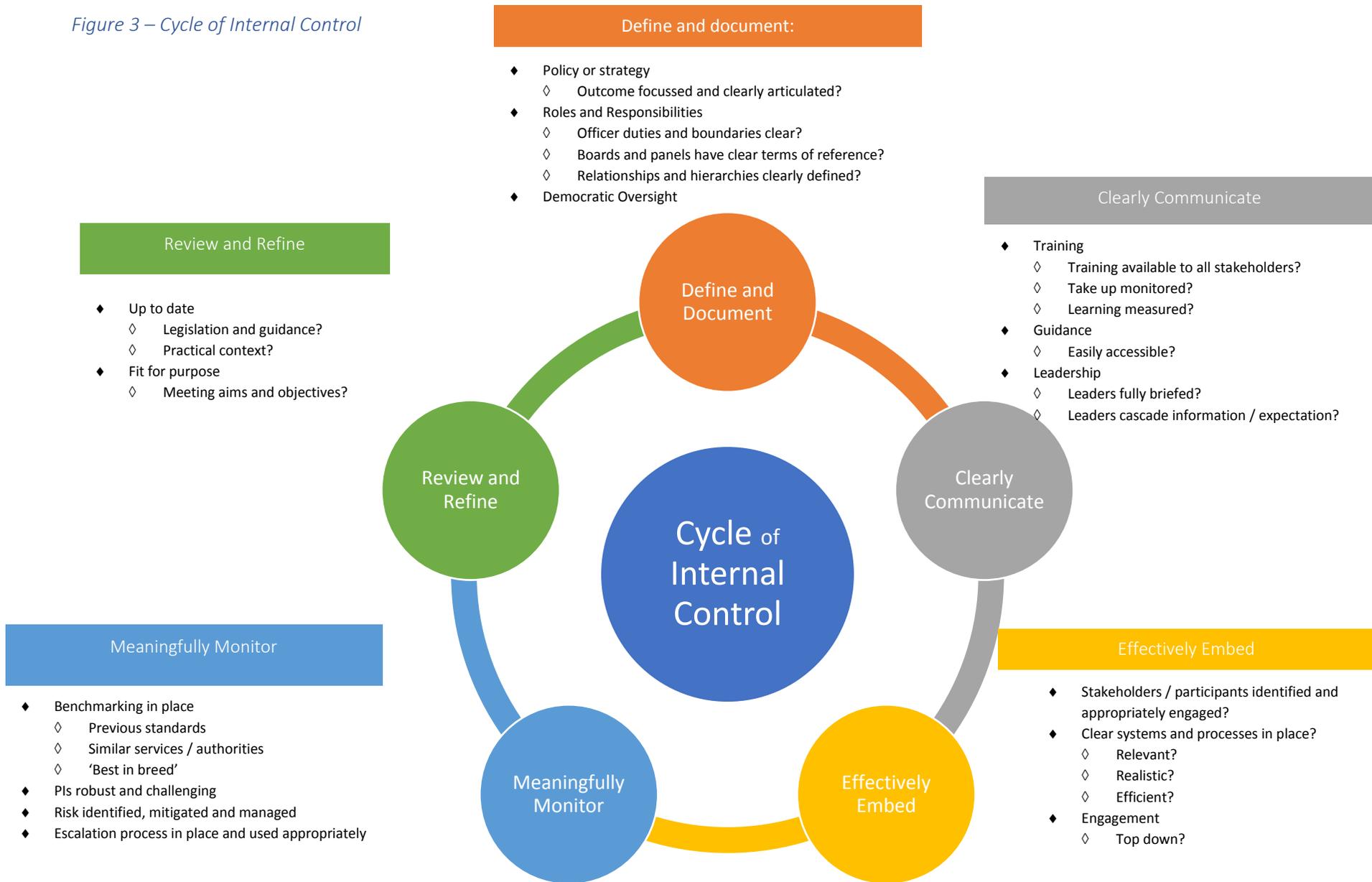
3 - HOW WE HAVE REVIEWED OUR GOVERNANCE FRAMEWORK

Figure 2 - Assurance Map

Bodies charged with governance:		1 st line of assurance	2 nd line of assurance	3 rd line of assurance		
		Responsibilities for implementation and accountability		Arrangements for testing		
Full Council Corporate Governance and Audit Committee (Delegated responsibility)		Operational ownership and management	Oversight and compliance specialists	Independent Assurance		
		Directors and section heads sectional and directorate leadership teams	Specialist officers Proper officers			
Systems and Processes of Internal Control	Define and Document	Clear arrangements for sub-delegation of functions and responsibilities	Development of policy & procedure	Internal Audit	External Audit	External Inspectors
	Clearly Communicate	Leadership – cascading of information and expectation	Provision of guidance & training,			
	Effectively Embed	Systems of managerial control (Supervision / 121 / appraisal etc.)	Oversight and advice tailored to service need			
	Meaningfully Monitor	Local performance monitoring; Identification and mitigation of risk; Escalation of concerns	Development of robust performance indicators; Benchmarking			
	Review and refine	Feedback on systems and processes	Review of legislation, sector best practice and guidance; Strategic review of arrangements	Action Planning & Monitoring		
Officer oversight:		Corporate Leadership Team Statutory Officers (Monitoring Officer, Chief Finance Officer, Head of Paid Service)		Officer oversight		
 Democratic Oversight		Executive Members Executive Board Scrutiny Boards Corporate Governance and Audit Committee Standards and Conduct Committee		 Democratic oversight		

3 - HOW WE HAVE REVIEWED OUR GOVERNANCE FRAMEWORK

Figure 3 – Cycle of Internal Control



3 - HOW WE HAVE REVIEWED OUR GOVERNANCE FRAMEWORK

Third line of assurance - independent assurance

49) Formal independent assurance is provided by Internal Audit, External Audit and other external inspection agencies.

Internal Audit

50) The Head of Internal Audit is the council's designated chief audit executive. In accordance with the Public Sector Internal Audit Standards⁴ (PSIAS) the Head of Internal Audit delivered their annual internal audit opinion and report to Corporate Governance and Audit Committee in October 2022. This opinion for 2021-22 stated that:

Based on the audit work undertaken for the 2021/22 internal audit plan, the internal control environment (including the key financial systems, risk and governance) is well established and operating effectively in practice.

...

*A **satisfactory** overall opinion is provided for 2021/22, based on the audit work detailed within this report, including both a range of audits and other value-adding activities.*

51) In December 2021 Corporate Governance and Audit Committee received a PSIAS external quality assessment undertaken by Glasgow City Council in relation to Leeds City Council Internal Audit Service, confirming that the service conforms to the requirements of PSIAS. The audit opinion stated:

The function is appropriately positioned within the organisation; independent and objective; trusted; highly regarded by stakeholders; and makes a positive contribution to the systems of governance, risk management and internal control.

52) The Internal Audit Service provides regular update reports in relation to Internal Audit, and bi-annual updates in relation to Counter fraud and corruption activity, to the Corporate Governance and Audit Committee. Reports provide assurance as to the quality and conduct of the internal audit service through compliance with PSIAS and as measured through feedback obtained from audited services. In addition, these reports update the Committee as to the control environment in place across the council by providing oversight of work undertaken in pursuance of the Audit Plan.

⁴ Performance Standard 2450

3 - HOW WE HAVE REVIEWED OUR GOVERNANCE FRAMEWORK

External Audit

- 53) Grant Thornton is appointed as the council's External Auditor for the period covering the statutory accounts for the financial years 2018/19 to 2022/23. They are represented at each meeting of Corporate Governance and Audit Committee. They have quarterly meetings with the Chief Officer Financial Services (the council's designated Chief Finance Officer), and bi-annual meetings with the Leader of Council, Chief Executive and Director of Resources in addition to the Chief Officer Financial Services. Additional meetings are arranged as necessary throughout the year.
- 54) The working draft audit opinion, considered by Corporate Governance and Audit Committee in February 2022, states that

Subject to satisfactory completion of our audit work we expect to issue an unqualified (clean) audit opinion on the 2020-21 financial statements.

- 55) Under the National Audit Office (NAO) Code of practice, the external auditor is required to consider whether the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Auditors are required to report their commentary on the Council's arrangements in relation to financial sustainability; governance; and improving economy, efficiency, and effectiveness.
- 56) The executive summary to the Auditor's Annual Report on Leeds City Council, states

Overall, we have not identified any significant weaknesses and related key recommendations, including in the Council's response to Covid-19. We have identified a small number of improvement recommendations to further enhance the Council's arrangements, which management has accepted and will implement.

- 57) The Financial Reporting Council Audit Quality Review team has undertaken a review of the audit of Leeds City Council for the year ended 31 March 2020. The purpose of the reviews is to monitor the quality of major local audits.

External Inspection and Peer Review

- 58) We engage with all formal inspection agencies including the Care Quality Commission and OFSTED, and our Protocol for the Coordination of External Inspection Reports ensures that reports and action plans arising from inspections are shared as appropriate with Executive Board, Scrutiny Boards and Corporate Governance and Audit Committee.
- 59) Peer review arrangements provide informal independent assurance in relation to specific services and there will be a corporate peer review in November 2022.

Ombudsman

- 60) There are arrangements in place to capture, record and monitor Ombudsman Complaints regardless of whether a finding of maladministration leading to injustice is found. Where appropriate, a finding of maladministration is reported to a formal meeting of Executive Board, along with any appropriate proposed remedial action. The Monitoring Officer also reserves the right to make a report of unlawfulness to Full Council.

3 - HOW WE HAVE REVIEWED OUR GOVERNANCE FRAMEWORK

3 - HOW WE HAVE REVIEWED OUR GOVERNANCE FRAMEWORK

Democratic Oversight

61) As demonstrated by the Assurance Framework at Figure 4 below, there is considerable democratic oversight, providing assurance that our governance framework is effectively embedded and operating soundly.

Corporate Governance and Audit Committee

62) Corporate Governance and Audit Committee is the committee charged with oversight of the council's governance arrangements, with responsibility for approval of the council's accounting statements and this Annual Governance Statement.

a) The Committee is also responsible for both the oversight of the council's Internal Audit Service and consideration of our external audit arrangements. Through approval of the risk based annual audit plan, receipt of regular update reports in relation to both internal audit and counter fraud and corruption, and receipt of the annual report and opinion of the Head of Audit, the Committee is provided with independent assurance of the effectiveness of arrangements for internal control. External independent assurance is secured by consideration of regular updates and reports, the audit of the council's accounts, and the External Auditor's opinion.

63) In addition, the Committee receives assurance directly through its own work programme.

a) A programme of annual assurance reports in relation to service specific controls (e.g. planning regulation and enforcement), and in relation to corporate systems of internal control (e.g. financial management, the decision making framework, and corporate risk arrangements) enable the Committee to critically examine arrangements for internal control, to provide robust and meaningful challenge and identify areas for growth and development.

b) The work programme is developed and managed flexibly by the Committee to enable consideration of further ad hoc reports in relation to matters of specific interest or concern. In this way the Committee has received assurance in relation to the council's climate emergency governance and controls.

Standards and Conduct Committee

64) Standards and Conduct Committee is responsible for promoting and maintaining high standards of conduct by elected and co-opted Members of the council. Through receipt of the Monitoring Officer's annual report the Committee has assurance that arrangements are effective in this regard.

Overview and Scrutiny Arrangements

65) The council has five Scrutiny Boards (Strategy and Resources; Infrastructure Investment and Inclusive Growth; Environment, Housing and Communities; Children and Families; and Adults, Health and Active Lifestyles), each responsible for the review and scrutiny of functions within their remit.

66) Overview and scrutiny arrangements seek to;

- assist the development of the Budget and Policy Framework by in-depth analysis of policy issues;
- research, community and other consultation in the analysis of policy issues and possible options;

3 - HOW WE HAVE REVIEWED OUR GOVERNANCE FRAMEWORK

- encourage and enhance community participation in the development of policy options;
- question Members of the Executive and Directors about their views on issues and proposals affecting the area;
- facilitate liaison with other external organisations to ensure that the interests of local people are enhanced by collaborative working; and
- question and gather evidence.

Executive Board

- 67) Under the Leader's executive arrangements, oversight of executive decision making lies collectively with the Executive Board and individually with named portfolio holders in relation to matters within their remit. Through consideration of reports presented for determination, and regular briefing on matters within their oversight, the Executive is able to monitor the way in which decisions meet policy objectives, are open and inclusive, and reflect relevant risks.
- 68) Executive Board is a key stakeholder in the formulation of our policies. Those which form part of the Budget and Policy Framework must be recommended by Executive Board to Council for consideration; significant executive policies and strategies are approved by the Executive Board; and local policies for approval within directorates are subject to briefing with relevant executive Members. This provides assurance that the policy framework meets the strategic objectives.
- 69) The Executive Board carries out performance monitoring through receipt of service specific (e.g. Tackling Inequality and Disadvantages in Communities: Locality Working) and corporate performance reports (including regular Financial Health Monitoring reports and annual reports on both performance and risk management). In this way it receives assurance that arrangements are effective in ensuring that resources are used efficiently to deliver strategic outcomes.
- 70) Where specific issues are raised in relation to the council's governance arrangements Executive Board are able to refer matters to Corporate Governance and Audit Committee for consideration.

Full Council

- 71) In addition to its role in holding the Executive to account, Full Council receives the annual reports of key committees⁵, enabling it to hold them to account for the effective discharge of relevant council functions.
- 72) Arrangements are in place to enable the receipt of formal reports of Statutory Officers as necessary.

⁵ Corporate Governance and Audit Committee; Standards and Conduct Committee; Scrutiny boards; Plans Panels; Licensing Committee; Climate Emergency Advisory Committee

3 - HOW WE HAVE REVIEWED OUR GOVERNANCE FRAMEWORK

Figure 4 - Assurance framework

	1 st line of defence	2 nd line of defence	3 rd line of defence	Bodies charged with governance
	Operational ownership and management	Oversight and compliance specialists	Independent Assurance	
Published arrangements	Constitution Website			
Corporate Governance and Audit Committee	Service specific annual assurance reports Ad hoc reports addressing key projects and risks	Annual Assurance reports in relation to corporate systems of internal control	Internal Audit (Approval of risk based plan, receipt of update reports; receipt of annual report and opinion) External Audit (agreement of nature and scope of annual audit plan; receipt of progress reports; receipt of ISA260 and annual audit report; certification of housing benefit grant claims) External Inspection (consideration of external inspection reports and action plans)	Approval of Annual Governance Statement and Statement of Accounts
Standards and Conduct Committee	Consultation on development of Members' Code of Conduct	Annual Report of Monitoring Officer		
Scrutiny Boards	Pre-decision scrutiny Arrangements for Call In Receipt of Performance reports	Consultation on development of budget and policy framework	External Inspection (consideration of external inspection reports and action plans)	
Executive Board	Executive Decision making Receipt of Service Specific Performance reports	Receipt of Corporate reports relating to performance and monitoring Strategy and policy approvals	External Inspection (consideration of external inspection reports and action plans)	
Full Council	Hold executive to account (executive questions and receipt of executive minutes)	Approval of Budget and Policy Framework Receipt of reports of Statutory Officers		Receipt of Annual Reports
Officer Information	Decision making reports Survey of Internal Control	Specialist Questionnaire		

4 - EFFECTIVENESS OF ARRANGEMENTS

Governance in Practice

73) Whilst, in the main, our governance framework has proven to be robust, resilient and responsive, the following points demonstrate the way in which our arrangements have been implemented or revised in response to the financial challenge, and learning and recovery from the pandemic:

Principle 1 - Behaving with integrity: (Doing the right thing in the right way)

We will behave with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

- We are committed to ethical governance and will embed our values and use them as the basis for planning and implementing services; have clear and enforced codes of conduct for Members and officers; and will work with external providers to ensure that they share our ethical standards.
- We will abide by the rule of law and will act in accordance with the legal and regulatory framework, dealing effectively with any breach
- We will have a zero tolerance approach to corruption and misuse of power

Ethical governance

74) Our “Team Leeds” values were reviewed and supporting behaviours refreshed and launched in the Autumn of 2021. To further support and embed the values and behaviours, throughout May and June 2022, the Chief Executive has talked to our leaders and managers about what is needed of them and development that will be available as part of our Leadership and Management development offer. Values and behaviours feature in the appraisal process, which encourages individuals to consider how they reflect the Team Leeds values individually and how well embedded they are within their teams.

75) In addition, Leeds City Council is the first local authority in the country to appoint a Freedom to Speak Up Guardian. The role is central to achieving the council’s People Strategy and Best Place to Work ambitions, and the successful delivery of our LCC Equality Priorities for Employment and Organisation Culture.

76) Following adoption of the new Councillor Code of Conduct in Spring 2021, it was further amended in May 2022. We reviewed the form for declaration of interests and provided on-line classroom led training sessions to enable all Members to acquaint themselves with the new Code provisions and later amendments and how they will impact on Members’ roles. On-line resources are available for those who were unable to attend or who wish to refresh their learning. Similar training was arranged for newly elected Members following the local elections. Additional advice and training is provided on a 1:1 basis as issues emerged during the year. Training has also been provided to officers responsible for advising Members on their interests.

77) Considering concerns raised by Elected Members about instances of harassment, intimidation and vulnerability, which were particularly intensified following the tragic death of Sir David Amess, the Monitoring Officer took the step of withholding details of Members’ home addresses from the publicly accessible register of interest unless requested not to do so by individual Members. This approach mirrored a recommendation by the Committee on Standards in Public Life and was adopted by authorities regionally and nationally.

4 - EFFECTIVENESS OF ARRANGEMENTS

78) Independence and rigour have been added to the process of considering complaints raised under the Members Code of Conduct by sharing the initial assessment of the complaint at Stage 1 of the process with the Independent Person. We have extended the term of office of the Independent Person for two years and begun the process of recruiting a new Independent Person in order that the existing Independent person can support the induction of their successor.

Counter fraud and corruption

- 79) We have reviewed and updated our Counter Fraud and Corruption Strategy and Response Plan and Whistleblowing Policy ; and we are developing awareness of this suite of policies through quarterly updates available on the council's InSite pages, and updated fraud awareness training available to all officers launched in May 2022. A review of the Anti Money Laundering Policy is nearing completion.
- 80) We have appointed an elected member as Counter Fraud Champion, and we continue to work with the corporate risk lead to encourage ownership of fraud risks and controls throughout the authority. This will be further strengthened by working with the Freedom to Speak Up Guardian through regular communication and joint working to raise awareness of reporting channels within the council.
- 81) We continue to engage with the National Fraud Initiative, and we are developing our use of data analytics to identify potential instances of fraud, in addition to proactive fraud reviews, and action to ensure the recovery of fraudulent payments.

Principle 2 - Ensuring openness and engagement: (Sharing information and inviting participation)

We will ensure openness and comprehensive stakeholder engagement

- We are committed to a culture of openness and will be transparent in our decision making
- We will use appropriate means to consult and engage with service users, local communities and other stakeholders to inform our activity
- We will develop formal and informal partnerships to ensure efficient use of resources and sustainable achievement of outcomes

Customer Contact

- 82) Our Customer Contact Centre is at the heart of our arrangements for customer contact. There are a number of key principles which govern this:
- To eradicate as many service failures as possible to minimise the need for contact
 - To provide clear public communications to minimise the need for clarification
 - To ensure effective feedback and completion of tasks once actions by the public are raised to minimise repeat contact;
 - To enable those who have access to digital technology to self-serve as a first preference;
 - To widen participation in the use of digital technology;

4 - EFFECTIVENESS OF ARRANGEMENTS

- To provide excellent face to face and telephony contact for key services which require complex handling or for customers who are unable to realistically self serve.
- 83) Our community hubs and libraries deliver customer services via face to face and telephone appointments. We continue to review practice and procedure in these settings, learning from experience during the Covid 19 pandemic whilst recognising the increasing demand for face to face appointments.
- 84) We continue to develop and implement our best practice work on addressing Digital Inclusion in the city. The impact of Covid in this area has been profound and has touched all aspects of individuals and families lives. The 100% digital Leeds ambition remains, and through the close working within IDS and the Library Service, support in the city can now include;
- the provision of equipment, grant funding, technical support, Digital Champions training, signposting to existing statistics, reports and toolkits.
 - advice on how to tackle digital inclusion issues in a way that works for different organisations
 - a growing network of digital Champions who help us to reach the digitally excluded in their communities by advocating the benefits of digital, and signposting people to free training and support available across the city.
 - a growing Tablet lending scheme with support on how to use tablets available free of charge in many of the Libraries and Community Hub sites across the city
- 85) We strive to maintain accessibility standards set by the Government within our web content. We are conscious of the potential for standards to slip with the increasing amount of web content, and shared ownership and development of this. We are taking steps to build guidance and support into the design system, to incorporate accessibility requirements into relevant procurement, and to ensure best use of the specialist resource within the web team to maintain the accessibility of Leeds.gov.uk and its subsites.
- 86) We have introduced the Householder Protocol for Householder planning applications; as a result of historic backlogs arising from the Lockdown period and customer complaints, to facilitate more efficient service delivery, consistency and clear communication. This protocol has been widely shared with customers who submit householder applications and details the level of service which customers should expect.

Engagement Tools

- 87) We have used a range of engagement tools to consult with citizens and stakeholders in relation to a range of plans and proposals, including the budget and Best City Ambition.
- 88) We are conducting an ongoing review of digital engagement tools with a view to making engagement online as effective as possible, and simpler for citizens to access. The use of Your Voice Leeds has been expanded and made available cross-council, offering a range of new functions including geographic/map-based tools to support effective consultation and engagement activity.
- 89) We are refreshing the Leeds Citizens Panel, with more than 250 new members recruited in 2022 so far. Total membership of the Panel is now circa 1,800.

4 - EFFECTIVENESS OF ARRANGEMENTS

90) We are reviewing our Statement of Community Involvement, setting out how we will consult, who we will consult and when we will consult, on planning applications and planning policy documents, and support the preparation of neighbourhood plans. The review will enable us to make engagement and consultation on planning matters as good as it can be - by making the best use of technology, reflecting on user experience and encouraging those who rarely get involved in planning matters to do so.

Best City Ambition

91) The adoption of our Best City Ambition followed agreement to replace the Best Council Plan to better reflect the importance of partnership working – our Team Leeds approach – in achieving the city’s shared goals. The Ambition was developed in conjunction with partners and stakeholders across the city and was subject to public consultation prior to its adoption. The Ambition document is the first stage of a refreshed approach being taken which will continue to develop over the coming months, with ongoing input from partners, citizens and communities.

92) The Best City Ambition sets out key principles around how Team Leeds should operate, including a firm commitment to co-production and co-design as standard in our way of working, and through both the Ambition and the Strategic Review of Neighbourhoods and Communities city partners are committing to a ‘power shift’ to the citizen and strong commitment to promoting the citizen voice.

93) We are taking a new approach to ensure the Ambition is effectively embedded in work on the ground in neighbourhoods and communities through the development of local area plans. These plans, which are at an early scoping stage, will be produced working closely with elected members through community committees and will help to shape the next phase of the council’s locality working agenda. They will provide a local ‘translation’ of the Ambition for each part of the city which plans cover, supporting priority setting, investment decisions and new ways of working with citizens which meet the specific needs of an area, within the overall context of our city-wide goals.

Partnerships

94) We have developed a Partnership Governance and Risk checklist for use by council services to help ensure that potential risks are covered during discussions about working with partner organisations. The checklist will help highlight any significant gaps in the control framework for the partnership, so that these can be addressed, and action taken to mitigate future problems.

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Principle 3 - Defining outcomes: (Having realistic priorities for what we can and should achieve)

We will define outcomes in terms of sustainable economic, social and environmental benefits

- We will maintain a clear strategic plan which sets out our priorities, and the intended outcomes for the citizens and communities of Leeds now and in the future.
- We will work to deliver our strategic plan in a way that is economically, socially and environmentally sustainable and demonstrates excellent value for money
- We will ensure that our services are appropriate to the different needs of citizens and communities and that we deliver fair access to our services

Best City Ambition

- 95) In order to implement the Best City Ambition we are working to establish a broader strategic framework which effectively influences priority setting, investment decisions and delivery on the ground. We have completed a successful mapping exercise and have commenced a review of all the council's strategies with the aim of removing duplication and arriving at a much-simplified set of key strategies which are easier to digest and communicate.
- 96) We are taking a range of actions across the Council, and with partners, to better understand and deliver on the city's ambition to strengthen resilience against the impacts of climate change locally. In July 2022, Executive Board approved the development of a Climate Adaptation and Resilience Plan, based upon the approach taken, and supported a programme of enhanced city-wide engagement in Leeds on the Council's activity to support both climate mitigation and adaptation.
- 97) We have continued to adapt our supportive approach to working with communities, applying learning from the pandemic to provide support throughout the cost of living crisis, and accelerating progress toward the three pillars of the Best City Ambition and strongly and consistently reflecting the challenge of tackling poverty and inequality in the city.

Medium Term Financial Strategy (MTFS)

- 98) The MTFS continues to provide a robust, consistent and sustainable approach to establishing and maintaining a stable and prudent financial basis on which the Council's services are delivered.
- 99) The MTFS recognises that the current and future financial climate for local government represents a significant risk to the Council's priorities and ambitions. The financial challenges faced by the council, including those resulting from COVID-19 and the current cost of living crisis, and the requirement to address these so that a balanced budget can be delivered in this and future years, continues to reinforce the need for the council's financial position to be robust, resilient and sustainable and that it has a sufficient level of reserves available to deal with any future unforeseen circumstances. These requirements underpinned the council's Medium Term Financial Strategy 2023/24 – 2027/28 which was agreed at Executive Board in September 2021.

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- 100) Recognising the challenge of bridging the estimated budget gaps for the period of the Strategy, whilst at the same time seeking to ensure that the Council's budget is robust, resilient and sustainable, another savings programme has been established. The cross council financial challenge savings programme is in place to identify robust, realistic, and deliverable budget savings proposals for Member consideration, with support provided across support services around service reviews. Progress against the delivery of approved savings are included in the monthly financial health reporting to Executive Board.
- 101) The MTFS aims to improve the Council's financial sustainability in order that the Council can withstand economic shocks in the future. As such, the Strategy provides for a base budget increase to the General Reserve from 2023/24 to improve future financial resilience.

Pre decision Scrutiny

- 102) Our Scrutiny Boards undertake pre-decision Scrutiny ensuring openness and transparency in our arrangements. In particular our Scrutiny Boards have:
- provided collective observations on proposals in relation to the Best City Ambition to the Executive;
 - supported the budget setting process, with early engagement and enhanced transparency in relation to savings proposals within the process;
 - advised in relation to the adoption of strategies and policies including the new Safer, Strong Communities City Plan and the Gambling Act 2005 Statement of Licensing Policy etc.

Principle 4 - Determining effective interventions: (Considering the options and taking informed decisions)

We will determine the interventions necessary to optimise the achievement of the intended outcomes

- We will ensure that decision makers are provided with relevant, timely information to support decisions which are proportionate, sustainable and realistic to meet identified aims and outcomes.
- We will ensure that our financial planning, and budgeting processes inform, reflect and support our decision making.
- We will consider best value in respect of all strategic objectives through the delivery of service specific outcomes.

Decision Making

- 103) All decision making reports include a section addressing whether and how the proposals support the three pillars and the Best City Ambition. We have reviewed and updated the council's report template to reflect the Best City Ambition and further strengthen how officers are required to account for the contribution their proposal makes. This follows the new report template and introduction of a significantly different approach to report writing which was rolled out in 2021 and has been widely well-received.
- 104) We will be curating a module based curriculum to develop knowledge and skills in relation to decision making in a political environment.

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Planning Control

105) We have undertaken a review of the Local Enforcement Plan, to ensure that systems and processes for enforcement in relation to breach of planning control remain fit for purpose.

Procurement and Contract Management

106) We are implementing an action plan responding to recommendations arising from a review undertaken in preparation for the core business transformation of procure to pay arrangements (the P2P review) and from the LGA peer review of procurement and commercial arrangements. Actions are designed to ensure compliant procurement activity, to deliver value for money in relation to external spend, and to have the capacity/capability to be effective. Actions to date include:

- New e-procurement platform;
- developing contract management best practice guidance and contract management system;
- reviewing procurement processes, guidance and documentation to improve efficiency and ensure fitness for purpose;
- improving supplier and market management capability.

107) Work is planned for the coming year to ensure effective contract management arrangements are embedded and routinely applied across the council.

Principle 5 - Managing risk and performance: (Ensuring that we can implement our plans)

We will manage risks and performance through robust internal control and strong public financial management

- We will integrate robust and effective risk management arrangements into all our activity and decision making to identify, mitigate and manage risks to the achievement of our goals.
- We will have effective arrangements to plan and monitor our performance in line with our strategic objectives, and to identify and deal with any failure in service delivery.
- We will have robust arrangements for internal control which are defined and documented, clearly communicated, effectively embedded, meaningfully monitored and regularly reviewed.

Performance Management

108) Following the implementation of the Best City Ambition, KPIs are in development to support the three pillars within the ambition. Some new corporate KPIs will be incorporated, whilst others will be moved to operational level.

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109) Building on good practice established through Covid multi-agency meetings, and the use of 'Dashboards' to report performance, we are undertaking a review of the performance reporting framework, to provide corporate performance reports to a range of stakeholders including Corporate Leadership Team and Scrutiny Boards.

110) Our Scrutiny Boards engage in a programme of performance monitoring work items; for example, the Infrastructure, Investment and Inclusive Growth Scrutiny Board has sought and received an annual update in relation to the council's Flood Risk Management policy.

Risk and Resilience

111) We have reviewed corporate and directorate risks to ensure they are aligned to the Best City Ambition. Both corporate and directorate leadership teams receive regular performance reports enabling monitoring and escalation of significant risks.

112) We are developing arrangements for joined up reporting of Risk, Emergency Planning and Business Continuity Management with a pilot approach in one directorate.

113) As we emerge from the pandemic it is clear Covid-19 has been the biggest practical test of the council's business continuity arrangements. Our review has shown that the organisation responded very well in the circumstances, but we have identified areas for additional focus in line with our approach of continuous improvement:-

- We have updated our Business Continuity Plan template and guidance to make the plans easier to use, review and update. The updated template also prompts consideration of new aspects around Fuel Shortages, and Staff 'single points of failure'.
- A corporate Teams site 'Resilience and Emergencies' has been developed to house all Business Continuity Plans (as well as Incident Response Plans) and key documents relating to them such as Guidance Notes and the new Business Continuity Plan template. Copies of Business Continuity Plans are also being saved on the externally hosted Resilience Direct website – a secure location for public sector organisations.
- An updated testing exercise for the Business Continuity Plans has been developed and piloted and will be rolled out, with bespoke scenarios facilitating services to consider whether plans are effective and robust.
- Business Continuity training has been developed and will be rolled out by request and where training need is identified.

114) We participate in regional exercises on Risk and Business Continuity, which have recommenced via the Local Resilience Forum, enabling us to test the effectiveness of our arrangements in the event of a disruptive incident. Whilst it is impossible to always be prepared for every incident and emergency, we are as well prepared as we can be with the resources and information available

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Financial management

- 115) The Financial Performance Outturn for the year ended 31st March 2022, received by Executive Board in June 2022, reported the final position on the General Fund shows an underspend of £1.5m. When compared to the provisional outturn position received at Executive Board in April, the overall position improved by £1.1m, allowing a corresponding contribution to the Council's general reserve.
- 116) The budget for 2021/22 required delivery of £56.1m of savings in addition to the considerable savings achieved since 2010. At Outturn, the majority of the £56.1m of budgeted savings have been delivered in full or managed through mitigating actions.
- 117) Recognising the ongoing financial challenges, Support Services functions are working more collaboratively to both maximise the resources that are available to the council whilst at the same time supporting services to ensure that they achieve value for money.
- 118) Our ongoing core business transformation programme will bring about fundamental changes in the way Finance, Procurement, Human Resource (HR) and Payroll activities are undertaken across the council. The new technology will enable services to standardise and simplify how they work, freeing up capacity by removing manual processes and 'off-line' manipulation and processing of data and providing decision-makers with timely, consistent and standard management information in relation to their people and finances.

Information Management and Governance

- 119) We seek to continually improve the processes relating to information management and governance and are undertaking reviews of the information request and Data Protection Impact Assessment processes, with a view to ensuring processes are efficient and effective, and that we achieve and maintain high levels of performance in both areas.
- 120) In addition, under the oversight of the SIRO we are reviewing the arrangements in place in relation to Information Risk Management across the organisation to ensure that relevant roles and bodies are joined up and effective, as well as reviewing the Council's Information Management Board alongside the appropriate lines of decision making.
- 121) We also continue to focus on our people and ensuring their knowledge is developed in relation to information governance through regular compulsory e-learning, with the new course due out in the Autumn of 2022. We are also working on a Workforce Development Plan for the Information Governance Team, ensuring they are best positioned to support and advise Council Services.

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Principle 6 - Developing Capacity: (Getting the best out of our resources and our people)

We will develop the council's capacity, including the capability of its leadership and the individuals within it.

- We will continually review how we use our assets and information to achieve outcomes efficiently and effectively.
- We will develop, maintain and implement arrangements which support and develop the capacity of Members and Officers.
- We will ensure that leadership roles are clear and defined and that relationships between elected Members and officers work effectively to set and implement our strategic goals.

Estate

122) We work in partnership with a range of public and third sector organisations to ensure best use of the council's estate by sharing space both in the city centre and the wider locality estate. Where necessary, appropriate and affordable we also consider the use of partner estate to meet the needs of the council in delivering services. This partnership working is developing the potential to deliver public sector hubs meeting the needs of citizens and communities in Leeds, and is reflected in the West Yorkshire Combined Authority's establishment of the Public Estate partnership of which the council is a member.

Officer Capacity

- 123) The council continues to operate a voluntary retirement and severance scheme which has contributed to a reduction in the workforce and subsequent savings which have contributed towards the balanced budget positions. In 2021/22 approval has been given for 56.06 FTEs to leave the Authority through the Early Leaver's Initiative (ELI) as part of restructuring exercises.
- 124) The organisation continues to move forward out of the Covid-19 pandemic, and this now affects all services differently, dependent upon the service that they deliver and the relevant national government guidelines. HR continue to monitor this centrally through our regular Trade Union meetings and our HR Business Partnering teams working closely with services to ensure services continue to be delivered safely.
- 125) In addition, the Corporate Leadership Team have recently considered information on our workforce capacity, specifically focusing on entry routes, recruitment, and workforce planning. This is to ensure we attract a diverse workforce to represent the city we serve, whilst forecasting our future skills gaps and what will be needed for the future. Work within this includes reviewing and revising our Employee Brand and our Employer Value Proposition for the Leeds City Council jobsite.
- 126) We recognise pressure in relation to recruitment, retention and resourcing, and HR are working with services on this, within the context of the financial challenge, and the wider Talent Management Strategy and People Strategy on the priorities agreed for this year: entry routes, recruitment and

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workforce planning. The focus of this is to ensure we can attract, recruit and retain the right people with the right values and skills to deliver services to the citizens of Leeds and the communities we serve.

- 127) We have built on learning from working practice developed during the pandemic to enhance our officer communication strategy. Quarterly BCLT (Best Council Leadership Team) events are supplemented by monthly Extended BCLT sessions to engage directly with a broader range of colleagues. There is a weekly BCLT update note, and a weekly all staff vlog or email from the Chief Executive. The Chief Executive has participated in more than 40 visits since Covid to engage directly with teams. A weekly manager email communicates key issues to all managers.
- 128) Similarly, we have learned from our external communication strategy during the pandemic. The Covid MP/Member updates, often daily during the pandemic have continued weekly with a shift away from just Covid. In addition, a regular email from the Chief Executive and Leader of Council shares key messages with around 600 partners and stakeholders across the city.
- 129) We are partnering with the Chartered Institute of Personnel & Development (CIPD) to understand more about our people-related activities using the “CIPD People Impact Tool”. The tool will offer insight into the current impact of the people activities in the organisation, tell us what is working well and provide an action plan for the future, helping us to both ready ourselves for Core Business Transformation and to assess the impact of the HR service and the People Strategy.
- 130) We have updated our approach to leadership and management development to build an offer that works for everybody across the organisation. The new leadership and management development framework builds on established high quality learning opportunities, and is structured into three parts “core”, “self-directed” and “community-led”. The framework will support and enable leaders and managers to be their best in changing times, evidenced through leaders and managers who are capable, confident and compassionate in their roles. The offer is available to 2,300 managers and was launched with a session with the Chief Executive.

Member Capacity

- 131) The Members Allowances Scheme was approved by Council in July 2022 following review by the Independent Remuneration Panel.
- 132) We have developed the Members training and development calendar in consultation with Members; extending opportunities for Member development by increasing both the amount of on-line sessions and access to external courses.
- 133) We have reviewed the member training offer for Planning and Sustainable Development issues required for Members who sit on the Plans Panels, to provide increased clarity and formal documentation, ensuring they are well versed in planning matters and current best practice.
- 134) We have reviewed the “Development Management and Enforcement and Member Communication Protocol” which guides Member involvement in the Planning process in Leeds. This has been revised to reflect changes in digital delivery and current best practice but has also had regard to the

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experience of other local authorities. Changes including using monitored inboxes for member communications, a more formalised process for member referrals to Plans Panel and assurances around public representations forwarded from ward members so information is not overlooked.

Principle 7 - Effective accountability: (Ensuring our processes are clear, robust, and open to review)

We will implement good practices in transparency, reporting and audit, to deliver effective accountability.

- We will provide clear, accessible and timely information so that we can be held to account for the decisions we take and for our performance
- We will have effective arrangements to provide independent assurance in respect of our governance arrangements
- We will welcome peer challenges, reviews and inspections from regulatory bodies, and will implement action plans which arise from them

Effective Scrutiny

135) Our Scrutiny arrangements enable our five Scrutiny Boards to:

- make recommendations to the Executive and/or appropriate committees and/or Council arising from the outcome of the scrutiny process
- review and scrutinise the performance of other public bodies in the area and invite reports from them by requesting them to address the Scrutiny Board and local people about their activities and performance.
- report and make recommendations to external partners (underpinned by statute in some cases – e.g. NHS bodies and those authorities responsible for crime and disorder strategies); and
- respond to referrals from external bodies (e.g. Healthwatch Leeds).

136) We have further improved our Scrutiny arrangements by reviewing reporting arrangements to improve the clarity of evidence base for scrutiny outcomes; developing end of municipal year summary reports for each Board; building on existing arrangements to utilise the Internal Audit Plan as a tool to assist in determining and scheduling scrutiny work; reviewing work categorisation to ensure it remains fit for purpose; and reviewing the communication and engagement approach.

Internal Audit

137) Our Internal Audit service seeks to ensure continuous improvement to ensure the agility of the audit plan whilst maintaining the efficiency and effectiveness of the service to support a robust audit opinion. This year we have:

- Developed a system for recommendation tracking to gain assurance that high and medium priority recommendations have been implemented
- Increased presence at directorate and service leadership teams to drive completion of the plan.
- Made greater use of data analytics to provide key assurances

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- Increased support to emerging and transformational projects in addition to audit and assurance work.

Ombudsman

138) We have engaged with Ombudsman investigations and seek to learn from findings. For example, as a result of adverse findings in relation to a small number of planning cases during the year we have amended systems and processes in the interests of good governance and transparency and to mitigate the chance of reoccurrence. Changes included:

- Process for recording where the Chair of Plans Panel has not used their discretionary powers to refer an item to the Plans Panel when requested to do so
- Changes to the conditions discharge process, with written justification where conditions can, or cannot be discharged
- More robust recording of s106 onsite obligations

139) It has not been necessary for the Monitoring Officer to report to Council in relation to any Ombudsman report received during the period of this Statement. Work is currently taking place to enhance formal corporate oversight of Ombudsman complaints by Corporate Leadership Team.

External inspection

140) Following the inspection which took place in February 2022, Ofsted have judged⁶ services for children in Leeds to be outstanding in their overall effectiveness. The Ofsted recommendations were about: contingency planning in children's written plans and consistent decision-making for strategy discussions. An action plan has been developed by Children and Families Senior Leadership Team, to implement improvements in these areas as part of our overall approach to transitioning out of the pandemic.

141) Council have accepted the Public Sector Audit Appointments' invitation to opt into the sector led process for the appointment of external auditors from 2023/24 to ensure the appointment of an external auditor in accordance with statutory requirements.

2021 Action Outcomes

142) We have monitored the actions identified in the 2021 Annual Governance Statement and include at Annex 1 to this Statement a summary of the outcomes in relation to each of these.

⁶ For full Ofsted report - [50182665 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk/reports/50182665)

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2022 Actions identified

143) We have reviewed the results of our survey of internal control and enquiries of specialists (see section 3) and developed appropriate detailed action plans responding to issues and opportunities for improvement these raise. A summary action plan is included at Annex 2 to this Annual Governance Statement 2022. The plan will be monitored by officers under the oversight of Corporate Governance and Audit Committee to ensure that appropriate progress is achieved.

Annex 1 – 2021 ACTION OUTCOMES

Actions Identified	Outcomes	Status
Principle 1 - We will behave lawfully, with integrity and in the public interest and demonstrate this through our conduct and behaviour.		
Fraud & Corruption: <ul style="list-style-type: none"> • We have developed and will implement a communication plan to raise awareness and understanding of the council’s counter fraud arrangements, policies and strategies including in particular: <ul style="list-style-type: none"> ○ whistleblowing arrangements ○ Anti-bribery and anti-money laundering arrangements ○ The Counter Fraud Strategy ○ Fraud awareness 	<p>There is a communications plan in place for the counter fraud arrangements within the authority. This has been utilised throughout the year, to raise awareness of counter fraud policies/fraud risks as demonstrated by:-</p> <ul style="list-style-type: none"> • Regular updates on InSite on counter fraud risks • Update of the Whistleblowing Policy and Counter Fraud and Corruption Strategy and notification to staff through various methods of communication • Refresh of the counter fraud page on Insite with links to relevant documents/policies • Undertaking a Counter Fraud Workshop with CGAC members to raise awareness, and the appointment of a member Counter Fraud Champion • Awareness raising during World Whistleblowing Day and International Fraud Awareness Week • Refreshed Fraud Awareness training rolled out in May 2022 available to all council staff on PALS <p>Arrangements are in place to update the communications plan, and deliver messages and updates to staff and members of the public where relevant, over the coming financial year.</p>	Complete
Equality, diversity & inclusion: <ul style="list-style-type: none"> • We will develop a new central Race Equality Insite page and • We will develop this location to house all of our diversity/inclusion activity so it is easier for staff to access and to understand. 	<p>An InSite page has been created as a central site that houses all the race equality commitments and activities.</p> <p>Arrangements are in place to continue to develop site content to include</p> <ul style="list-style-type: none"> - Better links to Workforce Racial Equality Standard (WRES) - More data and progress reports - Mandatory training provision 	Complete
Principle 2 - We will be open and engage with local communities, service users and our other stakeholders.		
Consultation and Engagement <ul style="list-style-type: none"> • We will build on the experience of online consultation and engagement activity developed during the pandemic to ensure that remote engagement is able to provide both quantitative and qualitative insight. 	<p>Testing of different software and methods for online qualitative engagement, (including Teams, Miro, and engagement platforms: engagement HQ and Commonplace) has underpinned the development of training documentation and advice on best practice. Arrangements are in place to continue to develop best practice, evaluating and learning from experience, and maintaining awareness of available software.</p>	Complete
<ul style="list-style-type: none"> • We will further review the consultation and engagement toolkit on Insite to ensure up to date, accessible information and guidance is provided to enable staff to 	<p>A review of the toolkit has been undertaken. The toolkit is publicised to staff through the manager update, InSite and the report writing guidance.</p> <p>Arrangements are in place to continuously review and update the toolkit to ensure it remains fit for purpose.</p>	Complete

Annex 1 – 2021 ACTION OUTCOMES

Actions Identified	Outcomes	Status
effectively deliver a full range of online consultation activity.		
Principle 3 – We will focus our resources on outcomes and ensure council tax payers and service users receive excellent value for money		
Strategic planning: <ul style="list-style-type: none"> We will work with our partners to develop our Best City Ambition and produce a communication plan to embed this within the council, and across our partner organisations. 	The Best City Ambition has been developed and was adopted by Full Council on 23 February 2022. The Ambition runs to 2030, but will be subject to a light-touch review every 12 months, and a fuller review every three years following completion of the statutory Leeds Joint Strategic Assessment.	Complete
<ul style="list-style-type: none"> We will review and map our strategic and policy framework to ensure that it is clear, coherent and accessible. 	A council-wide strategy review has been undertaken. Strategies have been mapped and engagement with senior officers and Cabinet members is currently taking place to understand where there are opportunities for simplification of the council’s overall strategic framework. It is anticipated that this work will be completed by Autumn 2022.	In progress
<ul style="list-style-type: none"> We will consider our informal governance arrangements (panels, boards, groups) to ensure that they are able to appropriately influence and add value to our decision making 	The review of governance arrangements follows from the strategy review above and will continue to take place over the coming municipal year and will be reflected in the 2022 action plan.	In progress
Performance Management: <ul style="list-style-type: none"> We will continue to review our performance against existing key performance indicators and compare recovery against pre-pandemic levels 	Performance is monitored and reported quarterly to Directorate Management Teams and Corporate Leadership Team. Reports are submitted twice yearly to Scrutiny Boards.	Complete
<ul style="list-style-type: none"> We will identify, communicate and embed appropriate performance indicators to measure performance against the new Best City Ambition. 	Work is being undertaken with services and directorate to review and develop an updated set of key performance indicators that reflect the Best City Ambition. A draft set of KPIs has been developed and is subject to consultation. It is intended that the new suite of KPIs will form the basis of reporting for the first time in November 2022.	In progress
Procurement: We will implement an action plan to: <ul style="list-style-type: none"> Review the council’s procurement strategy to ensure it reflects the balance of corporate priorities Focus more energy and resources on delivering strategic value from procurement and contract management; Engage elected Members with the strategic decision making for procurement and contract management; 	The procurement and commercial action plan is in place, with progress monitored and update reporting to Corporate Governance and Audit Committee. The following actions are completed and in progress: <ul style="list-style-type: none"> A risk register has been developed and a further review of the strategy is planned. A savings tracker implemented which includes both non- cash savings and income generation, and plans to reduce spend on existing contracts/new procurements are incorporated in the Council budget setting process. 	Arrangements in place

Annex 1 – 2021 ACTION OUTCOMES

Actions Identified	Outcomes	Status
<ul style="list-style-type: none"> • Utilise technology to improve efficiency and to gather data that will underpin procurement decisions; • Ensure that PACS have the updated skills and capacity to drive a more strategic approach; • Embed a Leeds-wide approach to contract management and commercial • Improve working with system partners • Continue our focus on achieving social value objectives through procurement 	<ul style="list-style-type: none"> • Power BI is being explored to provide information/ intelligence to aid commercial strategies and decision making, • Technological solutions are being evaluated and introduced including <ul style="list-style-type: none"> ○ product evaluation for new integrated ERP technology; ○ Considerations of utilisation of market intelligence systems, ○ near completion of an auto invoice processing solution ○ new tendering portal system commenced. • A review has been carried out of the Procurement skills framework and a broader review is scheduled to be undertaken. • Development of ability for directorates to self-support lower value procurements.- • Collaborative opportunities are continually explored. Developing Council-wide approach to improving supplier and contract management, including the development of a CM module. • Social Value is now incorporated into the procurement process. A Social Value good practice guide is in place, though under continual review. 	
Principle 4 - We will ensure we have clear responsibilities and arrangements for transparent and effective accountability		
<p>Decision Making:</p> <ul style="list-style-type: none"> • We will develop a share point platform to <ul style="list-style-type: none"> ○ Give access to decision monitoring information to assist in the provision of clear, up to date advice, and checking that arrangements are embedded; ○ Include clear information on alignment of executive delegations to executive and scrutiny oversight to assist in the provision of clear, up to date advice, and to aid compliance with the decision making framework. 	<p>A SharePoint hub has been established with access for colleagues in procurement and finance together with governance support officers within directorates. The hub contains</p> <ul style="list-style-type: none"> • decision monitoring – with details of all decisions published, and compliance with decision making framework. • details of the alignment of functions between directors, executive portfolio holders and scrutiny boards 	Complete
<ul style="list-style-type: none"> • We will review the Protocol on the Role of Members And Officers In Decision Making to ensure that it is up to date and fit for purpose. 	<p>The protocol has been reviewed and approved by Executive Board in July 2022.</p>	Complete
Principle 5 - We will take informed and transparent decisions		
<p>Decision Making:</p> <ul style="list-style-type: none"> • We will report monitoring of urgent decisions through quarterly internal audit update reports to Corporate Governance and Audit Committee, to enable 	<p>Decision monitoring information has been included with Internal Audit update reports to the Corporate Governance and Audit Committee from September 2021</p>	Complete

Annex 1 – 2021 ACTION OUTCOMES

Actions Identified	Outcomes	Status
contemporaneous oversight of arrangements and the early identification of performance trends and concerns		
<ul style="list-style-type: none"> We will further develop our arrangements for decision monitoring to include sample checking of published decisions to ensure compliance with categorisation & transparency arrangements 	A sampling process has been drafted and is to be trialled with a view to obtaining independent assurance over a range of factors	
<ul style="list-style-type: none"> We will develop and implement a decision making communication plan to promote awareness of the decision making framework; ensure that information, advice and guidance are readily accessible to all; and that appropriate training is targeted at officers engaged in decision making activity 	The Communication Plan includes: <ul style="list-style-type: none"> arrangements for decision monitoring as set out above arrangements for the provision of advice and guidance, including in particular the provision of further information in relation to the principles of decision making arrangements for training. 19 detailed remote training sessions have been provided, and bitesize e-learning videos are being created to provide support in relation to selected elements of the framework. 	
Principle 6 - We will ensure that we have robust and effective audit, scrutiny, information governance, risk and financial management controls		
Business Continuity: <ul style="list-style-type: none"> We will complete the review of the criticality of the council's business continuity plans 	The review has been carried out via reporting to Directorate Management Teams. Plan owners and key contacts are tasked with implementing the changes to relevant Business Continuity Plans.	Complete
<ul style="list-style-type: none"> We will review and update the business continuity plan template to ensure it is both streamlined and fit for purpose, and will implement it across the business continuity plans 	The Business Continuity Plan template has been revised and streamlined, and is available on the Emergency Planning/Business Continuity MS Teams site. The new template is being rolled out across the BC Plans as annual reviews are undertaken. The majority of plans have been converted, however a small number of plans are being rescoped / merged and these will be captured on the new template. It is anticipated that by the end of 2022 all business continuity plans will be on the new template. Corporate Governance and Audit Committee will receive an update in the risk and resilience assurance report.	In progress
<ul style="list-style-type: none"> We will complete the review of the business continuity plans to ensure they include up to date details about how services will deal with a cyber-outage 	All Business Continuity Plans include a section which is up to date on how the service would deal with a cyber-outage, including arrangements for recovery and telephony. The Business Continuity Plan for Integrated Digital Systems is being reviewed to ensure that it includes clear roles and responsibilities in relation to cyber risks, including which are held corporately in IDS and which are the responsibility of directorates and services.	In progress
<ul style="list-style-type: none"> We will develop a central accessible and secure location for the business continuity plans 	A MS Teams site has been developed for Emergency Planning and Business Continuity Management, with training delivered to users in December and January.	Complete

Annex 1 – 2021 ACTION OUTCOMES

Actions Identified	Outcomes	Status
	We have migrated Business Continuity Plans and Incident Response Plans to the externally hosted Resilience Direct to ensure access to 'off network' copies of our plans.	Complete
<ul style="list-style-type: none"> We will routinely report Business Continuity (along with Emergency Planning) to directorate management teams 	Reporting takes place twice annually in Spring and Autumn and is working well.	Complete
Risk Management: <ul style="list-style-type: none"> We will promote the new Risk Management Policy and Strategy and deliver risk management training to council staff and elected members. 	Risk Management Strategy and Policy has been promoted via Directorate Management Teams and Senior Leadership Teams at which risk is discussed, and via the front news page of InSite. Advice, guidance and training routinely include signposting to the policy and strategy as a useful source of information.	Complete
<ul style="list-style-type: none"> We will continue to promote the Partnership Governance and Risk checklist to relevant staff, and will incorporate this in the new risk management training offer. 	The checklist and toolkit are promoted via Directorate Management Teams and cross referenced from Risk, Partnership and PM Lite Insite pages.	Complete
<ul style="list-style-type: none"> We will review the corporate risks in conjunction with the development of the Best City Ambition 	The Risk Management SharePoint site (RMS) reflects introduction of the Best City Ambition. All corporate and directorate risks have been reviewed, with new and existing risks mapped to the appropriate pillar.	Complete
Financial management: <ul style="list-style-type: none"> we will produce and make available a recorded training package that will heighten staff awareness and support compliance with the key control processes within our financial management arrangements. 	A review of the Closedown process has been undertaken, and an action plan developed, with further work planned to fully document the budget process. Completion of these tasks will ensure that core financial processes, are sufficiently robust in addition to contributing significantly towards embedding key control processes with staff. Training development has been incorporated into the Finance Service Plan for 2022/23, and resource identified within the financial management structure to progress this.	In progress
Land and Property: <ul style="list-style-type: none"> We will review our estate management systems to ensure that they are up to date and fit for purpose. 	We have reviewed the systems in place to support the management of the estate and put arrangements in place to scope and procure an integrated solution. This is being progressed as a Priority 1 project. Corporate Governance and Audit Committee will assurance report on estate management arrangements in March '23	In progress
Principle 7 - We will develop our capacity and capability to be effective.		
Human Resources: <ul style="list-style-type: none"> We will develop a stronger online presence for HR so it is easier for staff/managers to contact the right HR adviser. 	Arrangements have been put in place to ensure that appropriate HR colleagues are easy to identify including: <ul style="list-style-type: none"> A key contacts document shared with key partners key contact information on Insite up to date and easy to find rapid response to routine HR queries via The HR Advisory service Social media channels used to promote work undertaken and include clear signposting to relevant HR colleagues 	Complete

Annex 1 – 2021 ACTION OUTCOMES

Actions Identified	Outcomes	Status
<ul style="list-style-type: none"> We will promote and embed the new Leadership & Management Development offer which is accessible to all staff. 	<ul style="list-style-type: none"> The new/refreshed leadership and management development offer has been widely communicated to all leaders and managers The mid-year appraisal check-in and regular one to ones provide opportunities for a development discussion using the offer Arrangements are in place to further embed the offer in accordance with a delivery plan endorsed by Corporate Leadership team 	Complete
<ul style="list-style-type: none"> We will promote and embed new Manager values. 	<ul style="list-style-type: none"> The refreshed values and behaviours framework has been widely promoted across the whole organisation The values and behaviours toolkit and other appropriate areas of the intranet and Leeds.gov.uk public-facing site have been updated The values and behaviours are an integral part of staff appraisal The framework is referenced at all key employee touchpoints Arrangements are in place to further embed the values and behaviours as part of the organisation's plans to enhance leadership and management development opportunities 	Complete
<ul style="list-style-type: none"> We will embed a clear corporate framework for managing workplace change via consultation/negotiation with trade unions 	<ul style="list-style-type: none"> The 2020 consultation and engagement framework, agreed with the Trade Unions, is used and supported by a fortnightly meeting chaired by a HR Service Manager. Information is shared regularly with TU colleagues via a tracker which includes relevant information A comprehensive archiving arrangement ensures that as reviews conclude, information about them can be retrieved if needed. 	Complete
<ul style="list-style-type: none"> We will develop work in accordance with a Service Review which will address issues around managing staff productivity and performance. 	<ul style="list-style-type: none"> Arrangements are in place to support managers where required in relation to staff productivity and performance matters. It is expected that additional resources will be available in 2022 from HR to assist managers with any formal performance management processes. 	Complete
<p>We will review our approach to Staff Recognition and implement recommendations including the formal and informal mechanisms to reward long service, performance and positive behaviours.</p>	<ul style="list-style-type: none"> An interim approach to staff recognition was agreed in 2021, including a week-long recognition week and corporate awards for excellence event. Arrangements are in place to develop a sustainable approach that works for all directorates for 2022 onwards. 	Complete
<ul style="list-style-type: none"> We will consider a review of our arrangements for Induction. 	<ul style="list-style-type: none"> A review of our arrangements for induction has been undertaken and Implementation has included: <ul style="list-style-type: none"> ○ Virtual welcome via “new starter social” sessions, ○ Updating of all induction checklists and ○ Improvement of the induction toolkit on Insite. 	Complete

Annex 2 – 2022 SUMMARY ACTION PLAN

Outcomes / Actions Identified	Timeframe	Action Owner	Officer oversight
<p>Principle 1 - Behaving with integrity: (Doing the right thing in the right way) We will behave with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law</p>			
Organisational Culture			
<p>The Chief Executive has requested an internal audit review of Organisational Culture to offer a view on</p> <ul style="list-style-type: none"> • The actions taken to embed the council’s values and behaviours across all services and activities; • How we assess the extent to which values and behaviours have been embedded; and • How our values and behaviours shape the culture of the organisation. 	Review complete by October 22; Arrangements in place to implement recommendations by March 23.	Head of Internal Audit / Chief Officer Strategy & Resources / Chief Officer Human Resources	Chief Executive
We have requested a review of arrangements in place to manage the risks associated with employee outside interests	Review complete by September 22 Recommendations to be implemented March 23 in line with the timescales set out in review report.	Head of Internal Audit / Chief Officer Human Resources	Director of Resources
Ethical conduct of Members			
We will progress a process for the recruitment and induction of new Independent Person	December 22	Head of Service (Legal)	City Solicitor
Counter fraud and corruption			
<p>We will review and further embed our communication plan to raise awareness and understanding of the council’s counter fraud arrangements, policies and strategies including in particular:</p> <ul style="list-style-type: none"> • Whistleblowing arrangements • Ant-bribery and anti-money laundering arrangements • The Counter Fraud Strategy • Fraud awareness training including the provision of bespoke sessions • Strengthening working arrangements with the Freedom to Speak Up Guardian, Counter Fraud Champion, and the key counter fraud contacts within the council. 	March 23 in accordance with communication plan	Principle Audit Manager	Chief Officer Financial Services

Annex 2 – 2022 SUMMARY ACTION PLAN

Outcomes / Actions Identified	Timeframe	Action Owner	Officer oversight
Principle 2 - Ensuring openness and engagement: (Sharing information and inviting participation)			
We will ensure openness and comprehensive stakeholder engagement			
Customer Contact			
In connection with the locality asset review, we will review and restate the Community Hub/Library proposition to deliver further services from sites.	March 23	Chief Officer Community Hubs, Welfare & Benefits	Director of Communities Housing and Environment
Decision Making			
We will review and develop the training provided in relation to the decision making framework to support officers in their decision making activity	Arrangements in place by end Dec '22	Principal Audit Manager (Corporate Governance)	Chief Officer Financial Services
We will review arrangements for decisions in relation to the receipt of income.	June 23		
Consultation and Engagement:			
We will continue to improve and signpost towards the Consultation and Engagement Toolkit on InSite for info on best practice methods and approaches.	Arrangements in place by March 23	Policy & Intelligence Manager	Chief Officer Strategy & Resources
We will continue to work with IDS to rationalise the number of tools and systems the council procures for online consultation and engagement activity, moving towards a single online engagement hub for the council in the longer term.			
Partnerships			
We will develop and implement a communication plan in relation to partnership governance and risk tools.	Arrangements in place by December 22	Principle Audit Manager (Corporate Governance) / Policy & Intelligence Manager	Director of Resources.

Annex 2 – 2022 SUMMARY ACTION PLAN

Outcomes / Actions Identified	Timeframe	Action Owner	Officer oversight
We will develop and implement a plan to further communicate and embed light touch arrangements for partnership governance and risk.	Arrangements in place by December 22	Policy & Intelligence Manager / Principal Audit Manager (Corporate Governance)	Director of Resources
<p>Principle 3 – Defining outcomes: (Having realistic priorities for what we can and should achieve)</p> <p>We will define outcomes in terms of sustainable economic, social and environmental benefits</p>			
Strategic Framework:			
We will develop and deliver an internal communication plan to <ul style="list-style-type: none"> • Communicate a clearer strategic framework for LCC, led by the Best City Ambition, • Provide the context for all upcoming strategy reviews, and • Set principles to reduce amount of strategy, and focus on fewer but more aligned and impactful strategic documents. 	Plan in place by December 22	Head of Intelligence & Policy	Chief Officer Strategy & Resources
We will develop an externally facing strategy hub to be created where strategic framework above can be clearly outlined and relevant documents hosted.	When new LCC website in place		
We will review the Best City Ambition in a light-touch way annually, providing opportunities to strengthen connections and keep its profile high.	Arrangements in place by December 22		
We will refresh the Leeds Policy Network, supported by the Three Pillars Group, to continue to facilitate connections between Best City Ambition and themed policy/strategy areas.	By September 22		
Social Value		Head of Procurement and Commercial Service	Director of Resources
We will continue to implement Procure to Pay Review Action Plan and will: <ul style="list-style-type: none"> • Amend CPRs to strengthen requirement to include social value in all Council contracts • Refresh delivery documents & tools to ensure user friendly • Further improve connectivity with staff in PACS 	As set out in Phase 2 of the P2P action plan		
<ul style="list-style-type: none"> • To review arrangements for delivery and monitoring of social value (as current arrangements with Social Value Portal expire) 	March 23		

Annex 2 – 2022 SUMMARY ACTION PLAN

Outcomes / Actions Identified	Timeframe	Action Owner	Officer oversight
<p>Principle 4 - Determining effective interventions: (Considering the options and taking informed decisions) We will determine the interventions necessary to optimise the achievement of the intended outcomes</p>			
Decision Making			
We will embed arrangements for the sample testing of key and significant operational decisions taken by officers	December '22	Head of Internal Audit	Chief Officer Financial Services
Directors will monitor the impact of June 2022 changes to the report template aimed at improving accountability for decisions against the priorities in the Best City Ambition and Three Pillars.	March '23	Head of Intelligence & Policy	Chief Officer Strategy & Resources
We will continue to consider our informal governance arrangements (panels, boards, groups) to ensure that they are able to appropriately influence and add value to our decision making	March '23		
<p>Procure to Pay Review Action Plan (P2P)</p> <p>We will continue to progress with P2P stream of Core Business Transformation Programme to procure and implement modern integrated cloud technology to exploit digital capability, but also to drive down costs and achieve better value for money through efficient and standardised practices, and will:</p> <ul style="list-style-type: none"> • Review and simplify Contract procedure Rules, procurement documentation and tools to make user friendly and aid self service • Develop and embed contract management best practice across the Council • Provide additional, targeted commercial support services to improve commercial skills, • Improve supplier management and market intelligence to support supplier negotiations. 	As set out in Phase 2 of the P2P action plan	Head of Procurement and Commercial Service	Director of Resources
<ul style="list-style-type: none"> • Review and update Procurement Strategy and processes when Procurement Bill enacted to ensure compliance with the new regulatory regime 	Anticipated 2023		

Annex 2 – 2022 SUMMARY ACTION PLAN

Outcomes / Actions Identified	Timeframe	Action Owner	Officer oversight
Principle 5 - Managing risk and performance: (Ensuring that we can implement our plans) We will manage risks and performance through robust internal control and strong public financial management			
Performance Management:			
We will review the Best City Ambition performance framework,	December 22	Head of Intelligence & Policy	Chief Officer Strategy & Resources
We will work with directorate leadership teams, CLT and scrutiny boards to improve performance reporting, using the resources we have (including Power BI) to best effect by focusing more selectively on the indicators and performance information which can drive improvement and evidence based policy-making.	from January 23		
Risk and Resilience:			
We will make refresher training available to all services on all aspects of risk and resilience (risk management, business continuity planning, and emergency planning)	Arrangements in place by December '22	Head of Intelligence & Policy	Chief Officer Strategy & Resources
We will develop and implement a communication plan in relation to the refreshed corporate business continuity policy and strategy.	By March '23		
We will facilitate risk review sessions with directorate leadership teams	By March '23		
Information Management and Governance			
We will develop and deliver a service action plan to <ul style="list-style-type: none"> • Review IMG governance bodies, systems and processes in relation to: information requests; Data Protection Impact Assessments (DPIA); information security incidents; information risk management • Develop and implement an IMG communication strategy to include: reviewing policy framework; relationship development; reporting arrangements including dissemination of lessons learned; a cross council training programme; Implement a workforce development programme for the Information Governance Service	As articulated in the service action plan	Information Governance Manager	Director of Resources / Chief Digital information Officer

Annex 2 – 2022 SUMMARY ACTION PLAN

Outcomes / Actions Identified	Timeframe	Action Owner	Officer oversight
<p>Principle 6 - Developing Capacity: (Getting the best out of our resources and our people) We will develop the Council’s capacity, including the capability of its leadership and the individuals within it.</p>			
Integrated Digital Services			Director of Resources
We will undertake an iterative review of arrangements for governance and decision making in relation to Integrated Digital Services to ensure controls articulated, communicated and embedded within the service and across the Council.	First iteration concluded by end December 22	Chief Digital information Officer / Head of Internal Audit	
Human Resources			
We will launch a new corporate induction process and seek and review feedback for this will be done during 2023 after initial sessions	Launch by November 22, Review by March 23	Chief Officer Human Resources	Director of Resources
<p>Principle 7 - Effective accountability: (Ensuring our processes are clear, robust, and open to review) We will implement good practices in transparency, reporting and audit, to deliver effective accountability.</p>			
External Inspection and Review			
Corporate Peer Challenge (CPC) We will engage with the LGA CPC review team to ensure robust, strategic and credible challenge.	October 22 to January 23	Chief Officer Strategy and Policy	Chief Executive
Internal Audit			
We will establish and implement an internal audit communication strategy to enhance the profile of the service, encourage early engagement, and develop understanding of audit review process.	March 23	Head of Internal Audit	Chief Officer Financial Services / Head of Internal Audit