

# Annual Governance Statement 2017/18



## Scope of Responsibility

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Sandwell Metropolitan Borough Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. The council also has a best value duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

In discharging this overall responsibility, the council is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, which includes arrangements for the management of risk.

The council has a [Code of Corporate Governance](#), which was revised in line with the latest principles of the CIPFA/SOLACE Framework Delivering Good Governance in Local Government. The new principles have been adopted in this statement. A copy of the current code has been placed on the council's website at [www.sandwell.gov.uk](http://www.sandwell.gov.uk) or can be obtained from the council offices, Sandwell Council House, Freeth Street, Oldbury, B69 3DE. This statement is prepared to comply with the requirements of regulation 4(3) of the Accounts and Audit Regulations 2015 in relation to the publication of an annual governance statement to accompany the statement of accounts.

## The Purpose of the Governance Framework

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The governance framework comprises the systems and processes, and culture and values, by which the council is directed and controlled and its activities through which it accounts to, engages with and leads the community. It enables the council to monitor the achievements of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.

Risk management and internal control are a significant part of the council's corporate governance framework and are designed to manage risk to a reasonable level. They cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The systems of risk management and internal control are based on an ongoing process designed to identify and prioritise the risks to the achievement of the council's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.

The governance framework has been in place at the council for the year ended 31 March 2018 and up to the date of approval of the annual report and statement of accounts.

## The Governance Framework

The council has devised its Vision 2030, which outlines ten ambitions for the long-term future of Sandwell. This environment is consistent with the seven core principles of the CIPFA/ SOLACE framework. The key elements of the systems and processes that comprise the council's governance framework (as detailed in the Code of Corporate Governance) and where assurance against these is required are described below.

| Core Principles of the CIPFA/ SOLACE Framework  | Governance Framework Providing Assurance  | Assurances Received   | Issues Identified  |
|---|---|---|--|
| <ul style="list-style-type: none"> <li>• Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.</li> <li>• Ensuring openness and comprehensive stakeholder engagement.</li> <li>• Defining outcomes in terms of sustainable economic, social, and environmental benefits.</li> <li>• Determining the interventions necessary to optimise the achievement of the intended outcomes.</li> <li>• Developing the entity's capacity, including the capability of its leadership and the individuals within it.</li> <li>• Managing risks and performance through robust internal control and strong public financial management.</li> <li>• Implementing good practices in transparency, reporting, and audit to deliver effective accountability.</li> </ul> | <ul style="list-style-type: none"> <li>• Annual review of the Constitution (including Head of Paid Service, Chief Financial Officer and Monitoring Officer)</li> <li>• Corporate business plans</li> <li>• Medium term financial plan</li> <li>• Corporate risk management strategy</li> <li>• Strategic risk register and assurance map</li> <li>• Scrutiny arrangement</li> <li>• Codes of conduct</li> <li>• Partnership framework</li> <li>• Standards committee</li> <li>• Audit and Risk Assurance Committee</li> <li>• Internal audit plan</li> <li>• External audit plan</li> <li>• Independent external reviews (e.g. Ofsted, CQC)</li> <li>• Children's Services Commissioner</li> <li>• HR Strategy</li> <li>• Business planning and performance management framework</li> <li>• Learning and development plans</li> <li>• Communication strategy</li> <li>• Confidential reporting code (whistleblowing policy)</li> <li>• Counter fraud and corruption strategy</li> <li>• Customer services system</li> <li>• Information governance framework</li> <li>• Management Board, Member and directors' assurance statements</li> <li>• Procurement and contract procedure rules and Financial Regulations</li> <li>• Committee management information systems</li> <li>• Select Committee for Leisure Provision</li> <li>• Governance Board</li> </ul> | <ul style="list-style-type: none"> <li>• Statement of accounts</li> <li>• External audit- Report to those charged with governance (ISA 260) report</li> <li>• Annual Internal Audit report</li> <li>• Audit and Risk Assurance Committee annual report</li> <li>• Review of the effectiveness of internal audit</li> <li>• Annual report of the Ethical Standards &amp; Member Development Committee</li> <li>• Member and Executive Development Programmes</li> <li>• Ofsted – monitoring visits</li> <li>• Quarterly progress reports from Children's Services Commissioner to Department for Education</li> <li>• LGA Corporate Peer Challenge</li> <li>• Ofsted Annual Report of HMCI of Education, Children's Services and Skills</li> <li>• Annual Local Government Ombudsman report</li> <li>• Annual fraud report</li> <li>• Director of Public Health annual report</li> <li>• Sandwell Safeguarding Children's Board annual report</li> <li>• Sandwell Safeguarding Adult's Board annual report</li> <li>• Scrutiny annual report</li> <li>• PSN certification</li> <li>• Investors in People</li> <li>• Employee engagement survey</li> <li>• Ofsted inspection Sandwell Adult Family Learning</li> <li>• Planning committee annual report</li> <li>• Corporate Parenting Board annual report</li> <li>• Clinical Commissioning Group annual report</li> <li>• Sandwell Leisure Trust annual performance report</li> </ul> | <ul style="list-style-type: none"> <li>• Children's Services</li> <li>• Resilience of the Medium Term Financial Strategy</li> <li>• Land Sales and Other Matters</li> <li>• Compliance with Contract Procedure Rules and Allocation of Grants</li> <li>• Business Continuity</li> <li>• General Data Protection Regulations</li> <li>• Cyber Security</li> </ul> |

In reviewing the council's priorities and its implications for its governance arrangements, the council carries out an annual review of the elements that make up the governance framework to ensure it remains effective.

The key changes to the governance framework during 2017/18 include:

- The scrutiny model was remodelled in 2017/18 and reduced from six to four scrutiny boards to align with the cabinet portfolios. In addition, a chair of the Budget and Corporate Scrutiny Board was appointed to have overall responsibility for the co-ordination of scrutiny work across the council.
- The continuation of the jobs promise and planned leavers register until 31 March 2019 was approved by Cabinet which will negate the need for compulsory redundancies and will assist in controlling the establishment list in a structured and supportive way.
- The Select Committee for Leisure Provision considered the current and future leisure provision in Sandwell. This work concluded in October 2017.
- Implementation of a Modern-Day Slavery policy.
- Appointments have been made to the Sandwell Children's Trust Board, with the Trust going live from 1 April 2018. The Trust delivers children's social care services for the council, with the statutory duty remaining with the council. The Trust has day-to-day operational independence in the management and delivery of these services and is managed by a board of non-executive and executive directors.
- The Information Governance Board has been established, which is a sub-group of the Corporate Governance Board and has a key role in ensuring compliance with the General Data Protection Regulations and Data Protection Act 2018.
- Establishment of the Project Board and project governance arrangements to deliver the Aquatic Centre for the Commonwealth Games.
- There have been permanent appointments to the posts of Executive Director of Neighbourhoods, Director of Housing and Communities, Director of Regeneration and Growth and Director of Children's Services.
- Following the decision to refresh the council's vision, the council consulted residents across the six towns, businesses, voluntary community sector and staff and key strategic partners across the borough to discuss Sandwell's long-term direction. From this, ten ambitions were identified which were formulated into the Vision 2030 and this was approved by full council on 18 July 2017.



## The Review of Effectiveness

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The council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by: the work of the Members and senior officers within the council who have responsibility for the development and maintenance of the governance framework; Internal Audit's annual report; the Audit and Risk Assurance Committee; the Ethical Standards and Member Development Committee; the Scrutiny function and reports made by the council's external auditors and other review agencies and inspectorates, as noted above, all of which are publicly available through the council's website and include:

- Internal Audit has reviewed itself against the governance arrangements set out in the CIPFA Statement on the Role of the Head of Internal Audit and the council is able to confirm that the arrangements conform to these requirements. The council is also able to confirm no key non-compliances with the Public Sector Internal Audit Standards.
- Internal Audit has concluded that based on the work undertaken during the year, on areas of key risk, the implementation by management of the recommendations made and the assurance made available to the council by other providers as well as directly by Internal Audit, it can provide reasonable assurance that the council has adequate and effective governance, risk management and internal control processes.
- In 2016/17, a number of issues regarding potential fraud and the conduct of certain Members was referred to the Economic Crime Unit at the West Midlands Police. In 2017/18, following a detailed review of the material held by the council, the Police reached a determination that there was insufficient evidence to meet the threshold for recording a crime. They stated however, that this would not prevent the council pursuing any action that it deemed appropriate if it identified any breaches of standards or misconduct. Therefore, a number of standards investigations are ongoing.
- During the year, the Ethical Standards Sub-Committee heard two cases where they determined that two Members had breached the Members' Code of Conduct and sanctions were imposed. Details of these cases were reported to Council on 17 April 2018 as part of the Ethical Standards and Member Development Committee Annual Report.
- During the year, Member and Executive Development Programmes have been developed that have been designed by Members and focus on their development, training and support requirements from both a corporate and personal councillor perspective.
- The council's external auditors KPMG LLP have audited the Statement of Accounts for 2017/18 and have provided an independent audit opinion of the financial statements. The external auditors have also provided a value for money conclusion on the council's arrangements to secure economy, efficiency and effectiveness in its use of resources.

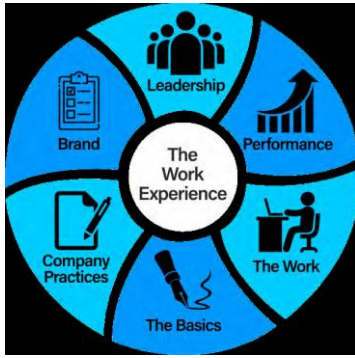


- The council is required to confirm whether its financial management arrangements conform to the governance requirements of the CIPFA Statement on the Role of the Chief Financial Officer in Local Government. The statement sets out five principles which define the core activities and behaviours that belong to the role of the Chief Financial Officer and the organisational arrangements needed to support them. The council is able to confirm that its financial management arrangements do conform. The Chief Financial Officer has been involved in preparing this statement and is satisfied that no matters of significance have been omitted from this statement.

- The council has embedded effective standards for countering fraud and corruption through the adoption of and adherence to the CIPFA Code of Practice on Managing the Risk of Fraud and Corruption. The Code is based on five principles and having considered these, the council is satisfied that the organisation has adopted a response that is appropriate for its fraud and corruption risks and commits to maintain its vigilance to tackle fraud.



- In October 2016, the council was advised of the Government's Statutory Direction (under section 479A of the Education Act 1996) to appoint a Children's Services Commissioner to improve children's social care services and also to set up a new arrangement in the form of a children's trust to deliver children's social care services for a period of time. The Trust went live on 1 April 2018. The Trust has day-to-day operational independence in the management and delivery of these services and is managed by a board of non-executive and executive directors. The statutory duty to provide children's social care services however, remains with council. As such, a comprehensive programme of governance arrangements has been agreed, which will enable the council to monitor progress of the Trust and to consider performance and operational issues on a regular basis.
- A re-inspection of services for children in need of help and protection, children looked after and care leavers was undertaken by Ofsted in November 2017. The report issued in January 2018 concluded that Children's Services in Sandwell remained inadequate.
- In January 2018, the council participated in a Local Government Association Corporate Peer Challenge. The challenge process praised the authority for protecting frontline services through its budget planning and having a strong vision for the future of the borough. It also highlighted the strong management of finances, committed staff and the recently-launched Vision 2030. The review made 12 recommendations in areas including strengthening the arrangements for partnership working to deliver the Vision 2030; strengthening the influence the council has beyond the borough boundary and across the region; the council's approach to long term financial planning; leadership team development; conducting a governance review and the development of town plans. Working groups for each of the recommendations are being established and plans being developed to set out the actions to be taken to implement the recommendations made.
- A Local Government Association Peer review of adult safeguarding was also undertaken in January 2018. It highlighted a number of positive issues, including having a strong corporate vision for the future articulated through Vision 2030, strong financial management and a clear intention and track record of protecting frontline services and strong working practices and performance.
- An Ofsted inspection of Sandwell Adult Family Learning was undertaken in January 2018. The service had a positive inspection, improving its rating from "requires improvement" to "good".
- Following bronze accreditation in 2015, Sandwell MBC has now been awarded silver accreditation for Investors in People. The council is the first in the West Midlands to receive the silver accreditation, which is only gained by 5% of assessed organisations.



- In November 2017, the council conducted an employee engagement survey to understand how employees felt about their jobs and working for the council. The survey achieved a response rate of 63%, a 2% increase on the previous survey, and achieved an employee engagement index of 65%, a 1% increase on the previous survey (average public-sector benchmark is 63%).

We have been informed by the sources noted above, on the result and implications of the review of effectiveness of the governance framework, that the arrangements continue to be regarded as fit for purpose in accordance with the council's governance framework. The key areas for improvement to be specifically addressed with action plans are outlined below. A number of issues were identified in the 2016/17 Annual Governance Statement and an update of the progress made in implementing the actions to improve these areas of weakness is included below. Where sufficient progress has not been made, the issues and outstanding actions have been carried forward and included in the 2017/18 issues.

## Progress of the Governance Issues from 2016/17

The table below describes the governance issues identified during 2016/17 (which were reported in the 2016/17 annual governance statement) and the progress that has been made against the implementation of actions to address these issues, during 2017/18.

| Key Area for Improvement   | Update on Position and Implication for the 2017/18 Annual Governance Statement  |
|--|---|
| <p><b>Children’s Trust</b></p> <p>The council received a Government Statutory Direction (under section 479A of the Education Act 1996) to set up a new arrangement in the form of a children’s trust to deliver children’s social care services for a period of time.</p>  | <p>The Trust went live on 1 April 2018. A contract was approved by Cabinet on 28 February 2018 and includes a suite of documents including:</p> <ul style="list-style-type: none"> <li>• articles of association</li> <li>• governance side agreement setting out the arrangements between the council and Secretary of State</li> <li>• a service delivery contract for 10 years This includes the financial mechanism, service specification and performance management framework</li> <li>• a support services agreement detailing the services the council will be providing to the Trust</li> <li>• occupation/lease arrangements.</li> </ul> <p><b>Complete</b></p>   |
| <p><b>Children’s Services</b></p> <p>The Secretary of State appointed a Children’s Services Commissioner to work with the council to improve children’s social care services. The improvement agenda focused on seven key priorities set by the Commissioner that required addressing as a matter of urgency, before the wider improvement agenda could be progressed.</p> | <p>An Ofsted re-inspection of services for children in need of help and protection, children looked after and care leavers was undertaken in November 2017. The report issued in January 2018 concluded that Children’s Service in Sandwell remained inadequate. The report highlighted that the effectiveness of some services had deteriorated, most recommendations from the Ofsted 2015 inspection had not been fully met, the pace of change to address service deficits had been too slow and only in recent months, with the appointment of a new senior management team, had the trajectory of improvement quickened. The report made 17 recommendations for improvement.</p> <p><b>Carry forward</b></p> |
| <p><b>Resilience of the Medium Term Financial Strategy (MTFS)</b></p> <p>The council approved a balanced budget for 2017/18, but savings of £10m for 2018/19 and £17m for 2019/20 are needed. A Cabinet Summit was held in June 2017, where ideas for savings to cover most of this shortfall were identified and were to be broken down into projects with definite</p>   | <p>Following the decision to refresh the council’s vision, the council consulted residents across the six towns, businesses, voluntary community sector and staff and key strategic partners across the borough to discuss Sandwell’s long-term direction. Vision 2030 was approved by full council on 18 July 2017.</p> <p>Following this approval, Vision 2030 was launched with staff engagement events taking place in September whereby staff had the opportunity to discuss the Vision face to face with directors and members and provided feedback, comments and ideas about how services could contribute to the delivery of the Vision.</p>   |



| Key Area for Improvement   | Update on Position and Implication for the 2017/18 Annual Governance Statement   |
|--|--|
| <p>timelines for delivery. This would complement the work currently in progress.</p>   | <p>The feedback and ideas collated have been fed into business planning workshops that took place in October, and a corporate (and directorate) business plan(s) is now being developed to align the business and financial planning framework to Vision 2030. Cabinet agreed the new plans at its meeting on 28 February 2018.</p> <p>Alongside this, work has commenced on developing an outcome based performance framework which will look at key borough wide performance measures. An ongoing review of council policies is also being undertaken and as part of this will consider whether these policies lend themselves to contributing to the partner Vision 2030, and to ensure that they do not conflict with the aims of Vision 2030.</p> <p>The recommendations from the corporate peer challenge that took place in January 2018, will also contribute to informing the development of the performance management framework.</p> <p><b>Carry forward</b></p>                |
| <p><b>Land Sales and Other Matters</b></p> <p>The Gowling WLG's report and QC's advice identified a number of issues. These related to the council's risk, governance, internal control environment and member and officer conduct.</p>  | <p>The issues raised around the Gowling WLG report have been reported, where appropriate, through the Audit and Risk Assurance Committee.</p> <p>The member conduct matters continue to be dealt with separately, by the Ethical Standards and Member Development Committee.</p> <p>The council introduced a new protocol for the disposal of council owned land and buildings in 2016, to strengthen the steps that are to be carried out in all land and building sales undertaken by the council. Audit Services are currently assessing how well this is being embedded into the council's processes.</p> <p><b>Carry forward</b></p>  |
| <p><b>Compliance with Contract Procedure Rules and Allocation of Grants</b></p> <p>Three limited assurance internal audit reports were issued on Grants within Neighbourhood Services, Grot Spot Funding and Off Contract Spend within Grounds Maintenance and Parks and Green Spaces. A comprehensive review of Neighbourhood Services, taking into account the findings of the audit reports, was completed by the Interim Director of Neighbourhood</p> | <p>Off contract spend has been subject to monthly audit checks in the Housing and Communities directorate with reports provided to the Director and Service Managers. This has also been a standard agenda item on management team meetings. This has delivered a significant reduction in off contract spend within all areas, but particularly Grounds Maintenance and Parks and Green Spaces. To provide the Director with continued assurance, audit checks will continue to be completed on a quarterly basis and discussed at management team meetings.</p> <p>New procedures are being prepared in readiness for the launch of a new grants programme, Neighbourhood Grants Programme, which is to incorporate all the existing small grants programmes including Local Area Budget, Youth Offer and Healthy Towns Budgets and briefings and training regarding the new processes will be made available prior to the launch for officers and elected members. The process will</p> |

| <b>Key Area for Improvement</b>   | <b>Update on Position and Implication for the 2017/18 Annual Governance Statement</b>  |
|---|--|
| <p>Services and a report including a wide range of recommendations was presented to Cabinet on 22 February 2017.</p>  | <p>be managed and resourced by the Business Excellence service area and will be subject to quality and performance rigour.</p> <p>In addition, the grot spots application form and guidance notes have been simplified and combined into a single document. The re-design is to address the main emphasis of the audit report which was to ensure that monies were spent addressing actual grot spots.</p> <p>Audit Services is undertaking a series of follow up reviews in 2018, and where appropriate, findings will be reported back to the Audit and Risk Assurance Committee</p> <p><b>Carry forward</b></p> |
| <p><b>Business Continuity</b></p> <p>To ensure that the council has in place a framework for its business continuity planning arrangements, to ensure that it is able to maintain the delivery of critical services in the event of an emergency.</p> | <p>The preparation of business continuity plans continues to be progressed through engagement by directorates. Currently, most priority one and priority two services have completed plans or draft versions in place. Plans are refined and updated to reflect any lessons learned whenever an unplanned incident occurs.</p> <p>The Neighbourhoods plans have been tested and a plan will be developed to test other plans in due course.</p> <p>A new Emergency Planning Manager was appointed in February 2018.</p> <p><b>Carry forward</b></p>  |

## Significant Governance Issues and Action Plan for 2017/18

Based on the council's established risk management approach and system of internal control, the following issues have been assessed as being "significant" in relation to the council achieving its vision. Over the coming year appropriate actions to address these matters and further enhance governance arrangements will be taken. These actions will address the need for improvements that were identified in the review of effectiveness and their implementation and operation will be monitored as part of the next annual review and risk management arrangements in place.

| Key Improvement Area and Actions for Implementation  | Responsibility and Implementation Date                |
|--|---|
| <p><b>Children's Services</b></p> <p>The Ofsted re-inspection of services for children in need of help and protection, children looked after and care leavers was undertaken in November 2017. The report issued in January 2018 concluded that Children's Service in Sandwell remained inadequate. The report highlighted that the effectiveness of some services had deteriorated, most recommendations from the Ofsted 2015 inspection had not been fully met, the pace of change to address service deficits had been too slow and only in recent months, with the appointment of a new senior management team, had the trajectory of improvement quickened. The report made 17 recommendations for improvement. Although the Trust went live from 1 April 2018, the council still has a statutory responsibility for service delivery. The Trust has been contracted to develop children's social care to be rated requires improvement by 2020 and good by 2022. The Trust is working with its improvement partner, Doncaster Children's Trust, to support its development and to chair its Improvement Board. The council has also established a client function to monitor delivery of the contract through a performance management framework, including the establishment of a Strategic Partnership Board which meets quarterly and an Operational Partnership Board which meets monthly.</p> | <p>Director of Children's Services<br/>2020</p>       |
| <p><b>Resilience of the Medium Term Financial Strategy (MTFS)</b></p> <p>The final local government finance settlement was received on 6 February 2018 and was reflected in the updated MTFS which was approved by Council in March 2018.</p> <p>Council approved a balanced budget for 2018/19, but savings of £6.5m for 2019/20 and £6.4m for 2020/21 are needed.</p> <p>Work is on-going across the council to identify ways of achieving these savings.</p> <p>Cabinet members and officers have developed a vision for the council for 2030, that was signed off by Council on 18 July 2017.</p> <p>Members received a report on 7 February 2018, incorporating directorate business plans, which outlined details of service budgets and how they develop and contribute to the Vision 2030 ambitions.</p> <p>A new Performance Management Framework that will replace the scorecard will be developed to measure the impact that progress against Vision 2030 is having on people's lives.</p>  | <p>Executive Director of Resources<br/>March 2019</p> |

| Key Improvement Area and Actions for Implementation  | Responsibility and Implementation Date  |
|--|---|
| <p><b>Land Sales and Other Matters</b></p> <p>There are a number of ongoing matters relating to land issues and other matters. Audit Services are assessing how well the new protocol for the disposal of council owned land and buildings is being embedded into the council's processes and where appropriate, findings will be reported back to the Audit and Risk Assurance Committee.</p> <p>Outstanding Member conduct matters will continue to be dealt with through the Ethical Standards and Member Development Committee.</p>  | <p>Executive Director of Resources and Executive Director of Neighbourhoods<br/>March 2019</p> <p>Director – Monitoring Officer</p> |
| <p><b>Compliance with Contract Procedure Rules and Allocation of Grants</b></p> <p>The new procedures for grants will be introduced and will incorporate all the existing small grants programmes including Local Area Budget, Youth Offer and Healthy Towns Budgets and briefings. Training regarding the new processes will be made available to officers and elected members. The process will be managed and resourced by the Business Excellence service area and will be subject to quality and performance rigour.</p> <p>Audit Services will be undertaking a series of follow up reviews in 2018, and where appropriate, findings will be reported back to the Audit and Risk Assurance Committee.</p>  | <p>Executive Director of Neighbourhoods<br/>March 2019</p>  |
| <p><b>Business Continuity</b></p> <p>Directorates continue to make progress in preparing business continuity plans. At present, most priority 1 and 2 services have completed plans in place, with a view to having a full suite of updated priority 1 and 2 plans in place by March 2019. The updating of plans will be monitored annually at directorate management level and biannually by the wider corporate management team. The Resilience Unit is putting in place a training programme for service/business managers to test service level plans.</p>   | <p>Executive Director of Neighbourhoods<br/>March 2019</p>  |
| <p><b>General Data Protection Regulations and the Data Protection Act 2018</b></p> <p>On 25 May 2018, new data protection regulation comes into force. The regulations will be supported by a new Data Protection 2018 Act which will be a direct replacement for the Data Protection Act 1998 and will apply to all public and private bodies in the United Kingdom. The regulation applies to the collection and processing of personal and/or sensitive personal information. Non-compliance could result in fines of up to £17million. To manage and implement the necessary changes, the council has:</p> <ul style="list-style-type: none"> <li>• Created an Information Governance Board</li> <li>• Identified relevant champions across the council</li> <li>• Established a framework to deliver in</li> <li>• Co-ordinated work across the council</li> <li>• Provided training, guidance and assistance</li> <li>• Refined current processes</li> </ul> | <p>Director – Monitoring Officer<br/>December 2019</p>  |

| Key Improvement Area and Actions for Implementation  | Responsibility and Implementation Date                |
|--|---|
| Where the council is deemed to be non-compliant, an improvement plan will be developed.  |   |
| <p><b>Cyber Security</b></p> <p>The council has undertaken an exercise to assess itself against the “10 Steps to Cyber Security” to ensure it has a co-ordinated approach and understanding of its existing cyber security controls or those available to it. The review highlighted areas where the council required improvement. An improvement plan is being developed which will address some of the more immediate issues, with some actions already being progressed. One of the key findings is the recognition that Cyber Security is a fast-moving issue and the council needs to be pro-active in managing, monitoring and reacting to the risk of on-going threats. It is the aim of the council to be listed on the directory of organisations awarded Cyber Essentials and to use this as a platform to gain further security accreditations.</p> | <p>Executive Director of Resources<br/>March 2019</p> |

## Certification

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To the best of our knowledge, the governance arrangements, as outlined above have been effectively operating during the year with the exception of those areas identified as requiring improvement. We propose over the coming year to take steps to address the above matters to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified during the review of effectiveness and will monitor their implementation and operation as part of our annual review.



**Councillor Steve Eling, Leader of the Council**

Date:



**Jan Britton, Chief Executive**

Date: