BRENT COUNCIL
ANNUAL GOVERNANCE STATEMENT
2008/09

1   Scope of responsibility

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

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

1.3   The Council has approved and adopted a code of corporate governance, which is consistent with the principles of the CIPFA/SOLACE Framework *Delivering Good Governance in Local Government*. A copy of the code is contained in the council's Constitution and can be found on our website at http://www.brent.gov.uk/Democracy.nsf/.

1.4   This statement explains how the Council has complied with the code and also meets the requirements of regulation 4(2) of the Accounts and Audit Regulations 2003 as amended by the Accounts and Audit (Amendment) (England) Regulations 2006 in relation to the publication of a statement on internal control.

2   The purpose of the governance framework

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

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 or objectives and can, therefore, only provide reasonable and not absolute assurance of effectiveness. 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 of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.

2.3   The governance framework has been in place at the Council for the year ended 31st March 2009 and up to the date of approval of the statement of accounts.

3   The governance framework

3.1   The key elements of the systems and processes that comprise the Council's governance arrangements are set out over the following pages against the six core principles upon which the CIPFA/SOLACE Framework is based. The six core principles being as follows:

1.   Focusing on the purpose of the Authority and on outcomes for the community and creating and implementing a vision for the local area;

2.   Members and officers working together to achieve a common purpose with clearly defined functions and roles;

3. Promoting values of the authority and demonstrating the values of good governance through upholding high standards of conduct and behaviour;

4. Taking informed and transparent decisions which are subject to effective scrutiny and managing risk;

5. Developing the capacity and capability of members and officers to be effective; and

6. Engaging with local people and other stakeholders to ensure robust public accountability.

3.2 Each of these core principles are broken down into a number of supporting principles and these are used by the Council on an annual basis to review and summarise the key elements of the overall governance framework, as well as to identify specific actions needed to address any weaknesses and/or to achieve further improvement in the year ahead. The full arrangements for reviewing the effectiveness of the governance framework are detailed in section 4 of this statement.

3.3 For the purposes of linking the 2008/09 statement back to that made at the end of 2007/08, the following table cross references the six core principles to the headings previously used to describe the key elements of the governance arrangements.

Core Principle	Previous Heading
1	Identifying and communicating the Council's vision and intended outcomes for citizens and service users.
	Reviewing the vision.
	Measuring service quality and ensuring best use of resources.
2	Defining roles.
3	Standards of behaviour.
	Decision making.
4	Internal control and risk management.
	Audit arrangements.
	Compliance with statute and internal policies and procedures.
	Whistle-blowing and Complaints.
5	Training and development.
6	Communication and consultation.
	Partnerships.

3.4 The tables over the following pages provide an overview of the key elements of the governance arrangements against the six core principles, together with any actions to be focussed upon during the 2009/10 financial year.

CORE PRINCIPLE 1 - Focusing on the purpose of the authority and on outcomes for the community and creating and implementing a vision for the local area		
The local code should reflect the requirements for local authorities to:	Position at March 2009	Actions Needed to Address Weaknesses and responsible officer
1. Develop and promote the authority's purpose and vision	In November 2006 the Council agreed its new Corporate Strategy for the following four year period. The aims and targets set out in the Strategy are consistent with those set out in the partnership Community Strategy and have been used to support the development of the Local Area Agreement (LAA) 2008. The priorities of the Corporate Strategy are regularly promoted via The Brent Magazine, the website, press releases and targeted campaigns. At service area level, service priorities are extensively consulted on with users and other relevant stakeholders. Service Plans are presented annually to Lead Members prior to finalisation.	
2. Review on a regular basis the authority's vision for the local area and its impact on the authority's governance arrangements	Implementation of the Corporate Strategy is regularly monitored by the Executive and the LAA by the Local Strategic Partnership (LSP). Implementation of Service Plans at service area level are monitored throughout the year by Departmental Management Teams (DMTs) using a range of embedded systems and processes.	
3. Ensure that partnerships are underpinned by a common vision of their work that is understood and agreed by all parties.	The introduction of the LAA in April 2006 provided the opportunity to review the governance arrangements and operational effectiveness of our LSP and partnership structures. A mapping of partnership activity was undertaken and a framework and guidance on effective partnership working adopted by the LSP. The Council and its partners on the LSP have been through an extensive consultation and challenge process to identify the 35 priorities for inclusion in their new LAA for 2008 onwards. These have now been agreed by the partnership and reviewed by the membership. At service area level, objectives of partnerships are documented in the Service Plans and within contract documentation.	
4. Publish an annual report on a timely basis to communicate the authority's activities and achievements, its financial position and performance.	A joint review of performance and summary of accounts has been produced annually over the last two years. Progress against the Corporate Strategy was published in August 2008 as part of The Brent Magazine, and will continue to be published annually.	
5. Decide how the quality of service for users is to be measured and make sure that the information needed to review service quality effectively and regularly is available.	The Corporate Strategy sets out specific improvement targets across the range of council services. These are reflected in our new LAA priorities, and also within Service Plans, and are monitored through the corporate PerformancePlus system. Performance reports on all Council and partnership improvement priority areas are reported to the Executive and the CMT on a quarterly basis. Significant improvements in monitoring of shared Community Plan objectives have taken place with quarterly monitoring reports on the LAA targets being considered by both the LSP and the	

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	Public Services Board. Key targets continue to be monitored through the Improving Brent Action Plan 2007-2010. At service area level, additional mechanisms are in place to monitor the quality of service being delivered, be this directly or through partner organisations. The annual Residents Attitude Survey is a further source of information regarding service users' satisfaction with the services being provided.	
6. Put in place effective arrangements to identify and deal with failure in service delivery.	Potential service failure is identified through the PerformancePlus system and Service Plans. These are regularly reviewed and referred to High Level Monitoring for a corporate response and remedial action. Performance issues in relation to specific partner organisations / contractors are dealt with at service area level in accordance with agreed contract management procedures. Issues are escalated as appropriate.	
7. Decide how value for money is to be measured and make sure that the authority or partnership has the information needed to review value for money and performance effectively. Measure the environmental impact of policies, plans and decisions.	The Improvement & Efficiency Strategy was published during 2008/09 which set out the framework for improving value for money and performance over the next four years. A comprehensive benchmarking exercise of the Council's services was undertaken in conjunction with RSe Consulting. The results of this work led to the identification of areas to be included in the first wave of service reviews as part of the Improvement and Efficiency Strategy. Additional benchmarking of services included CIPFA benchmarking clubs for support services and a comparative review of efficiency savings and service costs with Hounslow and Hammersmith & Fulham Councils. Arising from one of the recommendations of the One Council Finance review Deloitte MCS Ltd have benchmarked the cost of the finance function. This will inform their recommendations for the future structure and operation of finance across the Council. The corporate Efficiency Board measures progress on the efficiency programme which underpins the Efficiency Strategy. The council monitors progress on delivering government efficiency targets set under the Gershon initiative and also has an included a stretch efficiency target under its Phase 1 Local Area Agreement. The council now brings together finance, activity and performance monitoring in a single performance and finance review report which enables officers and members to have a more holistic view of progress across the council on Value for Money. In addition, development of a value for money tool-kit for managers is one of a range of measures to support managers delivering better value for money. Unit costs are also used to measure progress in key areas e.g. on the children's transformation agenda.	Delivery of the identified Improvement & Efficiency reviews. (Brent Excellence Support Team Program Manager)

CORE PRINCIPLE 2 - Members and officers working together to achieve a common purpose with clearly defined functions and roles		
The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
1. Set out a clear statement of the respective roles and responsibilities of the executive and of the executive's members individually and the authority's approach towards putting this into practice.	Article 2 of the Constitution describes the role of Members of the Council, the Executive, Mayor, Full Council and overview and Scrutiny. Members completed annual reports which were published on the website although reports were not received from all Members.	Members will continue to be encouraged to submit annual reports. (Member Development Manager)
	Up to date job descriptions are in place for Senior Officers. Monitoring Officer Advice Notes give advice to Members on decision making and standards of conduct. Local Democracy and Standards WebPages are updated regularly.	
	All non-confidential reports and Minutes are now on the Internet.	
	All Executive decisions and key decisions by officers are recorded	
2. Set out a clear statement of the respective roles and responsibilities of other authority members, members generally and of senior officers.	Roles and responsibilities are covered in the Constitution. Draft job descriptions were not formally adopted by Members however these are now to be reviewed by Constitutional Working Group (CWG).	Job profiles to be developed for key post holders. (Member Development Manager)
	Up to date job descriptions are in place for Senior Officers.	
3. Determine a scheme of delegation and reserve powers within the Constitution, including a formal schedule of those matters specifically reserved for collective decision of the authority taking account of relevant legislation and ensure that it is monitored and updated when required.	Clearly set out in the Constitution. The Legislation Tracker shows which CMT member is responsible for implementation of emerging legislation.	
	The Borough Solicitor maintains a register of officer authorisations. The Constitution is renewed and reported to full Council every May.	
4. Make a chief executive or equivalent responsible and accountable to the authority for all aspects of operational management.	Covered in the Constitution and job descriptions.	

CORE PRINCIPLE 2 - Members and officers working together to achieve a common purpose with clearly defined functions and roles		
The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
5. Develop protocols to ensure that the leader and chief executive (or equivalent) negotiate their respective roles early in the relationship and that a shared understanding of roles and objectives is maintained.	Chief Executive and Leader agreed respective roles following election in May 2006 and continue to meet on a weekly basis.	
6. Make a senior officer (usually the section 151 officer) responsible to the authority for ensuring that appropriate advice is given on all financial matters, for keeping proper financial records and accounts, and for maintaining an effective system of internal financial control.	Covered in the Constitution and job description.	
	Covered by statute and Financial Regulations.	
	All reports have to be cleared by the Director of Finance & Corporate Resources. Director attends all Leader's briefings and meetings of the Executive and full Council.	
	Independent assurance on the adequacy and effectiveness of the overall systems of internal control, including internal financial control, is provided by the Council's external auditors, internal auditors and a number of other external bodies / inspectorate. Both the internal and external auditors report to the Audit Committee on a quarterly basis.	
7. Make a senior officer (other than the Responsible Financial Officer) responsible to the authority for ensuring that agreed procedures are followed and that all applicable statutes, regulations are complied with.	Covered in the Constitution and job descriptions.	
	Covered by statute and Financial Regulations.	
	All reports have to be cleared by the Borough Solicitor who attends all Leader's briefings and meetings of the Executive and full Council. A lawyer also attends all other committee meetings and is responsible for issuing the legislation tracker, monitoring officer advice notes and legal bulletins.	
8. Develop protocols to ensure effective communication between members and officers in their respective roles.	These are Covered in Part 7 of the Constitution and in the Access to Information protocol.	
9. Set out the terms and conditions for remuneration of members and officers and an effective structure for	The scheme of Member allowances has been reviewed by the CWG and there have been two interim reports recommending changes to the allowances scheme. As at the end of March 2009, the scheme was subject to a further review. This has since been reported to Full Council in May 2009.	

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managing the process including an effective remuneration panel (if applicable).	The new appraisal scheme and revised management competencies have been implemented.	
10. Ensure that effective mechanisms exist to monitor service delivery.	The PerformancePlus system is now fully operational across the Council and a standard service planning template with detailed target setting was introduced in 2007.	
	An integrated quarterly Performance and Finance monitoring report is now produced. This is reviewed by the Executive, CMT and the Performance & Finance Select Committee.	
	Partners have had direct access to PerformancePlus during 2008 to monitor shared LAA objectives.	
11. Ensure that the organisation's vision, strategic plans, priorities and targets are developed through robust mechanisms, and in consultation with the local community and other key stakeholders, and that they are clearly articulated and disseminated.	2008 Place Survey completed. Consultation on the Organisation's vision, strategic plans and priorities is undertaken through a number of established consultation mechanisms. These include five area consultative forums, six service user consultative forums, the Brent Youth Parliament and the Brent Citizens' Panel. Recruitment to the Citizens' Panel through the Place Survey took place during 2008. Panel membership now stands at 2,000. The outcomes of consultation are fed back through the Consultation Portal website.	2009 Residents' Attitude Survey has been commissioned. Findings to be reported on by August 2009. (Head of Consultation) Further development work on continuous panel recruitment linked to consultation database. (Head of Consultation)
12. When working in partnership ensure that members are clear about their roles and responsibilities both individually and collectively in relation to the partnership and to the authority.	The term 'partnership' is now defined in the Constitution. Following a review of partnership activity in Brent, a set of protocols and guidelines for the operation of joint working was agreed by the LSP in early 2007. This document covers roles and responsibilities, protocols for financial administration and staff management. In January 2008 a partnership conference was held in Brent, addressed by the Local Government Ombudsman, to consider the issue of complaints within partnerships. We are now working on proposals for the handling of complaints within partnership services.	To further develop and formalise arrangements for the handling of complaints in relation to services operated by partner organisations. (Corporate Complaints Manager)
13. When working in partnership: ensure that there is clarity about the legal status of the partnership	So far guidance has been given on specific projects such as LAML, South Kilburn Neighbourhood Trust, WLA Joint Procurement Unit and other WLA initiatives.	With the increasing number of services delivered jointly within the LAA we will be looking at the appropriate legal structures and will

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The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
ensure that representatives or organisations both understand and make clear to all other partners the extent of their authority to bind their organisation to partner decisions.		provide guidance when required. (Borough Solicitor and Director of Policy & Regeneration)

CORE PRINCIPLE 3 - Promoting values for the authority and demonstrating the values of good governance through upholding high standards of conduct and behaviour		
The local code should reflect the requirements for local authorities to:	**Review January to March 2009**	**Actions Needed to Address Weaknesses and responsible officer**

CORE PRINCIPLE 3 - Promoting values for the authority and demonstrating the values of good governance through upholding high standards of conduct and behaviour		
The local code should reflect the requirements for local authorities to:	**Review January to March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
1. Ensure that the authority's leadership sets a tone for the organisation by creating a climate of openness, support and respect.	Executive members have undertaken a range of training including media and presentation skills and key members have had support from an external mentor. This will be ongoing. IDeA have been engaged to provide peer support to Liberal Democrat executive members with a specific brief to work on team working and communication within the Executive and within the political groups. The Member Code of Conduct includes the 10 general principles of conduct, including respect for others, leadership and stewardship. The Constitution contains the Planning Code of Practice, Licensing Code of Practice, Code of Practice on Publicity and the protocol for Member Officer Relations. Members and Chief Officers work collaboratively on the Policy Coordination Group, Leader's Briefing, Service Planning and Budget Awaydays. The Leader meets weekly with the Chief Executive and also addresses the Corporate Roadshows and the Senior Managers Conference.	The importance of securing a climate of openness, support and respect will be emphasised in the job profiles for Members once adapted. (Borough Solicitor)
2. Ensure that standards of conduct and personal behaviour expected of members and staff, of work between members and staff and between the authority, its partners and the community are defined and communicated through codes of conduct and protocols.	A new Code of Conduct for Officers was agreed in 2005. Other codes, including the IT Usage Policy and Harassment Policy are all held on the intranet and are subject to regular review. Staff are made aware of their responsibilities through general communications, such as the Chief Executive Newsletter, Insight Magazine and via attachments to payslips, as well as at team briefings. The Improving Brent Programme sets out the requirement for having the highest standards of ethical behaviour across the organisation. New Anti-Fraud Framework, replacing the earlier 2003 framework, was publicised and issued in February 2008. Work is ongoing on raising staff and member awareness through training presentations.	
	The Brent Member Code of Conduct reflects the model code published by the government, having been reviewed and amended in September 2007.	
3. Put in place arrangements to ensure that members and employees of the authority are not influenced by prejudice, bias or conflicts of interest in dealing with different stakeholders and put	Review of Members' and officers' gifts and hospitality completed and reported to Standards Committee and Director of HR. The Constitution contains various other codes including: Licensing, Planning, Member Officer Relations. Advice notes are issued by the Borough Solicitor regarding conduct.	
	The registers of Members' interests and Members' gifts and hospitality are now placed on the web site enabling easy public access.	

CORE PRINCIPLE 3 - Promoting values for the authority and demonstrating the values of good governance through upholding high standards of conduct and behaviour		
The local code should reflect the requirements for local authorities to:	Review January to March 2009	Actions Needed to Address Weaknesses and responsible officer
in place appropriate processes to ensure that they continue to operate in practice.	Declarations of Interest for staff are required to be completed by designated staff upon commencement of employment with the authority, or at the point of progression to a relevant grade. Staff have a responsibility to inform the authority of any changes to their original declaration as appropriate. Declarations are reviewed at service area level when completed so as to allow management to make arrangements to avoid any potential conflicts. Previously there has been no formal process in place regarding how this review should be undertaken or the required frequency of review. However, the conflict of interest policy has recently been updated, including a proposed amendment to clarify the position regarding officers with other contractual relationships with the Council.	CMT to approve the updated conflict of interest policy and guidance. Formal guidance to then be produced and approved regarding the review of declarations of interest by service areas. (Assistant Director, HR / Borough Solicitor)
4. Develop and maintain shared values including leadership values both for the organisation and staff reflecting public expectations and communicate these with members, staff, the community and partners.	The Member Code of Conduct includes reference to Leadership and Stewardship and other values. A new Code of Conduct and competency framework has been developed for managers and staff together with a management charter which all set out the expected behaviours for officers, including Leadership and working with others.	
5. Put in place arrangements to ensure that procedures and operations are designed in conformity with appropriate ethical standards, and monitor their continuing effectiveness in practice.	Standards of conduct for Members are set out in the Constitution.	
	Protocol for Member/officer relations is set out in Constitution.	
	Standards Committee has remit to monitor compliance.	
6. Develop and maintain an effective standards committee.	The terms of reference for the Standards Committee are set out in the Constitution. The Committee has an independent chair and vice chair. The Committee has an annual work programme and is supported by the Borough Solicitor.	
7. Use the organisation's shared values to act as a guide for decision making and as a basis for developing positive and trusting relationships within the	The organisation's shared values are reflected in various policies and procedures, such as the Planning Code of Practice and its Access to Information Rules, both which encourage transparent, informed and well reasoned decision making. These are reinforced by the guidance notes issued to memebrs from time to time in the form of Monitoring Officer Advice Notes and in legal bulletins. There have in the past been very few complaints to the Standards Board and this reflects the clear emphasis on high standards of ethics and probity and strong decision making arrangements.	Organisational values to be developed and embedded with staff and managers involved to ensure shared ownership and buy-in. (Assistant Director, HR)

CORE PRINCIPLE 3 - Promoting values for the authority and demonstrating the values of good governance through upholding high standards of conduct and behaviour		
The local code should reflect the requirements for local authorities to:	**Review January to March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
authority.	The Corporate Strategy also includes clear corporate values for the Council. However, as part of the new drive for a one council culture the need for clear internal or organisational values has been identified.	
8. In pursuing the vision of a partnership, agree a set of values against which decision making and actions can be judged. Such values must be demonstrated by partners' behaviour both individually and collectively.	As part of the process for agreeing the 35 improvement priorities for the LAA partners, there is a commitment to a number of values around addressing inequality, focusing on preventative actions and delivering value for money through the LAA. They have also signed up to a 'Compact Agreement' setting out the principles for partnership working and how they engage with the voluntary and community sector.	

CORE PRINCIPLE 4 - Taking informed and transparent decisions which are subject to effective scrutiny and managing risk Taking informed and transparent decisions which are subject to effective scrutiny and managing risk

The local code should reflect the requirements for local authorities to:	Position at March 2009	Actions Needed to Address Weaknesses and responsible officer
1. Develop and maintain an effective scrutiny function which encourages constructive challenge and enhances the organisation's performance overall and of any organisation for which it is responsible.	The Executive are responsible for the implementation of policy and ensuring the effectiveness of service delivery.	
	Scrutiny is responsible for monitoring the performance of the Executive.	
	Key targets continue to be monitored through the Improving Brent Action Plan 2007-2010. The Improving Brent Action Plan 2007-2010 sets out the key actions and priorities derived from the Corporate Strategy and is supported by a detailed monitoring report which is assessed every six months by the Corporate Management Team and the Executive against the agreed targets.	
	The Improving Brent Action plan includes enabling elected members to scrutinise effectively the decision-making and performance of the Council through robust Scrutiny and Overview arrangements. The Chair of Overview and Scrutiny is given an opportunity to report back to every full Council meeting. Call in arrangements in the Constitution allows Overview and Scrutiny to review decisions made by the Executive. Forward Plan Select Committee is able to scrutinise decisions before they are made.	
2. Develop and maintain open and effective mechanisms for documenting evidence for decisions and recording the criteria, rationale and considerations on which decisions are based.	Decision making arrangements are set out in the Constitution. The Council operates a Leader and Cabinet (Executive) model of decision making. Although some decisions are reserved for Full Council, most are made by the Executive or by committees, sub-committees or officers. There are currently no decision making powers delegated to individual Members. In accordance with the Local government Act 2000, the Council has mechanisms in place to allow the effective, independent and rigorous examination of the proposals and decisions by the Executive. These mechanisms involve the Overview and Scrutiny process including call-in and question time. The conduct of the Council's business is governed by the Constitution, which includes Standing Orders and Financial Regulations.	
	Decision making meetings of the Executive are open to the public.	
	Copies of reports and decisions are available on the intranet and through the One Stop Shop and Libraries.	
	All meetings are clerked by well trained and experienced committee support officers and lawyers are present to provide advice on law and procedure.	
3. Put in place arrangements to safeguard members and employees against conflicts of interest and put in place appropriate processes to ensure that they continue to	Review of Members' and officers' gifts and hospitality completed and reported to Standards Committee and Director of HR.	
	The registers of Members' interests and gifts and hospitality are now placed on the web site enabling easy public access.	
	The Monitoring Officer prepares an annual report to the Standards Committee.	

CORE PRINCIPLE 4 - Taking informed and transparent decisions which are subject to effective scrutiny and managing risk Taking informed and transparent decisions which are subject to effective scrutiny and managing risk		
The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
operate in practice.	As per Core Principle 3, section 3.	
4. Develop and maintain an effective audit committee (or equivalent) which is independent or make other appropriate arrangements for the discharge of the functions of such a committee.	The Audit Committee was established in 2007 and has met quarterly. The terms of reference are set out in the Constitution. Work has commenced on reviewing the effectiveness of the current structure and membership of this Committee, with a number of options being discussed for its future makeup.	To complete the review of the effectiveness of the Audit Committee and to finalise any revisions to the structure and membership, including updating the Terms of Reference, if appropriate. (Director of Finance & Corporate Resources / Borough Solicitor)
	The provision of the internal audit function within the Council is through the Audit & Investigations Team, working in partnership with Deloitte & Touche Public Sector Internal Audit Ltd. The Audit Committee approve the annual Internal Audit Plan and receive progress reports at each quarterly meeting.	
	External audit is provided by the Audit Commission. Their plans, interim reports and annual audit letter are all presented to the Audit Committee.	
5. Put in place effective transparent and accessible arrangements for dealing with complaints.	The Council has a well regarded corporate complaints procedure that has been praised and endorsed by the Local Government Ombudsman (LGO), as set out in the annual LGO letter and our annual report on complaints which is submitted to the Overview and Scrutiny Committee. Complaints are initially handled by service area managers and, if appealed, by trained complaints officers within departments. A central team is also in place with the Policy & Regeneration Unit to handle escalated complaints on behalf of the Chief Executive and to oversee the process as a whole.	
6. Ensure that those making decisions whether for the authority or partnership are provided with information that is fit for the purpose – relevant, timely and gives clear explanations of technical issues and their implications.	Members are required to make sound decisions based on written reports which are prepared in accordance with the report writing guide and have to be cleared by both Finance and Legal. The Executive receives a briefing (Leaders Briefing) two weeks prior to the Executive meeting when members can ask detailed technical questions of officers. A large cohort of Members have attended general training skills sessions. Specific skills sessions and mentoring have been arranged for Executive members and those with special responsibilities. A programme of training and development is in place to support Members and provide them with enough information and the skills to be able to make effective decisions.	In addition to mentoring support for Executive members a new programme will be publicised and promoted with specific training for chairing meetings planned. (Member Development Manager)

CORE PRINCIPLE 4 - Taking informed and transparent decisions which are subject to effective scrutiny and managing risk Taking informed and transparent decisions which are subject to effective scrutiny and managing risk		
The local code should reflect the requirements for local authorities to:	Position at March 2009	Actions Needed to Address Weaknesses and responsible officer
7. Ensure that professional advice on matters that have legal or financial implications is available and recorded well in advance of decision making and used appropriately.	All reports must be cleared by Finance and Legal and contain financial and legal implications.	
8. Ensure that risk management is embedded into the culture of the organisation; with members and managers at all levels recognising that risk management is part of their job.	The Risk Management Strategy has been revised and was presented to Audit Committee in December 2008. A revised Corporate Risk Guidance document has also been produced and circulated across the Council. Risk management training for Members took place in March 2009. As per the revised Strategy, Members have a key role in the management of risk via the following: • The Deputy Leader and Lead Member for Corporate Resources have overall responsibility for ensuring that working risk management processes are in place; • The Executive / Council consider risks as part of their decision making role on corporate policies, including the annual budget setting processes, major policy decisions and major projects; and • The Policy Co-ordination Group, combining the Executive and Corporate Management Team, review corporate risks through regular Corporate Hotspots monitoring reports.	Additional guidance on positive risk, project risk and links to business continuity management to be developed. (Head of Procurement Strategy & Risk Management / Assistant Director of Regeneration / Head of Emergency Planning & Business Continuity) Further training to be delivered to DMTs and risk owners. In addition, an e-Learning tool is to be developed to assist with ongoing training and participation levels to be formally monitored. (Head of Procurement Strategy & Risk Management)
	Corporate Hotspots include the highest category – likelihood and impact – of cross-council level and service area level risks, e.g. significant risks to the achievement of key strategic objectives, to the finances of the authority, to the health and well-being of residents and/or staff, or to the reputation of the authority.	
	Financial Hotspots are identified and reviewed across each of the Service Areas on a monthly basis by the Strategic Finance Group. In each case the risk is assessed in terms of the minimum	

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	and maximum impact from a monetary perspective. In addition, an indication is provided as to whether the risk has been included in the year-end forecast for each Service Area, thereby providing a link between risk management and budget monitoring.	
	Risks are also identified as part of the budget setting process. Major spending risks were identified for 2009/10 and in each case a 'worst case' monetary figure has been recorded, together with the 'likelihood' and the 'net risk' monetary figure.	
	A consistent, standard risk template has been devised and is utilised for the drafting of Service Plan related risk. Risks are linked to both Service Plan objectives and Council objectives. The register has been set up to include the measurement of inherent/residual risk and revised guidance has been issued to all staff. More frequent monitoring has been implemented via management reports provided to Corporate Steering Groups responsible for pertinent risk categories. These Steering Groups also have responsibility to feedback to risk owners and/or escalation of risk as required.	Reporting cycles and structure / method of reporting to be fully established. (Head of Procurement Strategy & Risk Management) Work to be undertaken to identify sources of assurance for identified risks and controls and to develop a draft Assurance Framework for the Council. (Head of Procurement Strategy & Risk Management / Internal Audit)
	Risk management is also considered as part of major projects, although further work regarding developing a standard project management methodology for the Council is currently being taken forward and will seek to ensure that this is done in a standard way, in accordance with the overall RM framework.	To ensure that project risk management is fully aligned with the overall RM framework as part of the development of a standard project management methodology for use across the Council. (Assistant Director of Regeneration / Head of Procurement Strategy & Risk Management)

CORE PRINCIPLE 4 - Taking informed and transparent decisions which are subject to effective scrutiny and managing risk Taking informed and transparent decisions which are subject to effective scrutiny and managing risk		
The local code should reflect the requirements for local authorities to:	Position at March 2009	Actions Needed to Address Weaknesses and responsible officer
9. Ensure that arrangements are in place for whistle blowing to which staff and all those contracting with the authority have access.	New Whistleblowing Policy now in place. This has been publicised to staff and is on the intranet under 'Raising Concerns'. The new policy is more explicit regarding contractors/agents and the points of contact outside the authority. Whistleblowing allegations are dealt with, in the first instance, by the Audit & Investigations Team.	
10. Actively recognise the limits of lawful activity placed on them by, for example the ultra vires doctrine but also strive to utilise powers to the full benefit of their communities.	See above section 6. In addition regular Monitoring Officer Advice Notes are issued.	
11. Recognise the limits of lawful action and observe both the specific requirements of legislation and the general responsibilities placed on local authorities by public law.	See above section 6. In addition regular Monitoring Officer Advice Notes are issued.	
12. Observe all specific legislative requirements placed upon them, as well as the requirements of general law, and in particular to integrate the key principles of good administrative law – rationality, legality and natural justice into their procedures and decision making processes.	Legal comment and consultation on reports. Monitoring Officer Advice Notes issued and Legislation Trackers in place.	

CORE PRINCIPLE 5 - Developing the capacity and capability of members and officers to be effective		
The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
1. Provide induction programmes tailored to individual needs and opportunities for members and officers to update their knowledge on a regular basis.	The Council runs a Member development programme which is reported to the Standards Committee annually. The Borough Solicitor provides training to new and existing Members on decision making and standards of conduct. The Council has a Corporate Learning & Development Plan and programme which is reviewed and evaluated on an annual basis to meet the strategic and service objectives of the Council. The programme is also developed on the basis of a training needs analysis of individual staff as a result of annual performance appraisal. Each new member of staff is required to undergo induction training. However, induction rates are still below 100%.	A concerted plan to ensure all new starters attend mandatory induction is required. CMT to monitor and ensure compliance within departments. (Head of Learning & Development and Strategic HR Managers)

CORE PRINCIPLE 5 - Developing the capacity and capability of members and officers to be effective		
The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
2. Ensure that the statutory officers have the skills, resources and support necessary to perform effectively in their roles and that these roles are properly understood throughout the organisation.	Officers have an annual appraisal containing developmental objectives linked to the Corporate Strategy and Departmental Service Plans. The Council's Corporate Learning and Development Plan and service offering are based on the needs identified in individual appraisals and Service Plans. Workforce Development Plans have now been completed for all Service Areas including current and future skills and staffing requirements.	
	Each role has a job description and role specification.	
	All the statutory officers are members of the Corporate Management Team (CMT).	
3. Assess the skills required by members and officers and make a commitment to develop those skills to enable roles to be carried out effectively.	As part of the development of departmental Service Plans and Workforce Development Plans, analysis is being undertaken to identify the skills required for future service delivery to ensure that officers are fully skilled to deliver quality services.	
4. Develop skills on a continuing basis to improve performance including the ability to scrutinise and challenge and to recognise when outside expert advice is needed.	The Learning & Development Plan and service offering reflect the skills and knowledge required to deliver the corporate strategy and is reviewed on an annual basis to ensure continuing improvement and alignment to the goals of the Council. Individuals are encouraged to develop through their annual appraisal, six monthly reviews and regular one-to-ones which focus on improving performance and achievement of corporate/departmental objectives. A new appraisal system has been developed based on the competency framework which includes providing a customer focussed service, and leadership and influencing skills. The corporate training offering also offers courses on customer care and working with partners. The 2008 staff survey results show 70% of staff receive an appraisal. The annual review of the Member development programme was reported to the Standards Committee in March 2009.	Achieving higher levels of staff appraisal is a priority for the organisation to focus on improving performance. A review of the appraisal scheme to improve implementation and quality is required. (Head of Learning & Development)
5. Ensure that effective arrangements are in place for reviewing the performance of the authority as a whole and of individual members and agreeing an action plan which might for example aim to address any training or development needs.	Standards for performance are set out in the Corporate Strategy, individual Service Plans, and the Best Value Performance Plan. Quarterly reports on service and financial performance are produced and considered by the CMT, Executive and Performance & Finance Select Committee. This includes performance on key partnership targets within the LAA. The LAA is designed to deliver the aims of the published Community Strategy. Services that are undergoing significant change of require support to achieve improvements are monitored through regular meetings with the Chief Executive. A summary of the Council's performance is published each year in the Brent Magazine and delivered to all households. All performance data is available on the Council's website.	

CORE PRINCIPLE 5 - Developing the capacity and capability of members and officers to be effective		
The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
	As indicated above, the Council has an annual corporate Learning & Development programme based on strategic objectives including the Council's performance improvement priorities. A national performance management training programme has recently been piloted for staff in conjunction with the corporate Policy and Performance team.	
6. Ensure that effective arrangements designed to encourage individuals from all sections of the community to engage with, contribute to and participate in the work of the authority.	Area and Service User Consultative forums (ACfs and SUCfs) are chaired by Members and supported by lead officers from the service areas. The number of ACf and SUCf Chairs and Lead Managers meetings have been reduced from eight per year. SUCfs include: Pensioners forum; Black and Minority Ethnic forum; Voluntary Sector forum; Private Sector Housing forum; and Brent Disabled forum.	Two joint ACf/SUCf Chairs & Lead Managers meetings per annum proposed from May 2009. (Head of Consultation) Mapping of other consultation and voluntary sector groups is ongoing. (Head of Consultation)
	The Youth Parliament has been operating since March 2007 and provides an opportunity for children and young people to present their views to the Council.	
	The forum progress reports to Overview & Scrutiny Committee now include additional information on Citizens' Panel and other consultation issues. These reports are no longer quarterly but only 'occasional', (as requested), due to agenda priorities.	
	Regular ward meetings provide a forum for Members to discuss matters of concern with officers and shape how services are provided at the neighbourhood level. Depending on the issues being addressed, these meetings may be attended by the Police and other relevant partner agencies.	
	All committee meetings are held in public, with the exception of any elements relating to exempt or confidential information.	
7. Ensure that career structures are in place for members and officers to encourage participation and development.	Whilst many areas/professions have a clear career structure, work is being undertaken to develop career pathways, generic job roles and a talent management system. A new management development centre has been established to assist in the further development of junior and middle managers. The current workforce development planning work includes succession planning. A Talent management and succession planning scheme was approved by CMT in March 2009.	Complete work in relation to career pathways, generic job roles and talent management. (Assistant Director, HR) Talent management scheme to be introduced during 2009/10. (Assistant Director, HR)

CORE PRINCIPLE 6 - Engaging with local people and other stakeholders to ensure robust public accountability		
The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
1. Make clear to themselves, all staff and the community, to whom they are accountable and for what.	Council policy and services are promoted to residents via The Brent Magazine produced monthly, the Council website and wider media.	Continue using and further developing / improving all forms of communication.
	Use the staff magazine - Insight, the intranet, and internal briefing programme to communicate with staff. Brent Brief, a fortnightly briefing document to allow managers to deliver corporate, service area and team information was introduced in March 2009.	(Director of Communication & Diversity)
2. Consider those institutional stakeholders to whom they are accountable and assess the effectiveness of the relationships and any	A new Consultation & Engagement Strategy is being developed in line with the new duty to inform, consult and involve, and the requirements of the Comprehensive Area Assessment (CAA) process. The new strategy will promote better alignment of consultation with our partners and will contain an Annual Partnership Consultation Plan. The Consultation Portal will be further developed to establish more effective ways of evaluating	Consultation with partners to establish a framework for joint working and information sharing. New Plan to be agreed by May 2010.

CORE PRINCIPLE 6 - Engaging with local people and other stakeholders to ensure robust public accountability		
The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
changes required.	consultation activity.	(Head of Consultation)
3. Produce an annual report on scrutiny function activity.	An annual report is presented to the Overview & Scrutiny Committee in July each year.	
4. Ensure that clear channels of communication are in place with all sections of the community and other stakeholders including monitoring arrangements to ensure that they operate effectively.	Consultation Strategy 2006–2009 was formally launched in January 2006. Implementation is monitored by the Consultation Team. Strategy objectives and quality standards reinforced through training to members and staff. Also at Corporate Induction sessions. Further details as per Core Principle 5, section 6.	Core training on consultation strategy and techniques being developed. (Head of Consultation)
5. Hold meetings in public unless there are good reasons for confidentiality.	All meetings are held in public. Some parts of meetings are held in private when exempt or confidential information might be disclosed. This is subject to the agreement of the members present.	
6. Ensure arrangements are in place to enable the authority to engage with all sections of the community effectively. These arrangements should recognise that different sections of the community have different priorities and establish explicit processes for dealing with these competing demands.	As per Core Principle 5, section 6, Brent's consultation network includes area and service user consultative forums, the Brent Youth Parliament and the Brent Citizens' Panel and the Brent LINk (Brent Local Information Network). Service user consultative forums cover Pensioners, Black and Minority Ethnic, Voluntary Sector, Private Sector Housing and Disabled Users. Other consultation, voluntary sector and user groups are currently being mapped by the Consultation Team.	Mapping of other consultation and voluntary sector groups is ongoing. (Head of Consultation)
	Neighbourhood Working Project in progress.	Continued implementation and further development of the Neighbourhood Working Project. (Head of Neighbourhood Working)
	2009 Residents' Attitude Survey now commissioned.	Reporting scheduled for August 2009. (Head of Consultation)
7. Establish a clear policy on the types of issues they will meaningfully consult on or engage with the public and	A Communication Strategy 2007-2010 has been agreed by CMT.	Further development of consultation portal in progress.

CORE PRINCIPLE 6 - Engaging with local people and other stakeholders to ensure robust public accountability		
The local code should reflect the requirements for local authorities to:	**Position at March 2009**	**Actions Needed to Address Weaknesses and responsible officer**
service users including a feedback mechanism for those consultees to demonstrate what has changed as a result.		(Head of Consultation)
8. On an annual basis, publish a performance plan giving information on the authority's vision, strategy, plans and financial statements as well as information about its outcomes, achievements and the satisfaction of service users in the previous period.	Progress against the Corporate Strategy was published in August 2008 as part of The Brent Magazine.	
9. Ensure that the authority as a whole is open and accessible to the community, service users and its staff and ensure that it has made a commitment to openness and transparency in all its dealings, including partnerships subject only to the need to preserve confidentiality in those specific circumstances where it is proper and appropriate to do so.	A review of the Council's adherence to the Freedom of Information (FOI) Act is reported to CMT on an annual basis. The Council is meeting its obligations under the act and performance is generally high with regard to responding to requests within the statutory time limit.	
	A report on the impact of the Environmental Information Regulations (EIR) is also presented to CMT on an annual basis and efforts are made to co-ordinate FOI and EIR requests wherever possible.	
10. Develop and maintain a clear policy on how staff and their representatives are consulted and involved in decision making.	The Council's managing change policy includes guidance on staff and trade union consultation. A draft engagement policy has also been developed. The role of the line manager in people management has been documented and is shortly to be published which includes guidance on engagement. The content of this is being incorporated into the Council's new people management courses.	

4   REVIEW OF EFFECTIVENESS

4.1   The Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the executive managers within the authority who have responsibility for the development and maintenance of the governance environment, the Head of Internal Audit & Investigation's Annual Report and also by comments made by the external auditors and other review agencies and inspectorates.

4.2   The process that has been applied in maintaining and reviewing the effectiveness of the governance framework is described below:

The Council

- Has monitored performance against the Corporate Strategy Objectives by taking an annual report and has set the annual budget in accordance with the Corporate Strategy priorities;

- Receives the annual budget report which summarises the financial position and the transactions for the year and considers the annual performance plan; and

- Has agreed the Constitution, setting out the decision making structure, delegated authority and financial regulations that underpin the internal control framework. This follows cross party review by the Constitutional Working Group.

The Executive

- Makes key decisions in accordance with the Budget and Policy Framework;

- Has established a Performance Board to consider the performance of specific service areas;

- Has sessions with the Corporate Management Team twice per year to consider the medium term financial strategy and its linkages with the council's policy priorities; and

- Meets monthly with the Corporate Management Team to receive an update on the Council's financial position and monitoring reports from the Strategic Finance Group.

The Audit Committee

- Has met four times during 2008/09 and has considered the work of Internal Audit during the year, the Head of Internal Audit's annual report and opinion and the External Auditor's annual letter;

- Maintains an overview of the Council's Constitution in respect of contract standing orders and financial regulations;

- Monitors the effective development and operation of risk management and corporate governance in the Council; and

- Reviews the annual statement of accounts. Specifically to consider whether appropriate accounting policies have been followed and whether there are concerns arising from the financial statements or from the audit that need to be brought to the attention of the Council.

The Standards Committee

- Receives reports from the council's Monitoring Officer on issues concerning member conduct and would consider reports referred from Ethical Standards Officers or the Monitoring Officer which require investigation and/or determination.

The Forward Plan Select Committee

- Enables pre-scrutiny of Executive decisions by non-executive members.

Overview & Scrutiny

- Oversees and scrutinises decisions made by the Executive;

- Has task groups who undertake detailed work on improving prioritised service areas linked to the Corporate Strategy themes; and

- Has two cross cutting sub-committees to examine detailed performance information on a six monthly basis, namely the Health Select Committee and the Performance & Finance Committee.

The Performance & Finance Select Committee

- Receives reports on Best Value, budget monitoring and considers the Annual Performance Plan and quarterly "Vital Signs" document.

Budget Panel

- Is a sub-committee of Overview and Scrutiny and participates in the budget setting process by examining the robustness of the budget, the ability to deliver savings, key revenue budget outputs and decisions, and key capital budget outputs and decisions.

Audit & Investigations

- Provide assurance to the Council on operational and financial controls via delivery of an agreed audit plan;

- Produce an Annual Audit Report including the Head of Audit annual opinion on the Council's internal controls; and

- Where identified as a result of audit work, significant internal control weaknesses have been reported to Service Directors and copied to the relevant Service or Corporate Area Director. Recommendations for improvement are made in each report. Each significant audit report is followed up after a suitable period and any failure to implement recommendations is noted and reported back to the relevant director and the Audit Committee.

External Audit and Inspectorates

- The Director of Finance & Corporate Resources meets with the Council's external auditors on a monthly basis and, if appropriate, they raise any concerns they have regarding the internal control environment. These meetings become more frequent during the closing of the accounts process when any material weaknesses or issues are raised; and

- The outputs from various Inspectorates in relation to the Comprehensive Performance Assessment (CPA) provide some assurance as to the internal control environment. The latest assessment in February 2009, the last under the CPA regime, gave the Council a three star, "improving strongly" rating, its highest rating to date.

4.3 We have been advised on the implications of the result of the review of the effectiveness of the governance framework by Audit Committee and a plan to address weaknesses and ensure continuous improvement of the system is in place.

5 SIGNIFICANT GOVERNANCE ISSUES

5.1 Set out below are a number of significant governance issues which have been identified, together with a summary of the actions taken to date, or which are being proposed for 2009/10 to deal with these.

An indication as to the progress made against those issues raised in the 2007/08 Annual Governance Statement is also included.

- The Chief Executive has launched the One Council agenda which aims to develop a joined up culture and to achieve greater consistency of application of corporate policy, standards and procedure across all service areas. This includes an Improvement & Efficiency Programme, encompassing a range of service reviews together with a number of One Council Task Groups in areas including: Procurement, Project Management and Financial Management. The Council is also progressing with the construction of a new civic centre and with a significant schools expansion programme. This major transformation agenda will require elements of change to existing governance arrangements and will also involve significant levels of resource and co-operation from staff across the Council. This was also raised as a significant issue in 2007/08. However, its repeat inclusion is not due to a lack of progress in terms of the actions needed, rather it reflects the expansion and progression made with regards to the overall scope of the transformation agenda.

- With the increasing number of services delivered jointly within the LAA the council continues to examine the appropriate legal and organisational structures to ensure that governance arrangements remain adequate. This was also raised as a significant issue in 2007/08. Its repeat inclusion reflects the ongoing significance of partnership working.

- Risk Management was raised as a significant issue in 2007/08. The risk management framework has been strengthened during 2008/09, as set out in Core Principle 4, section 8. The requirement now is for specific elements of the framework to be further developed and for the framework as a whole to be embedded across the Council. An action plan is in place regarding this.

- From a treasury management perspective, the collapse of the Icelandic banks left the Council with two outstanding deposits: one for £10m with Heritable Bank and one for £5m with Glitnir Bank. The Council has been working with other local authorities, the Local Government Association (LGA) and other organisations such as the Chartered Institute of Public Finance and Accountancy (CIPFA), to recover the two loans or to mitigate the effects of non-recovery until the situation is resolved. Members have been updated on the position throughout and the Treasury Management Strategy and Annual Investment Strategy for 2009/10 reflected this. The Council will continue to seek recovery of the two amounts during 2009/10.

- Within Environment & Culture, two significant governance issues have been identified as requiring improvement in 2009/10:

  o Successful conclusion of the Trading Standards Consortium Agreement; and

  o Improved monitoring and forecasting of cost and income streams and the development of more sophisticated models of the financial performance in waste management, the parking account and income associated with property.

- Children & Families have experienced significant overspends on children with disabilities in 2008/09. Measures for resolving this are being actioned which include securing budget growth through the 2009/10 Council's budgeting process and reviewing the service through the current programme of Improvement & Efficiency reviews. In addition, an issue has been identified with regards to the governance arrangements within a Foundation School. This is currently subject to further investigation, continuing into 2009/10.

- Adult Social Care has had significant difficulties in managing its overall budget in recent years. In 2007/08 this reflected the ongoing discussions with the Primary Care Trust over financial responsibility for a number of clients. These discussions are ongoing and there is still a degree of uncertainty regarding responsibility for funding of some clients. There has been a significant but forecast overspend in 2008/09. Budget monitoring is tight and accurate once the year has commenced. Overspending budgets are identified and this is fed into the budget setting process for the following year. All appropriate measures are taken to control overspending during the year, including increased levels of activity monitoring information, but demand is difficult to manage given that clients who meet the Council's eligibility criteria are entitled to a care service. One of the key aims of the Transformation Programme taking place across Adult Social Care is to help achieve savings, partly through increasing staff efficiency through the development of a new assessment and care management framework, and partly through improving value for money through the development of a new service commissioning unit. The Transformation Programme is split into seven key workstreams and is managed by a Transformation Team, with oversight from the Transformation Board.

- The Council implemented its new Interact Payroll and HR system in October 2007. The system is provided by Logica CMG who are also responsible for undertaking elements of the payroll process. Interact is an integrated system and the original target date for full functionality was April 2008. However, a number of issues have arisen since the system going live and, whilst the payroll has been processed each month so as to ensure that employees are paid on time, resources, including from Logica CMG, have had to be diverted to dealing with these. An action plan is in place to address the issues. However, as at 2008/09 year-end, Logica are failing to deliver against this action plan in a timely manner. The matter is now being escalated to the Logica Board.

- Declarations of Interest for staff are required to be completed by designated staff upon commencement of employment with the authority, or at the point of progression to a relevant grade. Staff have a responsibility to inform the authority of any changes to their original declaration as appropriate. Declarations are reviewed at service area level when completed so as to allow management to make arrangements to avoid any potential conflicts. Previously there has been no formal process in place regarding how this review should be undertaken or the required frequency of review. However, the conflict of interest policy has recently been updated, including a proposed amendment to clarify the position regarding officers with other contractual relationships with the Council. The updated policy is to be approved and corporate guidance subsequently produced and approved regarding this.

5.2 We propose over the coming year to take steps to address the above matters to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our next annual review.

Signed:…………………………………………   …………………………………………………

       Cllr Paul Lorber   **Gareth Daniel**

       Leader of the Council   **Chief Executive**