

West Suffolk Annual Governance Statement 2020-21

1. Scope of responsibility

- 1.1 West Suffolk Council was created on 1 April 2019, assuming the district-tier functions and responsibilities that were previously the responsibility of St Edmundsbury Borough Council and Forest Heath District Council.
- 1.2 This is the second annual governance statement of West Suffolk Council, and explains how the council has:
- conducted its activities in a lawful way, in accordance with proper governance standards
 - put in place arrangements to ensure public money is safeguarded and accounted for, and being used in an economic, efficient, and effective way
 - managed risks to its business; and
 - put in place arrangements to secure continuous improvement in the way in which its functions are exercised, having regards to economy, efficiency and effectiveness.
- 1.3 This statement covers the period 1 April 2020 to 31 March 2021.

2. The impact of COVID-19 on West Suffolk Council

- 2.1 On 23 March 2020, the country entered a period of full national lockdown in order to reduce the potential impact of COVID-19. The annual governance statement 2019-20 recognised the impact that the lockdown and measures necessary to support local communities had affected the council during the initial response phase.

2.2 Over the past year, the need to support the ongoing response to the COVID-19 pandemic has dominated the council's activities. This is actively reflected throughout this annual governance statement.

3. The impact of Brexit upon West Suffolk Council

3.1 In anticipation of the UK's exit from the EU on 31 January 2020 the council kept a watching brief regarding developments around the withdrawal agreement and the future relationship with Europe. This has included engagement with Local Government Association (LGA) activities and briefings and participation in a cross-Suffolk officer group working on the implications of the UK's withdrawal for the local area.

3.2 In practice, the impacts directly upon the council itself were limited, albeit the council appreciates there are challenges presented to the wider community as was discussed at the Overview and Scrutiny Committee meeting in March 2021.

3.3 The council will continue to monitor the position alongside partners to understand the potential interventions it can take to relieve potential challenges and seize opportunities presented.

4. The purpose of the code of corporate governance

4.1 The Local Code of Corporate Governance adopted by the predecessor councils was carried forward to West Suffolk Council. The code, which is available on the council's website, was prepared in accordance with the principles of the Chartered Institute of Public Finance and Accountancy (CIPFA) and Society of Local Authority Chief Executives (SOLACE) Framework, 'Delivering Good Governance in Local Government'.

4.2 The code sets out the council's governance framework. The governance framework comprises the systems, processes, culture and values by which the council is directed and controlled and the activities through which it accounts to, engages with and leads the community. It enables the council to monitor the achievement of its strategic objectives and to consider whether

those objectives have led to the delivery of appropriate, cost-effective services.

- 4.3 The system of internal control is a significant part of that framework and designed to manage risk to an acceptable level. It could not eliminate all risk of failure to achieve the council's aims and objectives, but it has sought to provide reasonable rather than absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify, prioritise, and manage the risks to the achievement of the council's aims and objectives.
- 4.4 This annual governance statement seeks to identify how the council has complied with its code of corporate governance throughout the year 2020-21.

5. The governance framework

- 5.1 There are seven core principles of good governance identified in the CIPFA SOLACE Delivering Good Governance in Local Government Framework 2016 as follows:
- Principle A – behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
 - Principle B – ensuring openness and comprehensive stakeholder engagement
 - Principle C – defining outcomes in terms of sustainable economic, social, and environmental benefits
 - Principle D – determining the interventions necessary to optimise the achievement of the intended outcomes
 - Principle E – developing the entity's capacity including the capability of its leadership and the individuals within it
 - Principle F – managing risks and performance through robust internal control and strong public financial management
 - Principle G – implementing good practices in transparency, reporting, and audit to deliver effective accountability

5.2 The Local Code of Corporate Governance sets out the principles of good governance and describes in full the arrangements the council has put in place to meet each of these.

Principle A	Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
Key elements of the council's governance framework	<ul style="list-style-type: none"> • Constitution • Employees code of conduct • Councillors code of conduct • Contract procedure rules • Anti-fraud and anti-corruption policy • Whistleblowing policy • Anti-money laundering policy • Registers of interests • ICT security policy • Monitoring Officer • Safeguarding policy
Activity within principle A in 2020-21	
<ul style="list-style-type: none"> • At the start of the pandemic, the council enacted its business continuity plans across its services. The council's response was led by a Strategic Direction Team, who assessed the impact on the council's wider communities and ability to achieve its objectives, supported by a Tactical Management Team, who oversaw the council's operational response. • This enabled the council to quickly identify challenges arising, the means to resolve them, and then monitor progress in doing so. Where necessary, decisions made were published in accordance with constitutional and legal requirements. 	

- In April 2020, the Government issued regulations allowing council meetings to be held virtually. This required changes to the council's constitution and procedures and protocols to be formed to ensure that decisions could take place in a transparent way online. West Suffolk's Development Control Committee was recognised by the Local Government Association (LGA) as an example of how virtual meetings should be conducted.
- During the summer 2020, Transparency International published a report, 'Permission Accomplished', raising concern regarding the potential for fraud in national planning systems. West Suffolk Council benchmarked itself against Transparency International's framework and recommendations. Although a high degree of compliance was recognised, in February 2021 the council approved changes to its Planning Code of Practice to ensure it reflected all aspects raised by Transparency International.
- In January 2021, the Monitoring Officer published a new set of guidance for councillors to assist in complying with the code of conduct.
- During the year, the internal audit team have reviewed the council's registers of interests and procedures for declaring gifts and hospitality. The outcome of the audit was positive, recommending procedural changes to simplify the process used to record the small number of staff gifts and hospitality received.
- Over the last year the council has strengthened its approach to safeguarding, developing the network of safeguarding leads across the council, updating its policy and guidance and support to staff.

Proposed activity for the coming year and areas for improvement

- In December 2020, the LGA published a new Model Code of Conduct for Local Authorities. This will be supplemented by accompanying guidance, which is expected to be published in May 2021. The council will wish to review the code and emerging guidance and assess whether to adopt this, working in partnership with other local council bodies across Suffolk.

<ul style="list-style-type: none"> • It is proposed to undertake a review of the council’s whistleblowing policy and ensure alignment with revisions made to the corporate complaints policy during 2020. • The Overview and Scrutiny Committee has committed to a review of the council’s response to Modern Slavery, which will commence once the Government has published revised regulations and guidance to local authorities. 	
Principle B	Ensuring openness and comprehensive stakeholder engagement
Key elements of the council’s governance framework	<ul style="list-style-type: none"> • Annual report • Reports and minutes available on the council’s website • Consultation statement • Equality scheme • Use of complaints and feedback to aid learning for future service development.
Activity within principle B in 2020-21	
<ul style="list-style-type: none"> • With the need to focus on aligning resources to support the COVID-19 response, the council simplified its annual report production process to focus on the key achievements made during the year to supporting achievement of the council’s corporate objectives. • As highlighted above, the council has undertaken its committee meetings on the virtual Teamslive platform. This has served to increase engagement with committees, with more members of the public joining meetings virtually than previously attended in person. Meetings are automatically recorded and available for viewing afterwards. • In light of the pandemic, the council has been required to review the way in which it makes services available to the public, and consults and engages with them. The council’s offices were required to close to the public, placing 	

increased emphasis on telephone and internet contact (see principle D below).

- In the licensing sector, consultations had originally been scheduled to take place at times where a national lockdown was then announced. As a result, consultations were delayed to ensure key stakeholders, such as licensees, would have the opportunity to input to reviews of policy.
- Due to the need to ensure the council has a robust local plan in place, it was not feasible to delay the council's Issues and Options Consultation. Instead, work was undertaken to ensure that the public would still be able to respond to the consultation, but in new ways. A virtual village hall was created, with officers available on the phone and on-line chat function to answer questions rather than in person. Officers attended town and parish council virtual meetings on request and held a number of dedicated seminars with local groups, schools, businesses, stakeholders and infrastructure providers. Video clips were prepared and shared on social media throughout the consultation, alongside radio adverts and more traditional methods of consultation through newspaper articles and promotion through the local coffee caravan. The council received over 3,000 representations to the consultation as a result.
- The council worked with the Western Assembly of Youth (WAY) group on the local plan consultation, and this group prepared posters and leaflets as well as a YouTube film.
- A group of members from the Overview and Scrutiny Committee are reviewing the council's website to understand how it works for residents and where improvements could be made to assist in some of the most common functions the website is used for.
- Newmarket Youth Action Group has been working on a youth strategy for young people, developed by a collaboration of the statutory and voluntary sector. The aim is to bring the strands together and cement the strategy within the town council approach for young people. January 2021 saw the first meeting to finalise the approach, and discussions about where the strategy and young persons' approach will sit in the town council framework.

<p>Once the final draft of the strategy has been completed this will be submitted to a working party to develop and implement.</p> <ul style="list-style-type: none"> • WAY have been working with the police to ascertain young people’s views of police engagement, and recently undertook a survey for the police to help shape policing engagement with young people in the future. WAY are also working with the council’s waste team to explore an environmental policy for schools and plastic, and also working with Suffolk County Council to explore a domestic abuse campaign for young people. 	
<p>Proposed activity for the coming year and areas for improvement</p>	
<ul style="list-style-type: none"> • The future of how council meetings and decision making will operate is in an uncertain environment. The government is consulting on whether to legislate to allow for virtual or hybrid meetings, but in the meantime the Council has to return to meeting “in person” to make decisions. This is proving challenging to do whilst ensuring meetings are compliant with Covid safe guidance, and ensuring they are open to the public, and making decisions in a transparent way. 	
<p>Principle C</p>	<p>Defining outcomes in terms of sustainable economic, social, and environmental benefits</p>
<p>Key elements of the council’s governance framework</p>	<ul style="list-style-type: none"> • Strategic framework • Growth investment strategy • Business plans • Medium term financial strategy • Local plans • Risk management policy and toolkit • Investment framework

Activity within principle C in 2020-21

- In March 2020, the onset of the COVID-19 pandemic required the council to refocus its short-term priorities on supporting its communities through the pandemic. This uncertainty, when combined with other external shocks such as the impact of Brexit has made redefinition of outcomes challenging, albeit the work undertaken by the council during 2019-20 to reappraise its strategic framework meant that it was well placed to quickly focus resources into priority services, enabling the council to continue to progress strategic objectives alongside the need to support communities.
- In June 2020, Suffolk agreed a comprehensive Local Outbreak Engagement Plan, with the aim of creating a whole system approach to protect people from the consequences of COVID-19. This ultimately contributed to the national strategy to minimise the occurrence and impact of COVID-19. A cross-sector Local Outbreak Engagement Board was created to oversee delivery of the plan with specific delivery strands allocated to implement the plan and necessary actions to support it.
- In July 2020, the Cabinet agreed the final report of the council's Environment and Climate Change Taskforce. This set the council's strategic approach as to how to work towards the achievement of net carbon zero by 2030, as well as the wider work to support the reduction of carbon emissions in Suffolk as a whole.
- The council has continued to progress work towards its local plan. As outlined above, the Issues and Options consultation was undertaken during the autumn of 2020. In March 2021, it was agreed to establish a local plan working group of members to support the detailed work required to develop the emerging plan documents.

Proposed activity for the coming year and areas for improvement

- The council will continue to work on developing its local plans and has a programme in place with adoption planned mid-2024.

<ul style="list-style-type: none"> • We will work as part of the Suffolk system in developing and delivering a COVID-19 recovery plan and Suffolk Climate Change Emergency Plan. • The council will also continue to develop its recovery strategy and approach to support the county-wide approach, for example supporting local towns and business organisations in place-based economic recovery. 	
Principle D	Determining the interventions necessary to optimise the achievement of the intended outcomes
Key elements of the council's governance framework	<ul style="list-style-type: none"> • Consultation statement and programme • Families and communities approach • Enforcement • Balanced scorecards • Procurement policy • Medium term financial strategy • Business partner model • Business case model • Commercial guidance • Partnership working across the public and voluntary sectors in Suffolk
Activity within principle D in 2020-21	
<ul style="list-style-type: none"> • As part of the response to, and recovery from, COVID-19, West Suffolk Council has been represented at both councillor and officer level in a number of cross-Suffolk groupings. These boards, cells and groups have involved other public and voluntary agencies working together first to respond to COVID-19 and then to plan how to lead the recovery from the pandemic. 	

- Within West Suffolk Council, with the need to immediately respond to the Coronavirus crisis, the organisation was quickly required to re-align resources in two key areas. First, to supporting the programme of business grants, ensuring that every eligible business in the district was aware of the programme of support available to them with the aim of minimising the impact of COVID-enforced closures on local businesses. Second, the Suffolk-wide Home But Not Alone programme, ensuring that all residents who were shielding or vulnerable had access to the necessary support they required.
- As the national response to COVID-19 has changed, so the council has been required to adapt its intervention approach. Measures have worked across both a policy and operational level, and have included:
 - Assessing how council services such as the operations and elections teams can operate safely within the pandemic
 - Making changes to policy approaches in areas such as suspending the garden waste service temporarily, the holding of events, car park charging and debt management
 - Lobbying Government and partners for changes to support our communities, such as increased funding for local government and leisure service providers
 - Allocating resources to supporting partners in COVID-19 efforts
 - Supporting changes in the business grant programme. Where there has been discretion within the programme, ensuring that the benefits of the programme will be achieved
 - Continuing to identify residents who are shielding as national guidance has changed, ensuring they have the necessary support
 - Supporting payments to individuals entitled to them through the track and trace programme
 - Supporting social distancing measures in public spaces
 - Delivering the Government's "everybody in" programme for rough sleepers, finding new and innovative housing solutions; and

- Supporting local businesses to ensure they remain compliant with Government guidance; and taking action where this is not adhered to.
- This required a significant shifting in the approaches across Suffolk to data sharing, enabling data to be shared in new ways and on a greater scale than previously to develop solutions on an individual basis. For example, West Suffolk Council contributed data to the county-wide programme of work to identify vulnerable people who should be proactively contacted with offers of support during the early periods of lockdowns. This work was to minimise the number of people who 'slipped through the net' as a result of different organisations providing support across the public sector system.
- Within the council, there has been a recognition that as a direct result of the pandemic, and the indirect result of the measures necessary to support it, achievement of the council's performance measures has been more challenging, particularly in areas such as income levels, collection of council tax and business rates, sundry debt management and housing. The council has taken a pragmatic approach and where targets have not been achieved provided clear rationale to support this.
- The financial challenges the council faces, which have been exacerbated by the pandemic, have necessitated the council to develop its approach to reviewing service operations, as part of a target operating model (TOM2) with the intention of improving customer experience, driving efficiency and delivering continuous improvement.

Proposed activity for the coming year and areas for improvement

- The council will need to continue to work with partners to identify the impact of the COVID-19 pandemic and therefore the necessary interventions to achieve the corporate priorities.
- The council will need to work to deliver the TOM2 model across services, delivering financial savings alongside the wider benefits for customers in order to support achievement of a balanced budget for 2021-22.

Principle E	Developing the entity’s capacity, including the capability of its leadership and the individuals within it
Key elements of the council’s governance framework	<ul style="list-style-type: none"> • Workforce plan • Learning and development policy • Constitution • Employee performance review framework • Disciplinary procedure • Job descriptions
Activity within principle E in 2020-21	
<ul style="list-style-type: none"> • At the outset of the pandemic, it was necessary that, wherever possible, staff worked from home. Changes were made to reporting processes for staff sickness and absence to ensure that changes in staff resources could be quickly understood. Level of absence, including sickness arising from coronavirus and the need for self-isolation was reported through to the Tactical Management Team and Strategic Delivery Team to enable resources to be re-allocated as necessary. • The council had to reappraise working practices with a view to ensuring that staff could work safely in the different working environments; there was effective staff engagement and the council supported the wellbeing of its staff in a challenging environment. These initiatives included: <ul style="list-style-type: none"> ○ two staff wellbeing surveys ○ a wellbeing toolkit for managers ○ all-staff organisational development and wellbeing workshops, leading to five internal working groups, looking at health and wellbeing, future of the workforce and ways of working, exploring the digital future, public access and ways to engage with the community, and the future of the workplace and safe workspaces 	

- a remote working charter
- support groups for parents and those working at home alone
- virtual physiotherapy sessions; and
- the council's first awards scheme.
- In February 2021, a further series of organisation-wide engagement sessions took place alongside some leadership specific workshops, which responded to the areas in which staff identified that they required support and development, including building positive mindsets, boosting accomplishments, leading virtual teams and maximising impact and virtual conversations. These areas will remain relevant as staff continue to explore how the organisation moves forwards throughout recovery.
- Staff development generally has successfully transferred to an online format, with sessions primarily hosted on the Microsoft Teams platform or through short format 'watch and go' e-learning development sessions. Member development sessions have also transferred to a virtual format, with a higher attendance generally recorded than previously noted for in-person formats. Sessions have been recorded to enable those unable to attend to be able to re-watch at a later date.
- The council is continuing to work with partners across the eastern region to explore opportunities to work more collaboratively on member development.

Proposed activity for the coming year and areas for improvement

- There is on-going activity focused on how we work differently in the future around workspaces with a plan being developed for a return to the offices in line with the Government roadmap (June 2021).
- A staff working group has now been formally established focused on health and well-being, to continue to help inform and develop the organisation response.
- Work is underway to set a longer-term workforce strategy to replace our interim People Plan.
- There is on-going work to support the new structures and longer-term transformation programme.

Principle F	Managing risks and performance through robust internal control and strong public financial management
Key elements of the council's governance framework	<ul style="list-style-type: none"> • Financial procedure rules • Contract procedure rules • Treasury management strategy and growth investment strategy • Budget monitoring • Performance and Audit Scrutiny Committee • Strategic risk register • Investment framework • Risk management toolkit • Balanced scorecards • Internal audit • Business continuity plan • Complaints
Activity within principle F in 2020-21	
<ul style="list-style-type: none"> • The COVID-19 pandemic has had a significant impact on the council's financial position. This has been closely monitored to ensure there is a clear understanding of the financial position as the situation has emerged, and how this will impact upon the council's budget, including: <ul style="list-style-type: none"> ○ Fortnightly briefings to Cabinet members and the officer Leadership Team, and monthly updates to the officer Senior Management Team ○ Regular monitoring reports through the Performance and Audit Scrutiny Committee and additional reports to the Cabinet ○ All-member briefings; and 	

- Joint discussions with Suffolk partners to understand the cross-county impact, contributing to lobbying for further financial support.
- The council's risk register was subject to significant modification to take into account the impact of the pandemic. As well as a specific risk relating to COVID-19, risks were re-analysed to understand the potential impacts of the events arising during the pandemic.
- Emergency planning approaches were reappraised, to ensure that appropriate health and safety measures could be enacted in the event of a civil emergency during the pandemic. In addition, the council took part in cross-partner scenario planning to support the management of a significant outbreak.
- It was necessary to re-evaluate the internal audit annual work plan in light of the pandemic. Whilst fewer assurance reviews were undertaken, internal audit resources were reallocated to supporting the development of processes required to support COVID-19 relief efforts, such as working to help ensure processes for the payment of business rates grants minimised the risk of fraud and error arising.
- Internal audit reviewed the council's compliance with CIPFA's Financial Management Code and concluded that general compliance was being achieved, with some areas highlighted for further consideration. We will continue to work across Suffolk to share good practice in this area.

Proposed activity for the coming year and areas for improvement

- The ongoing nature of the pandemic is likely to impact upon the council and its communities for some time to come. On an ongoing basis it will be necessary to appraise the potential impact on the council's budget and ability to achieve its organisational objectives.

Principle G	Implementing good practices in transparency, reporting and audit to deliver effective accountability
Key elements of the council's governance framework	<ul style="list-style-type: none"> • Council's website • Statement of accounts • Annual governance statement • Annual report • Medium term financial strategy • Anti-fraud and anti-corruption policy • Whistleblowing policy • Data protection policy • Officer Information Governance Group • Balanced scorecards • Annual internal audit report and opinion
Activity within principle G in 2020-21	
<ul style="list-style-type: none"> • The COVID-19 pandemic required the council to refocus resources on the immediate need to support its communities, with the result that, with the support of the Information Governance Group, development work in this area had to be suspended to accommodate more immediate priorities. However, the council has continued to work to ensure it meets its statutory responsibilities with regards the publication of records, the Freedom of Information Act and Data Protection Act. Staff were provided with additional guidance relating to the potential risks of working from home with respect to council information. • In anticipation of Brexit, the council worked to ensure that the potential risks of the UK being declared non-adequate for data transfer purposes were minimised. 	

- In May 2020, the council was awarded the Cyber Essentials Plus certificate. This demonstrates the council’s ongoing commitment to ensuring high standards of data security. The council has also engaged with the Ministry of Housing, Communities & Local Government cyber security team to help towards learning the lessons of data breaches experienced elsewhere.

Proposed activity for the coming year and areas for improvement

- A programme of health checks within services to evaluate compliance with the Data Protection Act will be commenced, two years after its introduction, and support improvements where required.

6. Review of effectiveness

6.1 The annual review of the governance framework and system of internal control involves:

- a self-assessment exercise
- consideration of the relative significance of audit issues raised and audit opinions issued during the period
- the external auditor’s comments, and other review agencies and inspectorates’ reports; and
- where appropriate, production of an action plan where progress is assessed and recorded.

6.2 The Leadership Team reviews the draft annual governance statement prior to submission to the Performance and Audit Scrutiny Committee, which approves this statement.

6.3 The internal audit team is responsible for giving assurance to councillors, the Head of Paid Service, s151 Officer, Leadership Team and the Performance and Audit Scrutiny Committee on the design and operating effectiveness of the council’s risk and internal control arrangements.

- 6.4 Based upon the audit work undertaken during the financial year 2020-21, as well as assurances made available to the council by other assurance providers, the Service Manager (Internal Audit) has confirmed that reasonable assurance can be provided that the systems of internal control within these areas of the council, as well as the risk management systems, are operating adequately and effectively. Similar to previous years, internal audit work has however identified a number of areas where existing arrangements could usefully be improved, and agreed actions will be followed up by the internal audit team in the usual way.
- 6.5 The council is subject to an annual programme of independent external audits and inspections. The external auditor summarises the findings from his audit of the financial statements and the council's systems which support them and his assessment of arrangements to achieve value for money.
- 6.6 The review of the effectiveness of the governance framework for 2020-21 concluded that the arrangements continue to be regarded as fit for purpose in accordance with the governance framework.

7. Significant governance issues

- 7.1 In determining the significant issues to disclose, the council has considered whether issues have:
- seriously prejudiced or prevented achievement of the council's objectives
 - resulted in a need to seek additional funding to allow it to be resolved or had resulted in a significant diversion of resources from another aspect of the council's services
 - led to material impact on the accounts
 - received adverse commentary in external inspection reports
 - been treated by the Service Manager (Internal Audit) as being significant in internal audit reports issued during the year
 - attracted significant public interest or seriously damaged the council's reputation

- resulted in formal action being taken by the s151 Officer or the Monitoring Officer; and
- councillors had advised that it should be considered significant for this purpose.

7.2 As is embedded throughout this document, the measures necessary to support the COVID-19 pandemic, as well as the consequences of the pandemic itself, have had a significant financial impact upon the Council. This has required the Council, as with all other councils across the country being required to seek additional funding from the Government.

7.3 There are no other significant governance issues to disclose.

8. Assurance by Chief Executive and Leader of the Council

We approve this statement and confirm that it forms the basis of the council's governance arrangements and that these arrangements will be monitored and strengthened in the forthcoming year as described above.

Signed:

John Griffiths

Leader of the Council

Date:

Signed:

Ian Gallin

Chief Executive

Date: