Pendle Borough Council

Annual Governance Statement

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2022



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Annual Governance Statement

1. Scope of Responsibility

- 1.1 As a local authority, the Council is required by law to review its governance arrangements at least once a year. The preparation and publication of an Annual Governance Statement in accordance with the CIPFA/SOLACE Delivering Good Governance in Local Government Framework (2016) (the Framework) fulfils this requirement. The Framework requires local authorities to be responsible for ensuring that:
- their business is conducted in accordance with all relevant laws and regulations
- public money is safeguarded and properly accounted for
- resources are used economically, efficiently and effectively to achieve agreed priorities which benefit local people.
- **1.2** The Framework also expects that local authorities will put in place proper arrangements for the governance of their affairs which facilitate the effective exercise of functions and ensure that the responsibilities set out above are being met.
- 1.3 The Council has adopted a Local Code of Corporate Governance which is consistent with the principles of the CIPFA/SOLACE framework 'Delivering Good Governance' (and any subsequent guidance issued). A copy of the Local Code can be downloaded from:-

www.pendle.gov.uk

or by writing to: Chief Finance Officer Town Hall Market Street Nelson Lancashire BB9 7LG 1.4 This statement explains how the Council has complied with the seven principles set out in the CIPFA/SOLACE Framework during 2021/22. The preparation of this statement also fulfils the requirement under Regulation 6(1b) of the Accounts and Audit Regulations 2015 to produce and publish an Annual Governance Statement.

2. The Purpose of the Governance Framework

- 2.1 The governance framework comprises the systems processes, cultures and values, by which the Council is directed and controlled and its activities through which it accounts to, engages with and leads its communities. 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 services and the achievement of value for money.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives; it can, therefore, only provide reasonable and not absolute assurance of effectiveness.
- 2.3 The system of internal control is 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 and potential impact of those risks being realised and to manage them efficiently, effectively and economically.
- 2.4 The governance framework has been in place at the Council for the year ended 31st March 2022 and up to the date of approval of the Statement of Accounts for the 2021/22 financial year.
- 2.5 During this period the Council has continued to deal with the Covid-19 pandemic. The pandemic continued to impact both operationally and strategically and the Council sought to meet the challenges presented by the pandemic whilst continuing to implement Government policy changes.

Principles of corporate governance

Principle A: Integrity and Values

- Staying true to our strong ethics and standards of conduct
- Respecting the rule of law
- Creating a culture where statutary officers and other key post holders are able to fulfil their responsibilities
- Ensuring fraud, corruption and abuse of position are dealt with effectively
- Ensuring a safe environment to raise concerns and learning from our mistakes

Principle B: Openness and Engagement

- Keep relevant information open to the public and continuing their involvement
- Consultation feedback from the public is used to support service and budget decisions
- Providing clear rationale for decision making being explicit about risk, impact and benefits
- Having effective scrutiny to constructively challenge what we do and the decisions we make

Principle C: Working Together

- Identifying and managing risks to the achievement of outcomes
- Managing service users' expectations effectively with regard to determining priorities and making best use of the resources available
- Considering and balancing the combined economic, social and environmental impact of decisions
- Taking a long term view with regard to decision making, whilst considering risk and acting transparently
- Ensuring fair access to services for all

3. The Council's Governance Framework

Principle A - Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.

- 3.1 The Council has a formal Constitution which is reviewed at least annually, amended as required and made publicly available on our website at www. pendle.gov.uk. The Constitution sets out how we operate, how decisions are made and the procedures which are followed to ensure that these are efficient, transparent and accountable to local people. Some of these processes are required by the law, while others are a matter for us to choose.
- **3.2** The Constitution includes the following documents which provide guidance for officers and Councillors on

Principle D: Making a Difference

• Having a clear vision and strategy setting out our intended outcome for citizens and customers

Principle E: Capability

- Clear roles and responsibilities for Council leadership
- Maintaining a development programme that allows councillors and officers to gain the skills and knowledge they need to perform well in their roles
- Evaluating councillor and officers' performance, compliments and complaints to enable results (outcomes) to be measured and enable learning

Principle F: Managing Risk and Performance

- Ensuring that effective risk management and performance systems are in place, and that these are intergrated in our business systems / service units
- Having well developed assurance arrangements in place including any commercial activities
- Having an effective Audit Committee
- Effective counter fraud arrangements in place

Principle G: Transparency and Accountability

- Having rigorous and transparent decision making processes in place
- Maintaining an effective scrutiny process
- Publishing up to date and good quality information on our activities and decisions
- Maintaining an effective internal and external audit function.

the standards of behaviour expected to ensure integrity:

- Code of Conduct for Members (councillors)
- Code of Conduct for Employees
- Guidance on the role of a Councillor
- 3.3 The Council's Monitoring Officer maintains the Codes of Conduct and investigates any suspected breaches. Alleged breaches of the Members Code of Conduct are investigated in accordance with an agreed protocol and may involve the Independent Person appointed for this purpose with some matters considered by a Standards Hearing Committee. Councillors sign a formal declaration agreeing to abide by the Code of Conduct. For staff, the Employee Handbook sets out the requirements and standards expected and this forms part of the staff induction process.

3.4 The Council also has established a set of core values which are intended to underpin all that we do. These are published annually as part of our Strategic Plan and include the following ethical values

PRIDE

Take pride in all you do

Believe in Pendle and be an ambassador for the Council Don't forget your customers

ENTERPRISING

Be open to doing things differently

Ensure public money is spent in the smartest way

Don't ignore new ways of working

NO BLAME

Don't be afraid to fail. Together we achieve more Act in an open, honest and friendly manner

Don't ignore the impact your behaviour has on others

DETERMINED

Face challenges in a positive way

Make the effort to find information for yourself Don't limit your opportunities to learn and grow

LISTEN

Listen to and support others

Value alternative views

Don't forget to thank others for their contribution

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EQUALITY

Value differences and celebrate diversity

.....

Ask for help and support when needed Don't make assumptions about people

3.5 Staff and councillors are also made aware of other policies relevant to this principle of the framework including the Council's Anti-Fraud, Theft and Corruption, Anti-Bribery and Whistleblowing Policies. These arrangements are reviewed and reported on via the Council's Accounts and Audit Committee being the Committee charged with oversight of the governance arrangements at the Council. At the heart of these policies is the requirement for all relevant parties to act with integrity.

- 3.6 All councillors have to register and declare certain pecuniary interests such as employment, land holdings and contracts with the Council. The register of interests is available on our website at www.
 pendle.gov.uk. Councillors must declare such interests at meetings which they attend. There are also procedures laid down for staff and councillors relating to the receipt of gifts and hospitality.
- 3.7 All Council decisions have to consider legal implications. These are set out in reports to councillors which are published on the Council's website. The Council's Constitution sets out the responsibility for decision-making. Certain decisions are reserved to the full Council with others delegated to the Policy and Resources Committee or other Committees each acting in accordance with parameters set out in the Constitution.
- **3.8** A number of areas are delegated to officers for the purposes of decision-making, however, limits on the exercise of delegation are laid down in an approved Scheme of Delegation to Officers within the Constitution. The Council's legal team will advise on the legal implications of the proposed decisions and where necessary will engage external legal advisors. The Council's Monitoring Officer and Section 151 Officer have specific responsibility for ensuring legality, for investigating any suspected instances of failure to comply with legal requirements, and for reporting any such instances to councillors.



PRINCIPLE B - Ensuring openness and comprehensive stakeholder engagement.

- 3.9 One of the Council's 5 strategic objectives is 'working with partners, the community and volunteers to provide services of good value' included within this objective is reference to the operation of decision making structures that are open, transparent and accountable. It is an important principle for how the Council conducts itself.
- **3.10** All decisions of the Council are made in accordance with principles laid down in the Constitution and include the following
- A presumption in favour of openness
- With due explanation as to what options were considered and giving clear reasons for the decision.
- **3.11** All Council meetings, Policy & Resources Committee and other Committees are open to the public.
- **3.12** Agenda papers and reports together with the Minutes of all meetings are publicly available on the Council's website unless they are exempt from publication. Examples of the latter are rare at Pendle Council. All Council meetings have an opening section which includes public participation with an opportunity to raise questions at the meeting. Guidance on this is also available on our website.
- 3.13 The Council has Area Committees covering all parts of the Borough with defined terms of reference and the ability generally to determine local matters. These meet monthly and provide a valuable tool in promoting engagement with the local community.
- **3.14** The Council's guidance on 'The role of a councillor' contains the following which reinforces the importance of openness requiring councillors to:

...contribute constructively to open government and democratic renewal through actively encouraging the community to participate in the Council's decision making processes; and, to this end, seek to involve the community in decisions that affect them by ensuring they have full information and then by helping them make their views known...

3.15 The Code of Conduct for councillors also outlines the following requirements

You must act solely in the public interest and should never improperly confer an advantage or disadvantage on any person or act to gain financial or other material benefits for yourself, your family, a friend or close associate.

You are accountable for your decisions to the public and you must co-operate fully with whatever scrutiny is appropriate to your office.

You must be as open as possible about your decisions and actions and the decisions and actions of your authority and should be prepared to give reasons for those decisions and actions.

- **3.16** The Council undertakes consultation on specific topics as and when it is considered necessary to do so. The Council also makes use of social media via Facebook and Twitter.
- 3.17 The Council is committed to publishing information freely and to develop further our culture of openness and transparency and publishes information in accordance with the Local Government Transparency Code. The Council's Freedom of Information Publication Scheme provides a general guide for the public in terms of what information should routinely be available to them by either accessing our website or upon request.
- **3.18** Partnership working is important and the Council has in place a wide range of arrangements, ranging from small scale local groups (e.g. Parks Friends Groups, Pick up for Pendle) to larger and more formal partnerships (e.g. public/private partnership with Liberata and joint venture arrangements with Barnfield Investment Properties).

PRINCIPLES C & D – Defining outcomes in terms of sustainable benefits (economic, social and environmental) and determining the interventions necessary to achieve them.

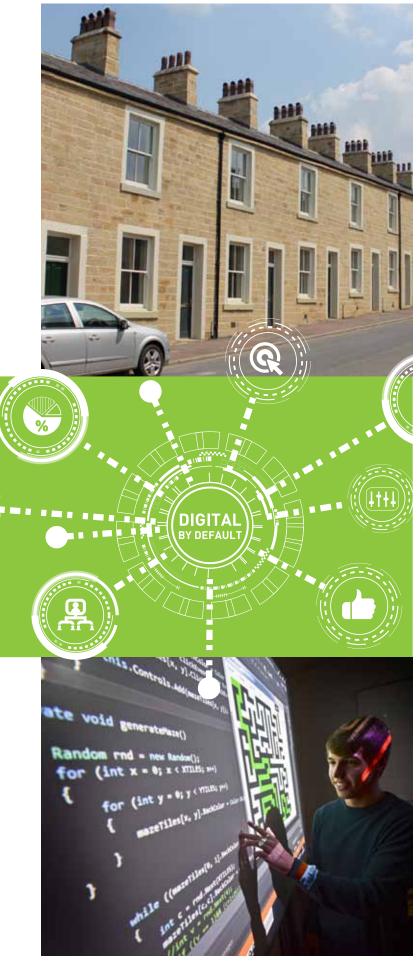
- **3.19** The Council's strategic vision for the Borough is set out in our Strategic Plan. Our vision is to work with our partners to ensure that:
 - Pendle is a place where quality of life continues to improve and where people respect one another and their neighbourhoods
 - Pendle is a place where everyone aspires to reach their full potential
 - Pendle is recognised locally, regionally and nationally as a great area to live, learn, work, play and visit.
- **3.20** Underpinning the Council's Strategic Plan are a number of other strategic plans and documents that outline their contributions to achieving the Council's vision and objectives. Examples include, but are not limited to:
 - Core Strategy (Planning)
 - Economic Recovery and Growth Strategy
 - Housing Strategy
 - Financial Strategy (and Medium Term Financial Plan)
 - Human Resources, Information Technology/Security.
- **3.21** Each service area of the Council prepares an annual service plan setting out its contributions to the delivery of strategic objectives and outcomes. Services are required to set and monitor agreed targets for performance. Performance against and achievement of expected outcomes is monitored regularly via the Council's corporate performance management system (Pentana) and reported quarterly to councillors, Corporate Management Team and the Performance Clinic Panel. Where the expected performance is not being met then potential intervention measures are considered and implemented where appropriate.
- **3.22** In relation to the buying of goods and services, staff must comply with the Council's Contract Procedure

Rules. These set out relevant considerations when reaching decisions on award of contracts and include relevant environmental and sustainability aspects including the achievement of 'social value' in addition to cost.

3.23 Decisions on the overall level of resources allocated are taken by the Council following recommendations from the Policy and Resources Committee. Resources and spending plans are critically reviewed to optimise their use and level of fit with the Council's objectives. Financial planning arrangements are well established and underpinned by a three year forward projection as part of the Council's medium term financial planning arrangements. This includes both capital and revenue budgets.

PRINCIPLE E – Developing the Council's capacity including the capability of Council leadership and staff.

- **3.24** At the heart of this principle is the Council's fourth strategic objective which is 'Maintaining a sustainable, resilient and efficient organisation which is Digital by Default'. The aim is to ensure that, as an organisation, we are suitably placed to deliver the priorities identified for Pendle and its residents. To do this we will employ the right people with the right skills in the right job. We will maintain robust financial processes, standards and systems optimising the technology and resources we have available to us, making us more efficient and effective in our service delivery and becoming Digital by Default.
- **3.25** In recent years the Council has invested in training programmes to enhance organisational development, develop leadership skills and promote a coaching culture with staff at all levels encouraged to be innovative and challenge the normal way of doing things. All staff take part in annual performance management reviews which include consideration of their individual training and development needs. A range of training methods and resources are applied and feedback is actively encouraged to assess the benefit of investment in training. The Council has developed a workforce plan, organisational development strategy and a learning and development strategy. Training is available for







councillors including induction and topic specific matters in addition to what is available from organisations such as the Local Government Association.

- **3.26** Capacity is enhanced via a range of partnerships and collaborative arrangements, as well as our commissioning and procurement processes through which the Council operates a mixed economy approach to delivering services in the most effective and efficient way. Service delivery models include, in-house, external outsourced, transfers to external parties and joint venture arrangements, such as PEARL, PEARL2, PEARL (Brierfield Mill) and PEARL Together. On a regional and sub-regional basis the Council works closely with the Lancashire Enterprise Partnership and Pennine Lancashire bodies notably in areas such as economic development, regeneration and skills/training. It also works closely with Nelson & Colne College and Lancashire Adult Learning on training provision.
- 3.27 Wider partnership working and engagement across Lancashire has also been evident during the Covid-19 pandemic via the Council's continued collaboration with the Lancashire Resilience Forum (LRF) and the continuation of the Pendle Community Support Hub.
- **3.28** Leadership roles are well defined at the Council for staff and councillors, distinguishing, for example, the role of Council leader and the officer being the Head of Paid Service (i.e. the Chief Executive).

A protocol is included in the Council's Constitution which reflects the principles underlying the respective Codes of Conduct which apply to members and employees. The shared object of these codes is to enhance and maintain the integrity of local government and therefore, demands high standards of personal conduct.

3.29 The Council is committed to a culture of continuous improvement and has a focus on service delivery and effective performance management. Peer learning is encouraged and the Council has undertaken a Corporate Peer Challenge review led by the Local Government Association in February 2022 to provide an assessment and feedback on, amongst other things:

- The Council's approach to transformation including the shape of the programme and plans for delivery, within the local context.
- The use of the existing governance model to support decision making which is well informed, suitably agile, engaging and proportionate.
- The overarching capacity to deliver available to the Council and how this is utilised to deliver on the priorities of the Council.
- **3.30** The Council's Workforce Development Strategy acknowledges the essential role staff play in the Council's ability to deliver effective services; thus wanting to ensure that every employee fulfils their potential and takes advantage of the development opportunities available to them.
- **3.31** Sustaining organisational resilience is increasingly challenging at a time when recruitment is challenging both nationally and locally with headcount reducing in response to ongoing resource constraints. Set against this, the importance of supporting staff health and well-being is acknowledged and a suite of policies and procedures are in place to help staff maintain their own physical and mental well-being. Examples include the annual health and well-being programme, work/life balance policy and the operation of flexible working for most staff.

PRINCIPLE F – Managing risks and performance through robust internal control and strong public financial management.

- 3.32 The maintenance of systems and processes to identify and manage the key strategic and operational risks to the achievement of the Council's objectives. The Council's **risk management framework** continues to evolve and presently includes the following arrangements
 - Risk Management Strategy and Policy Statement
 - Arrangements for the Strategic Risk Register comprising corporate risks assigned to designated officers, with appropriate counter-measures and an action plan established for each key risk
 - Officer Working Groups (the Corporate Governance Working Group and the Risk Management Working Group) dedicated to maintaining risk management arrangements under review

- Periodic review of risks in-year with reports to the Council's Management Team, Policy and Resources Committee and the Accounts and Audit Committee
- The use by Internal Audit of a risk based approach in the preparation and delivery of the internal audit plan
- The requirement for council officers to consider risk management issues when submitting reports to Committee for consideration by councillors
- A suite of policies and procedures in relation to Whistleblowing, Anti-Fraud Theft and Corruption, Anti-Bribery and Anti-Money Laundering
- A suite of Business Continuity Plans are in place, i.e. Business Continuity Policy and Strategy, Strategic Crisis Management Plan, a Local Crisis Management Plan for each main office location and Fleet Street Depot; and a Business Recovery Plan for critical services
- **3.33** Councillors and officers have previously been trained in risk management and the leader of the Council is briefed on the strategic risks faced by the Council. Managers have the responsibility for the effective control of risk, and all service plans have a section on risk management.
- 3.34 Corporate Governance including risk management, incorporating the key strategic risks for the Council, are the subject of periodic reports to Policy and Resources Committee and the Accounts and Audit Committee.
- **3.35** The Corporate Governance Working Group reviews the Strategic Risk Register, to ensure that risks are being actively monitored and managed and target risk scores have been introduced for all identified strategic risks, as a means of providing much greater focus on those areas where risk management can be effective. Details of changes are reported to Corporate Management Team and the Accounts and Audit Committee.
- **3.36** The Chief Executive, as the Council's Head of Paid Service, is responsible for the corporate management of the Council.
- **3.37** The Corporate Director is appointed the Council's Monitoring Officer. The appointment of a Monitoring Officer is required in accordance with Section 5 of the Local Government and Housing Act 1989. It is the function of the Monitoring Officer to report to

Members upon any contravention of any enactment or rule of law or any maladministration by the Authority. The Monitoring Officer also has responsibilities under the Council's Ethical Framework relating to the Members' Code of Conduct and the Standards Regime.

- **3.38** The Chief Finance Officer is designated as the officer with statutory responsibility for the proper administration of the Council's financial affairs, in accordance with Section 151 of the Local Government Act 1972.
- **3.39** The three statutory officers referred to above have unfettered access to information and to councillors on the Council so that they can discharge their responsibilities effectively. The functions of these officers and their roles are clearly set out in the Council's Constitution. In particular, the role of the Chief Finance Officer at the Council accords with the principles set out in CIPFA Statement on the Role of the Chief Financial Officer in Local Government.

3.40 An established **financial management framework** comprising the following

- Financial and Contract Procedure Rules as part of the Constitution
- Medium term financial planning using a three year cycle, updated annually, to align resources to corporate priorities
- Service and financial planning integrated within the corporate performance management cycle
- Annual budget process involving scrutiny, challenge and consultation
- Annual review of the adequacy of the level of financial reserves
- Regular monitoring by management of revenue and capital budgets with reports to Management Team, Policy & Resources Committee
- Annual reports to councillors on both the final revenue and capital out-turns compared to the approved budget
- Continuous challenge of the scope for securing efficiencies and service improvements
- Production of an annual Statement of Accounts compliant with the requirements of local authority accounting practice
- Compliance with the requirements established by CIPFA, the public sector accountancy body; specifically ensuring that the Council's financial management arrangements conform with the governance requirements of the CIPFA statement on the Role of the Chief Financial Officer in Local Government (2015).

- A regular review of the Council's Financial Management arrangements.
- **3.41** A **performance management framework** which provides an explicit link between the corporate priorities and personal objectives of staff and their training and development needs. Performance is reported to councillors and the Management Team on a systematic basis with areas of poor performance investigated proactively. Key features of the Performance Management Framework include
 - A regular review of the Strategic Plan to ensure that priorities are reviewed, remain relevant and reflect the aims of the Council
 - Service Plans produced with explicit goals and associated performance targets in order to ensure that achievement of performance is measurable
 - The Council's staff appraisal system Performance Management Reviews against a competency framework - links personal objectives directly to Service Plans
 - Regular reports on the performance of key indicators which are presented to councillors and Officers

3.42 An **information governance framework** which

sets out the way we handle and process information, in particular, the personal and sensitive data relating to residents, suppliers and employees. Key features of the information governance framework include

- A suite of policies and procedures on the Council's Information Security which are available on the Intranet for all staff to review
- Arrangements for document management and retention
- A Data Protection Policy and Procedure with nominated staff responsible for providing advice and guidance on Data Protection matters
- Compliance with the Local Government Transparency Code and provision of Open Data on the Council website
- A system for dealing with requests for information submitted to the Council under the Freedom of Information Act 2000 (including a regular review of the Council's Publication Scheme)
- Regular reviews of the Council's Information Governance and Security arrangements by Internal Audit and external assessors.
- Formation of the Information Governance Working Group which meets on a monthly basis.
- 3.43 The provision of an Internal Audit Service, which operates in accordance with the statements, standards and guidelines published by the Auditing

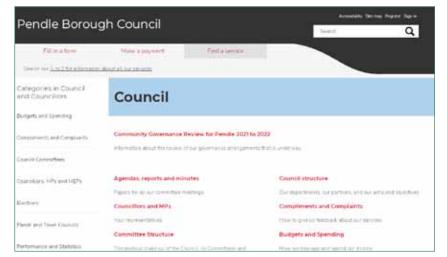
Practices Board, CIPFA (particularly the Public Sector Internal Audit Standards) and the Chartered Institute of Internal Auditors. The Internal Audit Service examines and evaluates the adequacy of the Council's system of internal control.

- 3.44 Internal Audit is an independent and objective appraisal function established by the Council for reviewing the system of internal controls. This is in compliance with Regulation 5 of the Accounts and Audit Regulations 2015 that specifically requires a local authority to undertake an adequate and effective system of internal audit. This work is delivered by way of a Strategic Audit Plan developed using a risk-based approach. The Internal Audit plan is agreed and monitored by the Accounts and Audit Committee. The Head of the Internal Audit Service is required to give an opinion on the adequacy of the Council's system of internal control each year and ensure the assurance arrangements conform to the governance requirements of the CIPFA Statement of the Role of the Head of Internal Audit (2010).
- **3.45** Lastly, each member of Management Team is required to sign an Assurance Statement in relation to a range of key controls operating in their area of work. This specifically seeks assurance from Senior Managers that, other than those identified during the course of their normal work or by Internal Audit, they are not aware of any weaknesses in the Council's systems of internal control.

PRINCIPLE G – Implementing good practice in transparency, reporting and audit to deliver effective accountability.

3.46 All reports to meetings of Council, Policy and Resources Committee and other committees are publicly available on our website with the Minutes also published showing what decisions have been taken and the reason(s) why. Other forms of public accountability reporting include the annual Statement of Accounts, the Council's Annual Report and in year financial and performance monitoring reports. Reports from External Audit are also published online including their annual report setting out the findings resulting from their audit of the accounts and their assessment of the Council's arrangements for securing value for money.

- **3.47** The Council reports performance against qualitative and quantitative targets and financial targets on a regular basis. Progress updates on the implementation status of audit recommendations are also reported quarterly to the Accounts and Audit Committee. The Internal Audit service complies with the requirements of the Public Sector Internal Audit Standards and has direct access to councillors and all staff in order to discharge its responsibilities.
- 3.48 The Council publishes information in accordance with the Local Government Transparency Code. The Council's website includes a section on Open Data. Open Data is about being transparent, sharing our information with the wider community, and giving them the opportunity to use that data to build useful applications. The data must be in open and machine readable formats that are easy to reuse where possible.
- **3.49** The Council welcomes peer challenge reviews and inspections from regulatory bodies and will act on any recommendations arising as appropriate.





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4. Key Roles

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The key roles for those responsible for developing and maintaining the Governance Framework are:

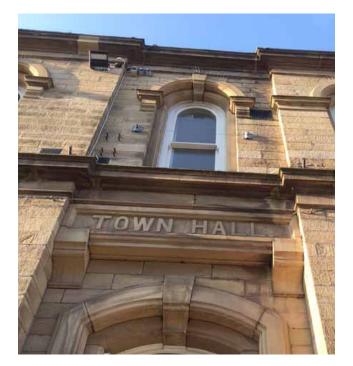
Council	 Approves the Strategic Plan Approves the Constitution (inc Financial Regulations) Approves key policies and budgetary framework
Policy & Resources Committee	 Develops and makes recommendations to the Council on matters of strategic policy Oversees the work of the Council generally Determines the need for in-depth scrutiny of any issue relating to the Council's functions and establish the arrangements for this to be undertaken if necessary
Accounts & Audit Committee	 Provides independent assurance to the Council on the adequacy and effectiveness of the governance arrangements, risk management framework and internal control environment Promotes high standards of Member conduct and approves the Annual Statement of Accounts and the Annual Governance Statement
Area Committees	• Appointed by Council aimed at improved service delivery in the context of best value, and more efficient, transparent and accountable decision making at a local level
Corporate Management Team / Leadership & Transformation Board	• Implements the policy and budgetary framework set by the Council and provides advice to Policy & Resources and the Council on the development of future policy and budgetary issues, overseeing the implementation of Council policy
Corporate Governance Working Group	• Accountability for developing, embedding and maintaining the Council's governance and risk framework
Chief Financial Officer (s151)	 Leads and directs the financial strategy of the Council and ensures that the Council controls and manages its money well, being suitably qualified and experienced ensuring the Finance Team is fit for purpose Contributes to the effective corporate management and governance of the Council
Monitoring Officer	 Advises the Council on ethical issues, standards and powers to ensure the Council operates within the law and statutory Codes of Practice Overall responsibility for the maintenance and operation of the suite of Anti-Fraud, Theft and Corruption policies and contributes to the effective corporate management and governance of the Council

In compliance with the Accounts & Audit Regulations 2015, a review of the effectiveness of the system of internal audit is undertaken annually with the results of the review reported to the Accounts & Audit Committee.

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5. Review of Effectiveness of Internal Control

- **5.1** The Council has a responsibility for conducting, at least annually, a review of the effectiveness of its Governance Framework including the system of internal control. This review of effectiveness is informed by the work of the Corporate Management Team who have a responsibility for the development and maintenance of the governance environment, the Annual Report on Internal Audit from the Head of the Internal Audit Service and also reports from the External Auditor and any other review agencies and inspectorates.
- **5.2** The purpose of a review is to identify and evaluate the key controls in place to manage principal risks. It also requires an evaluation of the assurances received, identifies gaps in controls and assurances and should result in an action plan to address significant internal control issues.



Annual Governance	Statement (AGS)					
Audit Committee						
Corporate Leaders	nip Team					
A	_					
2nd Line of Defence	1st Line of Defence	3rd Line of Defence		10		
Risk, Control &	Risk, Owners /	Independent Risk	.±	ions	es	
Compliance	Managers	Assurance	Aud	pect	enc	tors
Functions that set directions, define policy and provide assurance	Functions that have day to day responsibility for managing and controling risk	Functions that provide independent assurance	External Audit	External Inspections	Review Agencies	Regulators
Financial Control	Operational Management					
i Inspection i	: Responsible for directly assessing, controlling and mitigating risk	Internal Audit				
Risk Management i Quality	: Design and implement Risk Control measures					
: Compliance	Management / Supervisory Controls					

Impact of Covid-19 on our Governance Arrangements

- **5.3** The Council's COVID response effort comprised work on the following matters
 - providing business grants to eligible businesses under the various business grant programmes funded by the Government
 - processing Track and Trace payments to those who are required to self-isolate
 - localised tracking and tracing of positive cases and their contacts; ensuring business compliance with COVID regulations through a business inspection programme
- **5.4** Financial impacts for the Council arising from the pandemic include the following:
 - additional costs (e.g. increased funding to Pendle Leisure Trust due to facility closures)
 - reduced income from certain sales, fees, charges, rents
 - reduced collection of council tax and business rates
 - increased housing benefit and council tax support payments
 - increased levels of bad debts and associated provisions
 - Revised ways of working represented a major challenge in the early stages of the pandemic. The way the Council and its staff have responded presented an opportunity moving forward to re-assess ways of working, the use made of office accommodation; the use of technology particularly as a way of replacing some face to face meetings with the benefit of reduced travel time/costs and increased productivity
 - Recovery of debt whilst the Council adopted a passive rather than an active approach to debt recovery, recognising the difficulties for both businesses and residents as a result of the crisis, the Council is gradually moving back to prepandemic recovery procedures

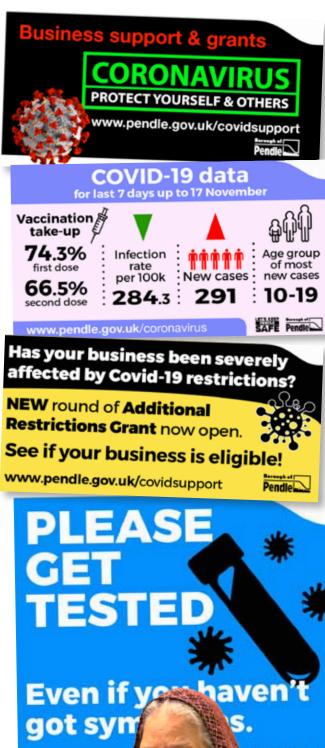
Vaccination bus is coming to Brierfield

Ages 12 and over - 1st & 2nd dose and booster

Friday 4 and Saturday 5 February 9.30am - 3.30pm Brierfield Community Centre, Colne Road, BB9 5HW

NHS

www.pendle.gov.uk/covidvaccination





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/coronavirus

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- Legal Processes The courts are now running at the same capacity as they were previously, before the outbreak of Covid-19 led to a closing of the courts to non-urgent hearings. This means that whilst matters have improved markedly, there is still a backlog to some extent leading to longer waiting times for contested cases. However on the whole the Council's enforcement function is not being detrimentally affected to any great degree
- Site Visits / Visits to properties whilst we stopped property visits for the majority of matters these have now resumed but initially took longer due to social distancing and the need for risk assessments
- Face-to-face meetings/visits these were discouraged during the first few months of 2021/22 due to social distancing requirements with the Contact Centre drop-in facility / reception re-opening in August 2021. The Reception at Nelson Town Hall is now open for business appointments only with all customer contact managed via No. 1 Market Street. Microsoft Teams is now widely used across the Council and provides an effective internal means of communication as well as facilitating meetings externally and slowly some face-to-face meetings are being re-instated
- Planning Enforcement This was largely suspended to provide some additional resource capacity to the Development Management Service. This service has now resumed
- Staffing levels / ability to recruit / lack of stability in key senior posts
- **5.5** The information above outlines how the Council's governance arrangements were impacted by the Covid-19 Pandemic. Despite the impact of the Pandemic, and its effect on the overall operation of the Council, work has been undertaken to maintain and review the effectiveness of the Council's Governance Framework. This includes the following matters



The Constitution was most recently reviewed in May 2018 at the Annual General Meeting of Council. The Council's Monitoring Officer and the Council in general oversee the operation of the Constitution to ensure its aims and principles are given full effect. The process to update the Council's Constitution in May 2020 to reflect any changes in governance arrangements following the move to reduce the number of councillors (from 49 to 33) was delayed as a consequence of the Covid-19 pandemic which resulted in the cancellation of elections in 2020. The elections have since been held in May 2021 and May 2022 and a corporate review of the Constitution will take place as part of the Corporate Peer Challenge Action Plan



- The Council's decision making arrangements operated according to the Constitution, either through the Council, Committees or the Scheme of Delegation Decisions arising from these arrangements have been published on the Council's website as required
- Following the expiry of the legislation supporting virtual meetings, the Council has returned for formal face-to-face Council meetings
- Despite the impact of Covid-19 on the capacity of the Council and its ability to respond to Freedom of Information requests, the Council continues to respond where possible in a timely manner to legitimate FOI requests as required
- The arrangements for scrutiny under the committee system operate via a Task and Finish Committee as required allowing for the review of key policy areas and

Following the expiry of the legislation supporting virtual meetings, the Council has returned for formal face-toface Council meetings

providing opportunities for public involvement in specific matters of business. Given the impact of Covid-19, during 2021/22 no Task & Finish Reviews were requested

- Further scrutiny of Policy and Resources Committee decisions is also provided by the Council's Call-In procedures. This is where any three members of the Council (representing at least two of the political groups) may sign and deliver to the Corporate Director a 'call-in notice' stating why they feel that the decisions should be considered further. Group leaders will then be consulted to obtain each of their views, potentially resulting in referral back to Policy & Resources Committee for re-consideration. There were 3 call-in notices instigated during 2021/22
- The Council has operated a Standards regime consistent with the requirements of the Localism Act 2011 during the year. There were no hearings of the Standards Board convened and no complaints which led to a finding of a breach of the Code of Conduct during 2021/22
- The Council continued to participate in a range of partnership arrangements during 2021/22 including a range of formal and informal partnerships. In particular, with the continuation of the Covid-19 Pandemic, the Chief Executive represented the Council on the Lancashire Resilience Forum (LRF) and a number of Council Officers were involved in the various groups and sub-groups established by the LRF
- A review of the Headline Actions in the Strategic Plan 2020/23 was undertaken during the year and these were approved by the Council and the Policy and Resources Committee. As part of this process, the additional strategic objective setting out how the Council will support the recovery of the Borough from the Covid-19 pandemic introduced in 2020/21 was retained

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- The Council's Performance Management Framework has operated effectively during the year with the exception of the performance framework for the Liberata contract. A review of the framework and the performance reporting processes is underway and we are currently testing the implementation of Performance Clinics to enable more focused discussions around service delivery and performance. Monitoring information on key areas of performance has been provided to Management Team / the Performance Clinics for review and action where this has been considered necessary. Performance Management information has also been reviewed by the Policy and Resources Committee
- The Liberata Performance Management Framework was suspended during 2020/21 due to the Covid-19 pandemic. Further to this and due to the continuing impact of Covid-19 there has been an inability to agree a small number of PI targets for 2021/22. However, the performance of the contract has continued to be reviewed and monitored on a regular basis, with information on key areas of performance being provided to Management Team / Performance Clinic Panel for review and action where this has been considered necessary. Performance Management information has also been reviewed by the Policy and Resources Committee
- The Council has embedded people management processes and procedures. In support of this, there is a Workforce Strategy in place. This has been approved by Management Team and shared with staff
- Because of the impact of Covid-19 on the Council's working arrangements and its overall capacity, it was not possible to conduct Performance Management Reviews as would normally be the case. It was envisaged that PMRs would be reinstated during 2021/22 subject to review of the procedures for conducting such reviews. Management Team have agreed that a new system is required and it is now

envisaged that this will be developed and implemented during 2022/23

- The Council published its annual Pay Policy in line with the statutory requirements of the Localism Act 2011, following approval by Council on 24th March 2022
- During 2021/22, there continued to be impacts on staffing across various services of the Council. This follows a national trend on difficulties in recruiting in certain roles, for example Environmental Health officers, Planning officers and waste collection vehicle drivers. Whilst the majority of vacancies have been filled, albeit in some cases on an interim / temporary basis, there are still vacancies unfilled which continue to have an impact on service delivery
- During 2021/22 the Council experienced vacancies in two of the three statutory officer posts, namely Chief Executive (Head of Paid Service) and Chief Finance Officer (S151 Officer). This posed significant risk to the Council in terms of the resilience and stability of the organisation. To mitigate the risk as much as possible an Interim Chief Finance Officer was brought in to assist with capacity and take on the role of Section 151 Officer whilst the recruitment of a permanent replacement was concluded. This arrangement was in place until November 2021 when the permanent appointment to the role was fulfilled and a satisfactory hand-over completed. In addition to this the Corporate Director assumed the duties of Deputy Chief Executive following the departure of the previous post holder. Rose Rouse joined the Council as new Chief Executive in October 2021
- In addition to this the Finance Team continued to be the subject of high staff turnover which has posed a risk in terms of the resilience of the team and the delivery of the service. However, a restructuring and major recruitment programme was undertaken to address these issues, with suitably qualified interims

being appointed to provide capacity to ensure continued delivery of the service. All substantive posts have now been filled

- Organisational resilience has been challenging during the last two years given the impact of Covid-19 pandemic. A number of staff contracted the disease and were either required to take sick leave to recover or to self-isolate to prevent the spread of the disease. To support the Council's staffing resource with their physical and mental health well-being, a range of health and well-being advice, guidance and services was made available. This was supplemented by health and safety training which was delivered via an online solution by Praxis42 called SHINE which is now in use at Pendle. This has now been replaced by a system called iHASCO
- Regular reports on the Council's Corporate Governance arrangements, as required by the Local Code of Corporate Governance, have been submitted to both the Policy and Resources Committee and the Accounts and Audit Committee during the year as appropriate. Indeed, the Council's corporate governance arrangements have been under regular review by the Corporate Governance Working Group which has reported regularly to the Council's Management Team
- The Council's Strategic Risk Register has been maintained under review during the year and updated periodically. Risk management matters have been considered by the Management Team, the Corporate Governance Working Group and by Policy and Resources Committee. To ensure Councillors are aware of the Council's key risks details of the key risks are periodically reported to Policy and Resources Committee and the Accounts and Audit Committee. A review of the Council's Risk Management Strategy and Policy Statement was adopted by the Council and a training programme is being planned. A comprehensive review of the Council's Strategic Risk Register is also underway
- The Accounts and Audit Committee continued to meet throughout the year and received various reports on the progress by External and Internal Audit against their respective work plans
- The Internal Audit service was outsourced to MIAA in March 2020, an arrangement that will remain in place until at least 31st March 2024. As part of this

service MIAA are required to provide the overall opinion on the adequacy of internal controls of the Council. The overall opinion expressed by MIAA for 2021/22 stated

The overall opinion for the period 1st April 2021 to 31st March 2022 provides Moderate Assurance that there is an adequate system of internal control; however, in some areas weaknesses in design and / or inconsistent application of controls puts the achievement of some of the organisation's objectives at risk."

- During the year, the Accounts and Audit Committee agreed an Internal Audit Charter. This is a mandated requirement of the Public Sector Internal Audit Standards and is a formal document that defines internal audit activity, authority and responsibility;
- Internal Audit completed 12 scheduled audits in the year. All high risk and key financial systems were audited with three 'Substantial Assurance' and four 'Moderate Assurance' opinions being returned. There were four 'Limited Assurance' opinions returned relating to the Main Accounting System (2020/21), Creditors and Purchasing (2020/21), ICT Strategy (infrastructure project) and Emergency Preparedness (draft). A review on Conflicts of Interest was undertaken on which MIAA reported that this did not require an opinion at this time and a full review would be conducted at a later date. Internal Audit will work with Management to address the weaknesses identified in these audits and progress will be reported to the Accounts and Audit Committee
- The Accounts and Audit Committee approves updates to the Anti-Fraud, Theft and Corruption Policy, the Anti-Money Laundering Policy, the Anti-Bribery Policy and the Whistleblowing Policy during the year. Details of these updated Policies are made available to all staff via a Message of the Day



• The internal audit function, delivered by Mersey Internal Audit Agency, underwent an External Quality Assessment of Conformance to the Public Sector Internal Audit Standards by CIPFA. The report produced in November 2020 provided the following opinion

It is our opinion that MIAA's selfassessment is accurate and, as such, we conclude that MIAA FULLY CONFORMS to the requirements of the Public Sector Internal Audit Standards.'

- No instances of internal fraud were reported during the year
- . The Information Governance Working Group (IGWG) meets frequently to consider issues such as: Subject Access Request procedures; Data Retention Policy; review and consolidation of IT Policies; Data Privacy Impact Assessments (DPIAs); GDPR Staff Training; Internal Audit findings; monitoring reports from the Data Protection Officer (DPO) and Information Governance arrangements within key partner organisations. The Group will continue to meet to oversee the Council's information governance arrangements, to review and update the Action Plan and, where necessary, report back to Management Team and CGWG. In particular, reflecting the impact of Covid-19, the IGWG supported the issue of updated IT security advice on the commencement of home working arrangements and regular employee briefings
- The Council provides staff with online Cyber / Information Security and GDPR training, ensuring regular updates on information security and governances for all staff using ICT. A decision was taken to procure a new training platform during 2021/22 to refresh the training provided and to also incorporate a phishing tool. The new system is called KnowBe4, and despite delays in procuring the system due to resource issues, this has now been launched. The first modules issued were selected to ensure staff were given a sound refresh on the key areas, these were An Introduction to the General Data Protection Regulations (GDPR) and Security Awareness Fundamentals



- The Council's external auditor, Grant Thornton UK
 LLP, audited the year-end Statement of Accounts
 and assessed our arrangements for securing value for
 money. The Auditor's Annual Report for 2020/21 sets
 out three key Recommendations as well as a number
 of Improvement Recommendations all of which
 are listed in this document from Page 20 onwards.
 This includes the Council's response to these
 recommendations.
- The Council has in place robust reporting arrangements on the financial affairs of the Council. Regular Strategic Monitoring reports were submitted to both Management Team and the Policy and Resources Committee during the year. Reports were also produced on the Council's Medium Term Financial Plan and Financial Strategy and these were used to inform the budget and Council Tax setting process
- The Council's Business Continuity Plans are in place and were updated during 2020/21 reflecting the changes to the Council's response to the Covid-19 pandemic. Further review and update of these plans were conducted as required throughout 2021/22. These plans consist of
 - a Business Continuity Policy and Strategy
 - a Strategic Crises Management Plan
 - a Local Crisis Management Plan for each main office location and Fleet Street Depot
 - a Business Recovery Plan for critical services.
- The Council's Business Continuity and Disaster Recovery arrangements are due to be subject to a scheduled desktop test during July 2022. This test will simulate the loss of the Council's financial system, testing the recovery of the servers from a backup on the replicated infrastructure at the DR site (Fleet Street Depot)
- The Council and Liberata IT Services have also made significant headway in the delivery of the Cyber Treatment Plan (CTP). This plan targets constructive change in reducing the cyber risk to councils in the face of rapidly increasing and changing cyber threats via funding and support provided by DLUHC (formerly MHCLG) Cyber Resilience Fund and the LGAs Local Digital Team.

- 5.6 As in previous years, each member of the Council's Management Team has completed an Assurance Statement in relation to a range of key controls that operated in their Service Area during 2021/22. Issues arising from these Statements are either reflected in this Statement or are not considered material
- **5.7** There have been no formal reports during the year from either the Council's Monitoring Officer or Section 151 Officer on matters of legality or financial related concerns. There were also no objections from local electors in respect of the financial statements and supporting information for the previous financial year
- **5.8** The Council has also commenced work on the transformation of critical services in order to support the Council's medium term financial strategy requirements.

6. Significant Governance Issues

- 6.1 It is stressed that no system of control can provide absolute assurance against material misstatement or loss. This Statement is intended to provide reasonable assurance.
- 6.2 Last year's Annual Governance Statement highlighted the following areas for improvement. Regular updates on the progress in addressing these issues have been reported to Management Team and Policy & Resources Committee throughout the year and the narrative below sets out the action which has been taken to address these issues:



Issue No 1 – Covid-19 Response & Recovery

The post-incident review in liaison with the Lancashire Resilience Forum will be the driver for future action on assessing the impact of the pandemic, both internally and externally to the Council.

Issue No 2 - The scale of savings required over the medium term continues to represent a significant challenge for the Council. There is a need to prioritise resources effectively and identify detailed savings options for the Council to consider as part of a strategy to achieve a balanced budget over the medium term.

The 2021 Autumn Spending Review set out three year Department Expenditure Limits for Government Departments but the Local Government Settlement covered just 1 year (2022/23).

The outcome of the Fair Funding Reviews is still unknown and there remains a high degree of funding uncertainty within the Medium Term Financial Plan.

An update on the MTFP 2022/25, Initial Budget Savings Options 2022/23 and Income Review 2022/23 was presented to Policy & Resources Committee on 25 November 2021 and confirmed by Council at their meeting on 9 December 2021. The General Fund Revenue Budget 2022/23, the Capital Programme 2022/23 and Council Tax Resolution were confirmed by Council at their meeting on 24 February 2022.

The Council's Transformation Agenda has also been approved by the Council at this meeting with the aim to identify and deliver efficiency and service improvement opportunities that align to the Council's MTFP. An Interim Transformation Director is now in place and the Transformation Programme is underway.

Issue No 3 - Embedding the Information Governance Framework into the Council's normal governance arrangements

Monthly meetings of the Information Governance Working Group (IGWG) continue to take place during which the action plan is actively reviewed, monitored and updated, with future actions being agreed and delivered as resources allow. Updates on progress and identified issues are reported to Management Team and the Corporate Governance Working Group as required.



Issue No 4 – Disaster Recovery – review and testing of local arrangements including designated recovery site

Due to the coronavirus pandemic and the implementation of home working arrangements, the testing of the physical arrangements for the new Disaster Recovery (DR) site were postponed until such time as staff return to the workplace.

A failover test is now being planned to take place in early July 2022 which will simulate the loss of the Council's financial system, testing the recovery of the servers from a backup on the replicated infrastructure at the DR site (Fleet Street Depot).

The Council also received Cyber Resilience Funding from HMCLG to enable the implementation of an agreed Cyber Transformation Plan, the aim of which is to minimise cyber risks exposure and enhance council recovery capability. This programme of improvements is now well underway with the majority of actions already completed. The majority of those actions remaining are due to be completed during 2022.

Issue No 5 – Performance Management Framework for Liberata Contract Services

A further suspension of the performance framework with Liberata was agreed for the period April – June 2021, given the continued impacts of the pandemic. Whilst a small number of the performance measures were agreed prior to 1 July 2021, the majority were not despite the Council's best efforts. All Indicators need to be agreed in order for the framework to be signed off. Due to delays in getting the targets approved, the issue was reported to the Joint Partnership Board at their July 2021 meeting. It was agreed that these targets needed to be discussed further between Liberata and Council officers and the progress reported back. Unexpected absence of key staff members and changes in management have result in further delays in this process throughout the year with a small number of targets not having been able to be agreed. For example, collection rates continue to be subject to volatility post pandemic, with further issues such as a the cost of living crisis also bearing down.

Whilst performance reporting and monitoring has continued with respect of all performance measures, a review of the performance management framework / contract is also being considered / explored by the Council's temporary Transformation Director as part of the Transformation Agenda.

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Issue No 6 – Performance Management Reviews (PMRs will need to be reinstated during 2021/22)

The PMR process was under review with the NWEO, with delays being experienced which are out of the control of the Council / Liberata. The review has now been progressed by the Organisational Development Director from Lancashire County Council, the findings of which have been presented to the Management Team. A new employee PMR process is being investigated with a view to implementation during the year. In the meantime, informal reviews are being undertaken between Managers and individual staff members.

Issue No 7 – Recruitment of Chief Executive and Chief Finance Officer

Appointments to both posts were made in August 2021.



Issue No.	Issue Identified	Source of Evidence	Summary of Action Proposed
1	Formal Performance Management Reviews (PMRs) reinstated	PMRs completed and PDPs developed for all staff	A review of the PMR process is currently being undertaken. It is anticipated that a new process for conducting reviews will be implemented during the year
2	External Audit recommend acute attention is given to the Medium Term Financial Plan to address the shortfall in funding identified in future years	Issue highlighted in Council Tax Setting Report in March 2022 MTFP Budget planning Financial stability / sustainability	A Transformation Programme has been established to look for savings in the short, medium and long term to address the financial risks facing the Council
3	The Council has had numerous finance staff changes through the various levels of the finance team over the last 18 months. The Council needs to ensure staff changes are minimised so controls can operate as expected and required	No material errors in the Financial Statements identified Permanent staff members appointed into vacant roles	As a priority ensure all key positions within the Finance function are filled and work is undertaken to transfer knowledge and skills across all staff within the service
4	Lack of appropriate forms of consultation and engagement in place with the local community and stakeholders, such as residents, businesses and voluntary sector when reviewing and developing the Council's budget and spending	Research and consultation findings / reports Corporate Plan 2023-2027	The Council will put in place appropriate forms of consultation and engagement aligned to the development of the Corporate Plan 2023-2027. This will include elements of budget consultation with the local community and stakeholders
5	There is currently no formalised savings plan in place at the Council although savings are identified these are removed from the budget	Formal Savings Plan in place with regular reviews of progress made with it	Savings will be identified by the Transformation programme and reported through that process but the key reports will be the Budget Monitoring reports which will be reported through Policy & Resources Committee
6	No sensitivity analysis or scenario planning is undertaken whilst updating the MTFP	Better informed decisions taken	The MTFP will be developed and will take account for sensitivity testing across variation factors such as pay inflation, general inflation, cost of borrowing, collection rates

Issue No.	Issue Identified	Source of Evidence	Summary of Action Proposed
7	No distinction is made in the financial information reported to those charged with governance between statutory and discretionary spending	If this approach is agreed, the different categories of spending will be clearer where it is possible to do so	The Council will consider this approach, however, this is not always a clear cut issue as the point at which statutory functions start and discretionary begins is blurred. It does not always aid officers and members to look at spend in this way but this analysis is available
8	The Council's budget should align to wider service improvement priorities	Poor performing areas will be developed so they can meet the required performance levels. Reports and minutes from meetings	Performance Reviews take place via Quarterly Performance Clinics to identify poor performance and allow specific targeting of resources where necessary. The budget setting process will be aligned with the development of the Corporate Plan 2023 – 2027
9	Lack of timely and sufficiently detailed budget monitoring information provided to members in order to support them in their decision making	Regular reports and minutes. PMR records	Revenue and Capital Budget Monitoring will be reinstated during 2022/23 and reported both to officers and members
10	Refresh of the Council's Strategic Risk Register and Risk Training is overdue	New Strategic Risk Register developed. Regular and improved reports provided. Record of Risk Training completed	The Council will complete the review of the current risk register which has already commenced and is part of the service planning process for 2022/23, ensuring that the risks included and scores assigned are relevant and meaningful. This will be externally reviewed and incorporated in the planned Risk Management Training (see below) to further refine the register Risk Training is in the process of being developed and is expected to be delivered the first week of September 2022 Improved reporting mechanisms will be developed to enable effective information sharing with Members thus enhancing the decision making process

lssue No.	Issue Identified	Source of Evidence	Summary of Action Proposed
11	Member and officer training to be resumed and kept up to date	Training records PMRs	Halted training programmes to be re-established
12	No evidence of review from either management or the monitoring officer of the Gifts and Hospitality Register	Evidence of regular review via reports to the Corporate Governance Working Group / Account & Audit	The Council will ensure that the register of gifts and hospitality is regularly reviewed by the Monitoring Officer and that this can be evidenced satisfactorily
13	Lack of assurance over data quality of performance reporting information	Data Quality Strategy regularly reviewed Internal Audit Review Reports	Internal Audit to incorporate reviews of performance information into their work plan to help provide assurances to Members of the quality of the data being used in their decision making process, where identified as necessary
14	Although recommendations are made on audit reports, progress is not reported on until the next review. Internal Audit progress reports include a summary of recommendations; however, this can be enhanced so members are unable to monitor how progress is being made in the meantime	Improved reporting to members	The Internal Audit Plan for 2022/23 has already been agreed but this will be fed into discussions for future Internal Audit reviews
15	The Council has the highest level of borrowing amongst the Lancashire districts and does not tie in with the Council's Capital Programme	Financial statements	A review of the capital programme for 2022/23 and beyond will be carried out to ensure that the level of borrowing is set at an appropriate level and in line with the capital financing requirement
16	The Council has recently completed a Corporate Peer Challenge and the findings of the review need to be addressed in a timely manner and progress reported to members	Peer review findings and recommendations Action Plan developed Progress reports to members	An action plan is currently in development. The Council will ensure the peer review findings are actioned on a timely basis, with progress reviewed on a regular basis by Management Team and members

5.4 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 have been identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review.



Rose Rouse

Rose Rouse Chief Executive



V. Shined

Councillor Nadeem Ahmed Leader of the Council

June 2022

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