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# Annual Governance Statement

2012-13



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## A. Scope of Responsibility

1. Wiltshire 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.
2. In discharging this overall responsibility, the Council is also responsible for putting in place proper arrangements for the governance of its affairs, including the management of risk, and facilitating the effective exercise of its functions.

## B. The Purpose of the Governance Framework

3. The governance framework comprises the systems and processes, and culture and values, by which the Council is directed and controlled and the activities through which the Council accounts to, engages with and leads the community. It enables the Council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost effective services.
4. The assurance framework and the system of internal control are significant parts of that framework. They are designed to manage risk to a reasonable level. They cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The assurance framework and the system of internal control are based on an ongoing process that is designed to:
  - identify and prioritise the risks to the achievement of the Council's policies, aims and objectives;
  - evaluate the likelihood of those risks being realised;
  - assess the impact of the risks if they are realised;
  - manage the risks efficiently, effectively and economically.
5. The assurance framework also provides a mechanism for monitoring and implementing a system of continuous governance improvement.
6. The governance framework has been in place at the Council for the year ended 31 March 2013 and up to the date of approval of the Statement of Accounts for 2012/13.

## C. The Governance Framework

7. The Council's governance framework comprises a broad range of strategic and operational controls, which work together to ensure the sound operation of the Council. The key elements are summarised below.
8. Documents referred to are available from the Council or may be viewed on the Council's website ([www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)).
9. The review of the Council's governance arrangements, through the Annual Governance Statement, has taken account of best practice identified in the CIPFA/Solace guidance Delivering Good Governance in Local Government, Addendum 2012.

### Purpose and Planning

10. The Council's vision and goals are set out in its 4 year Business Plan, which was adopted by the Council on 22 February 2011. The Council's vision is to create stronger and more resilient communities and in support of this it has the following goals:

- provide high quality, low cost customer focused services;
- ensure local, open and honest decision making;
- working with our partners to support Wiltshire's communities.

11. The Business Plan is supported by a Financial Plan, which demonstrates how it will be funded. The management of the Council's strategic risks helps achieve the Council's objectives.

Following the unitary elections in May 2013 a new Business Plan for 2013-17 has been developed which is due to go before full council for approval on 3 September 2013.

### Policy and Decision-Making Framework

12. The Council's Constitution provides the framework within which the Council operates. It sets out how decisions are made and the procedures which must be followed to ensure that these are efficient, effective, transparent and accountable.
13. The Constitution defines the role and responsibilities of the key bodies in the decision-making process - the Council, Cabinet, and Committees, including the Strategic Planning Committee, Area Planning Committees, Licensing Committee, Overview and Scrutiny Committees, Standards Committee, Audit Committee, Staffing Policy Committee, Officer Appointments Committee and Area Boards.

14. The council has established a Health and Well-being Board in accordance with requirements under the Health and Social Care Act 2012. The Board is a committee of the council with a strategic leadership role in promoting integrated working between the council and the NHS, and in relation to public health services. It is the key partnership and focal point for strategic decision making about the health and well-being needs of the local community.<sup>5</sup> The council has also established the Wiltshire Police and Crime Panel to review and scrutinise decisions of the Police and Crime Commissioner. The Panel is a joint committee with Swindon Borough Council.
16. The Constitution is reviewed regularly by the Monitoring Officer and the Standards Committee through its Constitution Focus Group to ensure that it reflects changes in the law and remains fit for purpose.
17. The Leader and Cabinet are responsible for discharging the executive functions of the Council, within the budget and policy framework set by the Council, and some of this is delegated to Area Boards.
18. The Council publishes a Forward Work Plan once a month giving details of all matters anticipated to be considered by the Cabinet over the following 4 months, including items which constitute a key decision<sup>1</sup>
19. Schemes of Delegation are in place for Cabinet Committees, Cabinet Members and Officers to facilitate efficient decision-making. The Leader has established two Cabinet Committees - the Cabinet Capital Assets Committee and the Cabinet Business Relief Committee.
20. The Council has established 18 area committees known as Area Boards. Each area board exercises local decision making under powers delegated by the Leader.
21. The Council's overview and scrutiny arrangements consist of a management committee and 3 select committees covering Children's Services, Environment, and Health. These committees establish standing and ad hoc task groups to undertake detailed reviews. Rapid scrutiny exercises also provide opportunities where there are time constraints. Scrutiny member representatives can also be appointed to boards of major projects.
22. These arrangements serve to hold the Cabinet, its Committees, individual Cabinet Members and officers to public account for their executive policies, decisions and actions.

<sup>1</sup> 'Key decisions' are defined in Paragraph 9 of Part 1 of the Constitution. They include any decision that would result in the closure of an amenity or total withdrawal of a service; any restriction of service greater than 5%; any action incurring expenditure or producing savings greater than 20% of a budget service area; any decision involving expenditure of £ 500,000 or more, (subject to certain exceptions), any proposal to change the policy framework; any proposal that would have a significant effect on communities in an area comprising two or more electoral divisions.

23. The Standards Committee is responsible for:

- promoting and maintaining high standards of conduct by Members and Officers across the Council;
- determination of complaints under the Members' Code of Conduct;
- oversight of the Constitution, overview of corporate complaints handling and Ombudsman investigations, and the whistle blowing policy.

24. The Localism Act 2011 introduced a new standards regime, which came into effect on 1 July 2012. As part of this the council published a new code of conduct for members and established arrangements for dealing with complaints under the code for Wiltshire unitary and parish councillors, including the appointment of 3 independent persons in accordance with the new statutory requirements.

25. The Audit Committee is responsible for:

- monitoring and reviewing the Council's arrangements for corporate governance, risk management and internal control;
- reviewing the Council's financial management arrangements and approving the annual Statement of Accounts;
  - focusing audit resources
- monitoring the effectiveness of the internal and external audit functions;
- monitoring the implementation of agreed management actions arising from audit reports.

#### Wiltshire Pension Fund

26. The Wiltshire Pension Fund is overseen by the Wiltshire Pension Fund Committee. This Committee has its delegated power from the full Council, rather than the Executive (Cabinet), so as to avoid any conflict of interest (e.g. in relation to the setting of employer contributions).

27. This Committee is responsible for all aspects of the fund, including:

- the maintenance of the fund;
- preparation and maintenance of policy, including funding and investment policy;
- management and investment of the fund;
- appointment and review of investment managers;
- monitoring of the audit process.

28. The Wiltshire Pension Fund Committee exercises its responsibilities in relation to investment management when it sets investment policy and appoints/monitors external investment managers.

## Regulation of Business

29. The Constitution contains detailed rules and procedures which regulate the conduct of the Council's business. These include:
- Council Rules of Procedure
  - Budget and Policy Framework Procedure
  - Financial Regulations and Procedure Rules
  - Procurement and Contract Rules
  - Members' Code of Conduct
  - Officers' Code of Conduct
  - Corporate Complaints Procedure
30. In April 2012 the Council completed a programme of work which resulted in the successful transfer and integration of the Public Health function in Wiltshire. A robust governance framework for Public Health was agreed and transferred.
31. The statutory officers - the Head of Paid Service (see note below in this paragraph), the Monitoring Officer (Solicitor to the Council) and the Chief Finance Officer have a key role in monitoring and ensuring compliance with the Council's regulatory framework and the law. The statutory officers are supported in this role by the Council's HR, legal and democratic services, finance, governance and procurement teams, and also by the internal audit service.
32. Internal Audit services in Wiltshire are provided through a partnership with South West Audit Partnership.
33. The following bodies have an important role in ensuring compliance:
- Audit Committee
  - Overview and Scrutiny Committees and Task Groups
  - Standards Committee
  - Internal Audit (this function is provided externally by the South West Audit Partnership (SWAP))
  - External Audit and Inspection Agencies.
34. The Council has established a Governance Assurance Group whose membership is composed of senior officers with lead responsibility for key areas of governance and assurance, together with an elected member who is the vice-chair of the Audit Committee. Other officers and members attend by invitation to provide the Group with information about issues on which it is seeking assurance. Officers can also bring any concerns about the Council's governance arrangements forward to the Group for consideration.

<sup>2</sup>. The Corporate Leadership Team comprises the three Corporate Directors, supported by the Chief Finance Officer / Section 151 Officer, Solicitor to the Council / Monitoring Officer, Service Director HR and Organisational Development and the Director of Communications

35. The Governance Assurance Group meets monthly and has a forward work plan. It is responsible for gathering evidence for and drafting the Annual Governance Statement. It identifies any potential significant governance issues throughout the year, and seeks assurance on the effectiveness of measures to address these. It has a key role in promoting and supporting sound governance across the organisation and reports as required to the Corporate Leadership Team.<sup>3</sup>

## Management of Resources, Performance and Risk

### Financial management

36. Financial management and reporting is facilitated by:

- Regular reports to Cabinet on the Council's Revenue Budget and Capital Programme;
- Regular review by the Corporate Leadership Team;
- Regular consideration of these reports by the Budget and Performance Task Group;
- Budget monitoring by Service Managers;
- Compliance with the Council's Budgetary and Policy Framework, Financial Regulations and Financial Procedure Rules;
- Compliance with external requirements, standards and guidance;
- Publication of Statement of Accounts;
- Overseeing role of the Audit Committee.

37. The Council's financial management arrangements are consistent with the governance requirements of the CIPFA Statement on the Role of the Chief Financial Officer in Local Government, issued in 2010.

### Performance and Risk Management Reporting

38. The Council's Business Plan sets out how the Council will:

- Protect our most vulnerable citizens by investing in their services;
- Invest in the future of Wiltshire by enhancing key service areas;
- Keep the council tax low;
- Make savings to cover the cut in government funding and projected investments.

<sup>3</sup>

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The role of Head of Paid Service was discharged by the Service Director, HR and Organisational Development until July 2013 when the council agreed that the role should be discharged by one of the corporate directors, Maggie Rae, pending consideration of a further report in November 2013 on how this would operate on a rotational basis between the three corporate directors)



39. The Business Plan is supported by the Risk Management Strategy. This is reviewed annually to ensure that risk management arrangements remain effective.
40. The Corporate Leadership Team receive quarterly reports detailing the risks that impact upon the strategic objectives of the Council. The Audit Committee receives reports every six months on the effectiveness of the risk management processes within the Council and its partnerships. Exception reports are submitted as and when required.
41. Risks are identified and monitored by service areas. Risks that are deemed significant are referred to the Corporate Risk Management Group (CRMG) for challenge and review. Reports are issued on the significant risks through the Council's reporting arrangements. Training on Risk Management is delivered to Members annually, including the development of specific training for staff involved in risk management arrangements as a result of their work.
42. The risks associated with major projects are managed through project management arrangements with regular reporting to the relevant boards and member bodies.
43. The Council's Business Continuity Policy provides a framework to maintain and develop business continuity arrangements at both corporate and service levels. It sets out the responsibilities of different management levels and groups as part of this process.

#### Internal Audit

44. The main role of Internal Audit is to provide an independent and objective opinion on the Council's control environment.
45. Internal Audit has the following additional responsibilities:
  - providing support to the Chief Finance Officer in meeting his responsibilities under Section 151 of the Local Government Act 1972, to make arrangements for the proper administration of the Council's financial affairs;
  - investigating any allegations of fraud, corruption or impropriety;
  - advising on the internal control implications of proposed new systems and procedures.
46. The annual Internal Audit Plan is based on an assessment of risk areas, using the most up to date sources of risk information, in particular the Council's Corporate and Service Risk Registers. The Plan is agreed with Corporate Directors, and presented to the Audit Committee for approval. The Committee receives reports of progress against the plan throughout the year. The Internal Audit Annual Report summarises the results and conclusions of the audit work throughout the year, and provides an audit opinion on the internal control environment for the Council as a whole.

## External Audit and Inspections

47. The Council is subject to audit by its external auditors, KPMG LLP, specifically in relation to the Council's financial statements and achievement of value for money (VFM). It is also subject to reviews by external inspection agencies, OFSTED, and the Care Quality Commission (CQC). The outcomes of external audit work and inspections are used to help strengthen and improve the Council's internal control environment and help secure continuous improvement.

## Directors' Assurance Statements

48. Service directors' assurance statements have been reviewed by the Governance Assurance Group. Any significant governance issues identified are included in Section E.

## Monitoring Officer

49. The Monitoring Officer has not made any adverse findings in the course of the exercise of his statutory responsibilities.

## D. Review of Effectiveness

50. 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 Council who have responsibility for the development and maintenance of the governance environment, the Council's internal audit function, and also by reports of external auditors and other review agencies and inspectorates.

51. The key principles of corporate governance are set out in the Council's Code of Corporate Governance as follows:

- Focusing on the purpose of the Council and on outcomes for the community, creating and implementing a vision for the local area;
- Engaging with local people and other stakeholders to ensure robust public accountability;
- Ensuring that members and officers work together to achieve a common purpose with clearly defined functions and roles;
- Promoting high standards of conduct and behaviour, and establishing and articulating the Council's values to members, staff, the public and other stakeholders;
- Taking informed, risk based and transparent decisions which are subject to effective scrutiny; and
- Developing the capacity of members and officers to be effective in their roles.

52. The effectiveness of the Council's assurance framework and system of internal control is assessed against these six principles.

**Focus on the purpose of the Council and on outcomes for the community, creating and implementing a vision for the local area**

53. The Council's vision and goals are set out in its Business Plan 2011- 2015. This is consistent with the long term priorities that are set out in the Community Plan 2011- 2026. Council will be asked to approve a new Business Plan for 2013 -17 on 3 September 2013.

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

54. The development of Wiltshire's area boards has played a key role in ensuring robust public accountability and engagement. The governance arrangements for the area boards are set out in the Council's Constitution. By the end of 2012 over 50% of items on Area Board agendas were resulting in local decisions.

55. During 2012/13 the Council introduced new ways of monitoring Area Board outcomes, including clearer reporting on outcomes from the JSA community conferences held in 2012, enhanced use of video reporting and grants evaluation and the establishment of the Area Boards achievements blog.

**Ensuring that councillors and officers work together to achieve a common purpose with clearly defined functions and roles**

56. The Constitution sets out clearly the roles and responsibilities of Councillors and Officers in the decision making process. This includes schemes of delegation which are currently under review as part of the ongoing review of the Constitution. Guidance and training for officers is available from Legal Services on the recording of decisions made by officers under new requirements introduced in September 2012.

57. The Council has adopted a Councillor and Officer Relations Protocol which:

- outlines the essential elements of the relationship between councillors and officers;
- promotes the highest standards of conduct;
- clarifies roles and responsibilities;
- ensures consistency with the law, codes of conduct and the Council's values and practices; and
- identifies ways of dealing with concerns by councillors or officers.

58. This Protocol has been reviewed to reflect the new Code of Conduct for Members, which came into effect on 1 July 2012.

## **Promoting high standards of conduct and behaviour, and establishing and articulating the authority's values to members, staff, the public and other stakeholders**

59. All staff are required to meet high standards of ethical conduct under the Officers' Code of Conduct.
60. The Officers' Code of Conduct was significantly strengthened by the introduction in the Spring of 2012 of the Behaviours Framework. This framework clearly articulates the behaviours expected of Council Officers. In 2012/13 the Council's staff appraisal procedure was amended to include a requirement for performance to be entered onto a central database (SAP) and for performance to be formally assessed against the Behaviours Framework.
61. The Council adopted a new code of conduct for Councillors and arrangements for dealing with member misconduct complaints under the requirements of the Localism Act 2011 which came into effect on 1 July 2012. The effectiveness of the code of conduct will be reviewed by the Standards Committee in the autumn of 2013.
62. Following the election of the Police and Crime Commissioner in November 2012, the Council has put in place a Police and Crime Panel and adopted a procedure for receiving and investigating complaints about the Police and Crime Commissioner and the Deputy Police and Crime Commissioner for Wiltshire.
63. The Council's Governance Service is responsible for customer complaints, access to information legislation, operation of the agreed arrangements under the new standards regime, and the promotion of good governance within the Council and with key partners, including the town and parish councils of Wiltshire. This helps to ensure that robust governance arrangements are supported across the Council.

### **Internal Audit**

64. Internal Audit represents an important element of the Council's internal control environment, and to be effective it must work in accordance with the Code of Practice for Internal Audit in Local Government, which lays down the mandatory professional standards for the internal audit of local authorities.
65. The Internal Audit Annual Report and Opinion 2012 -13 summarises the results and conclusions of the audit work throughout the year, and provides an independent audit opinion on the internal control environment for the Council as a whole. The Council's internal auditors, SWAP, have given an overall audit opinion of reasonable assurance on the adequacy and effective operation of the Council's control environment for 2012-13.

### **External Audit**

66. The latest report to those charged with governance, issued by KPMG LLP in respect of Wiltshire Council for 2012/2013, summarises the key issues arising from the audit of Wiltshire Council for the year ended 31 March 2013 and an assessment of the Council's arrangements to secure value for money in its use of resources.

67. The report highlights the key messages as follows:

- KPMG LLP issued an unqualified opinion on the accounts;
- The Council had addressed critical accounting matters appropriately. This included the implementation of International Financial Reporting Standards (IFRS);
- One adjustment to the draft financial statements was identified, which relates to a technical accounting adjustments. This does not affect either the cost of providing services or the net worth of the Council. This has been amended in the final version;
- KPMG LLP confirmed that the Council continued to evidence a strong financial reporting process and produced draft financial statements of high quality;
- KPMG LLP concluded that the Council had made proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

68. KPMG LLP's report to those charged with governance for 2012/2013 will be tabled at the meeting of the Audit Committee on 4 September 2013.

### **Taking informed, risk based and transparent decisions which are subject to effective scrutiny**

69. Cabinet Members and Officers exercising delegated powers are required to take decisions in accordance with their respective schemes of delegation. The Leader's protocol for decision-making by Cabinet Members ensures transparency by requiring publication of the intention to make a decision on 5 clear days' notice and the final decision.

70. In April 2012 the Council amended its constitutional Procurement and Contract Rules. This amendment resulted in strengthened arrangements for the governance of procurement, including a robust check and challenge system.

71. The Partnership Protocol and Register, now in operation for two years, captures the Council's partnerships arrangements. At present there are 42 identified partnerships in operation. Each partnership has an identified owner within the Council and has been reviewed to identify the risk status. The details of each partnership are available via the electronic Partnerships Register on the Council's intranet. These arrangements are being reviewed to ensure that all partnerships are appropriately captured on the register.

72. Since implementing the recommendations of a major review in May 2012 to increase the effectiveness of the Overview and Scrutiny function, a single work programme has been developed in discussion with Cabinet members and senior management which focused on Council priorities, customer needs, intervention and outcomes. It aims for early dialogue enabling most of its work to support policy development and pre-decision scrutiny in the Council.

73. The work undertaken by the Audit Committee this year has included:

- review and approval of the Annual Governance Statement and Statement of Accounts for 2011-12;
- review of the work and findings of Internal Audit, including the Annual Report and audit opinion on the control environment;
- review of the Council's risk management arrangements;
- review of the work and findings of external audit, including the Annual Audit Letter and Report to Those Charged with Governance.

74. Work on the Council's Business Continuity Management is a continuous development process designed to achieve resilience and the best possible outcomes for services and communities. A strategic and tactical training day was held in January 2013 for all Corporate Directors, Service Directors and Heads of Service. The training familiarised senior managers with the new major incident and recovery plans, increased resilience amongst managers and offered a practical exercise to put knowledge into practice. This training also built on the resilience arrangements and training that were put in place as a result of the Olympic and Jubilee celebrations during the summer of 2012.

75. The successful transfer of the Public Health team into the authority in April 2013 offers an opportunity to strengthen our response to both business continuity and emergency planning - to learn from their experience and expertise and to ensure the Council is able to respond to Public Health emergencies. We are therefore reviewing what form these services might take and how they may be delivered in the future to ensure continued robust resilience.

### **Developing the capacity of councillors and officers to be effective in their roles**

76. The Council is committed to the ongoing development of its Councillors and recognises the importance of building up their capacity and effectiveness.

77. The Council's Councillor Development Policy:

- Establishes Councillors' individual training needs and protocols and allocates budget according to the Council's priorities;
- Ensures equality of access to funds and training events;
- Evaluates the effectiveness of councillor development annually to inform the allocation of funding for future years.

78. A refreshed People Strategy for 2012 – 2015 has been developed and launched to support delivery of the business plan and the transformation programme. This includes embedding the behaviours framework and developing the culture of the council. An action plan will support the delivery of the People Strategy, which is critical to enabling the Council to create the capacity it needs to work in different ways and successfully meet current and future challenges.

#### Housing Landlord Service Improvement Plan

79. Wiltshire Council's housing services have engaged in a range of improvement projects which will modernise the services and address the issues raised in recent audits. The improvements include:

- Four new maintenance and repairs contracts delivering significant additional expenditure in the housing stock;
- A draft Asset Management Strategy and Business Plan;
- The implementation of a new housing IT system with improved work flows and an electronic document filing facility;
- A restructure of the Housing Management function to deliver a modern housing service;
- Increased resources into tenancy engagement and participation including a new housing board and tenant scrutiny.

80. The improvement programme will continue through 2013. The programme of work is governed by a programme board which considers all risks and issues at its fortnightly meeting.

## **E) Significant Governance Issues**

81. The following have been identified as significant governance issues:

### **Safeguarding Children and Young People**

In March 2012 Ofsted carried out an inspection of Wiltshire's safeguarding and looked after children services. Their report, published on 24 April 2012, judged the overall effectiveness of safeguarding services to be inadequate. In response to the Ofsted report in September 2012 the Department for Education issued the authority with an Improvement Notice which sets out a number of actions which must be completed before the end of 2013.

The Improvement Notice includes a requirement to create an Improvement Board with an independent chair. Wiltshire established the Improvement Board prior to the Improvement Notice being issued and an independent chair was appointed in June 2012. The Improvement Notice also requires that there is an Improvement Plan which is monitored by the Board at each meeting. The Director of Children's Services, Lead Member for Children's Services and the chair of Wiltshire Safeguarding Children Board report on progress and any issues and blocks to each Board meeting. The Council has had a risk action plan in place since June 2012. This focuses on failure to implement the actions included in the Improvement Plan. It is updated after each meeting of the Improvement Board.

In July 2013 Ofsted undertook an inspection of local authority arrangements for the protection of children in Wiltshire. This inspection considered key aspects of a child's journey through the child protection system, focusing on the experiences of the child or young person, and the effectiveness of the help and protection being offered. Inspectors scrutinised case files, observed practice and discussed the help and protection given to children and young people with social workers, managers and other professionals. Wherever possible Inspectors talked to children, young people and their families. Inspectors looked at over 120 case files during the inspection. No cases were identified by inspectors where children and young people were left at unnecessary risk of harm. The report notes that the response of senior leaders within Wiltshire Council and its partners was swift and effective following the 2012 inspection and that child protection practice has demonstrably improved since the last inspection. The report also prioritises a number of action items to be completed immediately or within the next 3 to 6 months. Overall the report of the inspection notes that overall effectiveness of the arrangements to protect children in Wiltshire is judged to be adequate. The report findings were consistent with the progress reports and issues reported to the Improvement Board.

The Improvement Board will continue to meet until the Improvement Notice is lifted. In addition to monitoring items included in the Improvement Notice the Improvement Board will also oversee implementation of the actions arising from the July Ofsted inspection. Over the next few months plans will be developed for ensuring there is robust governance of longer term improvement plans. This will include continuing to strengthen the Wiltshire Safeguarding Children Board.



## **Managing Significant Reductions in Government Funding and Changes in Legislation**

There have been significant changes in the funding formula for local government and other public sector partners in recent years.

This continues to cause uncertainty over the process of setting budgets and precepts. The government announced a new comprehensive spending round in June 2013, has provided more certainty to the grants due to the council in the next two years.

Other changes have been introduced, such as the Welfare Reform Act, and the impact of these will need to be reviewed to look at any cost pressures that might arise.

At the same time the Council must continue its drive for transformation and manage the increasing demand for services, for example, to protect vulnerable children and adults. The Council's business plan and financial plan deal with these challenges, but these areas will need to be closely monitored.

## **Information Security**

In February 2013 the Corporate Leadership Team agreed an action plan to strengthen and improve the Council's information governance arrangements. A number of priority actions have been put in place, including the appointment of a Corporate Director as the Council's Senior Information Risk Owner (SIRO), the establishment of an Information Governance Steering Group and the introduction of an on-line register of data incidents. Progress against the improvement plan is being monitored by the Corporate Leadership Team with the direct involvement of the SIRO.

Jane Scott  
Leader of the Council

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Corporate Directors

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Dated

