Annual Governance Statement

for Norfolk County Council

2020-21

1. Introduction

- 1.1. The Accounts and Audit (England) Regulations 2015 require that:
 - The Council must conduct a review at least once a year of the effectiveness of its system of internal control,
 - Findings of this review should be considered by the Council,
 - The Council must approve an Annual Governance Statement; and
 - The Annual Governance Statement must accompany the Statement of Accounts.

For Norfolk County Council (the Council) the Audit Committee undertakes these duties on behalf of the Council.

- 1.2. The COVID-19 outbreak, which started in late 2019 and developed rapidly during early 2020, meant that the Council deployed the Civil Contingencies Act 2004 [1] provisions and in order to follow government guidance on remote working and social distancing suspended Council meetings. This was an emergency situation and response to the many government announcements had to be made quickly. An exercise to assess the response made is expected to take place in the future. Since 17 March 2020, all NCC colleagues have been working from home where possible. Technology improvements were rolled out swiftly to enable this. Some colleagues continued to work in the community where their role required it. Where essential services required colleagues to be in a premises, or if they do not have a suitable homeworking environment or for wellbeing reasons, measures were put in place to enable this. Non-essential buildings were closed, and activities were re-prioritised to reflect the new reality. A rapid roll-out of "soft telephony" (MS Teams), Teams voice conferencing facilities and other remote working technology (such as Zoom) was undertaken and has enabled over 5,000 employees to access NCC systems remotely and continue to support the organisation and the public. Additionally, grants of up to £250 were available to staff to purchase officerelated items to further enable home working. How we have delivered our services and which services remained active has kept in step with national guidelines and infection prevention and control measures identified through NCC risk management process.
- [1] Councils are category one responders under the Civil Contingencies Act 2004, which sets out the legislative framework for responding to emergencies such as the Covid-19 outbreak. As part of the local resilience forum councils work with local partner organisations to plan and activate emergency responses and there are established officer-led processes for leading the strategic (gold), tactical (silver) and operational (bronze) responses under the 2004 Act.

- 1.3. Council meetings were cancelled from mid-March 2020 to mid-May 2020. All Council meetings, including Full Council, Cabinet, Scrutiny and other committees have been successfully held remotely from May 2020. These meetings have been held as open meetings through the use of YouTube for live broadcast and video playback. Video and audio recording have also been made available on the NCC website to ensure openness and transparency. The Council has participated in the Norfolk Resilience Forum and has held effective Gold and Silver meetings regularly (at times daily) throughout the outbreak. A detailed report on the COVID-19 response and the financial implications was reported to Cabinet on Monday 11 May 2020. Go to the COVID-19 response and the financial implications report. A NCC response to COVID-19 initial lessons learned report was reported to Cabinet on Monday 3 August 2020. Go to the NCC response to COVID-19 initial lessons learned report. A report providing a progress update on the action plan went to Cabinet 2 November 2020. Go to progress update on the action plan report. The Cabinet has also received reports on outbreaks and locally supported contact tracing. Inperson Council Meetings, with social distancing measures employed, restarted in May 2021.
- 1.4. The COVID-19 pandemic has had a profound impact on the Council's activities and finances in 2020-21. Additional funding has been provided in-year by Government as part of the response to COVID-19 to meet additional cost pressures, partially compensate for lost income and offset the impact of non-deliverable savings. At the same time, normal operations have been severely disrupted. The economic downturn resulting from the pandemic is causing widespread economic impacts. In July 2020, the Council launched the "Norfolk Delivery Plan 6", which is our contribution to the New Anglia Local Enterprise Partnership's "Norfolk and Suffolk Covid-19 Economic Recovery Plan 7". Rebuilding the local economy, while attracting investment and putting infrastructure in place to support further growth remains a priority. The Council is continuing to work with partner organisations to respond to the pandemic and protect Norfolk's citizens and businesses including through Norfolk's Local Outbreak Management Plan (go to that plan here). The emergency nature of some of the grants received and in some cases the lack of clarity on any associated restrictions and conditions, means that the Council applied a greater degree of assessment and judgement to determine the appropriate accounting treatment. The grants were reported in the financial reporting to the Cabinet and where they were required verification certificates were completed following reasonable checks to ensure that the conditions had been met.
- 1.5. Despite the challenges of the last year, the Council has taken action to maintain the delivery of vital services across all areas of its operations and has worked in partnership across the whole system to protect vulnerable people, support businesses, and ensure the safety of all staff delivering this vital work. The work of Public Health and the Norfolk Office of Data Analytics (NODA) have played a key role in providing insights that have informed the management of the pandemic across Norfolk, both in terms of tracking the course of the pandemic but also predicting trends that allowed for strategic decision making for the

county. The Council has conducted research on the potential impacts of the pandemic on Norfolk, its economy and its residents. This research is informing the Council's recovery planning and that of our delivery partners across Norfolk. The impacts of the COVID-19 crisis will continue to have a significant impact on demand for our services and on the budget we have available. Demand for some services was already rising each year with more older people requiring social care and more children with special needs and disabilities needing support. New pressures from the crisis will add to this, and the economic and psychological distress of lockdown on our residents is increasing demand for our social care and support services as well as NHS services.

- 1.6. The consensus has been that we would enter a third wave of the pandemic in the summer/autumn of 2021. However, there are two significant unknowns, the positive impact of the vaccinations programme on transmission of the virus, the early indications are that the vaccines significantly reduce the severity of symptoms, and the impact of new variants of the virus. Therefore, NCC is continuing to use, and share, the data driven insights from Public Health and NODA as we plan for the coming year so that we continue to work effectively with partner organisations to respond to the challenges the pandemic provides. That, combined with the research on the impact of COVID-19 on Norfolk over the next 5 years, is informing our recovery planning for Norfolk.
- 1.7. Internally the Council is building on the changes to how we use technology to support new ways of working, accelerated by the pandemic and national lockdown. We are taking the lessons from what worked during the pandemic into how we run our services as lockdown restrictions ease. Digital inclusion is key and we are proud of the work we have supported to get every child online and try new models of service to ensure support to some of our most vulnerable clients during the pandemic that will also provide new, more sustainable models of service going forward. Whilst we meet current needs, our service transformation programmes are delivering new models of service we are also safeguarding the future by continuing to invest in preventative action and early intervention. This is particularly important in the context of the impact of pandemic on the economy, levels of employment, mental and physical well-being in Norfolk. The Council is also working jointly with health partners as part of longer-term transformation within the health and social care system, such as discharge arrangements from hospital and short-term care.
- 1.8. The Chief Internal Auditor reviews the effectiveness of the system of internal control throughout the year and reports annually to the Audit Committee. The Chief Internal Auditor will report to the Audit Committee in July 2021 that, in his opinion, the system of internal control, including the arrangements for the management of risk during 2020-21, was acceptable and therefore considered sound. A further update report on the COVID 19 Governance arrangements was reported to the Audit Committee in January 2021. Go to A further update report on the COVID 19 Governance arrangements (Appendix C page 19).

1.9. As part of producing this statement, Executive Directors have completed and signed an Annual Positive Assurance Statement and completed a supporting departmental assurance table. Action plans will be put in place where any strengthening may be required and assurance, on completed actions, will be reported to the Audit Committee in October 2021. Data Protection has been recognised as a topic that needed further strengthening. Significant activity has been undertaken to deliver the recommendations laid out in the SOCITM report of March 2020, alongside critical work to ensure the Council remained compliant during Covid, after Brexit and as a result of Schrems II. An annual report from the Council's Senior Information Risk Officer (SIRO) will be reported to the July 2021 Audit Committee. Each department received an Annual Health and Safety report for the year. Recommendations were made to strengthen and improve Health and Safety management and those will be followed up. The Council is alert to recent local authority Public Interest reports; the risks, consequences and any lessons that can be taken for sustaining and or further strengthening governance, if required to meet new challenges.

2. Scope of responsibility

- 2.1 The Council is responsible for ensuring 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 it exercises its functions having regard to 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, facilitating the effective exercise of its functions, and which includes arrangements for the management of risk.
- 2.2 The Council has approved and adopted a Code of Corporate Governance consistent with the principles of the Delivering Good Governance in Local Government (CIPFA/SOLACE, 2016). The Code was approved by the Policy and Resources Committee on 26 March 2018 and updated in May 2019 for consequential changes due to the adoption of the Cabinet system. If you require any further information regarding this statement please contact Mr. Simon George, Executive Director of Finance and Commercial Services, Norfolk County Council, County Hall, Martineau Lane, NR1 2DW.
- 2.3 Through the application of the Code of Practice on Local Authority Accounting in the United Kingdom 2020-21, the Annual Governance Statement must include reference to controls where significant activities take place through a group entity. This includes Companies that the Council owns, or part owns.

- 2.4 This statement explains how the Council has complied with the Code of Corporate Governance and meets the requirements of regulation 4 of the Accounts and Audit (England) Regulations 2015 (as amended), in relation to the publication of an Annual Governance Statement.
- 2.5 The Council administers the Norfolk Pension Fund and the governance arrangements are statutorily prescribed. The Council complies with these requirements. For further details, please consult the Norfolk Pension Fund Governance Statement 2020.
- 2.6 The Council hosts or is represented on several Joint Committees, which are:
 - Norfolk Records Committee,
 - Norfolk Joint Museum Committee,
 - Eastern Shires Purchasing Organisation (ESPO),
 - Eastern Inshore Fisheries and Conservation Authority,
 - Norfolk Parking Partnership Joint Committee,
 - Norfolk and Waveney Joint Health Scrutiny Committee,
 - Joint Committee for Transforming Cities Fund projects.
- 2.7 The Council owns 10 companies; eight are limited by shares and two are limited by guarantee with no share ownership. In addition, two companies were dissolved during 2020-2021 and one has been dissolved in 2021-22 as they were no longer required. Further details are set out below: (eight are 100% owned (two dissolved during the year), three are partially owned (two dissolved in 2021-2022) and two are limited by guarantee with no share ownership), detailed below:

Active Companies:

- The largest wholly owned company by the Council is the Norse Group Limited. It is the parent company of NPS Property Consultants Limited, Norse Transport, Norse Eastern Limited, Norse Commercial Services Ltd and Norse Care Ltd, plus their subsidiaries. The group delivers a range of professional services to both public and private sector clients throughout the UK. The group's client lists include many local authorities and housing associations, government departments, health authorities and emergency services. For more information regarding NORSE and its services, please refer to its website at http://www.norsegroup.co.uk
- Hethel Innovation Ltd, is wholly owned by the Council. The primary purpose of the
 company is to support inclusive economic growth and deliver associated economic
 benefits for the benefit of Norfolk communities, particularly where there are specific
 challenges, or the market has failed to address need. The company owns and runs
 Hethel Engineering Centre, manages Scottow Enterprise Park on a lease from the
 Council, and promotes a variety of networks and events to promote enterprise in
 Norfolk. For more information please refer to the website at
 http://hethelinnovation.com/.

- Independence Matters is a Community Interest Company (CIC) which started trading 1 November 2013. The Council owns 49% of the shares with the remaining shares held by an Employee Benefit Trust. A ten-year strategic partnership agreement was signed with Norfolk County Council in July 2019. Within the Partnership Agreement both parties have signalled the intention to transfer the 51% staff share ownership to Norfolk County Council to support future procurement if it is in the best interest of all parties. Currently staff shares are held by Independence Staff Matters Ltd as corporate trustee of the Independence Matters Employee Benefit Trust. The new partnership agreement has removed the block contract covering the traded services, with service predominately contracted using the relevant procurement framework. In response to the issues facing a national home care provider and to ensure continuity of care, Home Support Matters was set up on 10th December 2018, as a wholly owned subsidiary of Independence Matters. For more information regarding Independence Matters please refer to its website at http://independencematters.org.uk/.
- Norfolk Safety Community Interest Company (CIC) operates in partnership with Norfolk Fire and Rescue Service, and provides a range of risk management, training and development and other services to public bodies, third sector organisations and businesses. The company is limited by guarantee with no share ownership and the guarantees are provided by County Council employees acting on behalf of the County Council. For more information on the CIC please refer to website at http://norfolksafety.org/
- Legislator 1656 Limited is a holding company which is jointly owned with Norwich City Council and is controlled through each party owning 50% of the voting share capital. The company owns 100% of Legislator 1657 Limited whose principal activity is the leasing of investment properties. The companies were created when Norwich City Council and the County Council jointly sold 80.1% of their shares in Norwich Airport in 2004.
- Repton Property Developments Ltd was incorporated on 27 July 2017 and is wholly owned by the Council. Its primary objective is to undertake direct property development with the aim of maximising financial returns (capital receipts and revenue income) for the Council to support service delivery.
- NCC Nurseries Limited is wholly owned by the Council and was incorporated on 27
 November 2019. The company has been set up to provide nursery provision after
 the previous provider, Great Yarmouth Community Trust, went into receivership. It
 operates six nurseries in the Great Yarmouth area and in due course it is expected

that the company will seek alternative providers to run the nurseries and will withdraw from the sector.

• LCIF 2 Limited was incorporated on 29 August 2019. The company is a management company which is responsible for the set up and implementation of the Low Carbon Innovation Fund. The company is limited by guarantee with no share ownership and the guarantees are provided 50% by the Council and 50% by the University of East Anglia. The Fund will invest in equity and convertible loans to support growing technologies across three LEP areas (New Anglia, Herefordshire and the Cambridge and Peterborough Combined Authority).

Non-Active companies:

- NCC HH Limited, incorporated on 27 November 2019, was established to continue to provide alternative education provision at Horatio House Independent School which was under threat as a result of the previous provider, Great Yarmouth Community Trust, going into liquidation on 10 December 2019. NCC HH Ltd ceased actively trading on 31 August 2020 as the company had fulfilled its purpose and is now in the process of being closed.
- The Great Yarmouth Development Company, which was jointly owned with Great Yarmouth Borough Council, with each party owning 50%. The company was dissolved on 24 August 2021.
- Norfolk Energy Futures Ltd was wholly owned by the Council. The company was dissolved on 29 September 2020.
- Educator Solutions Ltd, incorporated on 15 April 2016, was wholly owned by the Council. Educator Solutions was dissolved on 13 October 2020.
- NPLaw Ltd (formerly Public Law East Limited), incorporated on 13 February 2017, is a wholly owned company. It is currently dormant.

Where appropriate the wholly owned/partly owned companies have Council Member and/or Officer representation on their boards of directors. Assurance about the governance in place for Norse has been obtained through the reports received by their Internal Auditors and a signed Group Annual Assurance Statement. All other significant companies have provided an Annual Positive Assurance Statement and completed a supporting assurance table. An audit has recently been completed for Hethel Innovation

Ltd. The audit found there were some areas that needed strengthening and management are currently dealing with this.

- 2.8 The Council is a partner in five pooling arrangements, detailed below:
 - The Norfolk Learning Difficulties Pooled Fund now exists only as a legal entity as part of the arrangements for commissioning Learning Difficulties health services.
 The Council now receives funding directly from Central Government as part of the formula funding
 - Norfolk Medicines Support Service. The Council, the Clinical Commissioning Groups (CCG's) and Arden and Greater East Midlands Commissioning Support Unit, have put in place a Section 75 agreement, effective from 4th November 2019 until 31st October 2022. The CCG is the lead commissioner and Arden and GEM are the provider.
 - There has been a Better Care Fund pooled arrangement in place, covering the five CCGs in Norfolk. Since April 2020, the CCGs have formed a single Norfolk and Waveney CCG. A new Section 75 for 2020-21 has been created and signed. The Better Care Fund (BCF) requires local authorities with responsibility for social services and CCGs to create a pooled commissioning fund for the provision of integrated health and community care services, with a priority purpose of supporting the integration of health and care. It incorporates Better Care Fund monies and Improved Better Care Fund grant. The pooled fund is secured through an agreement under section 75 of the National Health Service Act 2006. The Norfolk and Waveney STP Executive overseas the governance of the pooled fund. The Better Care Fund plan, which sets out how funds are spent, is required to be approved by the Health and Wellbeing Board. The Council administers the pooled funds.
 - Following the Coronavirus pandemic, a separate Section 75 agreement has been agreed to enable partnership arrangements to support the hospital discharge service requirements, commissioning of adequate step-down care capacity and reclaim of related costs to the NHS. This will apply from 19th March 2020 to 31st March 2021. The council will be supporting contracts for all hospital discharge, including costs that would normally be commissioned by the CCG. Costs will be recovered via a monthly claim to NHSEI with Norfolk County Council contributing resources that would normally have been expected to support care following hospital discharge. An extension to this arrangement will be required to cover at least the first 6 months of 2021/22. That work is pending the publication of national guidance to help shape an extended Section 75 agreement.

- Norfolk County Council with all seven district councils participated in the Norfolk Business Rates Pool until 2020-21. The Pool had enabled Norfolk Authorities to retain revenue from additional business rates growth by avoiding a levy on growth which would otherwise be payable to Central Government. Pooled funds are used to support economic development projects in Norfolk with Norfolk Leaders approving the allocation of funds to projects. Norfolk Authorities also participated as a 75% Business Rates Pilot Pool in 2019-20. In addition to the pooled funds used to support economic development projects, the pilot delivered additional retained business rates income for Norfolk Authorities, with the financial benefits arising in 2020-21. Norfolk Leaders have agreed to suspend Business Rate pooling in 2021-22 in view of the risks to business rates income related to the COVID-19 pandemic. The use of 2020-21 Pool gains will be considered by Norfolk Leaders during 2021-22.
- Norfolk County Council acts as the accountable body for the Greater Norwich Growth Board Infrastructure Investment Fund. The 2013 Greater Norwich City Deal allows, amongst other things, access to £60 million of Public Works Loan Board (PWLB) borrowing at a reduced rate to fund strategic infrastructure. The agreement included a commitment from Broadland District Council, Norwich City Council and South Norfolk Council to pool CIL income, and in October 2015 an agreement including Norfolk County Council was signed to pool CIL income in order to create a substantial local growth fund to support local infrastructure projects". Further information can be found at https://www.greaternorwichgrowth.org.uk/
- 2.9 Norfolk County Council has been designated to manage the 2014-2020 France (Channel) England Interreg Va European programme.

The programme is an EU Commission programme funded through the Cohesion Fund and provides up to €223M of grant covering the geographic area of South and East England and Northern France. This will leverage up to a total of €315M of funds (with match funding). The programme budget is agreed by the French and UK Governments. The Cooperation Programme (CP) was approved by both national governments and by the Commission in October 2015. For further information please refer to website https://www.channelmanche.com/en/programme/about-the-programme/

Following the UK Government's EU (Withdrawal Agreement) Bill i.e. "Brexit", the programme is guaranteed to continue until its natural conclusion in line with the Cooperation Programme.

Within the Council, a Project Board has been set up to oversee the management of risks this initiative generates for the authority.

The Audit Authority reports to the Audit Committee on progress made against the audit strategy and audit plan. Should significant issues arise and fail to be resolved with regards to the management and control system, these would be reported to the Audit Committee. No such issues were reported in 2020-21.

The programme also has its own governance arrangements involving Member States and EC representatives.

3. The purpose of a governance framework

- 3.1 A governance framework comprises the systems and processes, culture and values by which the Council is directed and controlled and through which it accounts to, engages with and leads the community. It enables the County Council to monitor the achievement of its strategic objectives and consider whether they have led to the delivery of appropriate, cost effective services.
- 3.2 The system of internal control is a significant part of that framework 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 to identify and prioritise such risks. It evaluates the likelihood of them being realised and the impact they would have should they be realised and helps manage them efficiently, effectively and economically.
- 3.3 All wholly owned companies have a system of governance which is the responsibility of their Board of Directors and designed to give the Directors adequate information to review the activities of the Group and review and control the business risks.

4. The Governance Framework

4.1 The council achieves good standards of governance by applying the principles of Delivering Good Governance in Local Government: Framework (CIPFA/SOLACE, 2016).

The Council's Code of Corporate Governance sets out the Council's governance standards. These standards ensure the Council is doing the right things, in the right way in a timely, inclusive, open, effective, honest and accountable manner. The Code is based upon the following principles:

- A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law
- B. Ensuring openness and comprehensive stakeholder engagement
- C. Defining outcomes in terms of sustainable economic, social, and environmental benefits
- D. Determining the interventions necessary to optimise the achievement of the intended outcomes
- E. Developing the entity's capacity, including the capability of its leadership and the individuals within it

- F. Managing risks and performance through robust internal control and strong public financial management
- G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability
- 4.2 These principles represent best practice and are taken from the 'International Framework: Good Governance in the Public Sector' produced by CIPFA/IFAC. Good governance is dynamic and involves continuous evaluation and review. To achieve good governance the Council should achieve their intended outcomes, while acting in the public interest at all times. As overarching requirements for acting in the public interest, principles A and B apply across all other principles (C G)
- 4.3 The Council's <u>Code of Corporate Governance</u> details the arrangements in place to comply with each of the principles. This Annual Governance Statement reviews the effectiveness of those arrangements and references changes that took place at the end of the financial year (and remain to date) for the Governance of the Council, as a result of the Covid-19 outbreak.
- In the initial response to the Covid-19 emergency the Council developed a Distribution Infrastructure to assist with the distribution of supplies to vulnerable members of the community, established a 'step down' facility to assist with transfer of care cases from the NHS, and supported the local care market through constructive management of its contracts and payments. The Council sourced Personal Protective Equipment (PPE) for health and social care organisations including privately managed care homes in the County, and ensured it was available to organisations in need. The Council supported the management COVID-19 outbreaks with care homes and companies as well as in our communities. The Council co-ordinated the local track and trace process. Since the vaccination became available, the Council has worked with partners to ensure successful roll-out of the vaccination programme to targeted groups.
- 4.5 The Council has had to divert significant resources to responding to the Covid-19 pandemic. NCC and NFRS staff provided a huge range of valuable support and services since the start of the pandemic, including: standing up and maintaining an outbreak control response centre, assistance to hospitals, ambulance driving, delivery of essential items to vulnerable people, sourcing and delivering PPE and other medical supplies to NHS and care facilities, support to vaccination call centres and identification of groups eligible for the vaccine, developing and delivering a Norfolk wide testing strategy, enabling people financially impacted by the pandemic to access assistance. Strategic and operational control, including redirecting effort from other activities, was for many months exerted by a Gold and Silver command structure. In late 2020, more control was gradually been handed back to directorates with a Recovery Group being formed to coordinate that work. A Programme Board has now been established in early 2021, to take that recovery work forward. The Council has made use of remote meetings for decision making but has also used individual cabinet member decision notices where it is appropriate to do so. Along with other local authorities the Council has received financial assistance from the Government in relation to liabilities associated with responding to the Covid-19 situation. The risk management framework has been followed to provide for both a Covid-19

Operational Risk Register for use by the tactical Silver Group and a Covid-19 Strategic Risk Register for use by the Corporate Board to manage emerging risks through the different phases of the pandemic and once the emergency response lifts.

- 4.6 The Council has continued to put measures in place to support communities, as the pandemic has continued, responding appropriately to the different restrictions imposed at various times. The Council has recognised the increased pressure the pandemic has created, in terms of economic difficulties, unemployment, and impact on physical and mental health. It is working with partners to address these issues and will build this into planning in future years. The Council established internal staffing and wellbeing procedures to ensure that staff and managers were and, continue to be, fully supported and resourced when working remotely or in the community during the emergency.
- 4.7 The Council has been unable to continue with remote committee meetings after 7th May 2021. The governance department has made plans for this and has ensured that the Council is able to continue with transparent decision making.

5. Effectiveness of the governance framework

5.1 The Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control.

That review is informed by:

- The work of the Head of Paid Service and Executive Directors within the County Council who are responsible for the development and maintenance of the governance environment
- The statutory roles of the Council's Monitoring Officer and Section 151 Officer
- The signed departmental assurance statements received and signed by Executive Directors for 2020-21
- The Annual Governance Statement working group
- Work performed by Internal Audit
- Comments made by the external auditors and other review agencies and inspectorate
- Systems and controls carried out as outlined in the Code of Corporate Governance.

Responsibility for this annual review has been delegated to the Audit Committee. Overall, it is considered the Council's governance arrangements continue to be fit for purpose, in accordance with the governance framework.

5.2 The effectiveness of the governance framework can be demonstrated by the following:

	Principles	Comment
А	Behaving with integrity, demonstrating strong	Executive Directors confirmed, in all significant respects services comply with the Council's Constitution, Financial
	commitment to ethical	Regulations and key policies and procedures which include for

	Principles	Comment
	values and respecting the rule of law.	declarations of interest, compliments and complaints and whistleblowing. Where required actions are in place to ensure full compliance.
		A register of Members interests, and a register of gifts and hospitality is published for each Member on the Norfolk County Council internet.
		The Standards Committee met twice during 2020-21 on 27 th July 2020 and 18 th January 2021. The role of the Standards Committee is to promote and maintain high standards of conduct by councillors and co-opted members.
		Progress on the Council's Equality, Diversity and Inclusion objectives 2020-2023 was reported to Cabinet in November 2020. Go to November 2020 Cabinet Agenda (Page 156).
		The Monitoring Officer's Annual Report will be reported to the Audit Committee in July 2021. There are no exceptions to report.
В	Ensuring openness and comprehensive stakeholder engagement.	Cabinet, Scrutiny Committee, Select Committees and Full County Council have met regularly throughout the year from May 2020. These were virtual meetings and the agenda and public reports are available to the public prior to the meetings and minutes are available afterwards. There is provision for the public to ask questions. All meetings were filmed and streamed live on You Tube on the NCC Democratic Services Channel. Decisions taken at these meetings have been recorded in minutes. Ongoing support has been provided to schools and care sectors in line with the guidance issued by the Department for Education and the Department of Health and Social Care. A Norfolk Strategic Planning Framework has been endorsed by all stakeholder authorities in October 2019. It includes the shared objectives with Norfolk's Local Planning Authorities (including Norfolk County Council).
		The Council recently agreed a new <u>Customer Service</u> <u>Charter.</u> It refreshes the existing service standards and now sits at the heart of how we relate to each customer.
		During the year the Council has effectively engaged with stakeholders, residents and people who use the services provided. The Council consults on changes to services and other key decisions, such as the annual budget. The Council embraces the "We Asked, You Said, We Did" approach to consultation by publishing key findings from consultations and feeding back how these have contributed to council decisions.

Principles	Comment
	The Council adapted and extended digital engagement with residents and stakeholders in order to meet the challenges and issues presented by COVID-19. The annual budget consultation and feedback from residents were via webinars led by our Cabinet Member for Finance and senior officers. The Norfolk Residents Panel, designed to reach out to a broad make up of people from across all seven districts in Norfolk and representative of our local population, was launched. It is primarily an engagement tool and it has been created to give a voice to a wide cross section of Norfolk's population, to understand what they are thinking and what they want to see from the council in the future. All recruitment and contact with our panel members have been conducted online.
	During the COVID-19 pandemic, small businesses in the County were stretched resource wise and sometimes represented a high risk in terms of virus transmission. They needed accessible online materials and support tailored to their needs, employees and customers. The council with partners in other sectors including district, borough and city councils, health and police, used their knowledge of local businesses and the demographics of workers and residents to identify key business types and workers to target with prevention messages.
	Together we designed toolkits based on behavioural science ensuring that businesses were supported to encourage engagement and communication in preventive behaviours to reduce virus transmission. The partnership provided translations of the toolkits into a range of languages to target the hardest to reach groups. They also provided content targeting some of the key risk behaviours in transmission. The toolkits were viewed by 18,000 business in Norfolk.
	There is an agreed Communication Strategy and Media Protocol delivered by the media team.
	From mid-March to early May the Council deployed the Civil Contingencies provisions and suspended Council meetings. Decisions have been taken by Cabinet Portfolio Holders or the Head of Paid Service, as allowed for in the Council's Constitution.
	Decisions taken by the Head of Paid Service and Portfolio Holders are published as a Summary which is reported to Cabinet. Any Delegated Decisions called in from those made by Cabinet Members will be considered at a subsequent Scrutiny Committee. As a result of the Covid-19 adjustments

	Principles	Comment
		Officer Delegated decisions were reported at part 10 (pages 3 and 4) of the 11 th May 2020 Cabinet agenda.
C	Defining outcomes in terms of sustainable economic, social and environmental benefits.	The vision for Norfolk in 2021, was approved by Full Council on 12 February 2018. This set out the direction of the Council in the next three years and what it would like to achieve. The 'Vision for Norfolk 2021 Caring for our County' outlines the Council's commitment to: Building communities we can be proud of Making the most of our beautiful County Starting a new relationship with Norfolk families Investing in children and families Helping our population remain independent, resilient and well Getting our own house in order. Across the Council, teams and departments have developed 'Plans on a Page' bringing fresh thinking to the task of proposing new and different ways to prepare for the future. Plans on a page support the Council's vision. On 7 May 2019 the Council formally adopted "Together, for Norfolk an ambitious plan for our County 2019-2025". It includes clear priorities and outcomes, as stated below: Priorities Focusing on inclusive growth and improved social mobility Encouraging housing, infrastructure, jobs and business growth across the County Developing our workforce to meet the needs of the sectors powering our local economy. This way we can help Norfolk have a growing economy, full of thriving people living in strong communities we are proud of.

Principles	Comment
	 Outcomes Growing economy: More businesses start, grow and invest in Norfolk The local economy is inclusive, and supports and benefits local businesses and communities Infrastructure is in place to support housing development, inward investment and sustainable growth Enough homes are being built to meet people's need, including affordable homes Easy access to the County, good transport, fat internet and strong mobile network help people and businesses connect with each other People with high level qualifications are attracted to and remain in Norfolk High quality employment opportunities are available
	 All children in Norfolk have a good education which meets their needs, encourages ambition and gives them knowledge and skills for adult life and employment Young people and adults, including people with learning or physical disabilities and mental health problems, are able to develop skills for the future, and local businesses are able to invest in them Workers in Norfolk can access well paid, high value skilled jobs through the achievement of higher accredited learning and those in need of improved foundation skills can access learning All families, older people and people with learning or physical disabilities are supported to live well and independently in their community
	 Strong Communities People are socially active and connected to their communities People of all ages enjoy good health and increased wellbeing Services in communities are joined up and more able to meet people's needs

	Principles	Comment
	 Community groups and voluntary organisations are able to deliver services which people need in their community Communities are safe and resilient People have access to high quality culture and heritage facilities People can enjoy high quality of life in an environment which is protected 	
	The Council's new Environmental Policy was presented and approved at Full Council on 25 November 2019. Progress with the policy was reported to Cabinet on 12 January 2021. Go to Cabinet report.	
		The pandemic has presented a number of additional challenges, which are taken into account as part of the recovery planning and runs alongside our performance programme that ensures vital signs are meaningful and reflect positive outcomes for the people of Norfolk.
D	Determining the interventions	Performance
	necessary to optimise the achievement of the intended outcomes.	Performance Pyramid Vision NCC plan
		Cabinet & Executive Directors Corporately significant vital signs Corporately significant vital signs Financial Monitoring Corporate risks
		Portfolio holders & Departmental Vital signs' of service performance
		Heads of Service / Operational Team Managers Indicators Team Managers Team / Individual work plans Managed by Heads of Service / Team Managers
		During the year Cabinet received performance monitoring reports on the identified key areas (vital signs). These included performance dashboards and a detailed review of those areas not performing as expected. These provided both quantitative and qualitative performance information. Where performance is not meeting expectations, the reasons why are discussed and the required action to improve performance is identified.
		To improve its economy, efficiency and effectiveness the Council uses information about its costs and performance to improve the way it manages and delivers its services. The vital signs and corresponding targets were revised in April 2020 and strongly reflect our corporate priorities. The previous paper-

	Principles	Comment
		based performance reporting system has been overhauled into a digital system and was launched at the end of April 2021. The digital performance system provides a clear line of sight from our strategic goals through to our operational plans. Each Executive Director/Departmental Management Team uses the system to review performance and provide challenge on at least a monthly basis. This system of performance measuring and monitoring will be in continual development and review to ensure it meets the performance needs of the organisation.
		The annual report showing how we are delivering against the plans and commitments stated in the Norfolk County Council Plan 2019-25, has been delayed due to COVID-19 as well as the pending local government elections. It is the intention to publish this in June 2021. Norfolk County Council is currently working to identify the priorities arising from the Covid-19 crisis and will be reviewing and refreshing Together, for Norfolk as necessary in the current performance year.
		External challenge has been provided through benchmarking, inspections and peer reviews. Details of other inspections and peer reviews are included in Appendix 1 .
Е	Developing the entity's	Developing NCC's capacity
	capacity, including the capability of its leadership and the individuals within it.	There are a number of strategies, policies and frameworks that drive the development of NCC's capacity, including the NCC Workforce Priorities, Performance Development Conversations, and suites of learning focused on leadership & management, digital skills, core skills, induction, apprenticeships, and professional skills such as social care.
		Professional communities are under development and supported by technology to enable virtual communities to develop. Career families and profession leads are an emerging approach and, once a strengths-based approach is embedded and the Oracle replacement is live, colleagues will be provided with a more integrated approach to the recruitment and development of people.
		A refreshed mandatory training policy has been created and is currently in the process of sign off; compliance rates will be monitored using the Learning Hub system and shared with relevant subject matter owners, Strategic HR Business Partners, and managers via accessible dashboards. A simplified policy supporting change within the organisation has been created and signed off and is live now.

	Principles	Comment
		The coaching strategy continues to be implemented and the new cohort of ILM 5 internal coaches is now qualified and ready for deployment. A collaborative approach to procurement of senior external coaches for senior leaders is underway with the Norfolk NHS System Transformation Plan (STP).
		An NCC approach to workforce planning is being developed and, once operational in the second half of 2021, will support Strategic HR Business Partners to bring a modern and consistent approach to their directorate workforce plans. The creation of the Recruitment Business Partner role will assist with this.
		The annual staff survey provides statistically robust insight into colleagues' perceptions of their experience working at NCC, and this process is now embedded as business as usual as we approach our third year of completion. On-line data dashboards now enable visibility of data regarding the NCC workforce and this is available to appropriate HR professionals and managers. Detailed action plans are owned by each directorate and progress on these is governed by the NCC Corporate Board. The Board receive reports on the results of the survey and the progress with departmental action plans to support this process.
		Governance of the above strategies, policies and frameworks continues to sit with the Norfolk Development Academy, the Social Care Development Academy, the employment committee, the HR Leadership Team, Corporate Board, and other transformation boards or committees as required. Risks and issues with adherence to policies or implementation of strategies are raised to the appropriate governance forum and appropriate remedial plans or actions are developed. The Head of Organisation Effectiveness and Learning (Head of OE and L) leads the above strategies, policies and frameworks on behalf of the Director of People. The strategic resourcing lead leads on the resourcing and recruitment strategy for NCC and has a team including an operational manager, contracts manager and business partner to deliver this service.
F	Managing risks and performance through robust internal control and strong public financial management.	As per the earlier introduction in 1.2, the emergence of COVID-19 in early 2020 saw a monumental shift in the ways of working across the Council. From a risk management perspective, the Council has faced numerous new risks, leading to risk management playing a more prominent and direct role in the Council's operations.

Principles	Comment
	General
	Overall, risk management has continued to be embedded throughout the Council, with risk coverage at several key Member and officer led meetings, as well as a risk section within all standard NCC reports. Risk has taken on a greater role in discussions during 2020-21 due to the increased number of risk factors associated with the pandemic.
	Generic Corporate Risks
	Treatment of the generic corporate risks has continued alongside those specific to the pandemic, with quarterly reporting of the generic corporate risks to the Council's Cabinet and Audit Committee. The Council's annual risk management report was reported to the April 2020 Cabinet and Audit Committee. Whilst these meetings were cancelled owing to the pandemic, Members still received the reports.
	Departmental Risks
	At departmental risk level, departmental risk summaries were reported to the April 2020 Cabinet. Again, whilst this meeting was cancelled, Cabinet Members still received the summaries as part of the risk management report. During the pandemic, the departmental risk registers have been maintained, with departmental risk summaries scheduled to be reported in July 2021 to Cabinet and Audit Committee.
	Risk Management During the Pandemic
	Business as usual risk management processes (as set out above) continued to operate during the COVID-19 pandemic. Given the scale and complexity of the pandemic and associated changes to services and ways of working, additional steps were taken to capture and identify new and emerging risks. The Risk Management Officer was an active manager of the Council's Tactical (Silver) Group, supporting risk management. New corporate level operational and strategic risks were identified and mitigated appropriately. These were initially captured on separate risk registers and managed through the Silver Group, reporting to the Council's Strategic (Gold) Group where needed. The strategic risks reported as part of the Risk Management report to the July 2020 Cabinet and Audit Committee. As the arrangements and ways of working relating to the pandemic
	became embedded, and as local risks evolved, the need for a separate Covid-19 specific risk register reduced and risks now

Principles	Comment
	continue to be assessed and mitigated under 'business as usual' processes. To recommence face to face activities, as national and local restrictions were reduced/removed, several risk tests or criteria had to be met including infection, prevention and control. Model COVID-19 risk assessments and guidance was provided for departments and support provided by the Health, Safety and Well-being Service to ensure services are delivered safely.
	Under the Fire and Rescue Services Act 2004 (The Act), the Council is the statutory Fire and Rescue Authority (FRA). The Act makes it a statutory requirement for the Fire and Rescue Authority to produce an Integrated Risk Management Plan. Norfolk FRA published its Integrated Risk Management Plan (IRMP) for 2020-23 January 2020. Go to the latest published annual Norfolk Fire and Rescue Statement of Assurance 2019/20.
	In January 2021 Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) reported they were impressed with how the service adapted and responded to the pandemic and how it put the health and wellbeing of its people at the forefront of decision making.
	Collaboration arrangements between the Fire and Rescue Service and Norfolk Constabulary have been formalised through a Memorandum of Understanding and collaboration agreement. This collaboration has enabled a number of service improvements to be put in place, including:
	 a new shared emergency control room, taking 999 calls from across Norfolk more shared fire and police stations a shared approach to dealing with missing persons shared resources and training. Oversight of activities is carried out through the Council's Cabinet system, with any decisions taken in line with the Council's Constitution.
	All the Executive Directors have confirmed there are approved protocols, signed contracts and effective governance arrangements in place for work performed by third parties.
	Performance of wholly owned companies is monitored by Senior Officers and Members attendance at Board Meetings.

Principles	Comment
	The Scrutiny Committee and three Select Committees constitute the Council's overview and scrutiny arrangements pursuant to section 21 of the Local Government Act 2000. The Scrutiny Committee monitors the decisions made by the Cabinet, Officers making executive decisions on delegated authority and other decisions. The Scrutiny Committee have 'called-in' decisions which have been made by the Cabinet but not yet implemented. This enabled them to consider whether the decision is appropriate.
	The three select Committees are: a) People and Communities Committee b) Infrastructure and Development Committee c) Corporate Committee
	The Member Training Programme ensures Members are aware of their responsibilities in decision making. This includes being sufficiently challenging and ensuring they have the appropriate level of support and information to enable them to make an informed decision. A register of all councillor training is held. The mandatory training delivered during 2020/21 was Corporate Parenting which was attended by all Members. It is the intention to refresh Member training and in late 2020 a meeting of Member Support and Development Advisory Group (MSDAG) helped shape the planning and content for the induction and training programme. The training will be rolled out after the 2021 local government elections.
	The Council has robust internal control:
	 An Annual Internal Audit Report from the Executive Director of Finance and Commercial Services/Chief Internal Auditor will be made to the Audit Committee at its July 2021 meeting. There were no exceptions to report.
	Systems and processes for financial administration, financial control and protection of the Council's resources and assets are in place and these are continually reviewed to ensure they meet the Council's business requirements. These controls are clearly described in the Financial Regulations in the Constitution and the Council's Medium -Term Financial Management agreed by the Council in February 2021. In addition, a Going Concern Statement has been produced to provide additional assurance.
	 A new CIPFA Financial Management Code was published in October 2019. Local Authorities were

Principles	Comment
	expected to implement the Code throughout the 2020/21 year with the first year of compliance expected to be 2021/22. Audit assurance has been provided confirming the Council has reviewed the financial management arrangements against the standards of the code and taken the required actions to ensure they are ready for compliance in 2021-22.
	 Effective internal control arrangements are in place. These include financial guidance, budgetary systems, monitoring systems, delegation arrangements, accounting procedures, information and systems governance and authorisation and approval processes.
	 An agreed governance framework has been set up for the replacement of the Human Resources and Finance System. The Corporate Select Committee have received reports on a regular basis. A project board and project team consisting of experienced officers and specialists, overseen by the Programme Director. A project management framework is in place and is supplemented by a third-party specialist acting as business change partner. The project is on track in terms of delivery timeframes to meet its implementation date of November 2021.
	 Annual accounts are published on a timely basis.
	 An effective internal audit function is resourced and maintained.
	Risk management arrangements are effective.
	 An effective Audit Committee is in place.
	 Measures are in place to prevent, detect and investigate fraud and corruption.
	 The internal audit team is compliant with the relevant professional standards, namely the United Kingdom Public Sector Internal Audit Standards. From January 2017 these were updated and are now known as the International Standards for the Professional Practice of Internal Auditing. An external review was undertaken by CIPFA in May 2017.
	 Outstanding corporate high priority audit recommendations are followed up to ensure controls are put in place as soon as possible. A summary of the outstanding corporate high priority audit findings is reported to the Audit Committee.
	Executive Directors have confirmed there are processes in place to ensure the quality of data maintained or used as part

	Principles	Comment
		of the decision making. The Council had successfully implemented a plan for the General Data Protection Regulation (GDPR) introduced on 25 May 2018. Data sharing arrangements are currently being made more robust.
		To ensure financial sustainability the Council plans and manages its resources to ensure it can continue to deliver its services. We have strong public financial management. Responsible Budget Officers are responsible for managing their budgets effectively. At the end of every month financial information on expenditure is produced including forecast expenditure and the planned impact on earmarked reserves. Finance Monitoring Reports have been discussed monthly at Cabinet.
G	Implementing good practices in transparency, reporting, and audit, to deliver effective accountability.	The Council ensures that it makes informed decisions and properly manages its risks.
		During the year the Council has published information, including reports, in a manner which is accessible to citizens and other stakeholders. The Council complies with the Local Government Transparency Code 2015 by publishing accurate data within appropriate time frames.
		Reporting on performance, value for money and stewardship have been included in the Annual Report, Statements of Accounts and Annual Governance Statement.
		The Audit Committee has considered matters of governance, including internal audit, risk management, anti-fraud and corruption, the annual statement of accounts, treasury management and external audit during 2021/22.
		An Annual Internal Audit Report from the Executive Director of Finance and Commercial Services/Chief Internal Auditor will be made to the Audit Committee at its July 2021 meeting. There were no exceptions to report.
		All Executive Directors have confirmed staff are aware of their responsibility to report upwards any unresolved matters of concern about internal control.

5.3 Active wholly owned Companies have completed assurance statements confirming the effectiveness of their governance framework. No concerns have been identified.

6. Review of Effective Action on Significant Governance Issues 2019/20

6.1 There were no significant governance issues reported in 2019-20.

7. Significant Governance Issues

7.1 There are no significant governance issues to report for 2020-21. The Council has a robust risk management function where corporate risks were managed through Cabinet and reported to the Audit Committee during the year.



Milleles

Councillor Andrew Proctor Leader of the Council

13th December 2021

Tom McCabe Head of Paid Service

13th December 2021

Notes:

Note 1: The following senior officers have contributed to drafting this statement

- Head of Paid Service
- Executive Director of Community and Environmental Services
- Executive Director of Adult Social Services
- Executive Director of Children's Services
- Executive Director of Finance and Commercial Services (Section 151 Officer)
- Director of Transformation
- Director for People
- Director of Governance
- Director of Financial Management

Executive Directors who <u>have produced</u> signed Annual Positive Assurance Statements and supporting assurance tables

Head of Paid Service and Executive Director of Community and Environmental Services Executive Director of Adult Social Services

Executive Director of Finance and Commercial Services

Executive Director of Children's Services

Director of Transformation on behalf of the Executive Director of Strategy and Governance

Appendix 1

External Reviews carried out during the year

Comment

3 Finance and Commercial Services

The overall key message in the external auditor's (EY) Annual Audit Letter (available on the Council Finance webpage <u>Statement of Accounts 2019-20</u>) was that an unqualified opinion was issued on the Council's accounts for 2019-20.

The County Council was also given an unqualified 'Value for Money' opinion, within the Annual Audit Letter 2019-20.

An independent review of the Council's Risk Management arrangements was conducted by Zurich Insurance and was reported in May 2021. The review concluded that the Risk Management principals were 'Embedded'. A number of recommendations were made to further strengthen the arrangements.

Children's Services

A remote peer challenge was reported in March 2021. It acknowledged Norfolk Children's Services had made significant progress and are well placed to make further improvement. There is an established, skilled and experienced senior management team, supported by many skilled, energetic and committed managers and staff across the organisation.

Adult Social Services

In December 2020, a Judicial Review of changes made to the council's charging policy found that Norfolk County Council had inadvertently discriminated against a group of people that the Court identified as severely disabled. The judgment described the discrimination as "unintended and unforeseen". It came about as the result of the interaction of a number of different charging and income disregard rules relating to certain individuals.

In response the council swiftly accepted the judgment and agreed to put in place an interim amendment to the charging policy for non-residential care which established the Minimum Income Guarantee at £165, and ceased to take into account enhanced daily living allowance element of Personal Independence Payment. The amendment was backdated to July 2019 and financial adjustments to charging for those affected were made as soon as practicable.

The Council apologised to people affected, and agreed to undertake a more detailed review of its charging policy as it related to disabled and 'severely disabled' people identified through this judgment, including further dialogue with individuals and the community on living costs, and including updating its Equality Impact Assessment.

Comment

Norfolk Safeguarding Adults Board (NSAB) produced an independent Safeguarding Adults Review (SAR) report on 9 September 2021 detailing their findings in respect of the deaths of three NHS patients placed within the private Hospital, Cawston Park. Alongside its finding, the report provides 13 recommendations. Of these recommendations, Norfolk County Council (NCC) is explicitly referenced in the following:

- b) Norfolk and Waveney CCG and Norfolk ASSD should review their commissioning arrangements to embrace "ethical commissioning"
- e) Norfolk and Waveney CCG and Norfolk County Council should transfer all its remaining patients from this Hospital. Please note Cawston Park Hospital closed in May 2021.
- I) Norfolk and Waveney CCG and the County Council should rebalance responsibility for Norfolk citizens away from "medical led admissions and social care discharges." The reform of the Mental Health Act (1983) should anchor discussions and agreements between these public authorities concerning ethical commissioning".

Community and Environmental Services

• Customer Services:

Customer Service Excellence - (trademark of the Cabinet Office) reviewed the Customer Service Centre operation 4 March 2021 and awarded their quality mark. The service achieved the highest judgement of 'Compliant Plus' in a total of 21 areas, (up from previous highest of 16 areas in the review conducted 12 November 2019).

Waste Services:

Data relating to waste and recycling performance was submitted to the Environment Agency and Defra for each quarter of 2019/20 in arrears, and following their audit processes the data was published on 03 March 2021 as part of the national data release go to https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables

NFRS:

Her Majesty's Chief Inspector of Fire & Rescue Services' (HMCIFRS) report to the Secretary of State under section 28B of the Fire and Rescue Services Act 2004. It contains assessment of the sector in England, based on the inspections carried out during 2020. Norfolk reports are published online. Go to State of fire and rescue annual assessment 2020 and select Norfolk.

Comment

Trading Standards:

An annual assessment by the United Kingdom Accreditation Service (UKAS), as the UK National Accreditation Body, is performed to confirm that the Trading Standards calibration laboratory is meeting the standards required to maintain its accreditation status. At the full reassessment performed by UKAS in June 2020, the assessment team were once again extremely complimentary of the services provided and confirmed that compliance and confidence in measurement is being achieved on a continuing basis. Therefore, accreditation was retained.

An annual assessment by an ISO9001 certification body of the Trading Standards laboratory was performed during April 2020. Following confirmation that the requirements of standards and regulations were met on a continuing basis, certification was maintained.

An annual assessment by representatives of the Secretary of State (BEIS) is performed to confirm that the Trading Standards laboratory's approved body – managed by Norfolk on behalf of the East of England Trading Standards Association Limited (EETSA) – is meeting the requirements of the appropriate UK legislation and normative documents. The assessment in March 2021 identified that requirements are being met on a continuing basis and therefore designation by the Secretary of State was maintained.

An annual assessment was conducted in April 2020 by our nominated Radiation Protection Advisor (RPA) to ensure that controls the Trading Standards laboratory has in place, when using ionising radiation (IR), comply with the legal requirements of the IRR17. This provides the laboratory with consent to use IR within the Trading Standards' laboratory facilities at Hethel Engineering Centre.

As part of its enforcement function, Officers of the Trading Standards Service are accredited on an annual basis by the National Crime Agency to conduct Financial Investigations. At the close of 2020/21 the national regulator has confirmed the accreditations of two Financial Investigators, three Financial Intelligence Officers and three Senior Appropriate Officers.

An inspection of NCC by the Investigatory Powers Commissioners' Office (IPCO) took place on 18 August 2020. The inspection concerned the Council's use of surveillance powers and was carried out remotely, utilising MS Teams. The information provided satisfied the Inspector that the Council is operating within the requirements of the legislation and guidance in this area and this therefore removed the requirement for a physical inspection on this occasion.

The annual inspection by the Sports Grounds Safety Authority (SGSA) was postponed in 20/21 due to the coronavirus pandemic. At its last inspection in December 2019 the SGSA found that the Council had carried out an effective discharge of its duties under the legislation.