

**Crawley Borough Council**  
**Annual Governance Statement 2022/23**

### **Introduction & Scope of Responsibility**

Crawley Borough 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.

In discharging this overall responsibility, the Council is responsible for putting in place proper arrangements for the governance of its affairs and the effective exercise of its functions, which includes arrangements for the management of risk. The Accounts and Audit Regulations (2015) require the Council to conduct a review, at least once a year, on the effectiveness of its system of internal control and include an Annual Governance Statement (AGS) reporting on the review with the Statement of Accounts.

The Council has approved and adopted a [Code of Corporate Governance](#) which is consistent with the principles of, and reflects the requirements outlined in, the 2016 CIPFA/SOLACE Framework, 'Delivering Good Governance in Local Government'. This statement explains how the Council has complied with the Code and also meets the requirements of Accounts and Audit (England) Regulations 2015. The Code was reviewed by the Head of Governance, People & Performance in October 2022 and no changes were made as it was still fit for purpose. This document is on the Council's website under the "[Supporting Information](#)" section which sits outside the main Constitution document.

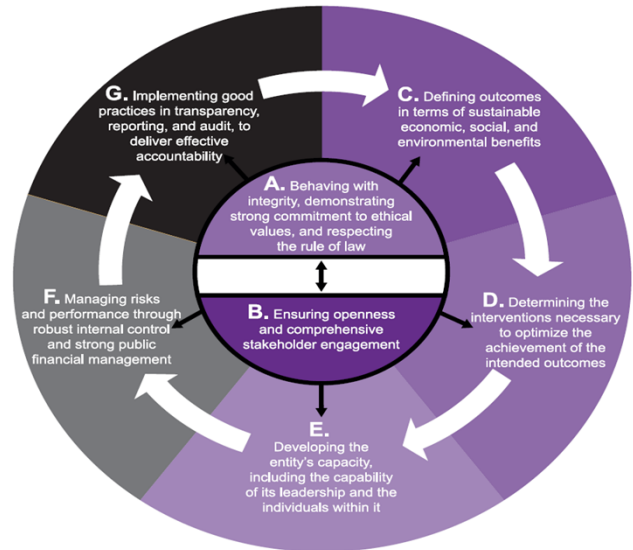
The Leader of the Council (Cllr Lamb until May 22 and then Cllr Jones) and the Chief Executive (Natalie Brahma-Pearl) both recognise the importance of having robust rules, systems and information available to guide the Council when managing and delivering services to the communities of Crawley.

The draft AGS in respect of the 1 April 2022 to the 31 March 2023 was considered by Governance Committee on the [13 June 2023](#). The final version will be presented to the Audit Committee on the 5 September 2023. This is subject to the Statement of Accounts potentially being presented to the Audit Committee at a date later in the year.

## The Principles of Good Governance

The CIPFA/SOLACE Delivering Good Governance publication (2016) defines the various principles of good governance in the public sector. The document sets out seven core principles that underpin the governance framework.

These principles apply to the AGS prepared for the 1 April 2022 to the 31 March 2023 and up to the date of the approval of the Annual Report and Statement of Accounts for the financial year 2022/23.



## The purpose of the Governance Framework

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

The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable, and not absolute, assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of Crawley Borough Council's policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively, and economically.

The governance framework has been in place at Crawley Borough Council from the 1 April 2022 until the 31 March 2023.

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

### The Constitution

Crawley Borough Council last updated its [Constitution on the 31 May 2023](#). The Constitution sets out how the Council operates, how decisions are made and the procedures to be followed to ensure that these are efficient, transparent and accountable to local people. Some of these processes are required by the law, while others are a matter for the Council to choose.

The Constitution is divided into 3 sections: Decision Making, Procedure Rules and Codes & Protocols. The Decision-Making section includes details of the Council's decision-making mechanisms and a [scheme of delegation](#) setting out who is responsible for taking which decision. The Procedure Rules detail how meetings are conducted and how decisions are taken and scrutinised. The Code & Protocols set out the expected standards of behaviour for Councillors and officers along with any other required Councillor related protocols. The Constitution details how the Council ensures that all those elements are efficient, transparent and accountable to local people.

The Governance Committee is responsible for regularly reviewing the Constitution and ensuring that it is both up to date and fit for purpose. Significant changes to the Constitution are considered by the Governance Committee before being put before the Full Council for adoption.

### **Statutory roles within the Governance Framework**

The Council has a legal duty to appoint to three statutory roles to fulfil the duties within the governance framework. These are outlined below:

<b>Head of paid service</b>
<ul style="list-style-type: none"><li>• Responsible for the overall corporate and operational management of the council (including overarching management responsibility for all employees).</li><li>• Required to report to and provide information for the Cabinet, the Full Council, the Overview and Scrutiny Commission and other Committees.</li><li>• Responsible for establishing a framework for management direction, style and standards and for monitoring the performance of the organisation.</li><li>• For this Council this is the Chief Executive.</li></ul>
<b>Monitoring Officer</b>
<ul style="list-style-type: none"><li>• Ensures that the council, its officers, and its elected Councillors, maintain the highest standards of conduct in all they do.</li><li>• Ensures that the Council is compliant with laws and regulations, as well as internal policies and procedures.</li><li>• Responsible for matters relating to the conduct of Councillors and officers, as well as monitoring and reviewing the operation and maintenance of the Council's Constitution.</li><li>• Ensures the lawfulness and fairness of decision making within the Council and, after consulting with the Head of Paid Service and the Chief Finance Officer, will report to the Full Council (or to the Cabinet in relation to a Cabinet function) if they consider that any proposal, decision or omission would give rise to unlawfulness or if any decision or omission has given rise to maladministration. Such a report will have the effect of stopping the proposal or decision being implemented until the report has been considered.</li><li>• For this Council this is the Head of Governance, People &amp; Performance.</li></ul>
<b>Section 151 Officer</b>
<ul style="list-style-type: none"><li>• Whilst all Councillors and Council officers have a general financial responsibility, section 151 of the Local Government Act 1972 specifies that one officer in particular must be responsible for the financial administration of the organisation, and that this officer must be CCAB qualified. This is typically the highest-ranking qualified Finance Officer.</li><li>• For this Council this is the Head of Corporate Finance.</li><li>• During the vacancy of the Head of Corporate Finance, the Chief Accountant acted as S151 Officer between the 20 January 2023 and the 28 February 2023.</li></ul>

## **Codes of Conduct**

Codes of Conduct exist for both staff and Councillors. All Councillors must adhere to a [Code of Conduct](#) to ensure that they maintain the high ethical standards the public expect from them. If a complainant reveals that a potential breach of this Code has taken place the Council may refer the allegations for investigation or decide to take other action.

On joining the Council, officers are provided with a contract outlining the terms and conditions of their appointment. All staff must declare any financial interests, gifts or hospitality on a public register, as set out in the Constitution. Additionally, Councillors are expected to declare any interests at the start of every formal Council meeting they attend in accordance with Standing Orders. Councillors and officers are required to comply with approved policies.

## **Whistleblowing**

The Council is committed to achieving the highest possible standards of openness and accountability in all areas of its practice. The Council's [Whistleblowing Policy](#) was revised in March 2022 and signed off by Cabinet on the [6 July 2022](#). The Policy sets out the options and associated procedures for Council staff to raise concerns about potentially illegal, unethical or immoral practice and summarises expectations around handling such matters.

## **Anti-Fraud, Bribery and Corruption**

The Council is committed to protecting any funds and property to which it has been entrusted and expects the highest standards of conduct from Councillors and officers regarding the administration of financial affairs.

The [Anti-Fraud and Corruption Policy](#) was updated in March 2022 and signed off by Cabinet on the [6 July 2022](#). Both the [Anti Bribery Policy](#) and the [Anti Money Laundering Policy](#) were updated in September 2022 and signed off by Cabinet on the [23 November 2022](#).

The Council has a Fraud and Investigations Team which acts to minimise the risk of fraud, bribery, corruption and dishonesty and recommends procedures for dealing with actual or expected fraud. The Team also prosecutes, where appropriate, and is involved in fraud training and awareness.

## **Principle B: Ensuring openness and comprehensive stakeholder engagement**

### **Transparency**

The Council and its decisions are open and accessible to the community, service users, partners and its staff. All reports requiring a decision are considered by appropriately qualified Legal, and Finance staff with expertise in the particular function area before they are progressed to the relevant Committee or group. This Council wants to ensure that equality considerations are embedded in decision-making and applied to everything the Council does. To meet this responsibility, equality impact assessments are carried out when there is significant change to major Council services, functions, projects and policies in order to better understand whether the change will impact people who are protected under the Equality Act 2010.

All reports and details of decisions made can be found on the Council's [website](#).

## **Freedom of Information/Environmental Information Requests**

The Freedom of Information (FOI) Act 2000 and Environmental Information Regulations (EIR) 2004 give anyone the right to ask for any information held by a public authority, which includes this Council. This is subject only to the need to preserve confidentiality and in the application of certain exemptions and exceptions which may be engaged where it is proper and appropriate to do so. The Council responds to such requests in a timely and impartial manner and in line with the legislation. The Council also proactively publishes information on its website as part of the [Publication Scheme](#).

## **Subject Access Requests**

Section 7 of the Data Protection Act provides for individuals to obtain a copy of information that an organisation holds about them upon making a written request.

## **Engagement and Communication**

Crawley Borough Council recognises that stakeholders require information about decisions that are being taken locally, and how public money is being spent in order to hold the Council to account for the services it provides.

The Council held its annual [Crawley Question Time on the 15 March 2023](#), which was open to the public, business leaders and partner organisations to ask questions about topics important to them. The views and comments expressed will help the Council and others to plan work on improving services and the town in general. The panel included representatives from Crawley Borough Council, West Sussex County Council, Sussex Police and the Crawley Clinical Commissioning Group. This meeting was held at the new Town Hall.

The Council held its first [Estates Day](#) in August 2022, which welcomed Crawley Homes tenants and leaseholders from across the town to talk about how they would like the Council to deliver its estate services and manage council housing. The Social Housing White Paper and forthcoming associated legislation will have an impact on the Council's future work, including how it manages its estates and engages with residents. The purpose of this event was to kickstart the Council's future commitment to estate management.

## **Consultations**

The Council publishes Forthcoming Decision Notices for planned consultations and future decisions. Internally, a consultation toolkit has been developed to guide Council staff through the consultation process. The agreed process ensures that engagement activity is relevant, accessible, transparent and responsive. To increase awareness, consultations are proactively promoted.

## **Complaints**

Crawley Borough Council is committed to delivering a high-quality service and aims to achieve the highest possible standards but recognises that, despite its best intentions and hard work, things can go wrong.

When there is service failure or users are unhappy about the way a matter has been handled, the Council openly wants to hear about such experiences and operates a two stage complaints system as part of its Complaints Policy. Stage 1 is where the complaint is dealt with locally by the relevant service area. If the complainant continues to remain dissatisfied with the Stage 1 response, a request can be made for a further review, conducted by a senior officer, normally the Head of Service as a Stage 2 complaint.

If the matter is still not resolved to their satisfaction, the complainant is entitled to take the matter up with the Local Government and Social Care Ombudsman or the Housing Ombudsman who deal with any complaints that relate to the housing managed service.

Complaints data is reported to the Corporate Management Team (CMT) on a quarterly basis and includes data on volumes received and reasons for those that are late. Lessons learned for upheld and part upheld complaints is also reported to CMT to ensure continuous improvement in service delivery. In addition, data is reported at a service level monthly to ensure action is taken to address any areas of concern.

Significant changes and improvements were made to the Complaints process in 2022/23. The Council's [Complaints Policy](#) was reviewed and updated in October 2022 and brought in line with Ombudsman requirements for consistency. Training was delivered by the Local Government & Social Care Ombudsman for over 50 members of staff on Effective Complaint Handling in May and June 2022.

The Housing Ombudsman requires landlords to carry out an annual [self-assessment](#) against their Complaint Handling Code. This was undertaken in September 2022.

The Council rolled out a new digital Corporate Complaints System in November 2022 to enable improved case management and reporting of complaints and to help evaluate performance and improve the customer experience.

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

#### **Corporate Plan Priorities 2023-27**

The [Corporate Plan](#) was updated and approved by the Full Council on the [22 February 2023](#). The Corporate Plan sets out the strategic direction of the Council for the next four years and consists of six key headline priority objectives which are underpinned by 33 objectives, projects and initiatives:

- Delivering value for Money and modernising the way we work
- Delivering affordable homes for Crawley and addressing homelessness
- Enabling a sustainable economic recovery and improving job opportunities
- Reconnecting communities
- Providing high quality leisure and culture facilities and supporting health and wellbeing services
- Protecting the environment

The Council continues to improve performance management within the organisation and service quality and best use of resources is ensured via:

- Strong Project Governance and Decision Making
- Transformation Board
- ICT Board
- Corporate Projects Assurance Group
- Portfolio Briefings
- Quarterly reporting to CMT
- Quarterly monitoring of complaints by CMT



The Council has a 'dashboard of measures' to track performance across a range of key services and the Corporate Plan priorities. This ensures that a timely response can be applied to service improvement and against service plans and strategies. This is encapsulated within the Performance Management Framework. The Corporate Performance Dashboard is reported to CMT on a quarterly basis. Heads of Service are encouraged to discuss the performance report as part of DMT discussions, to consider areas of success and improvement.

The Council recognises that to drive improvement it needs to closely monitor and review its performance. The Council routinely monitors its spend against budgets, and each department has an agreed purpose and collect data to measure their performance.

## **Financial Controls**

Financial reports comparing budget to actual and projections to end of year are available in real time to all key officers, with access/drilldown facilities appropriate to role and responsibilities. The Leader of the Council and the Cabinet also receive quarterly Budget Monitoring Reports. All Councillor financial seminars have taken place twice during the year to keep Councillors updated on the financial situation following the pandemic and the cost-of-living crisis.

## **Local Plan**

The [Local Plan – Crawley 2030](#), was adopted in December 2015 and reviewed in December 2020. It forms the Council's development plan under which development control decisions are taken. The Local Plan is supported by a number of Supplementary Planning Documents (including Conservation Area Statements and Development Briefs) and other planning considerations including Article 4 Directions and the Community Infrastructure Levy Charging Schedule and associated Infrastructure Plan. The Council's planning policies seek to balance the economic, social and environmental needs of residents, businesses and visitors, ensuring that Crawley continues to be a great place to live, to work and to visit.

Review of the Crawley Local Plan and its supporting evidence base commenced in 2019 and various rounds of formal public consultation have taken place. Progress had been delayed due to the need to address the requirements of Water Neutrality, but further formal consultation took place in May-June 2023. The [Local Plan 2024 to 2040](#) was submitted to the Planning Inspector on the 31 July.

Implementation of the Local Plan and the success of the Council's planning policies is measured and reported through the Authority's Monitoring Report which is published annually.

## **Transformation**

The Transformation Board, chaired by the Chief Executive, meets monthly, the Board is made up of all members of the Corporate Management Team, the Service and Improvement Development Manager and the HR and OD Manager. They monitor actions against the Transformation Plan.

In 2020 the Council updated the [Transformation Plan](#) to reflect the significant progress made against the previous Plan (2017/18). The purpose of the Transformation Plan for 2020-22 is to 'prepare the organisation to embrace new ways of working, providing easily accessible and more efficient services for our users, deliver value for money and creating a more commercial culture in order to sustain financial stability'.

The next plan 2023 – 2025, will be the third iteration and is currently in development by the Board and will reflect the changed organisational priorities and pressures. Previous versions have been largely internally focused to put in place structure, governance and enabled new ways of working resulting in positive service improvements.

Going forward the Council will need to respond to key emerging drivers:

- Focus on our Community Needs
- Continuing to deliver efficiencies
- A workforce with the right people, skills and attitudes
- Capacity to respond to wider change agendas both within the sector and more broadly
- Operational resilience reflecting the reduction in funding and need to generate income

## **Housing Strategy**

Housing need and the Council's policies to address this are contained within the Local Plan Housing policies.

Following the introduction of the Homelessness Reduction Act, the Council's [Homelessness Review and Homelessness Strategy \(2019 – 2024\)](#) was approved by the Full Council on 16 December 2019.

The Council has identified five priorities for addressing homelessness within Crawley:

- Preventing and relieving homelessness
- Tackling rough sleeping
- Meeting the needs of vulnerable people
- Accessing suitable and affordable accommodation
- Preventing repeat homelessness.

## **Procurement Strategy**

The Council operates a shared Procurement Service with Horsham, Mid Sussex and Mole Valley Councils, with Crawley acting as the lead Authority. Procurement processes are undertaken according to each Council's Procurement Code and the relevant public procurement regulations. These govern the way officers acquire goods, works and services, and ensure that Council processes are consistent, transparent, legally compliant, and that suppliers are treated fairly.

Depending on the type of contract being procured, suppliers may be asked as part of their bid to commit to the principles of a relevant charter or policy. Crawley has a Sustainable Procurement Charter, Unite Construction Charter and Social Value Charter. Further information on the Council's procurement processes, and key policies and charters are published on the website. [Procurement | Crawley GOV](#)

In January 2022, the Council introduced its first [Modern Day Slavery and Human Trafficking Statement](#). The Leader has delegated authority to approve minor amendments and approve subsequent annual statements for publication. The latest version was approved in August 2023.

The Council also provide quarterly updates to Cabinet on key procurements over £500,000 and a forward programme of key procurements. The last update went to [Cabinet](#) on the 23 November 2022.

## **Climate Emergency**

The Council declared a Climate Emergency in July 2019. In November 2021, the Cabinet agreed the Council's [Climate Emergency Action Plan](#) which includes short, medium and long term actions. This action plan was still applicable in 2022/23.

Details of current activities are available on the Council website. [Climate emergency | Crawley GOV](#).



## Equality, Diversity & Inclusion

The Council updated its [Equality, Diversity & Inclusion Statement 2022 – 2026](#) and was agreed by [Cabinet](#) on the 7 September 2022. The statement sets out the Council's equality, diversity and inclusion priorities which were identified as part of an informal review of how the Council currently discharges its equality duty. An [Equality, Diversity & Inclusion Action Plan](#) was also produced to support the delivery of these priorities which will be reviewed annually.

## Corporate Debt Policy

The Council updated its [Corporate Debt Policy](#) and was agreed by [Cabinet](#) on the 1 February 2023. The Council's approach to debt recovery co-ordinates with its welfare response to support the Council's strategic aims in helping Crawley rapidly recover from the COVID-19 pandemic and Cost of Living Crisis.

The Council uses "Lateral" software to enable it to have a shared view of debt across the Council. This system identifies people that are vulnerable and points them to get debt advice to help avoid them getting into further debt.

## Local Partnerships

The Council has a key role in a number of local partnerships, working for the benefit of residents and the community to improve the quality of life, including:

- Safer Crawley Partnership - formed in 1998 in response to the Crime and Disorder Act 1998.
- Crawley Wellbeing - a free, friendly and impartial service from the Local Authority, run in partnership with West Sussex County Council and the local NHS.
- Economic / Regeneration Partnerships - Crawley Growth Programme, Crawley Economic Recovery Taskforce/Town Deal Board.
- The Local Community Network (LCN) is a place-based approach to health and wellbeing delivery and aims to share plans, resources and priorities in tackling local, evidenced based, health inequalities. Membership includes colleagues from primary care, NHS, public health, the Local Authority and voluntary sector, using the Borough Council as the health anchor organisation to deliver the Crawley Health Programme.
- The Council is also a statutory member of the Local Safeguarding Children Board, Safer West Sussex Partnership, West Sussex Prevent Board, West Sussex Corporate Parenting Panel, the Adult Safeguarding Board and the West Sussex Health & Wellbeing Board
- Strategic Housing - the Council both leads and participates in a range of groups providing a multi-agency response to tackling street homelessness and providing improved outcomes for care leavers, ex-offenders older people and people with supported housing needs. A key focus remains planning for, and responding to, rising levels of housing need associated with structural issues within the housing market outside of the Council's control and broader economic factors. The Chief Executive continues to Chair the West Sussex Strategic Housing Partnership.

The Council also participates in national, sub-regional and County-wide partnership initiatives, including:

- Coast to Capital LEP
- Greater Brighton Economic Board
- Gatwick Diamond Initiative
- The Sussex North Water Neutrality Board
- The Gatwick DCO LA Group

## **Principle D: Determining the intervention necessary to optimise the achievement of the intended outcomes**

### **Effectiveness of Governance Framework**

The Council has responsibility for reviewing the effectiveness of its governance framework and this is undertaken by the work of CMT in its development and maintenance of the governance environment. Internal Audit produces an annual report and specifically comments on the governance framework as does the External Auditor. Areas identified for improvement are acted upon by CMT.

### **Financial Measures**

Crawley Borough Council publishes its Annual Statement of Accounts in accordance with CIPFA guidelines and the annual Budget is approved by the Full Council and is monitored and reported upon regularly. The Narrative Report which forms part of the Statement has a series of financial measures. Quarterly monitoring of finance is reported to Cabinet, other financial measures are reported to CMT on a quarterly basis together with other non-financial performance measures.

### **Consultations**

To be effective this policy aims to inspire and support a genuine two-way dialogue with all sections of the community and other stakeholders. There are a number of ways people can get involved and connect with the Council. Local people have the option to engage in a dialogue through social media sites (including Facebook and twitter), petition schemes, neighbourhood forums, Council meetings (open to the public), their local Councillor and annual Crawley Question Time.

Internally, a Statement of Community Involvement has been developed to guide Council staff through the consultation process. The agreed process ensures that engagement activity is relevant, accessible, transparent and responsive. To increase awareness and participation, consultations are proactively promoted via publications (printed and digital), press releases, social media, email, town notice boards and the Council's website. [Crawley Live](#), a Council publication, is published quarterly and sent to every household in Crawley to keep residents informed. It is also available online on the Council's website. Various methods are used (depending on the scope of the consultation) to seek people's views, including questionnaires, public events and exhibitions, focus groups, satisfaction surveys and feedback forms. A list of current consultations and consultation events is available on the Council's website at [www.crawley.gov.uk/consultation](http://www.crawley.gov.uk/consultation)

### **Public Consultation**

Where appropriate, the Council has carried out consultations with the general public, community groups and relevant stakeholders. There were a number of consultations carried out during 2022/2023 including:

Feedback and improvements to Goffs Park, Crawley Town Centre regeneration programme survey, Crawley Community Ambassadors survey, and Children's play area, regeneration surveys for Mill Pond, Shackleton Road, and Southgate.

All information gathered from public consultations is analysed and considered as part of the Council's decision-making process. Links to all surveys and consultations are hosted on [www.crawley.gov.uk/consultation](http://www.crawley.gov.uk/consultation) with results available upon request.

## **Principle E : Developing the Council's capability, including the capability of its leadership and the individuals within it**

### **Recruitment, Training and Development**

Human Resource policies and procedures are in place to facilitate the recruitment and retention of capable staff. The Council operates a robust interview and selection process to ensure that staff are only appointed if they have the right level of skills and experience to effectively fulfil their role.

The Council has shared [values and behaviours](#) that reflect the special nature of the Council. They describe what is important to the Council and what to expect from each other in the way work is done.

Annual Plan, Develop and Review (PDR) discussions were introduced in January 2022 and continue to be held on an annual basis. These discussions are an opportunity for line managers and staff to reflect on achievements in the past 12 months and plan for the year ahead. They are also linked to the Council's values and behaviours.

All new staff attend corporate induction sessions and undertake an e-learning induction package. Suitable training is available to support all staff to carry out their roles to the best of their ability. Newly elected Councillors are required to attend an induction which includes information on roles and responsibilities; political management and decision-making; the Code of Conduct, declaration and registration of interests, financial management and processes; information governance; and Data Protection.

Councillors' attendance at meetings is recorded via the Modern.Gov system. In the event of continual non-attendance for 4 months the matter will be passed to the Leader of the political group concerned for action to be taken. Should a Councillor fail to attend any formal meetings of the Council, for a period of 6 months, they relinquish being a Councillor. Each Group may seek approval from the Full Council to extend the 6-month non-attendance period, in exceptional circumstances.

Performance issues relating to staff are dealt with by the relevant Manager / Head of Service.

The Council has identified Organisational Capacity, Recruitment, Retention and Succession Planning as a Strategic Risk for the Council. The HR & Organisational Development Team is leading on meeting the challenges that the Council faces. It is supported by the People Board (chaired by the Deputy Chief Executive) which serves as a sounding board and a focused discussion group with staff members from different areas of the Council. The Corporate Management Team also monitors this as part of regular risk reporting.

### **Legal Compliance**

The Council's Constitution clearly defines the [roles and responsibilities](#) of the Chief Executive, Chief and Senior Officers, Councillors and Committees and outlines procedural standards, the Scheme of Delegation and protocol on Council/Officer relations.

The Monitoring Officer is responsible for legal compliance, Conduct and Compliance and working with departments to advise on legal issues across the Council.

## **Financial Compliance**

The Head of Corporate Finance has overall financial responsibility within the Council, as outlined in the Constitution. Within the Constitution are the [Financial and Budget Procedure Rules](#) which ensure that compliance takes place. The Accounts comply with financial regulations and the CIPFA Financial Management (FM) Code.

The Financial Management Code of Practice Compliance Assessment 2022/23 was undertaken by the Head of Corporate Finance (s151 officer) and the Chief Accountant (deputy s151 officer). The outcome of this assessment was reviewed by Corporate Management Team on the 25 April 2023.

## **Principle F: Managing risks and performance through robust internal control and strong public financial management**

### **Effective Scrutiny (Overview & Scrutiny Commission)**

The Council operates an Overview and Scrutiny Commission which has its own [terms of reference](#), as outlined in the Council's Constitution. This Commission supports the work of the Cabinet and the Council as a whole. It allows citizens to have a greater say in Council matters by holding public inquiries into matters of local concern. These lead to reports and recommendations which advise the Cabinet and the Council on its policies, budget and service delivery. The Commission also monitors the decisions of the Cabinet, enabling it to consider whether a decision is appropriate. The Commission may recommend that the Cabinet reconsider or amend the decision. It may also be consulted by the Cabinet or the Full Council on forthcoming decisions and the development of policy.

### **Financial Management**

The Head of Corporate Finance (S151 Officer) is responsible for leading the promotion and delivery of good financial management so that public money is safeguarded at all times, ensuring that budgets are agreed in advance and are robust, that value for money is provided by Council services, and that the finance function is fit for purpose. They provide advice on financial matters to both the Cabinet and the Full Council and is actively involved in ensuring that the Authority's strategic objectives are delivered sustainably in line with long term financial goals. The Head of Corporate Finance, together with the Finance team, ensure that new policies or service proposals are costed, financially appraised, fully financed and identifies the key assumptions and financial risks that face the Council.

### **Risk Management**

The Council's approach to risk management is set out in its [Risk Management Strategy](#) which was presented to Audit Committee on the [8 November 2022](#) and subsequently approved by the Cabinet Member for Resources on the 13 December 2022. The objectives of a risk management strategy are to:

- Integrate risk management into the culture of the Council by engendering a positive attitude and understanding to risk throughout service areas
- Manage risk in accordance with best practice
- Prevent injury, damage and financial loss to those connected with the Council's delivery of services.

The Risk Management Strategy sets out the roles and responsibilities for risk management arrangements in the Council.

The format and presentation of the strategic (significant) risks was reviewed and revised from a narrative to a tabular format. Showing the risk score without controls in place and the residual score with mitigation in place.

These strategic risks include the New Town Hall, District Heat Network, Delivering Affordable Housing, Homelessness, Migration / Asylum pressures, Three Bridges Station, Disaster Recovery & Business Continuity (data & health and safety breaches), maintaining a balanced budget, Recruitment, Retention and Succession Planning, Climate Emergency, National Waste Strategy (including food waste), Local Plan, Water Neutrality, Cost of living, Towns Fund programme and Damp and Mould.

The strategic risk register is a live document and discussed regularly at CMT and are reported to the Audit Committee on a quarterly basis. The last update for 2022/23 went to the [20 March 2023 Audit Committee](#). Operational risks are managed at departmental level.

Risk management awareness training was given to managers and Councillors during the financial year by the Council's insurers Zurich. Dedicated training on Accident and Investigation and Claims Defensibility was also provided for relevant officers, with a particular focus on tree maintenance, trips and falls on Council land and housing repairs.

### **Corporate Projects Assurance Group (CPAG)**

CPAG is chaired by the Chief Executive and includes the Deputy Chief Executive, Head of Corporate Finance (s151), Head of Governance, People & Performance (Monitoring Officer), Procurement Manager and Corporate Performance Manager. Its purpose is to monitor and manage strategic and significant risks and ensure improvement plans are adequate and managed effectively. It supports the framework of corporate controls to manage risks across the Council. The Group meets monthly.

### **Corporate Health & Safety**

The Council ensures all its employees' time at work is safe and free from injury and ill health. In addition, the Council aims to ensure, as far as is reasonably practicable, the safety of all other persons who may be affected by the Council's undertakings. The Corporate Health & Safety Advisor primarily focuses on monitoring and advising on the Council's legal and legislative requirements where Health and Safety is concerned.

Significant progress has been made on reviewing and updating Health and Safety policies. The following policies have either been updated or are still to be completed. The documents are available for staff on the Council's intranet and were approved by CMT:

- Cycling while at work completed in March 2023
- Personal Protective Equipment (PPE) completed in February 2023
- Manual Handling completed in December 2022
- Control of Asbestos completed in December 2022
- Lifting Operations and Lifting Equipment completed in October 2022
- Management of the Register of Aggressive & Potentially Violent Persons (Caution Register) this is currently in draft and awaiting sign off
- Smoke free Policy is currently awaiting sign off
- Other policies will be updated as and when required.

The Corporate Health & Safety Adviser has been working with Service Managers across the organisation to ensure that Corporate Risk assessments are in place and up to date. However, progress has been slow due to time pressures and capacity.

## Cyber Security & IT Resilience

The Council continues to manage its Cyber risk effectively, having made significant investments over recent years in both the technical resilience of the organisation through its infrastructure and software, as well as embarking on a comprehensive 'train, test and retrain' approach to cyber awareness and education for all staff and members. As an organisation, the Council recognises the critical nature of the threat that cyber-attacks pose and the ever-shifting developments that arise. As such the Council's Information Security Officer and wider team keep abreast of developments through specialist centres of advice and excellence like the National Cyber Security Centre (NCSC) and other such bodies. The Council also maintains compliance with all the security standards and accreditations, such as PSN (Public Service Network) Accreditation, which is an annual penetration test of all its systems and network, including physical access to buildings and equipment.

## Information Management & Information Governance Board

The Information Governance Board has oversight of data related resources and processes within the Council. Information Management has been a significant focus of the Board over the past 2 years, to ensure GDPR compliance. This includes preparing for the Council's move to SharePoint and the migration of data files and folders, putting in more controls regarding retention. This will continue to be a key area of work in the coming year. This Board has also overseen significant work in the arena of cyber security, including training and testing to ensure that the Council's network is as secure from attack as it possibly can be.

## Principle G: Implementing good practices in transparency reporting and audit to deliver effective accountability

### Internal Audit

The requirement for an internal audit function in local government is detailed within the Accounts and Audit (England) Regulations 2015, which states that a relevant body must:

***'Undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.'***

Internal Audit is provided by the Southern Internal Audit Partnership (SIAP) and fully conform with all requirements of the Public Sector Internal Audit Standards (PSIAS). The Council maintained a fully compliant internal audit service in 2022/23. SIAP produced an [Internal Audit Charter 22/23](#) which formally defines the internal audit activity's purpose, authority, and responsibility. This was approved by the Audit Committee on the [15 March 2022](#) and will be updated annually.

The Chief Internal Auditor (Head of SIAP) provides an independent and objective annual opinion on the effectiveness of internal control, risk management, and governance each year and is in accordance with the PSIAS. Progress on the Audit Plan is reported to the Audit Committee on a quarterly basis.

### Audit Committee

The role of the [Audit Committee](#) is to review and assess the adequacy of the Council's internal audit and risk management arrangements. This Committee meets quarterly and receives the reports from SIAP, including their progress reports and Annual Report. This Committee considers and comments upon the Internal Audit Plan, ensures the Audit and Risk functions are fulfilled and reviews the effectiveness of the Council's risk management arrangements.



## **Governance Committee**

The [Governance Committee](#) deals with Constitutional matters, the Conduct of Councillors, Political Management Arrangements, and Corporate Governance, Councillors' Allowances, Elections and all non-Executive functions not specifically delegated to another Committee or Sub-Committee of the Council. This Committee specifically monitors and reviews the Corporate Governance of the Council including giving consideration of the Authority's Annual Governance Statement.

## **Annual Accounts**

The Council publishes full audited accounts each year, which are also published on the Council's website at [Statement of accounts | Crawley GOV](#).

## **Review of Effectiveness**

Crawley Borough 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 CMT, who has responsibility for the development and maintenance of the governance environment, the Chief Internal Audit annual report, and comments made by relevant stakeholders, the external auditors and other review agencies and inspectorates.

Corporate Management Team undertook a self-assessment of these governance arrangements, and all declared they had adhered to the governance and decision-making arrangements in place for 2022/23.

## **Internal Audit Annual Report and Opinion**

The Chief Internal Auditor (Head of SIAP) is required to provide an independent opinion on the overall adequacy of the effectiveness of the Council's governance, risk and control framework. Their Annual Report and Opinion is considered, and any significant issues incorporated as a result. Report [FIN/625](#) was presented to the Audit Committee on the 21 June 2023 where the [Annual Report and Opinion](#) was considered.

The opinion states that sufficient assurance work has been carried out to allow the Chief Internal Auditor to form a reasonable conclusion on the adequacy and effectiveness of the internal control environment. In their opinion frameworks of governance, risk management and management control are **reasonable** and audit testing has demonstrated controls to be working in practice. Where weaknesses have been identified through internal audit review, SIAP have worked with management to agree appropriate corrective actions and a timescale for improvement.

In general, internal audit work found there to be a sound control environment in place across the majority of review areas included in the 2022/23 Audit Plan that were working effectively to support the delivery of corporate objectives. Two areas were identified to provide challenge to the organisation's risk environment. Limited assurance was given to Health and Safety - Driver Safety Checks and Taxi and Private Hire Licensing – New Driver Applications. These have been included in the Governance Action Plan as areas for improvement.

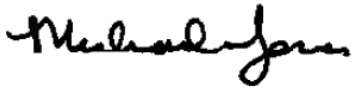
## **Significant Governance Issues**

There are no significant governance issues to report.

## **Conclusion**

To the best of our knowledge, the governance arrangements as defined above, have been operating effectively during the year and remain fit for purpose.

Signed on behalf of Crawley Borough Council:



Cllr Michael Jones  
Leader of the Council  
Date: 09/08/2023



Natalie Brahma-Pearl  
Chief Executive  
Date: 09/08/2023