

# Broads Authority

26 July 2024

Agenda item number 11

## Annual Governance Statement 2023/24 and Code of Corporate Governance 2024

Report by Senior Governance Officer

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### Purpose

Every year the Broads Authority reviews its governance and internal control systems, including risk management, and publishes an Annual Governance Statement and action plan, supported by a Code of Corporate Governance, to show how it is complying with the principles of good governance. The Annual Governance Statement 2023/24 and Code of Corporate Governance 2024 are appended to this report.

### Recommended decision

To approve the Annual Governance Statement 2023/24 and to note, subject to the implementation of improvements identified in the action plan, that the Authority's systems of governance and internal control are considered to be adequate and effective.

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## 1. Introduction

- 1.1. As a public body, the Broads Authority is responsible for making sure it has strong and up to date governance and internal control systems that comply with the principles of "good governance". Under the Accounts and Audit (Amendments) Regulations 2022, we must publish our draft un-audited annual Statement of Accounts by 31 May. Section 15(2) states that the Statement of Accounts should be accompanied by an Annual Governance Statement (AGS) on the effectiveness of our systems during the year, and an action plan to address any identified weaknesses. The AGS and CoCG were both published on the Council's website by 31 May 2024.
- 1.2. The AGS is guided by the "Delivering Good Governance in Local Government: Framework" which includes principles on integrity, ethical values and the rule of law; stakeholder engagement; sustainable economic, social and environmental benefits; leadership and resources; risk and performance; and transparency, reporting and review. Our internal and external audit, internal review and other reports, and the Code of Corporate Governance (CCG) all provide evidence for the AGS.
- 1.3. The Risk, Audit and Governance Committee will review the AGS on 23 July 2024 and present any suggested amendments or recommendations to today's meeting. Once the

Authority approves the Statement, it is signed by the Chair and Chief Executive and the Action Plan 2024/25 is implemented.

## 2. Code of Corporate Governance (CCG)

- 2.1. The CCG helps us to develop our governance framework based on best practice and external guidance. The Code is updated annually, with significant changes reported in the AGS and any actions included in the Action Plan. The CCG is signed by the Chair and Chief Executive and published on the Broads Authority website on the [how we work](#) page.

## 3. Audit opinion

- 3.1. The Head of Internal Audit's overall audit opinion in relation to the framework of governance, risk management and control at the Broads Authority in 2023/24 is "reasonable", with one of the four audits (Corporate Governance & Risk Management) having a "substantial" assurance grading. The audits for Procurement; Port Marine Safety Code; Key Controls and Assurance received a "reasonable" assurance. The Authority's Management Team accepted the vast majority of the recommendations raised and assigned responsibilities and deadline dates, as shown in the AGS action plan (appendix 1).
- 3.2. In providing the opinion, the Authority's risk management framework and supporting processes, the relative materiality of the issue arising from the internal audit work during the year, and management's progress in addressing any control weaknesses identified from this were taken into account. The opinion was discussed with the Section 17 Officer prior to publication.

Author: Sara Utting

Date of report: 09 July 2024

Background papers: none

[Broads Plan](#) strategic objectives: n/a

Appendix 1 – Annual Governance Statement 2023/24 and Code of Corporate Governance 2024

# Annual Governance Statement 2023/24 & Action Plan 2024/25 and Code of Corporate Governance 2024

This draft published May 2024

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## About this Statement

As a public body, the Broads Authority is responsible for making sure its governance and internal control systems are robust, up-to-date and in line with the principles of good governance. This is about conducting our business in accordance with the law and with proper standards, using public money wisely and efficiently, and having the right arrangements in place to protect our assets and meet our strategic aims. It is also about our members and officers representing the shared values and culture of the organisation.

To show how we are complying with good governance, we prepare an **Annual Governance Statement**<sup>1</sup> and publish it alongside our annual Statement of Accounts. The Statement is guided by '[Delivering Good Governance in Local Government](#)', which includes principles on integrity, ethical values and the rule of law; stakeholder engagement; sustainable economic, social and environmental benefits; leadership and resources; risk and performance; and transparency, reporting and review.

The Statement includes an annual action plan to address any weaknesses identified by internal and external audit, self-assessment and other reporting including our [Code of Corporate Governance](#) (Appendix 2).

This Annual Governance Statement will be considered by the Authority on 26 July 2024 and available via this [link](#). Our action plan 2024/25 and a review of last year's action plan are at Appendices 1(a) and 1(b).

## 1. Our governance framework

### 1.1. Purposes and duties

The Broads Authority is a statutory body with similar responsibilities to those of the English, Welsh and Scottish National Park Authorities<sup>2</sup>. It is the local planning authority, and a harbour and navigation authority. It has a duty to manage the Broads to conserve and enhance its natural beauty, wildlife and cultural heritage, to promote opportunities for the public to understand and enjoy its special qualities, and to protect the interests of navigation.

In managing the area, the Authority must have regard to the national importance of the Broads for its natural beauty and opportunities for open-air recreation, the desirability of protecting its natural resources from damage, and the needs of agriculture and forestry and economic and social interests of those who live or work in the area. The Authority also has the duty to maintain the navigation area to such standard as appears to be reasonably required and to develop and improve it as it thinks fit.

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<sup>1</sup> Regulation 6(1)(a) and (b) of the Accounts and Audit Regulations 2015

<sup>2</sup> The Broads Authority was established under the Norfolk and Suffolk Broads Act 1988. Further provisions for the management of the area were made through the Broads Authority Act 2009.

## 1.2. Strategy and policy

The [Broads Plan](#) is the key partnership strategy for the Broads, setting out a long-term vision and short-term objectives to benefit of the environment, local communities and visitors. The current Plan was adopted in Autumn 2022 and covers the period 2022-2027. Sitting under the Broads Plan are more detailed [guiding strategies](#), generally focusing on a single theme and covering a short-term period of 3-5 years.

The [Broads Local Plan](#) (adopted in 2019) sets out the policies used in determining planning applications for the plan period up to 2036. We also produce supporting supplementary planning documents such as the [Flood Risk SPD](#), and [planning design guidance](#), to help with the interpretation and implementation of policies. The Local Plan is subject to regular review, and the current review is underway, with consultation on Issues and Options between April and May 2024. The aim is to produce a Publication version of the Local Plan by the end of 2024 which can be consulted on and then submitted for examination before the end of June 2025.

Our [Annual Business Plan](#) outlines our work priorities for the coming year and summarises last year's progress. The Plan is a link between the strategies for the Broads and our Directorate work plans. The [Annual Business Plan 2024/25](#) outlines our work plans for 2024/25 and 3-year financial strategy for 2024/25 to 2026/27.

Each year we also identify a small set of strategic priorities, focused on Authority-led projects that have high resource needs or a very large impact on the Broads, or that are politically sensitive. This helps us target our resources and make the most of partnership working and external funding opportunities. We report on their progress at each [Broads Authority](#) meeting.

## 2. External factors influencing our governance arrangements

### 2.1. Environment Act and Agricultural Transition

The changes to environment and agricultural policies have significant bearing on funding and deliverability of projects and land use change in the Broads.

The Environment Act (2021) aims to improve air and water quality, protect wildlife, increase recycling and reduce plastic waste. The Act is part of a new legal framework for environmental protection, given the UK no longer comes under EU law. Section 40 of the Environment Act places a legal responsibility on public authorities in England to have due regard for habitats and species of the greatest conservation importance, whilst protecting all biodiversity.

In parallel, as part of the Agricultural Transition, government is rolling out Environmental Land Management schemes, with three schemes to pay for environmental and climate goods and services:

- the Sustainable Farming Incentive (SFI) will pay farmers to adopt and maintain sustainable farming practices that can protect and enhance the natural environment alongside food production
- Countryside Stewardship (CS) will pay for more targeted actions relating to specific locations, features and habitats.
- Landscape Recovery will pay for bespoke, longer-term, larger scale projects to enhance the natural environment.

New funding is provided through the [Farming in Protected Landscapes](#) (FiPL), also as part of Defra's Agricultural Transition Plan. It offers funding to farmers and land managers in AONBs, National Parks and the Broads.

The [England Peatland Action Plan](#) was published in 2021 and sets out the government's long-term vision for the management, protection and restoration of our peatlands, for the benefits of wildlife, people and the planet. The Caudwell Report for lowland peat, published in June 2023, sets a roadmap for lowland peat to reduce greenhouse gas emissions. Funding is provided through the [Nature for Climate scheme](#), to develop and implement peatland restoration projects.

Natural England's proposed [revision of SSSI condition](#) is to assess the whole feature assessment rather than the current SSSI unit-based approach. This would alter restoration trajectories and what needs to be put in place to deal with the pressures on SSSI sites in the Broads.

## 2.2. Planning policy changes

Different changes to planning policy need to be considered, as follows:

- Planning policy was introduced to control the impact of Nutrient Enrichment (phosphorus and nitrogen) from development on water quality to protect Special Areas of Conservation (SACs).
- Biodiversity Net Gain (BNG) is a strategy to develop land and contribute to the recovery of nature. It is a way of making sure the habitat for wildlife is in a better state than it was before development. BNG will be mandatory from November 2023, and from April 2024 for small development sites. Recreational Access Mitigation Strategy (RAMS) tariff is collected by councils to allow funding of a package of measures to manage and reduce the impact of people making extra visits to Special Areas of Conservation (SACs) in the counties.

## 2.3. Landscapes Review

On 29 November 2022, the Government set out its [action plan for Protected Landscapes](#), based on responses to the consultation on the Landscapes Review.

The November 2023 publication is a response to the findings of the Landscapes Review led by Julian Glover published in 2019, which set out a case for change to enable England's National Parks and National Landscapes (formerly AONBs) to fulfil their potential. The Government's proposals for implementing the Review's findings were put out to public consultation in November 2023, providing an update on delivery to date and an action plan for the future. A [report](#) was presented to the Broads Authority meeting on 26 January 2024.

## 2.4. Levelling Up and Regeneration Act 2023

A [report](#) on the implications of The Levelling Up and Regeneration Act 2023 was presented to the Broads Authority on 26 January 2024. In summary, there are three main amendments to the legislation for NPAs and the Broads Authority; one requires regulations to be made; one amends Section 17A of the Norfolk and Suffolk Broads Act 1988 by amending the words “a relevant authority shall have regard to the purposes of..” to “.. must seek to further the purposes of...”<sup>3</sup>; and the third inserts a new clause 17B (Duty of public bodies etc to contribute to the Broads Plan).

## 3. Committees, staffing and financial arrangements

### 3.1. Committees

The Broads Authority has unique governance arrangements, reflecting the interests of both national and local stakeholders. Of its 21 members, ten are appointed by the Secretary of State, nine are locally elected County and District Councillors, and two are co-opted from the Navigation Committee. Other than Planning Committee and those matters specifically delegated to the Chief Executive, all matters are dealt with by the full Broads Authority as the prime decision maker. Routine decision making is delegated by members to officers of the Authority through [the Scheme of Powers delegated to Chief Executive and other authorised officers](#).

The [Broads Authority](#) (the full Board) meets six times a year. Members also get invited to site visits or workshops as required, to give members more time to interact informally outside the main business meetings and to see what is happening out in the Broads. There is a transparent process for the annual appointment of Chairs and Vice-Chairs, committee membership and appointments to outside bodies, which allows members to express their preferences for serving on particular committees and outside bodies. The Chairs’ Group gives all Chairs and Vice-Chairs an active role in maintaining an overview of the work of the various committees, and supporting the Chair and Chief Executive.

The [Risk, Audit and Governance Committee](#) has limited decision making powers and meets three times a year. It is responsible for examining our governance, internal control and risk management framework, and taking a strategic view on whether our allocated resources are being used effectively. Its terms of reference were reviewed in July 2023 (including a change in name from Audit & Risk Committee) and specific powers were transferred to the newly established Standards Committee.

The [Standards Committee](#) was established in September 2023, and its purpose is the promotion and maintenance of high standards of conduct within the Authority. One of its key functions is to deal with complaints that Members have breached the Member Code of Conduct, in accordance with the adopted complaints process.

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<sup>3</sup> This relates to our three purposes as prescribed by Section 2 of the 1988 Act (“Functions of the Authority: general”)



Our functions as a Local Planning Authority are carried out by the [Planning Committee](#), with powers delegated to officers in line with national legislation. It is a decision-making committee and normally meets every four weeks. [Planning decisions](#), whether made at Committee or through delegated powers, are published on our website.

The [Navigation Committee](#) advises the Authority's on significant matters affecting the navigation area. While it does not make decisions, if the Authority does not accept the Committee's recommendations it must give reasons. There are five meetings a year, and members are also invited to the Authority's site visits and workshops.

The [Broads Local Access Forum](#) is a semi-independent body that advises the Authority on improving public access to land within the Broads executive area. The Forum normally meets four times a year.

The Authority has two **Independent Persons**, appointed for a 4-year period, who are consulted to help the Authority achieve high ethical standards. The current postholders were appointed in January 2021 until the annual meeting in July 2024 (the appointments were delayed by the cancellation of the 2020 annual meeting and an extension to the previous terms of office). New appointments will be made at the 26 July 2024 meeting.

### 3.2. Officers

The Authority has 139 full-time equivalent staff. There are four statutory officers who carry out specific duties. They are the Head of Paid Service (Chief Executive), Section 17 Officer (Director of Finance), Navigation Officer (Head of Ranger Services) and Monitoring Officer.

The Chief Executive, Director of Finance, Director of Strategic Services and Director of Operations make up the Management Team. There are seven section heads, covering the following sections: Construction, Maintenance & Ecology; Communications; Human Resources; ICT & Collector of Tolls; Planning; Ranger Services and Safety Management. The Management Team meets weekly and liaises regularly with the Section Heads through the Management Group. We are also required to have a Data Protection Officer, and this role is currently held by the Director of Operations as a qualified Data Practitioner.

### 3.3. Financial arrangements

It is considered that the Authority's financial management arrangements conform with CIPFA's [Statement on the Role of the Chief Financial Officer in Local Government](#) (2016). As a key member of the Management Team, the Director of Finance is actively involved in material business decisions to help the Authority develop, resource and implement its strategic plans sustainably and in the public interest.

We have a number of procedures in place to make sure we obtain best value for money in all we do, and we review them all on a regular basis. The Financial Regulations were reviewed in November 2022. Our Counter Fraud, Corruption and Bribery Strategy was updated in March 2023 and our Standing Orders Relating to Contracts (SORC) in February 2024. We also reviewed our Procurement Strategy in July 2023 and our Capital, Treasury and Investment Strategy in March 2024. An initial assessment against CIPFA's Financial

Management Code was received by Audit and Risk in July 2021 and progress is monitored against the action plan (last reported to ARC in July 2023). The Committee agreed to have updates every two years thereafter.

We monitor the effectiveness of our internal financial control systems through the consideration of regular internal audits, performance management and budget monitoring reports, and through reporting to the RAG Committee.

## 4. Decision making and openness

Our arrangements for decision making are set out in publicly available documents, published on our website at [Constitutional documents \(broads-authority.gov.uk\)](https://broads-authority.gov.uk). These include standing orders, terms of reference of committees, codes of conduct, scheme of delegated powers and protocol on member and officer relations. An updated Member Code of Conduct was adopted by the Authority in July 2021, based on the LGA's new model code, together with a revised Register of Interests form, and a revised complaints procedure in December 2022 (updated in Sept. 2023 to reflect the new Standards Committee and Hearings Sub-Committee). Both the Code of Practice for Members of the Planning Committee and Officers and the Protocol on Member and Officer Relationships were updated and adopted by the Authority in September 2021. A Monitoring Officer Protocol was adopted by the Authority in September 2023.

In January 2023, following an external review into a formal complaint, the Authority adopted a series of recommendations for improvements in the organisation's governance and procedures. This work was completed by the end of 2023. The next piece of work is to review the Standing Orders.

Each committee has distinct terms of reference. Meetings are held in public, apart from agenda items that are exempt under legislative guidance, and members of the public may ask questions at Authority meetings. Committee meetings are audio recorded and the public may request a copy of the recording.

Staff roles and responsibilities are defined through job descriptions and regularly updated policies and procedures, including an officer code of conduct and annual performance appraisals. In 2019/2020 we started to use the Best Companies Employee Survey. Our first Best Companies Index score was classed as 'good', which in terms of accreditation means we are 'one to watch'. The next survey was run at the end of 2021, and the outcome was again good, "one to watch". The survey is due to be repeated towards the end of 2024.

The Freedom of Information Act (FOIA) and the Environmental Information Regulations (EIR) give rights of public access to information held by public authorities, including the Broads Authority. Our [Publication Scheme](#) highlights the information we publish, how we make it available, and our charging policy. Our commitment to protecting people's privacy and processing personal data in accordance with data protection legislation is set out within our [Data Protection Policy](#).

## 5. Ethics and integrity

Under the Localism Act 2011 we have the duty to promote and maintain high standards, and we work to embed this throughout our governance and internal control systems. The seven principles of public life (known as the Nolan Principles) are incorporated in the Members' Code of Conduct, which was reviewed, and the updated version adopted in July 2021. Our Independent Persons provide external scrutiny of our standards processes.

We also have our own set of corporate core values (below), which are promoted to officers and members through posters and screen savers, codes of conduct and protocols, recruitment and appraisal processes, and development programmes.

### Our core values

- **We show commitment** - Working together for a common purpose; Showing flexibility, trust and enthusiasm; Delivering on our promises
- **We are caring** - Setting realistic and properly resourced workloads; Supporting each other to get things done; Giving praise and daring to challenge
- **We are exemplary** – Being visible, approachable and professional; Making sound judgements on strong evidence; Aiming higher, smarter and always inspiring
- **We are open and honest** – Being fair and consistent in our words and actions; Always willing to ask, listen and respond; Doing what's right and being accountable
- **We are sustainable** – Looking after our resources wisely; Understanding the impact of our choices; Doing work that adds real value

## 6. Engaging with stakeholders

We encourage our partners, interest and user groups and local communities to engage with us in various ways. This includes drop in events such as partnership working groups and direct contact such as officers or members attending user group meetings, public events, digital and social media, and formal written consultations. We also seek public opinion through surveys and the user analysis of our website and Facebook and Twitter feeds.

[Broads Engage](#) brings together many of the ways people can hear about and have a say on the use and management of the Broads. We also continued to engage with stakeholders through remote means, which can be more accessible to certain demographics.

At the launch of the Broads Plan 2022-2027, the Broads key partners have met regularly to monitor the implementation of the Broads Plan. A key project of the Broads Partnership is to develop a bid for the Landscape Recovery scheme, which is one of new environmental land management schemes set up by Defra.

## 7. Managing risk and performance

The Risk, Audit and Governance Committee's (RAG) responsibilities include gaining assurances, from a range of measures and reports, that the Authority is obtaining value for

money in the use of its resources, and that risk and performance are being actively managed to achieve best results.

We have a **Corporate Risk Register (CRR)** and three **Directorate Risk Registers (DRRs)**, together with a Risk Management Policy. The registers are reviewed quarterly by Management Team, and at every meeting of RAG. Any mitigated risk on a DRR that scores as a 'high risk' is referred to the CRR for monitoring. The Risk Management Policy is reviewed and updated every two years and is next due for review in January 2026.

Our **Business Continuity Plan** provides critical information to enable the Authority to continue operating during an unplanned significant event, including loss of premises, IT/telecommunications systems and utilities; national lockdown (e.g. pandemic) and major travel disruption. The plan relates to events that impact all or most of the Authority's operations and that require immediate action. Measures to respond to other identified and predictable business risks (such as significant loss of income or key staff) are covered elsewhere, including within our risk registers, resilience plans, and individual project plans.

A **weekly recorded briefing** from officers is made available to all staff, members and volunteers every week.

We have **internal financial controls** to reflect good practice and make sure our finances are managed securely to minimise risk. These include approved budgets, separation of duties and authorised signatures. We also maintain a database of all our land and property assets and an **Asset Management Strategy** that includes an asset disposal policy, to help us plan our maintenance and replacement programme and reduce the risk of unexpected costs.

Our **performance** across our operations is assessed at regular Management Team meetings, with financial reports and budgets considered monthly and reports provided to Members at each Authority meeting.

There is a **whistleblowing policy** for our staff, with a separate policy for Members adopted at the 29 July 2022 Authority meeting, and the Monitoring Officer has a duty to write a report if the Authority or any of its committees proposes action that would be unlawful or amount to maladministration.

## 8. Internal and external audit

Our **internal and external auditors** are the main independent sources of assurance on the operation of our governance framework and the Statement of Accounts.

An external provider reviews the effectiveness of our **internal control systems**, which includes our **internal audit function**. This helps to emphasise audit's key role and its connection to governance, risk management and internal control. The broad categories for internal audit are annual opinion, corporate governance, fundamental financial systems, service area audits and significant computer systems. The Head of Internal Audit (HIA) develops an annual **strategic audit plan** using a risk-based approach. The annual opinion is

given on the overall adequacy and effectiveness of the Authority's internal control environment, highlighting significant issues.

The Management Team responds to each recommendation in the internal audit report, stating whether it is agreed and what action will be taken. The RAG Committee receives a summary of internal audit work during the year and progress on implementing audit recommendations. Any significant concerns are reported up to the Broads Authority. The Authority is also informed of the work of the appointed External Auditors, including the Annual Audit letter from the External Auditors.

The **HIA's overall audit opinion** in relation to the framework of governance, risk management and control at the Broads Authority in 2023/24 is **reasonable**, with one of the four audits (Corporate Governance & Risk Management) concluding with a **substantial** assurance grading and the Port Marine Safety Code; Procurement and Key Controls all concluding with a "reasonable" assurance. The Authority's Management Team accepted the recommendations raised and assigned responsibilities and deadline dates, as shown in Appendix 1(a) below.

In providing the opinion, the Authority's risk management framework and supporting processes, the relative materiality of the issues arising from the internal audit work during the year, and management's progress in addressing any control weaknesses identified from this were taken into account. The opinion was discussed with the Section 17 Officer prior to publication.

## 9. Conclusion and Action Plan

No significant governance weaknesses have been identified.

Our Annual Governance Statement Action Plan 2024/25 and a summary of progress against last year's action plan are at Appendix 1. We are satisfied the Plan will address the identified minor issues, and we will report back on its implementation as part of our next Statement.

(Chair of the Authority)

John Packman (Chief Executive)

Dated: 26 July 2024

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## Appendix 1(a) - Audit recommendations: Action Plan 2024/25

**Table 1**

Actions arising from 2023/24 audit and outstanding actions from previous audits

Audit recommendation	Lead officer	Target/status
<b>Governance and Risk Management</b>		
<b>R1: Member Attendance</b> Add expectations for attendance and consequences for non-attendance to the Members' Code of Conduct	Senior Governance Officer	31/03/2025
<b>R4: Risk Management Framework</b> During the service plan refresh exercise, to identify, link, record and manage risks that threaten the achievement of operational objectives.	Senior Governance Officer	31/03/2024 Updated to 31/05/24
<b>Port Marine Safety Code</b>		
<b>R9: Pilotage</b> The General Direction for larger vehicles and navigation on works guidance be finalised	Head of Ranger Services	31/03/2024  Once legal advice is received, the General Direction will need a six month consultation.  Updated to 31/10/24
<b>R3: Key Performance Indicators</b> Update website data to reflect current PIs and put in place a process to ensure the monthly monitoring of PI data and the data published on the website is up to date and its accuracy substantiated by documentary evidence.	Head of Safety Management	31/05/2024
<b>R4: Compliance Statement</b> Action to be taken to ensure than an appropriate compliance statement is made by the Duty Holder when this is next required by the MCA (likely to be March 2024).	Head of Safety Management	31/07/2024

<p><b>R5: Marine Safety Plan</b></p> <p>Action be taken to ensure that the Authority complies with the requirement for a MSP and associated reporting process, either in the form of a separate safety plan or through relevant provisions being added to the MSMS and/or associated policies.</p>	<p>Head of Safety Management</p>	<p>31/10/2024</p>
<p><b>Corporate Health &amp; Safety</b></p>		
<p><b>R1: Health &amp; Safety at Work policy</b></p> <p>The Health &amp; Safety at Work Policy be reviewed and updated, if necessary, in line with the defined cyclical timescales. This will mitigate the risk of health and safety issues arising due to outdated policy.</p>	<p>Head of Safety Management</p>	<p>30/06/2024</p> <p>Updated to 31/12/24 to take account of new Head of Safety Management starting in June.</p>

## Appendix 1(b) - Audit recommendations: Progress against Action Plan 2023/24

**Table 1**

Actions arising from 2022/23 audit and any outstanding actions from previous audits

Audit recommendation	Lead officer	Target/status
<b>Governance and Risk Management</b>		
<p><b>R2: Change to committee meetings</b> In relation to the document management system (DMS), the following is undertaken:</p> <ul style="list-style-type: none"> <li>Notes are added to deferred items to explain which committee date the item has been deferred to; and</li> </ul> <p>To review if there is a way to match up/link the items on the forward plan to the generated items area.</p>	Senior Governance Officer	31/12/2023 updated to 31/12/24  Agreed at Risk, Audit & Governance Committee on 12/03/24 to delete this recommendation
<p><b>R4: Risk Management Framework</b> During the service plan refresh exercise, to identify, link, record and manage risks that threaten the achievement of operational objectives.</p>	Senior Governance Officer	31/03/2024 Updated to 31/05/24
<p><b>R1: Governance Framework</b> The Terms of Reference of the Authority and committees be updated following consideration of the report by VWV.</p>	Monitoring Officer / Senior Governance Officer	22/09/23 Completed
<p><b>R2: Governance Framework</b> Following publication of the VWV report, include the Hearings Committee (or similar) in the published committee structure, give its roles and responsibilities</p>	Monitoring Officer / Senior Governance Officer	22/09/2023 Completed
<b>Port Marine Safety Code</b>		
<p><b>R9: Pilotage</b> The General Direction for larger vehicles and navigation on works guidance be finalised.</p>	Head of Safety Management	28/02/2023  Carried forward to 2023/24  Updated to 31/03/24



**Corporate Health & Safety****R1: Health & Safety at Work policy**

The Health & Safety at Work Policy be reviewed and updated, if necessary, in line with the defined cyclical timescales. This will mitigate the risk of health and safety issues arising due to outdated policy.

Head of Safety  
Management

30/06/2024

Updated to 31/12/24 to take account of new Head of Safety Management starting in June.

# Broads Authority

## Code of Corporate Governance 2024

The Code of Corporate Governance helps the Broads Authority, as a public body, to develop its governance framework based on good practice and external guidance, and to demonstrate compliance with the principles of good governance.

Good governance is about making sure we do the right things, in the right way and for the right people in a timely, inclusive, open, honest and accountable manner. It is the systems and processes, and the values and principles, which direct and control what we do and how we relate to our communities. A key focus for good governance within the public sector is to achieve sustainable results that benefit the economy, the environment and society.

Our Code of Corporate Governance is based on the core principles in the CIPFA/SOLACE Framework [Delivering Good Governance in Local Government](#). We also have our own set of core values to underpin the behaviour of our Members and staff, who share responsibility for good governance.

We review and update the Code every year through consultation with senior staff, the Head of Internal Audit and the Chair of the Risk, Audit and Governance Committee. Any significant areas of concern raised in the review are referred to our Management Team or to the appropriate committee for comment or decision.

The Chief Executive is delegated to make necessary changes to the Code as a result of the review to keep it up to date. Significant changes to the Code are reported to the Authority in July as part of the Annual Governance Statement, and any new or outstanding actions are included in the Statement's Action Plan for the following year. The Code for 2023 was approved by the Authority on 28 July 2023 and signed off by the Chair and Chief Executive.

(Chair of the Authority)

John Packman (Chief Executive)

Date: 26 July 2024

## Broads Authority Code of Corporate Governance: Schedule (July 2024)

This schedule represents what we do, or intend to with immediate effect, to demonstrate our compliance with the principles of good governance in local government. The core principles and sub-principles are taken from the CIPFA/ SOLACE Framework [Delivering Good Governance in Local Government](#) (2016). We will review our performance against the Code during 2024/25 and report the results to the Risk, Audit and Governance Committee and subsequently to the Broads Authority in July 2025 as part of the Annual Governance Statement.

**Table 1**

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

Sub-principles	Our evidence to support this principle
<p><b>Behaving with integrity</b></p> <p>Behaving with integrity and leading a culture where acting in the public interest is visibly and consistently demonstrated, thereby protecting the reputation of the organisation</p> <p>Establishing and communicating specific standard operating principles or values for the organisation and its staff, building on the Seven Principles of Public Life (the Nolan Principles)</p> <p>Leading by example, embedding the above principles in effective, up-to-date policies and processes and using them as a framework for decision making and other actions</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Appointment of Independent Persons</li> <li>• Risk, Audit and Governance Committee oversight</li> <li>• BA Core Values</li> <li>• Codes of Conduct for Employees, Members and Planning Committee Members</li> <li>• Declaration of Gifts and Hospitality for Members and officers</li> <li>• Disciplinary Procedures for Officers</li> <li>• Financial Regulations, Contract Standing Orders and Procurement Strategy</li> <li>• Guide for Local Authority appointees to the Broads Authority</li> <li>• Internal and External Audit</li> <li>• Local Protocol on Member and Officer Relations</li> <li>• Member and officer induction and annual appraisals</li> <li>• Members’ Counter Fraud, Corruption and Bribery Strategy &amp; Response Plan</li> <li>• Monitoring Officer Protocol</li> <li>• Register of Interests for Members and declarations of interests made at meetings and recorded in minutes</li> </ul>

	<ul style="list-style-type: none"> <li>• Register of Interests for officers</li> <li>• Related party declarations note as part of the Statement of Accounts.</li> <li>• Safeguarding Policy</li> <li>• Social Media Policy</li> <li>• Standards Committee</li> <li>• Standing Orders for the regulation of Authority proceedings</li> <li>• Standing Orders Relating to Contracts</li> <li>• Terms of Reference of Committees</li> <li>• Whistleblowing Policy for Members</li> <li>• Whistleblowing Policy for Officers</li> </ul>
<p>Demonstrating strong commitment to ethical values</p> <p>Establishing, monitoring and maintaining the organisation’s ethical standards and performance</p> <p>Underpinning personal behaviour with ethical values that permeate all aspects of the organisation’s culture and operation</p> <p>Developing and maintaining robust policies and procedures that place emphasis on agreed ethical values</p> <p>Making sure external providers of services on behalf of the organisation act with integrity and in compliance with ethical standards expected by the organisation</p>	<ul style="list-style-type: none"> <li>• Annual performance appraisal for Members and officers</li> <li>• BA Core Values</li> <li>• Best Companies Index employee survey</li> <li>• Codes of Conduct for Employees, Members and Planning Committee Members</li> <li>• Equality Policy</li> <li>• Guide for Local Authority appointees to the Broads Authority</li> <li>• Monitoring Officer Protocol</li> <li>• Procurement Strategy and procedures</li> <li>• Recruitment &amp; Selection Policy and procedures</li> <li>• Standards Committee</li> <li>• Use of Independent Persons in complaints procedures</li> <li>• Whistleblowing Policy for Members</li> <li>• Whistleblowing Policy for Officers</li> </ul>
<p><b>Respecting the rule of law</b></p> <p>Demonstrating a strong commitment to the rule of the law as well as adhering to relevant laws and regulations</p> <p>Making sure statutory officers, other key post holders and members are able to fulfil their responsibilities in accordance</p>	<ul style="list-style-type: none"> <li>• Codes of Conduct for Employees, for Members, and for Planning Committee Members and Officers</li> <li>• Committee structure in place with Terms of Reference, including powers reserved to the BA</li> </ul>

<p>with legislative and regulatory requirements</p> <p>Making the best use of the full powers available for the benefit of citizens, communities and other stakeholders</p> <p>Dealing effectively with breaches of legal and regulatory provisions</p> <p>Dealing effectively with corruption and misuse of power</p>	<ul style="list-style-type: none"> <li>• Compliance with CIPFA’s statement on the role of the Chief Finance Officer in Local Govt (CIPFA 2015)</li> <li>• Counter Fraud, Corruption and Bribery Strategy and Response Plan</li> <li>• Disciplinary Procedures for Officers</li> <li>• Financial Regulations, Contract Standing Orders and Procurement Strategy</li> <li>• Internal and external audit</li> <li>• Job descriptions and recruitment process for officers</li> <li>• Member induction programme and development protocol</li> <li>• Monitoring Officer appointed by BA</li> <li>• Monitoring Officer Protocol</li> <li>• Provision of legal advice to Members and officers</li> <li>• Register of Member and officer interests and related party interests</li> <li>• Role descriptions for Members</li> <li>• Scheme of Powers delegated to Chief Executive and other authorised officers</li> <li>• Standards Committee</li> <li>• Statutory Officers appointed by the Authority</li> <li>• Whistleblowing Policy for Members</li> <li>• Whistleblowing Policy for Officers</li> </ul>
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**Table 2**

Principle B: Ensuring openness and comprehensive stakeholder engagement

<b>Sub-principles</b>	<b>Our evidence to support this principle</b>
<p><b>Ensuring openness</b></p> <p>Demonstrating, documenting and communicating the organisation’s commitment to openness</p> <p>Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness - if that is not the case, a</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement</li> <li>• BA Core Values</li> <li>• BA website (includes public information about Members and their roles, officer roles, and how the public can input to and influence BA decisions)</li> </ul>

<p>justification for the reasoning for keeping a decision confidential is provided</p> <p>Providing clear reasoning and evidence for decisions, in both public records and explanations to stakeholders, being explicit about the criteria, rationale and considerations used. In due course, making sure the impact and outcomes of those decisions are clear</p> <p>Using formal and informal consultation and engagement to determine the most appropriate and effective interventions or courses of action</p>	<ul style="list-style-type: none"> <li>• Broads Engage stakeholder events and promotion</li> <li>• Broads Local Plan - formal consultation stages (set out in Statement of Community Involvement)</li> <li>• Chairs’ briefings</li> <li>• Committee meetings held in public and audio recordings of meetings available to public on request</li> <li>• Committee meetings (non-decision making) held remotely and live-streamed, and also available to watch via YouTube</li> <li>• Corporate Partnerships Register</li> <li>• Fair and transparent data processing through privacy notices</li> <li>• Financial Regulations and Standing Orders Relating to Contracts</li> <li>• Financial statements</li> <li>• Information published in respect of expenditure over £250</li> <li>• Member Allowances Scheme</li> <li>• Public consultation processes for strategic plan reviews (e.g. Broads Plan, guiding strategies)</li> <li>• Public question time at Authority meetings</li> <li>• Publication of agendas and reports in line with Local Government Act 1972 requirements</li> <li>• Record of decisions in committee minutes</li> <li>• Use of Transparency Regulations 2015</li> </ul>
<p><b>Comprehensive stakeholder engagement</b></p> <p>Engaging effectively with all stakeholders, making sure the purpose and aims for each stakeholder relationship are clear so outcomes are successful and sustainable</p> <p>Developing formal and informal partnerships to encourage more efficient use of resources and more effective outcomes</p> <p>Basing partnerships on trust, shared commitment to change, culture that</p>	<ul style="list-style-type: none"> <li>- Annual Business Plan, Annual Report and visitor publications (e.g. Broadcaster), social media accounts</li> <li>- Appointment process to Navigation Committee and Broads Local Access Forum</li> <li>- Broads Briefing monthly newsletter from CEO</li> <li>- Broads Engage stakeholder events and promotion</li> <li>- Broads Local Access Forum</li> </ul>

<p>promotes and accepts challenge among partners, and clear awareness of the added value of partnership working</p> <p>Establishing a clear policy on the type of issues the organisation will meaningfully consult on or involve communities, individuals, service users and other stakeholders to make sure the service (or other) provision is contributing towards intended outcomes</p> <p>Having effective communication methods and making sure members and officers are clear on their roles in community engagement</p> <p>Encouraging, collecting and evaluating the views and experiences of stakeholders of different backgrounds, including reference to future needs</p> <p>Implementing effective feedback mechanisms to show how stakeholder views have been considered</p> <p>Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity</p> <p>Taking account of the impact of decisions on future generations of taxpayers and service users</p>	<ul style="list-style-type: none"> <li>- Broads Local Plan - formal consultation stages (set out in Statement of Community Involvement)</li> <li>- Broads Plan 6-monthly progress update report (and continual progress monitoring on e-system)</li> <li>- Broadsheet (toll payer newsletter)</li> <li>- KPI annual reporting as part of NPA monitoring process to Defra</li> <li>- Learning resources on BA website, including Broads Curriculum materials for schools</li> <li>- Navigation Committee</li> <li>- Notices to Mariners</li> <li>- Public questions time at Authority meetings</li> <li>- Regular meetings between Chairs and CEOs of BA and constituent local authorities</li> <li>- Regular officer level liaison with partner organisations</li> <li>- Visitor and user surveys</li> </ul>
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**Table 3**

Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits

<b>Sub-principles</b>	<b>Our evidence to support this principle</b>
<p><b>Defining outcomes</b></p> <p>Having a clear vision statement of the organisation’s purpose and intended outcomes, with performance indicators, which provide the basis for its overall strategy, planning and other decisions</p>	<ul style="list-style-type: none"> <li>• Annual Business Plan</li> <li>• BA guiding level strategies (e.g. Integrated Access, Sediment Management, Education, Biodiversity)</li> <li>• Broads Local Plan (spatial planning policy)</li> <li>• Broads Plan (key partnership strategy for the Broads, reviewed on 5-yearly cycle)</li> <li>• Corporate and Directorate Risk Registers</li> </ul>

<p>Specifying the intended impact on/ changes for stakeholders in the short and longer term</p> <p>Delivering defined outcomes sustainably basis within available resources</p> <p>Identifying and managing risks to achieving outcomes</p> <p>Managing service user expectations with regard to setting priorities and making the best use of available resources</p>	<ul style="list-style-type: none"> <li>• Corporate Partnerships Register</li> <li>• Norfolk &amp; Suffolk Broads Act 1998 (BA statutory purposes)</li> </ul>
<p><b>Considering social, economic and environmental benefits</b></p> <p>Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decisions about service provision</p> <p>Taking a longer-term view in decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation’s intended outcomes and short-term factors such as the political cycle or financial constraints</p> <p>Determining the wider public interest associated with balancing conflicting interests in achieving the various economic, social and environmental benefits, through consultation where possible, to ensure appropriate trade-offs</p> <p>Ensuring fair access to services</p>	<ul style="list-style-type: none"> <li>• Broads Local Plan</li> <li>• Broads Plan and guiding level strategies</li> <li>• Equalities Working Group</li> <li>• Norfolk &amp; Suffolk Broads Act 1998 (BA statutory purposes)</li> <li>• Project Development Group procedures</li> <li>• External Funding Guidance</li> <li>• Public consultation for strategic plan reviews</li> </ul>

**Table 4**

Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes

Sub-principles	Our evidence to support this principle
<p><b>Determining interventions</b></p> <p>Making sure decision makers receive objective and rigorous analyses of various options showing how intended outcomes</p>	<ul style="list-style-type: none"> <li>• BA and partner/stakeholder working groups</li> <li>• Budget setting process</li> <li>• Chairs’ briefing sessions</li> </ul>



<p>would be achieved and associated risks, to achieve best value.</p> <p>Considering stakeholder feedback when making decisions about service improvements, or where services are no longer required, to prioritise competing demands and limited resources such as people, skills and land, and bearing in mind future impacts.</p>	<ul style="list-style-type: none"> <li>• Chairs’ Group</li> <li>• Financial Regulations and Standing Orders Relating to Contracts</li> <li>• Member working groups</li> <li>• Project boards for large partnership projects (e.g. FiPL, Nature for Climate Peatland Scheme, FibreBroads)</li> <li>• Public consultation responses informing strategic plan and policy reviews (e.g. Broads Plan, Broads Local Plan)</li> </ul>
<p><b>Planning interventions</b></p> <p>Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets</p> <p>Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered</p> <p>Considering and monitoring risks facing each partner when working collaboratively, including shared risks</p> <p>Having flexible and agile arrangements so mechanisms for delivering goods and services can adapt to changing circumstances</p> <p>Establishing appropriate key performance indicators (KPIs) as part of the planning process to identify how the performance of services and projects is to be measured</p> <p>Ensuring capacity exists to generate the information required to review service quality regularly</p> <p>Preparing budgets in accordance with objectives, strategies and the medium-term financial plan</p> <p>Informing medium- and long-term resource planning by drawing up realistic estimates of revenue and capital expenditure, aimed</p>	<ul style="list-style-type: none"> <li>• Annual budget processes approved by BA with consultation by Navigation Committee</li> <li>• Financial Monitoring</li> <li>• Financial Strategy</li> <li>• Key Performance Indicator (KPI) annual reporting as part of National Park Authority monitoring process to Defra</li> <li>• Performance reporting to Committees</li> <li>• Regular monitoring undertaken by budget holders and Management Team and reported to committee</li> <li>• Review cycles for Broads Plan, guiding strategies (e.g. Integrated Access Strategy, Biodiversity &amp; Water Strategy) and Broads Local Plan</li> <li>• Risk management (see principle F)</li> <li>• Corporate Risk Register review by Risk, Audit &amp; Governance Committee</li> </ul>

<p>at developing a sustainable funding strategy</p>	
<p><b>Optimising achievement of outcomes</b></p> <p>Ensuring the medium-term financial strategy integrates and balances service priorities, affordability and other resource constraints</p> <p>Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term</p> <p>Ensuring the medium-term financial strategy sets the context for ongoing decisions on significant delivery issues, or responses to changes in the external environment that may arise during the budgetary period, to achieve outcomes while optimising resource use</p> <p>Ensuring ‘social value’ through service planning and commissioning</p>	<ul style="list-style-type: none"> <li>• Annual setting of tolls in consultation with Navigation Committee and through a member workshop</li> <li>• Asset Management Strategy</li> <li>• Budget and 3-year Financial Strategy agreed by BA</li> <li>• Budget reports, management procedures and training</li> <li>• Budgets monitored by Risk Audit &amp; Governance Committee and BA</li> <li>• Capital, Treasury and Investment Strategy</li> <li>• Procurement Strategy and reference guide</li> <li>• Standing Orders Relating to Contracts</li> </ul>

**Table 5**

Principle E: Developing the Authority’s capacity, including the capacity of its leadership and the individuals within it

<b>Sub-principles</b>	<b>Our evidence to support this principle</b>
<p><b>Developing capacity</b></p> <p>Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness</p> <p>Improving resource use through techniques such as benchmarking</p> <p>Recognising the benefits of partnerships and collaborative working where added value can be achieved</p> <p>Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources</p>	<ul style="list-style-type: none"> <li>• Annual presentation to BA on major partnerships</li> <li>• Health and Safety policies and procedures</li> <li>• ICT Corporate Group review of ICT performance</li> <li>• Management Team decision in recruitment processes</li> <li>• Member and officer induction and appraisal programmes</li> <li>• Corporate Risk Register review</li> <li>• Whistleblowing Policy for Members</li> <li>• Whistleblowing Policy for Officers</li> </ul>

<p><b>Developing leadership capacity</b></p> <p>Developing protocols to ensure elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship, and that a shared understanding of roles and objectives is maintained</p> <p>Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body</p> <p>Ensuring the Chair and Chief Executive Officer have clearly defined and distinctive leadership roles within a structure whereby the CEO leads in implementing strategy and managing the delivery of services and other outputs set by members, and each provides a check and a balance for each other's authority</p> <p>Developing the capabilities of members and senior management to achieve effective leadership, and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks</p> <p>Having structures in place to encourage public participation</p> <p>Considering the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections</p> <p>Holding staff to account through regular performance reviews that take account of training or development needs</p> <p>Maintaining the health and wellbeing of the workforce and helping individuals to maintain their own physical and mental wellbeing</p>	<ul style="list-style-type: none"> <li>• Director of Finance compliance with CIPFA Statement on the Role of the Chief Finance Officer in Local Government</li> <li>• Conditions of employment and HR policies</li> <li>• Contract management in respect of externally provided services</li> <li>• Data Protection Officer in place</li> <li>• Financial Regulations and Standing Orders</li> <li>• Member and officer appraisal programmes, Member Development Protocol</li> <li>• Member workshops on key issues</li> <li>• Monitoring Officer appointed by BA</li> <li>• Scheme of Powers delegated to Chief Executive and other authorised officers</li> <li>• Standards Committee</li> <li>• Standing Orders for the Regulation of Authority Proceedings</li> <li>• Terms of Reference for Committees</li> </ul>
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**Table 6**

Principle F: Managing risks and performance through robust internal controls and strong public finance management

Sub-principles	Our evidence to support this principle
<p><b>Managing risk</b></p> <p>Recognising risk management is integral to all activities and must be considered in all aspects of decision making</p> <p>Implementing robust and integrated risk management arrangements and making sure they work effectively</p> <p>Allocating clear responsibilities for managing individual risks</p>	<ul style="list-style-type: none"> <li>• Business Continuity Plan</li> <li>• Corporate Risk Register (reviewed every 3 months and reported to every meeting of the Risk, Audit and Governance Committee)</li> <li>• Counter Fraud, Corruption and Bribery Strategy and Response Plan</li> <li>• Risk analysis in BA reports</li> <li>• Risk Management Policy</li> </ul>
<p><b>Managing performance</b></p> <p>Effectively monitor service delivery including planning, specification, execution and independent post implementation review</p> <p>Making decisions based on relevant, clear objective analysis and advice, pointing out the implications and risks inherent in the organisation’s financial, social and environmental position and outlook</p> <p>Ensuring an effective scrutiny or oversight function is in place that provides constructive challenge and debate on policies and objectives before, during and after decisions are made. This will help enhance the performance of the organisation and any other organisation (or committee system) for which it is responsible</p> <p>Effectively and constructively challenging and policies and objectives to support balanced and effective decision making</p> <p>Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement</p> <p>Ensuring consistency between specification stages (such as budgets) and post</p>	<ul style="list-style-type: none"> <li>• Risk, Audit and Governance Committee</li> <li>• Capital, Treasury and Investment Policy</li> <li>• Chairs’ Group</li> <li>• Financial Monitoring</li> <li>• Financial Regulations and procedures</li> <li>• Management Team and Section Head reviews of Directorate work plans and budgets</li> <li>• Procurement Strategy</li> <li>• Regular finance reports to BA, Risk, Audit &amp; Governance Committee and Navigation Committee</li> <li>• Risk and financial implications in reports to BA</li> <li>• Standing Orders Relating to Contracts</li> <li>• Statement of Accounts follows directorate headings</li> <li>• Terms of Reference for Committees</li> </ul>

implementation reporting (such as financial statements)	
<p><b>Developing robust internal control</b></p> <p>Aligning the risk management strategy and policies on internal control with achieving objectives</p> <p>Regularly evaluating and monitoring risk management and internal control</p> <p>Having effective counter fraud and anti-corruption arrangements in place</p> <p>Making sure that additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor</p> <p>Having an audit committee or equivalent group/function, independent of the executive and accountable to the governing body</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Annual Internal Audit plans include key controls and corporate governance</li> <li>• Annual Report and Opinion provided by Head of Internal Audit with ref to governance, risk management and internal control arrangements</li> <li>• Risk, Audit and Governance Committee</li> <li>• Best Companies Index employee survey</li> <li>• Capital, Treasury and Investment Strategy</li> <li>• Codes of Conduct for Employees, for Members, and for Planning Committee Members and Standing Orders Relating to Contracts</li> <li>• Counter Fraud, Corruption and Bribery Strategy and Response Plan</li> <li>• Disciplinary Procedures for Officers</li> <li>• Effective internal audit function resourced and maintained</li> <li>• Financial Regulations, Contract Standing Orders and Procurement Strategy</li> <li>• Internal and external annual audit processes</li> <li>• Local Protocol on Member and Officer Relations</li> <li>• Monitoring Officer Protocol</li> <li>• Procurement Strategy</li> <li>• Publication of reports and meeting minutes showing declarations of interest made</li> <li>• Risk Owners (e.g. reporting to Corporate Risk Register)</li> <li>• Scheme of Powers delegated to Chief Executive and other authorised officers</li> <li>• Standing Orders Relating to Contracts</li> <li>• Training for Members</li> </ul>
<p><b>Managing data</b></p> <p>Having effective arrangements in place for the safe collection, storage, use and sharing</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement</li> <li>• Data and Information Retention Policy</li> </ul>

<p>of data, including processes to safeguard personal data</p> <p>Having effective arrangements in place and operating when sharing data with other bodies</p> <p>Regularly reviewing and auditing the quality and accuracy of data used in decision making and performance monitoring</p>	<ul style="list-style-type: none"> <li>• Data Asset Register, privacy notices and Protection policy</li> <li>• Data Protection Officer and deputy (qualified Data Practitioner), data protection training to Members and officers</li> <li>• Encryption of portable devices</li> <li>• IT security arrangements</li> <li>• Review of contracts to ensure data security provisions are incorporated</li> <li>• Statement of Accounts narrative report</li> </ul>
<p><b>Having strong public financial management</b></p> <p>Ensuring financial management supports both long-term achievement of outcomes and short-term financial and operational performance</p> <p>Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls</p>	<ul style="list-style-type: none"> <li>• 3-year Financial Strategy</li> <li>• Annual budget and budget management procedures</li> <li>• Annual Business Plan</li> <li>• Annual Statement of Accounts</li> <li>• Assessment against CIPFA Financial Management Code</li> <li>• Asset Management Strategy</li> <li>• Capital, Treasury and Investment Strategy Chief Finance Officer compliance with the CIPFA Statement on the Role of the Chief Finance Officer in Local Government</li> <li>• Earmarked reserves for long-term replacement of assets</li> <li>• External Audit reports</li> <li>• Financial Regulations and procedures</li> <li>• Financial statements</li> <li>• Reports to BA include financial and risk considerations</li> <li>•</li> </ul>

**Table 7**

Principle G: Implement good practice in transparency, reporting and audit to deliver effective accountability

<b>Sub-principles</b>	<b>Our evidence to support this principle</b>
<p><b>Implementing good practice in transparency</b></p> <p>Writing and communicating reports for public and other stakeholders in fair, balanced and understandable style, appropriate to the intended audience and easy to access and interrogate</p> <p>Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny, while not being too onerous to provide or for users to understand</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Information published in respect of expenditure over £250</li> <li>• Monthly data published on BA website in line with Local Government Transparency Code</li> <li>• Payment performance statistics for invoices paid within 30 days published on website on annual basis</li> <li>• Record of delegated decisions</li> <li>• Scheme of Powers delegated to Chief Executive and other authorised officers</li> <li>• Compliance with the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018)</li> </ul>
<p><b>Implementing good practice in reporting</b></p> <p>Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way</p> <p>Ensuring members and senior management own the results reported</p> <p>Ensuring robust arrangements for assessing the extent to which principles in this Framework have been applied, and publishing the results on this assessment, including action plan for improvement and evidence to demonstrate good governance (AGS)</p> <p>Apply Framework to jointly managed or shared service organisations as appropriate</p> <p>Ensure performance information that accompanies the financial statements on a consistent and timely basis and the statements allow for comparison with other, similar organisations</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Broads Plan 6-monthly progress reports</li> <li>• S17 officer reporting requirements</li> <li>• Statements of Accounts narrative report</li> <li>• Strategic Direction reports (BA annual strategic priorities)</li> </ul>

<p><b>Developing assurance and effective accountability</b></p> <p>Acting upon recommendations for corrective action made by external audit</p> <p>Ensuring an effective internal audit service with direct access to members is in place, providing assurance with regard to governance arrangements, and acting upon recommendations</p> <p>Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations</p> <p>Gaining assurance on risks associated with delivering services through third parties and evidencing this in the AGS</p> <p>When working in partnership, make sure arrangements for accountability are clear and the need for wider public accountability is recognised and met.</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Attendance of internal and external auditors at Risk, Audit and Governance Committee (RAGC)</li> <li>• Audit actions formally logged, followed up and reported to RAGC</li> <li>• Best Companies Index employee survey</li> <li>• Corporate and Directorate Risk Registers</li> <li>• Follow up of internal audit recommendations by Director of Finance and Senior Accountant and reported to every RAGC</li> <li>• Head of Internal Audit compliance with CIPFA Statement on the Role of the Head of Internal Audit</li> <li>• Internal audit function delivered by contract and meets PSIAS requirements</li> <li>• Peer Review (2017) and Action Plan (reviewed 2019/20)</li> </ul>
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