

A meeting of the **CORPORATE GOVERNANCE COMMITTEE** will be held in the **CIVIC SUITE, PATHFINDER HOUSE, ST MARY'S STREET, HUNTINGDON, CAMBS, PE29 3TN** on **WEDNESDAY, 9 JUNE 2021** at **7:00 PM** and you are requested to attend for the transaction of the following business:-

## **AGENDA**

### **APOLOGIES**

**1. MINUTES** (Pages 5 - 12)

To approve as a correct record the Minutes of the meeting of the Committee held on 24th March and 19th May 2021.

**Contact Officer: H Peacey - (01223) 752548**

**2. MEMBERS' INTERESTS**

To receive from Members declarations as to disclosable pecuniary and other interests in relation to any Agenda Item.

**Contact Officer: Democratic Services - (01223) 752548**

**3. CODE OF CONDUCT COMPLAINTS - UPDATE** (Pages 13 - 16)

To provide a summary and update of completed or ongoing complaints received regarding alleged breaches of the Code of Conduct under the Localism Act 2011 since the start of the year.

**Contact Officer: L Jablonska - (01480) 388004**

**4. UPDATE ON CODE OF CONDUCT AND REGISTER OF DISCLOSABLE PECUNIARY INTERESTS** (Pages 17 - 24)

To consider a report by the Elections and Democratic Services Manager on the Code of Conduct and Register of Disclosable Pecuniary Interests.

**Contact Officer: S Miller - (01223) 935946**

**5. REVIEW OF FRAUD INVESTIGATION ACTIVITY 2020/21** (Pages 25 - 30)

To consider a report by the Corporate Fraud Manager containing a summary of the activity of the Council's Corporate Fraud Team in 2020/21.

**Contact Officer: L Martin - (01480) 388861**

**6. IMPLEMENTATION OF INTERNAL AUDIT ACTIONS (Pages 31 - 36)**

To receive a report from the Internal Audit Manager providing an update on the implementation of audit actions since the last meeting.

**Contact Officer: D Moss - (01480) 388475**

**7. PROGRESS ON ANNUAL GOVERNANCE STATEMENT 2019/20 - SIGNIFICANT ISSUES (Pages 37 - 46)**

To receive a report outlining progress on issues arising from the 2019/20 Annual Governance Statement.

**Contact Officer: D Moss - (01480) 388475**

**8. WHISTLEBLOWING (POLICY, GUIDANCE AND CONCERNS RECEIVED) (Pages 47 - 56)**

To consider a report by the Internal Audit Manager on the outcome of a review of the Whistleblowing Policy and Guidance and on the allegations received under the Policy in the year ending March 2021.

**Contact Officer: D Moss - (01480) 388475**

**9. ANNUAL REPORT OF THE COMMITTEE (Pages 57 - 68)**

To consider the Annual Report to the Council in respect of the year ending March 2021 on the work that has been undertaken by the Corporate Governance Committee.

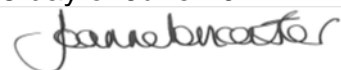
**Contact Officer: D Moss - (01480) 388475**

**10. CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT (Pages 69 - 70)**

To receive the Corporate Governance Committee Progress Report.

**Contact Officer: H Peacey - (01223) 752548**

8 day of June 2021



Head of Paid Service

**Disclosable Pecuniary Interests and Non-Statutory Disclosable Interests**

Further information on [Disclosable Pecuniary Interests and Non - Statutory Disclosable Interests is available in the Council's Constitution](#)

## **Filming, Photography and Recording at Council Meetings**

The District Council permits filming, recording and the taking of photographs at its meetings that are open to the public. It also welcomes the use of social networking and micro-blogging websites (such as Twitter and Facebook) to communicate with people about what is happening at meetings.

Arrangements for these activities should operate in accordance with [guidelines](#) agreed by the Council.

**Please contact Habbiba Peacey, Democratic Services Officer, Tel: (01223) 752548 / email: [Habbiba.Peacey@huntingdonshire.gov.uk](mailto:Habbiba.Peacey@huntingdonshire.gov.uk) if you have a general query on any Agenda Item, wish to tender your apologies for absence from the meeting, or would like information on any decision taken by the Committee.**

Specific enquiries with regard to items on the Agenda should be directed towards the Contact Officer.

Members of the public are welcome to attend this meeting as observers except during consideration of confidential or exempt items of business.

Agenda and enclosures can be viewed on the [District Council's website](#).

### **Emergency Procedure**

In the event of the fire alarm being sounded and on the instruction of the Meeting Administrator, all attendees are requested to vacate the building via the closest emergency exit.

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## HUNTINGDONSHIRE DISTRICT COUNCIL

MINUTES of the meeting of the CORPORATE GOVERNANCE COMMITTEE held as a Remote Meeting via Zoom on Wednesday, 24 March 2021

PRESENT: Councillor G J Bull – Chairman.

Councillors E R Butler, J C Cooper-Marsh, Dr P L R Gaskin, D A Giles, K P Gulson, P Kadewere, H V Masson, J P Morris and R J West.

APOLOGIES: Apologies for absence from the meeting were submitted on behalf of Councillors L W McGuire and Mrs S R Wilson.

### COUNCILLOR J W DAVIES

Prior to the commencement of the meeting, Members held a moments silence to mark the passing away of Councillor J W Davies, Chairman of the Council.

### 31 MINUTES

(During discussion on this item, Councillor P Kadewere took his seat at the meeting).

The Minutes of the meeting of the Committee held on 27th January 2021 were approved as a correct record.

In respect of Minute No. 20/25, the Chairman reported that he had consulted Group Party Leaders about the low level of returns from Members in relation to third party disclosures with a view to achieving a 100% return rate.

### 32 MEMBERS' INTERESTS

No declarations were received.

### 33 COMMUNITY GOVERNANCE REVIEW - ALCONBURY & ALCONBURY WESTON PARISH COUNCIL

(During discussion on this item, Councillor J Cooper-Marsh took his seat at the meeting and was welcomed to his first Committee meeting by the Chairman).

With the aid of a report prepared by the Elections and Democratic Services Manager (a copy of which is appended in the Minute Book) the Committee gave consideration to requests from Alconbury and Alconbury Weston Parish Councils to group the two parishes to allow a common Parish Council to be formed.

Members were acquainted with the background to the request, together with the consultation and timetable for implementation. The proposals would seek to enable the two communities to work closely together on common issues such as the sharing of facilities, flooding and Speedwatch whilst maintaining their own

civil identities. If pursued, the changes would take effect from May 2022 when Town and Parish Council elections were scheduled to take place throughout the District.

Questions that were raised related to the arrangements that would be in place to raise the precept for the 2022/23 financial year, the continuation of the two existing Parishes until the Reorganisation Order was in place and whether the two Parishes historically struggled to fill any vacant seats.

In welcoming the proposals and having been informed of a change to recommendation (a) of the report to reflect that the number of seats of the newly formed Parish Council should be determined following community feedback from the consultation, the Committee

#### RESOLVED

- (a) to agree the request from Alconbury and Alconbury Weston Parish Councils for a Community Governance Review to group the two parishes to allow a common Parish Council to be formed with the number of seats to be determined following community feedback from the consultation;
- (b) to agree the draft terms of reference of the review as detailed in Appendix A of the report now submitted, subject to amendments to be made to reflect recommendation (a) above; and
- (c) to authorise the Elections and Democratic Services Manager to agree a timetable in consultation with Alconbury and Alconbury Weston Parish Councils.

### **34 ANNUAL COMPLAINTS REPORT 2019/20**

A report by the Business Change Manager was submitted (a copy of which is appended in the Minute Book) providing Members with information on complaints referred to the Local Government & Social Care Ombudsman (LGO) and those received by the Council between April 2019 to March 2020.

The Committee were informed that the LGO had been advised of 23 complaints of which there had been four detailed investigations, two of which had been upheld. The latter cases referred to parking and benefits. With regards to internal complaints, it was noted that the number of Stage One complaints had decreased when compared to the previous year. The majority of complaints related to missed bin collections which attributed to 161 of the 280 Stage One complaints received. Having regard to Stage Two complaints, 17 had been received, which reflected positively upon the Council as it indicated that a number of complaints were largely resolved at Stage One.

In noting that the Complaints Tracker site had been updated during the course of the year and having had their attention drawn to the appendices within the report, specifically Appendix 4 and 5 which detailed compliments received and how Huntingdonshire compared with its neighbouring authorities respectively, it was

#### RESOLVED

that the Local Government & Social Care Ombudsman local authority report for Huntingdonshire District Council and the data relating to formal Stage One and Stage Two complaints for 2019/20 be received and noted.

### **35 DATA PROTECTION COMPLIANCE: UPDATE ON ACTION PLAN**

A report by the Information Governance Manager and Data Protection Officer was submitted (a copy of which is appended in the Minute Book) providing a status update on the actions identified as part of the Data Protection gap analysis review which had been discussed at the Committee's last meeting.

In noting that the report would no longer be submitted as a standing item at each meeting but that instead a future report would appear before the Committee once all actions had been concluded successfully, it was

RESOLVED

that the content of the report now submitted be received and noted.

### **36 SINGLE TENDER AWARDS**

With the aid of a report prepared by the Assistant Director for Transformation and Head of 3C ICT (a copy of which is appended in the Minute Book) the Committee were notified of single tenders/quotes approved by Heads of Service/Assistant Directors since the last Committee meeting. Having been informed of the requirement within the Council's Constitution, under the Code of Procurement, to report such matters to the Committee, it was

RESOLVED

that the content of the report now submitted be noted.

### **37 INTERNAL AUDIT PLAN 2021/22 & INTERNAL AUDIT CHARTER**

With the aid of a report by the Acting Internal Audit Manager (a copy of which is appended in the Minute Book) the Committee gave consideration to the Internal Audit Plan for 2021/22 and proposed changes to the Internal Audit Charter 2021.

In introducing the report, the Acting Internal Audit Manager reported that in light of the position with resources within the Internal Audit Team, the Internal Audit Plan for 2021/22 had been based on a priority list of assurance activities whilst also offering the flexibility to review and amend the Plan as any new or high priority risk areas emerged during the course of the year.

Questions were raised around the resources available to achieve the Plan, where it was noted that an annual plan had been prepared instead of two six monthly plans because resources would not be equal across the two half years and levels were not yet known. In response to comments made around the ambitious nature of the Plan, the Committee received assurances that the activities shown as green on the Plan were achievable but very dependent on resourcing especially if the team were to provide support to the Council's risk

management function. It was further reported that an interim progress report would be submitted to the Committee at its September 2021 meeting.

In noting that only minor changes had been made to the Internal Audit Charter, the Committee

RESOLVED

- (a) to approve the Internal Audit Plan for 2021/22 as submitted as Appendix 1 of the report;
- (b) to agree that changes can be made to the Internal Audit Plan following consultations between the Internal Audit Manager and Section 151 Officer and the Chairman of the Corporate Governance Committee; and
- (c) to approve the Internal Audit Charter 2021 as submitted as Appendix 2 of the report.

### **38 IMPLEMENTATION OF INTERNAL AUDIT ACTIONS**

With the aid of a report prepared by the Acting Internal Audit Manager (a copy of which is appended in the Minute Book) the Committee were updated on the implementation of audit actions.

Since the Committee's last meeting, the Acting Internal Audit Manager reported that discussions had been held at the Risk & Control Group and with the Council's Senior Leadership Team on the 100% target for the implementation of 'agreed internal audit actions to be introduced on time'. The consensus was that the target should remain given that they had been agreed with service managers at the time. Since the first meeting of the Risk & Control Group there had been a flurry of activity to update audit actions which had been encouraging to note.

Comment was made over the number of outstanding audit actions relating to 3C ICT and whether the relevant Executive Councillor had been sighted on the content of the report. Having regard to the former, it was reported that discussions had been held and that work was now being undertaken by the service to address its audit actions. Councillor D A Giles expressed his disquiet at the lack of progress which had been made to complete audit actions which had been raised on numerous occasions at previous Committee meetings and in doing so, the Chairman expressed his view that that the Committee should enable the Risk & Control Group sufficient time to bed in within the organisation before taking any further action.

Other matters that were discussed included the suggestion to set the scene to service managers from the outset on the importance of completing audit actions together with the role of the Committee in monitoring progress, confirmation that the audit actions relating to 3C ICT solely related to Huntingdonshire District Council and did not include other partner authority actions and a suggestion to receive a further update report on progress at the next Committee meeting. Whereupon, it was

RESOLVED



- (a) that the content of the report now submitted be noted; and
- (b) that a further update be provided at the Committee's June 2021 meeting.

**39    PROGRESS ON ANNUAL GOVERNANCE STATEMENT 2019/20 - SIGNIFICANT ISSUES**

A report by the Acting Internal Audit Manager was submitted (a copy of which is appended in the Minute Book) providing an update on progress against significant governance issues as reported in the 2019/20 Annual Governance Statement.

Having had their attention drawn to Appendix 1 which provided an update on the 10 significant governance issues which had been identified, Members were encouraged to note that action continued to be undertaken on all the issues reported. Having received assurances that ICT training was moving in the right direction and in thanking the Acting Internal Audit Manager for the production of a clear, concise and comprehensive report, it was

RESOLVED

- (a) that the Committee note the progress which has been made against the significant governance issues identified from the Annual Governance Statement 2019/20 as outlined in Appendix 1 of the report now submitted; and
- (b) that further update reports be submitted as a standing item at future Committee meetings.

**40    CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT**

The Committee received and noted a report (a copy of which is appended in the Minute Book) on progress of actions in response to any decisions taken at previous meetings.

The Assistant Director, Corporate Services reported that following feedback from Officers on the use of the Code of Procurement Waiver Procedure, minor amendments had been made with one use of the waiver procedure being utilised in relation to the Fish Weir Construction in Godmanchester. Records were being retained to document use of the procedure which would be reported to the Committee at future meetings. Finally, it was noted that the procedure had now been in operation for 3 months.

Chairman

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# HUNTINGDONSHIRE DISTRICT COUNCIL

MINUTES of the meeting of the CORPORATE GOVERNANCE COMMITTEE held at the BURGESS HALL, WESTWOOD ROAD, ST IVES, CAMBRIDGESHIRE, PE27 6WU on Wednesday, 19 May 2021

PRESENT: Councillor G J Bull, E R Butler, J C Cooper-Marsh, Dr P L R Gaskin, D A Giles, K P Gulson, P Kadewere, H V Masson, L W McGuire, R J West and Mrs S R Wilson.

APOLOGY: An Apology for absence from the meeting was submitted on behalf of Councillor J P Morris.

## 1 ELECTION OF CHAIRMAN

RESOLVED

that Councillor G J Bull be elected Chairman of the Committee for the ensuing Municipal Year.

## 2 MEMBERS' INTERESTS

No declarations were received.

## 3 APPOINTMENT OF VICE-CHAIRMAN

RESOLVED

that Councillor P L R Gaskin be appointed Vice-Chairman of the Committee for the ensuing Municipal Year.

Chairman

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**Public**  
**Key Decision - No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Code of Conduct Complaints – Update

**Meeting/Date:** Corporate Governance Committee – 9th June 2021

**Executive Portfolio:** Councillor R Fuller, Executive Leader

**Report by:** Elections and Democratic Services Manager & Deputy Monitoring Officer

**Ward(s) affected:** All

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### **Executive Summary:**

This report provides Members with an update on complaints cases regarding alleged breaches of the Code of Conduct. The Committee is responsible for maintaining high standards of conduct by Members of the District and Town and Parish Councils, for monitoring operation of the Code of Conduct and for considering the outcome of investigations in the event of breaches of the Code.

### **Recommendation:**

**The Committee is requested to note the progress of any outstanding complaints and the conclusion of cases resolved since the meeting in January 2021.**

## 1. PURPOSE OF THE REPORT

- 1.1 The purpose of this report is to provide a summary and update of completed or ongoing complaints received regarding alleged breaches of the Code of Conduct under the Localism Act 2011 since the start of the year.

## 2. WHY IS THIS REPORT NECESSARY/BACKGROUND

- 2.1 In accordance with the functions of the Committee, this report seeks to provide a summary of the current position in relation to the Code of Conduct complaints since the last meeting.
- 2.2 At the meeting of the Committee on 13th September 2017, Members requested that this report be submitted on a quarterly basis and to include categories of the Code of Conduct cases to enable feedback to be given to Town and Parish Councils should similar themes emerge on the nature of the complaints to enable further training to be arranged.

## 3. ANALYSIS

- 3.1 Details of allegations/complaints in relation to the Code of Conduct have been outlined in the table below. Specific detailed information regarding the complaint has not been provided as this may be prejudicial to the conduct of the ongoing complaints process and to protect the identity of councillors who may not have breached the Code of Conduct.

<b>Case Number</b>	<b>District/Town/ Parish Council</b>	<b>Allegation/complaint</b>	<b>Outcome</b>
20/45	Brampton Parish Council	Complaint against a Parish Councillor alleging a conflict of interest and failure to declare a disclosable pecuniary interest.	Potential breach of Section 34 of the Localism Act 2011 – refer to Police
20/46	Huntingdonshire District Council	Complaint against a District Councillor alleging he breached 3.4 (disrepute) of the Code.	Complaint dismissed, after consultation with the Independent Person, due to the complaint relating to conduct in the distant past (over six months before).
20/47	Huntingdonshire District Council	Complaint against a District Councillor alleging he breached 3.4 (disrepute) of the Code.	Matter currently under investigation.

#### **4. LEGAL IMPLICATIONS**

4.1 There are no significant implications to report.

#### **5. REASONS FOR THE RECOMMENDED DECISIONS**

5.1 This is an opportunity for Members of the Committee to be appraised of details of completed complaints and any outstanding complaints alleged against the Code of Conduct. This is in accordance with the functions of the Committee and its duty to discharge functions in relation to the promotion and maintenance of high standards of conduct within the Council and amongst Town and Parish Councils within the District.

#### **6. BACKGROUND PAPERS**

None.

#### **CONTACT OFFICER**

Name/Job Title: Lisa Jablonska, Elections and Democratic Services Manager &  
Deputy Monitoring Officer

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Email: [lisa.jablonska@huntingdonshire.gov.uk](mailto:lisa.jablonska@huntingdonshire.gov.uk)

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**Public**  
**Key Decision - No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Update on Code of Conduct and Register of Disclosable Pecuniary Interests

**Meeting/Date:** Corporate Governance Committee – 9<sup>th</sup> June 2021

**Report by:** Elections and Democratic Services Manager

**Wards affected:** All Wards

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### **Executive Summary:**

The Monitoring Officer has a duty to establish and maintain a register of Disclosable Pecuniary Interests (DPIs). This report provides the Committee with details of the current level of returns by Town and Parish Councillors and by District Councillors. It also contains a breakdown of the adoption by Town and Parish Councils of Codes of Conduct.

### **Recommendation(s):**

The Committee is

### **RECOMMENDED**

to consider and comment on the report.

## **1. PURPOSE OF THE REPORT**

- 1.1 Chapter 7 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of disclosable pecuniary or other interests of Members of the District Council. In addition, the District Council is responsible for maintaining the Register for Town and Parish Councils. The register is open for inspection at the District Council's offices and published on the District Council's website. Where a Town or Parish Council has a website, the District Council is required to provide that Council with the information necessary to enable it to publish their current register on its own website. Information in respect of the DPIs of each Town and Parish Council is presented in Appendix 1.
- 1.2 Each Town and Parish Council also has a duty to adopt a Code of Conduct. All Town and Parish Councils were requested to advise the Monitoring Officer when their Council had adopted a new Code and to confirm whether it was identical to that adopted and promoted by the District Council or alternatively the version produced by the National Association of Local Councils (NALC) or any other.

## **2. WHY IS THIS REPORT NECESSARY/BACKGROUND**

- 2.1 The Committee is responsible for maintaining high standards of conduct by Members of the District and Town and Parish Councils, for monitoring the operation of the Code of Conduct and for considering the outcome of investigations in the event of breaches of the Code. The District Council has a duty to maintain and publish the Registers of Pecuniary Interests of the District and Town and Parish Councils. Those Members who fail to comply with the 2011 Act are guilty of an offence and liable to a maximum fine of £5,000 and disqualification for up to five years.
- 2.2 This report describes the current position in relation to both matters.

## **3. ANALYSIS**

- 3.1 All DPI forms that have been received have been published. Any changes made to pecuniary interests have also been published.
- 3.2 Of 71 Town and Parish Councils, 33 have had their full Register published on the District Council's website, 31 Parishes have published their Register with vacancies and 9 Parish Councils currently have a form outstanding.
- 3.3 In terms of individual DPIs, 582 out of a total of 650 have been received from Parish Councillors; with 57 vacant and 11 outstanding. The up to date position on each Council is noted in Appendix 1. It is unlikely that there will ever be a complete return at any one time because of the ever-changing Parish Council membership.
- 3.4 All District Councillors' DPI forms are uploaded onto the Council's website.

#### **4. KEY IMPACTS**

- 4.1 The Corporate Team regularly requests updates from those Parish Councils where DPIs are outstanding. Similarly, incomplete or inaccurate forms are returned to Parish Councils with a request to revise and return. All Parish Councils are asked twice a year to verify details held by the District Council regarding DPIs and the Code of Conduct adopted by each Parish Council.

#### **5. WHAT ACTIONS WILL BE TAKEN/TIMETABLE FOR IMPLEMENTATION**

- 5.1 Parish Clerks are regularly reminded by email to submit DPI forms as soon as possible following any changes.

#### **6. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND/OR CORPORATE OBJECTIVES**

- 6.1 The Council's strategic priorities include collaboration with partners to enhance community resilience. By ensuring that DPIs are published, the Council is supporting local accountability and transparency in decision making which contributes to the objective to develop stronger and more resilient communities to enable people to help themselves.

#### **7. CONSULTATION**

- 7.1 Not applicable.

#### **8. LEGAL IMPLICATIONS**

- 8.1 There is no legal obligation upon a Town or Parish Council to notify the Monitoring Officer that it has adopted a Code of Conduct. Records indicate, however, that all Town and Parish Councils have adopted a Code. 57 of those Parish Councils have adopted one based on that adopted by the District Council. 12 Town and Parish Councils have opted for the Code promoted by NALC, and two have adopted their own version of the Code. The up to date position on each Council is noted in Appendix 2.

#### **9. REASONS FOR THE RECOMMENDED DECISIONS**

- 9.1 The Committee take a role in maintaining high standards of conduct by elected Members and monitoring the Code of Conduct.

#### **10. LIST OF APPENDICES INCLUDED**

Appendix 1 - Town and Parish Councils Disclosable Pecuniary Interests (DPI) forms.

Appendix 2 - Town and Parish Council New Standards Regime and Code of Conduct.

## 11. BACKGROUND PAPERS

None.

### CONTACT OFFICER

Name/Job Title: Sophie Miller, Democratic Services Officer (Scrutiny)  
Tel No: 01223 935946  
Email: [Sophie.Miller@huntingdonshire.gov.uk](mailto:Sophie.Miller@huntingdonshire.gov.uk)

## Town and Parish Councils' Disclosable Pecuniary Interests (DPI) forms

No	Town/Parish Council	No of Cllrs	DPIs Received	Vacancies	DPIs Outstanding
1	Abbots Ripton	6	6		
2	Abbotsley	7	7		
3	Alconbury	11	6	4	1
4	Alconbury Weston	7	5	2	
5	Alwalton	5	5		
6	Barham & Woolley	5	5		
7	Bluntisham	11	8	3	
8	Brampton	15	15		
9	Brington & Molesworth	5	4		1
10	Broughton	7	6	1	
11	Buckden & Diddington	15	14	1	
12	Buckworth	5	5		
13	Bury	9	8	1	
14	Bythorn & Keyston	5	5		
15	Catworth	7	7		
16	Colne	9	9		
17	Conington	5	5		
18	Earith	11	11		
19	Easton	5	4		1
20	Ellington	7	7		
21	Elton	9	9		
22	Farcet	11	3	5	3
23	Fenstanton	13	13		
24	Folksworth & Washingley	9	8		1
25	Glatton	5	5		
26	Godmanchester	17	17		
27	Grafham	7	7		
28	Great & Little Gidding	7	5	2	
29	Great Gransden	9	8	1	
30	Great Paxton	9	7	2	
31	Great Staughton	9	8		1
32	Hail Weston	7	7		
33	Hemingford Abbots	7	6	1	
34	Hemingford Grey	13	11	2	
35	Hilton	9	8	1	
36	Holme	7	7		
37	Holywell cum Needingworth	13	12	1	
38	Houghton & Wyton	9	8		1
39	Huntingdon	19	16	2	1
40	Kimbolton & Stonely	11	10	1	
41	Kings Ripton	5	4	1	
42	Leighton Bromswold	7	6	1	
43	Little Paxton	15	14	1	

44	Offord Cluny & Offord Darcy	11	8	3	
45	Old Hurst	7	6	1	
46	Old Weston	7	7		
47	Perry	9	5	4	
48	Pidley cum Fenton	7	7		
49	Ramsey	17	17		
50	Sawtry	15	13	2	
51	Sibson cum Stibbington	7	7		
52	Somersham	15	12	3	
53	Southoe & Midloe	7	7		
54	Spaldwick	7	7		
55	St Ives	17	14	3	
56	St Neots	21	20	1	
57	Stilton	11	10	1	
58	Stow Longa	5	4	1	
59	The Stukeleys	9	9		
60	Tilbrook	5	5		
61	Toseland	5	4		1
62	Upton & Coppingford	5	4	1	
63	Upwood & The Raveleys	9	8	1	
64	Warboys	15	15		
65	Waresley cum Tetworth	5	5		
66	Wistow	7	7		
67	Woodhurst	7	7		
68	Woodwalton	5	5		
69	Wyton on the Hill	7	4	3	
70	Yaxley	17	17		
71	Yelling	7	7		
	<b>Totals</b>	650	582	57	11

## Town and Parish Council New Standards Regime and Code of Conduct

No	Town/Parish Council	HDC Code	NALC Code	Own Code
1	Abbots Ripton	X		
2	Abbotsley		X	
3	Alconbury	X		
4	Alconbury Weston		X	
5	Alwalton	X		
6	Barham & Woolley	X		
7	Bluntisham	X		
8	Brampton	X		
9	Brinton & Molesworth	X		
10	Broughton	X		
11	Buckden	X		
12	Buckworth	X		
13	Bury	X		
14	Bythorn & Keyston	X		
15	Catworth	X		
16	Colne			X
17	Conington	X		
18	Earith		X	
19	Easton	X		
20	Ellington	X		
21	Elton	X		
22	Farcet		X	
23	Fenstanton	X		
24	Folksworth & Washingley		X	
25	Glatton	X		
26	Godmanchester	X		
27	Grafham	X		
28	Great & Little Gidding	X		
29	Great Gransden	X		
30	Great Paxton	X		
31	Great Staughton	X		
32	Hail Weston		X	
33	Hemingford Abbots	X		
34	Hemingford Grey	X		
35	Hilton	X		
36	Holme	X		
37	Holywell cum Needingworth	X		
38	Houghton & Wyton			X
39	Huntingdon	X		
40	Kimbolton & Stonely	X		
41	Kings Ripton	X		
42	Leighton Bromswold	X		
43	Little Paxton	X		
44	Offord Cluny & Offord Darcy		X	
45	Old Hurst		X	

## Appendix 2

46	Old Weston	X		
47	Perry	X		
48	Pidley cum Fenton	X		
49	Ramsey	X		
50	Sawtry	X		
51	Sibson cum Stibbington	X		
52	Somersham	X		
53	Southoe & Midloe	X		
54	Spaldwick	X		
55	St Ives	X		
56	St Neots	X		
57	Stilton		X	
58	Stow Longa	X		
59	The Stukeleys	X		
60	Tilbrook	X		
61	Toseland	X		
62	Upton & Coppingford	X		
63	Upwood & The Raveleys	X		
64	Warboys	X		
65	Waresley cum Tetworth		X	
66	Wistow	X		
67	Woodhurst		X	
68	Woodwalton		X	
69	Wyton on the Hill	X		
70	Yaxley	X		
71	Yelling	X		
	<b>Totals</b>	<b>57</b>	<b>12</b>	<b>2</b>



**Public**  
**Key Decision - No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Review of Fraud Investigation Activity 2020-21

**Meeting/Date:** Corporate Governance Committee – 9th June 2021

**Executive Portfolio:** Executive Councillor for Corporate Services

**Report by:** Corporate Fraud Manager

**Ward(s) affected:** All

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### **Executive Summary:**

The Council's Anti-Fraud and Corruption Strategy sets out a requirement that a report shall be submitted on an annual basis to the Corporate Governance Committee detailing the work that has been undertaken by the Corporate Fraud Team (CFT).

During 2020/21 the CFT:

- Were seconded to help with the award of Business Grants.
- Involved in 13 separate Business grant schemes.
- Verified and checked businesses bank accounts and active status to determine eligibility to grant payments
- Assisted in the award of over £50 million pounds worth of grants over the last 14 months

### **Recommendation:**

The Corporate Governance Committee is invited to comment on the contents of this report which details the work that has been undertaken by the Corporate Fraud Team during 2020/2021.

## 1. PURPOSE OF THE REPORT

- 1.1 This report provides a summary of the activity of the Council's Corporate Fraud Team in 2020/2021.

## 2. BACKGROUND

- 2.1 The CFT plays a key role in ensuring that the Council meets its requirements under the Anti-Fraud and Corruption Strategy (AFCS) 2018-2021 by providing a comprehensive fraud service across the whole of the Council. The AFCS sets out the requirement for the Corporate Leadership Team to approve an annual business plan that sets out the priorities for the team. The priorities are based on the level of risk facing specific service areas within HDC and the AFCS.
- 2.2 The team consists of a manager, an investigation officer and an intelligence / data analyst officer.
- 2.3 The CFT's main priorities changed significantly this year with the onset of the Coronavirus pandemic. Following the announcement of financial assistance to businesses by the government the CFT was seconded to assist in this work like so many other teams and services. The main aim was to support our local communities and businesses that had been financially impacted by the pandemic. The government over the last 14 months has brought out around 15 different schemes each with their own eligibility and criteria which has made the delivery of these grants a mammoth and complex procedure for all involved. With each grant there has been guidance requiring checks to be carried out either pre or post payment to address the concern of potential fraud. It was therefore necessary to establish pre and post assurance plans to check claims for each grant.

## 3. ANALYSIS/WORK UNDERTAKEN

- 3.1 This table shows the volume of business support grants paid over the last year and gives an indication of the scale of the work that the CFT had to do in ensuring that grants were only paid to eligible businesses.

Grant Scheme	Number of Businesses	Total Value
BG1 (Small Business Grant /Retail, Health and Leisure Grant)	2366	£ 29,480,000.00
BG2 (Discretionary Business Grants)	220	£ 1,638,500.00
Local Restrictions Support Grant (Nov)	984	£ 1,552,466.00
LRSB (Tier 2 Open)	452	£ 449,763.16
LRSB (Tier 2 Closed)	37	£ 55,438.35
LRSB (Tier 4)	974	£ 551,475.27
LRSB (42 Day Payment)	979	£ 2,327,191.14
LRSB (44 Day Payment)	975	£ 2,432,592.16

Closed Business Lockdown Payment	982	£ 4,665,000.00
Additional Restrictions Grant /Additional Restrictions Grant Expanded	596	£ 3,488,000.00
Restart Grants	957	£ 7,291,393.00
Enhanced Additional Restrictions Grant	22	£ 186,000.00

- 3.2 The sheer volume of applications and number of schemes announced throughout the year has been particularly challenging, especially as each one has had different eligibility and criteria to be met. At one point, the CFT was dealing with four different schemes running at the same time.
- 3.3 The CFT undertook a variety of checks using tools made available from the Cabinet office (Spotlight) and the National Fraud Initiative. This enabled the team to verify that limited companies and sole traders were active by performing checks using Spotlight as well as checking business rates records and conducting bank verification checks with the National Fraud Initiative which confirms that a bank account is associated with that company or individual. For sole traders who could not be verified via Spotlight, checks also involved looking for an online presence as well as checking the insolvency register for the trading name and person name as well as examining bank statements. For some grants an accountant or bookkeeper's letter was required which involved the CFT checking that accountants or bookkeepers were qualified by seeing actual qualifications or verifying membership to one of the professional bodies.
- 3.4 The CFT has been liaising with the National Anti-Fraud Network who advises all local authorities on known fraudulent claims and attempts to claim the grants. This mainly involved the first round of business grants due to the large sums of money involved, either £25K or £10K, depending whether the business was eligible for a Retail, Hospitality and Leisure Grant or Small Business Grant. It was nationally recognised that organised crime gangs were attempting to claim grants by impersonating large national companies. This was made easier as due to lockdown many businesses had little or no staff available to speak to or get hold of. Some of these attempts were very credible and the fraudsters used legitimate company personnel names to make the claims and provided mocked up false bank statements for payments to be credited to. The CFT spotted one such application which had supposedly come from a large national company. Officers had suspicions about the veracity of the document and contacted the Head Office to query it. The financial director was able to confirm that the company had not made any grant applications at all. The bank details provided were not for the bank they used and the email address provided was incorrect. It was later established the fraudsters behind this attempt had sent a number of applications to other authorities. A national alert was put out as a result of our findings, but unfortunately not before they had already been paid £75,000.
- 3.5 The CFT also identified a number of other suspected fraudulent claims made by organised crime gangs and these were handed over to NATIS, the National Investigation Service, appointed by the government to take on these investigations.

3.6 The CFT acts as the Single Point of Contact (SPOC) providing the DWP with information regarding Housing Benefit claims. However due to DWP colleagues being seconded to other departments to assist in the high level of Universal Credit applications these requests stopped.

3.7 The Corporate Fraud Manager is the Council's Coordinating Officer for the Re Regulatory Investigatory Powers Act which deals with Directed Surveillance and Communications Data requests. It is a requirement of the Council's Covert Surveillance (RIPA) Policy and Procedure that a report is made annually to CGC on any activity undertaken in line with the policy. In 2020/2021 HDC made no applications for Directed Surveillance due to the pandemic.

#### **4. KEY IMPACTS / RISKS**

4.1 The pandemic had a significant impact on Council priorities over the past year. This led to the focus of the CFT being re-directed from normal investigation work to playing a vital role in verifying business grant applications to ensure that payments were made correctly to support local businesses but applying a proportionate level of checks to protect the public purse from fraudulent applications.

4.2 However, diverting effort and resource to support the business grant process meant there was no resource available to deal with other types of investigation work during this time.

#### **5. WHAT ACTIONS WILL BE TAKEN**

5.1 Although a degree of involvement in business grant work will still be required for the foreseeable future, it is hoped that over the next few months, the CFT will be able to re-focus on normal investigation work. But the CFT will also engage with services across the Council to understand any additional risks and potential opportunities for obtaining services fraudulently that may have occurred during the pandemic in order to provide support on reducing those risks and carrying out investigations where appropriate.

5.2 A review of casework put on hold during the pandemic will be undertaken to decide how best to proceed and the team will re-engage with local Housing Associations to build on the relationships started prior to the pandemic to do joint working on illegal sub-letting etc.

#### **6. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND / OR CORPORATE OBJECTIVES**

6.1 Strategic priority: Becoming a more efficient and effective Council.

#### **7. REASONS FOR THE RECOMMENDED DECISION**

7.1 The Anti-Fraud and Corruption Strategy sets out a requirement for an annual report to be submitted to the Corporate Governance Committee on the work of the Corporate Fraud Team during the previous financial year.

## **BACKGROUND PAPERS**

CIPFA Fraud and Corruption Tracker Summary Report 2020

<https://www.cipfa.org/services/counterfraudcentre/fraud-and-corruption-tracker>

## **CONTACT OFFICER**

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**Public**  
**Key Decision - No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Implementation of Internal Audit Actions

**Meeting/Date:** Corporate Governance Committee – 9th June 2021

**Executive Portfolio:** Executive Member for Strategic Finance -  
Councillor Jonathan Gray

**Report by:** Deborah Moss, Internal Audit Manager

**Ward(s) affected:** All Wards

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### **Executive Summary:**

Key performance indicator: 100% of audit actions to be implemented by the agreed date. Not been achieved.

Performance in the last 12 months\*:

**34 actions introduced** - 20% on time, increasing to 85% when including late implementation

**6 actions not implemented** – 15%

*(\* actions due before the last 12 months period are not included in this measure).*

**10 overdue audit actions** remained outstanding (at 19/05/21).

All actions are receiving attention and are now being progressed.

### **Recommendation:**

It is recommended that the Committee consider the report and comment as they consider necessary.

## **1. PURPOSE OF THE REPORT**

- 1.1 To update members on the implementation of audit actions.

## **2. WHY IS THIS REPORT NECESSARY?**

- 2.1 At past meetings of the Corporate Governance Committee (CGC), the committee has expressed concerns at the underachievement of the management-set target of implementing 100% of agreed internal audit actions on time. This report provides an update for members based on audit actions that are outstanding as at 19<sup>th</sup> May 2021.

## **3. BACKGROUND**

- 3.1 Following each audit review, audit conclusions, associated actions and implementation dates are agreed between the audit client and the audit team. Services can disagree with any action and the audit report is a record of what has been agreed by way of actions and their target dates.
- 3.2 The target for the implementation of 'agreed internal audit actions to be introduced on time' is set at 100% in line with best practice that suggests that all recommendations are implemented by the agreed deadline. The deadline date is set/agreed with the client service and can be extended upon request where reasonable justification is provided (the measurement is taken against the new target date). Therefore, it is reasonable that all actions should be completed by their target date.
- 3.3 For the 12 months ending 19<sup>th</sup> May 2021, 34 audit actions were due to be implemented. The following shows the performance against due dates:
- 20% (8) were "implemented on time"; this increases to
  - 85% (34) when late implementation is also included
  
  - 6 actions (15%) have not been implemented.

## **4. NON-IMPLEMENTATION OF AUDIT ACTIONS**

- 4.1 Sometimes non-implementation of an action is due to operational circumstances and to reflect this, a process is in place for re-assessing an action's implementation date and extending it where reasonable. Even after the introduction of this process the 100% indicator is still not being achieved.  
All such extensions are agreed between the audit client and the Internal Audit Manager. Such audit actions are then not considered as "not implemented" and are excluded from the performance reporting unless the new target has also been missed ( measurement is taken against variable target date).
- 4.2 However, circumstances sometimes prevail such that extended deadlines are missed and the current practice is that non-implementation at this stage is reported to management and CGC.



- 4.3 As at the 19th May 2021 10 audit actions remained outstanding (overdue) and not implemented. This includes all outstanding actions (not just those due in the last 12 months) to give a more accurate reflection. A detailed analysis of these actions – providing original and variable deadlines - is shown in the **Appendix**.

Of the 10 actions:

- 1 action 2 years or older
- 4 actions are between 1 and 2 years overdue
- 4 actions are between 6 months and 1 year overdue (58%)
- 1 action is less than 6 months overdue (5%)

*\* Time is measured from the 'original target implementation date' to the 19th May 2021.*

- 4.4 A significant effort has been made to encourage and support Services to implement their actions – both those actions outstanding for a while and those that have fallen due in recent months – in an effort to establish a culture whereby actions are taken seriously and implemented in a timely manner.

## **5. KEY IMPACTS**

- 5.1 It is important that the Council maintains a sound internal control environment. Actions that the Internal Audit Service propose to address risk and control weaknesses are discussed with Heads of Service and, if appropriate, Directors and agreement is reached as to any corrective action that needs to be taken. Internal audit actions are not imposed on management or Services.
- 5.2 An action that is not implemented means that the weakness or risk originally identified in the audit report, and which the action was designed to address, will remain as a risk to the organisation.

## **6. LINK TO THE CORPORATE PLAN**

- 6.1 The Internal Audit Service provides independent, objective assurance to the Council by evaluating the effectiveness of risk management, control, and governance processes. It identifies areas for improvement across these three areas such that Managers can deliver the Corporate Plan objectives as efficiently, effectively and economically as possible.

## **7. RESOURCE IMPLICATIONS**

- 7.1 There are no direct resource implications arising from this report.

## **8. REASONS FOR THE RECOMMENDED DECISIONS**

- 8.1 The report has been requested by the Committee and as such, they need to decide what further action they wish to take.

## **9. LIST OF APPENDICES INCLUDED**

Appendix 1 – Outstanding Audit Actions Not Implemented as at 19th May 2021

### **BACKGROUND PAPERS**

Audit actions contained within the 4Action system

### **CONTACT OFFICER**

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Appendix 1: Overdue Audit Actions @ 19 May 21

Reference	Audit Name and Action Number	Assignee	Detail	Evidence to be Provided	Current Due Target	Original Target Date	Status	Timing	Time lapse since <u>original</u> date
1137	Data Protection and Information Management 15.16	Oliver Morley	The Senior Information Risk Officer (SIRO) shall decide how long information and emails etc shall be kept within Anite, and the process for purging or archiving. <i>The SIRO role was transferred on the departure of the previous incumbent late 2019, and the role reassigned the Corp Director (O Morley).</i>	Decision taken and copy of instruction informing managers.	31/07/18	30/09/16	NotStarted	Late	4 years +
1529	PCI DSS 18.19 / 3	Oliver Morley	A training needs assessment should be performed for all members of staff that have responsibility for PCI DSS compliance activities so as to determine their training needs.	Shared Service Management Board minutes	01/04/20	01/04/20	NotStarted	Late	1+ year
1530	PCI DSS 18.19 / 4	Oliver Morley	Compliance should be monitored and action taken when members of staff are found to have not completed the PCI DSS training or have not read the policy and procedures.	Shared Service Management Board minutes	01/04/20	01/04/20	NotStarted	Late	1+ year
1531	PCI DSS 18.19 / 5	Oliver Morley	Actions need to be drawn together in a policy which sets out how the council will manage PCA DSS compliance activities and the policy should be reviewed on a regular basis. this should include but not be limited to: - Assignment of roles and responsibilities for ensuring that the Council is PCS DSS compliant - Procures for staff that are responsible for taking card payments - The Council's security strategy in relation to the storage, processing and transmission of credit card data - A set of instructions for detecting, responding to the storage, processing and transmission of credit card data.	Shared Service Management Board minutes	01/04/20	01/04/20	NotStarted	Late	1+ year
1526	Protocol Policy Management System 18.19 / 3	Madelaine Govier	Management will put a plan in place to seek staff awareness of IT policies by including a rolling awareness programme for extant policies within the protocol policy management system.	High level plan.	30/11/20	01/06/20	NotStarted	Late	11 months

1518	Hardware & Software Asset Management Control 19/20 / 5	Nigel Brown	Management should perform an exercise to gather licensing information evidence relating to all the business and IT software applications. Additionally, licensing information should be recorded but not limited to : - Licence type - Product keys (if applicable) - Locations of the installation CD - Licence expiry	Management and monitoring tools in place on CA infrastructure.  Supporting evidence - completion of small works package for design to implement Lan Sweeper onto CA infrastructure.	31/03/21	01/09/20	InProgress	OnTrack	9 months
1519	Hardware & Software Asset Management Control 19/20 / 6	Nigel Brown	There should be a mechanism in place to monitor and review software installed on all end point devices.	Management add monitoring tools in place on CA infrastructure. Supporting evidence - completion of small works package for design to implement Lan Sweeper on to CA infrastructure	31/03/21	01/09/20	InProgress	OnTrack	9 months
1513	Access Management Control 19.20 / 5	Sagar Roy	Head of IT & Digital 3C Shared Services should ensure requirements for setting up new user access to the network are set out in formal policy document and is uploaded onto the intranet and the PPMS.  Line managers acknowledge the formal policy set out by 3CSS which ensures ECSS are notified of leavers in timely manner.	User access policy or requirements in an equivalent policy.  Acknowledgement from line managers and employee owners.	31/08/20	31/08/20	InProgress	Late	9 months
1516	Hardware & Software Asset Management Control 19/20 / 3	Colin Chalmers	A thorough review of the ICT asset database should be undertaken on a regular basis to ensure that all assets include a location and the information recorded on them is complete, accurate and up to date.	Review of records highlighted by BDO. Supporting evidence - written confirmation that task to review location records has been completed,	31/12/20	01/09/20	InProgress	Late	8 months
1552	Purchase Order Compliance	Claire Edwards	Investigation will be made into finding out how many supplier accounts we have for employees and put these accounts into suspension so they cannot be used.	IA to be advised of outcome.	30/04/21	30/04/21	NotStarted	Late	less than 1 month

TOTAL 10

**Public**  
**Key Decision - No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Progress on AGS 2019/20 - Significant Issues

**Meeting/Date:** Corporate Governance Committee – 9th June 2021

**Executive Portfolio:** Executive Member for Strategic Finance -  
Councillor Jonathan Gray

**Report by:** Deborah Moss, Internal Audit Manager

**Ward(s) affected:** All Wards

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### **Executive Summary:**

The Council's Annual Governance Statement (AGS), approved in January 2021, contains a list of significant governance issues together with proposed remedial action for each.

This report advises the Committee on the progress made against each of these issues and the action taken to date.

Progressive action continues to be taken on all the issues.

It is proposed that the next update is given as part of the 2020.21 AGS report (due to be presented to Corporate Governance Committee in July 21).

### **Recommendation:**

Committee is asked to review and comment upon the action and progress made to date.

## **1. PURPOSE OF THE REPORT**

To advise the Committee on the progress made against the significant governance issues reported in the 2019/20 Annual Governance Statement (AGS).

## **2. BACKGROUND**

The Accounts and Audit Regulations 2015 requires all relevant bodies to prepare an Annual Governance Statement (AGS). The purpose of the AGS is to communicate to stakeholders the standards of corporate governance the organisation demonstrates and identify any significant issues that have arisen in year, and what is planned to address these issues.

This report details the progress made to date on each significant issue.

## **3. DETAIL**

As a result of the Covid-year implications, the Final Accounts and AGS 19.20 were not approved by Committee until January 2021.

Ten significant governance issues were highlighted in the AGS together with an action plan to show how each issue was to be remediated.

The Audit Manager has provided an update from responsible officers on the action taken to date. The significant issues raised in the 2019/20 Annual Governance Statement are set out in detail in Appendix 1 and progress against each of these is reported there – recording both the March 21 update and now a May 21 update.

Action and progress continue to be taken on all issues identified.

In addition to this progress update report, a formal progress record will be included in the next AGS (2020.21), which will also highlight new significant issues identified during that year. This will allow for the monitoring of all significant issues by AGS year and their progress until each is resolved.

## **4. KEY RISKS**

The significant issues are raised because, without any remedial action, they may impact the governance of the Council.

## **5. LEGAL IMPLICATIONS**

The Council is responsible for ensuring that it has a sound system of internal control which facilitates the effective exercise of its functions and the achievement of its aims and objectives, ensures that the financial and operational management of the authority is effective and includes effective

arrangements for the management of risk (Regulation 3 of the Accounts and Audit Regulations 2015).

The Council must carry out an annual review of the effectiveness of its system of internal control which must be considered by the relevant committee. In the light of that review, the Council must produce an annual governance statement which must be approved by the relevant committee in advance of the Authority approving the statement of accounts (Regulations 6 (1), (2) and (4) of the Accounts and Audit Regulations 2015).

## **6. REASONS FOR THE RECOMMENDED DECISIONS**

The report has been requested by the Committee and as such, it needs to decide any further action it wishes to take.

## **7. LIST OF APPENDICES INCLUDED**

Appendix 1 - AGS 2019.20 Significant Issues Updated Action Plan May 2021

## **BACKGROUND PAPERS**

Annual Governance Statement 2019/20

## **CONTACT OFFICER**

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**Appendix 1: AGS 2019.20 Significant Governance Issues Updated Action Plan May 2021**

Area of Assurance	Issue / Gap	Action Plan Proposal	Progress @ March 2021	Progress @ May 2021
<p><b>Risk Management</b></p>	<p>RM is not fully embedded and functional within the Council in an effective way. The risk register requires revision and update otherwise it is at risk of being unreliable/unusable.</p>	<p>Service Plans will be redesigned to incorporate risk management.</p> <ul style="list-style-type: none"> <li>The risk register will be reinvigorated and redesigned before roll out to Services</li> <li>Internal audit reviews of top risks highlighted by management</li> <li>Longer term – potential audit review of RM.</li> </ul>	<p>Service Plan redesign to incorporate risk management has taken place and Services are currently preparing their Plans.</p> <p>The Risk &amp; Control team have decided to visit Services to assist them in updating their risk register and this will commence in the new financial year.</p>	<p>The risk register has been restructured to reflect the changes in organisational structure at the Council, and to rationalise the current risks listed.</p> <p>All entries have been 'reviewed' and re-dispositioned so to then validate with assigned owners.</p> <p>The next stage will be to engage with Services to allow them to identify and assess their risks and repopulate/rebuild the risk register.</p>
<p><b>Lone working</b> (red action in an audit report):</p>	<p>The Council lacks a corporate lone working procedure that is robust and effective. H&amp;S legislation requires us to protect our employees at work. A lack of protocol over lone workers could risk employees' safety and a breach of legislation.</p>	<p>Ownership to be appointed.</p> <ul style="list-style-type: none"> <li>To investigate lone worker systems that can operate within its 24-hour CCTV function.</li> <li>A suitable system/procedure to be implemented to protect all officers who lone work off site.</li> <li>Internal Audit to carry out a follow up review to ensure operation and compliance once installed.</li> </ul>	<p>This has been discussed at the Risk &amp; Controls Board, and investigations into neighbouring authorities' provisions have been undertaken. Further options will be investigated and then put to the mgmt team to decide.</p> <p>A follow up compliance review can be considered only once a LW system is implemented.</p>	<p>Through the new Services collaboration forum, advice recommends that Services with LW issues should conduct a risk assessment and a holistic view of the need understood.</p> <p>Services have been asked to identify and categorise their lone worker posts in order to assess the extent of the provision needed.</p>



<b>Head of Internal Audit</b>	<p>The resignation of the Internal Audit Manager affects the resourcing of the statutory Internal Audit service. This impacts on the provision of an annual Audit Opinion.</p>	<p>An Acting Internal Audit Manager has been appointed. This employee is an existing internal auditor at the Council and is MIIA qualified.</p> <ul style="list-style-type: none"> <li>• Restructuring of the function to take place to ensure adequate resourcing levels.</li> </ul>	<p>The Acting Manager is in place until the early April when formal appointment is due to be made.</p> <p>Discussions have taken place as to the various recruitment options for the vacant auditor post which will be advertised shortly.</p>	<p>Internal Audit Manager now in place (since April 2021).</p> <p>Additionally, an offer has been accepted by an auditor to take up the vacant internal auditor position.</p>
<b>GDPR (Data Protection Compliance)</b>	<p>Progressive action towards GDPR compliance and monitoring has not been sufficiently robust since the Regulations' effective date. This puts the council at a greater risk of a potential non-compliance with GDPR legislation, a data breach, penalty fine and reputational damage.</p>	<p>Information Governance team has carried out a gap analysis review across the Council.</p> <ul style="list-style-type: none"> <li>• Work to be done to ensure data protection training and awareness.</li> <li>• A planned Internal audit [follow up] review to assess compliance.</li> </ul>	<p>Progression on the gap analysis work and actions are continuing in IG eg work has started on preparation of info asset registers.</p> <p>The IG Manager is providing CGC with a separate report by way of update on these actions. (See Table of areas and actions from gap analysis.)</p>	<p>Work is progressing on areas identified.</p> <p>Updates are provided to the Information Governance Committee each quarter.</p> <p>Key areas that have progressed in the last quarter include the circulation of the Information Asset Templates in order to develop a central register.</p>
<b>Network Access Management Control</b> (red action in an audit report):	<p>The audit found that user accounts may not be regularly reviewed and monitored (by HR or systems owners) leading to leaver, inactive or dormant accounts.</p>	<p>Agreed that HR management would assign ownership to line managers to review the network accounts that do not match to payroll listing.</p> <ul style="list-style-type: none"> <li>• Agreed that line managers/Heads of Service would perform a regular review of all staff in their service as going forwards.</li> </ul>	<p>HR has provided ICT with a list of the highlighted 65 users that did not match the Payroll list of employees together with instructions as to which should remain active, which deleted and which needed further insight before remaining active.</p> <p>A follow up review of this action is included in the Internal Audit Plan</p>	<p>HR have investigated the users and informed ICT. IA have asked ICT to confirm that corrective action has been taken and user accounts closed where applicable.</p> <p>ICT also need to set up a regular review process whereby HoS confirm their users are still current and</p>

		<ul style="list-style-type: none"> <li>Progress to be monitored by Internal Audit.</li> </ul>	21.22 to ensure that regular checks on staff access rights have been carried out by line managers and heads of service.	legitimate to prevent this from happening again. This is also supported by a leaver's notification process to ICT.
<b>Procurement function</b>	Resignation of the Procurement Officer in March 2020 leaves the council with no Procurement support function. Absence of a procurement function for advice has meant Services had to procure without assistance and put compliance more at risk.	<p>The AD for Corporate Services has forged a good relationship with the Procurement Officer of a neighbouring authority which was used for support and advice where needed in the interim and going forward.</p> <ul style="list-style-type: none"> <li>The recruitment of a Procurement Officer was agreed.</li> <li>Subsequent appointment of an experienced procurement officer took place in September 2020.</li> </ul>	Completed (subject to satisfactory completion of the employee's probationary period).	<p>The appointed Procurement Officer left the post due to personal reasons before the end of the probation period.</p> <p>The post was advertised and an offer has been made to a candidate from local public sector organisation, to take up the vacant position.</p>
<b>Delivery of capital Schemes</b>	An audit review found that there several issues relating to governance, capability, capacity and delivery, and commissioning.	<p>Appointment of a Programme Delivery Manager took place in 2020.</p> <ul style="list-style-type: none"> <li>Many programmes and projects are already underway</li> <li>Internal Audit to carry out a follow up review.</li> </ul>	The Programme Delivery Manager has Undertaken a full Project Management Delivery Audit in September. Findings and recommendations to mitigate risks highlighted have been presented to the WP SLT Board; awaiting board decision on recommendations. In Parallel PDM has established a EPMO Enterprise wide Project Management (EPMO) Steering Group to review PM Improvement of tools and processes. And introduced a Gateway Assurance Review process for HDC Projects and programmes going forward.	<p>The April board agreed that PMD at HDC is not working, the discussion took place at the SLT away day in April 21.</p> <p>It was agreed at the April WP Board that a task force should be set up to look at the way forward it will be a task and finish group. As recommended in the next steps of the Sept. 20 Audit report by the PDM.</p> <p>The scope of what the task force focus should be has gone forward to the May WP</p>

			<p>A planned follow up review is included within the Audit Plan 21.22</p> <p>.</p>	<p>board to confirm what is realistically achievable with the resources available in the absence of any PMO, and with regards to the GAP report on PMD at HDC.</p> <p>In parallel to this the PDM has set up and is working with our partner PMOs to continue and develop our KTN- Knowledge transfer Networks with SC, City, and ICT. As well National uk gov project authority.</p> <p>PMD at HDC will need to be a watching brief, to ensure governance is not diluted which may impact on current PMD risk mitigation plans.</p>
<p><b>Audit reports Outstanding</b></p>	<p>There has been difficulty in obtaining replies by Services to draft audit reports. These reports highlight weaknesses and risks found in a system and if they remain not responded to and no actions are implemented to address the risks, then the risks potentially remain and assurance cannot be given.</p>	<p>Audit Manager has advised senior management of such outstanding reports.</p> <ul style="list-style-type: none"> <li>• A new Risk &amp; Controls Board has been developed which will formally reports these issues to Corporate SLT for action.</li> </ul>	<p>A list of outstanding reports has been formally reported by the R&amp;C Board to Corporate SLT for action.</p> <p>Responses/updates are awaited, and an updated list will be a standing item on the R&amp;C's monthly report.</p>	<p>A list of outstanding reports has been formally reported by the R&amp;C Board to Corporate SLT for action.</p> <p>Progress has been made to finalise and close outstanding reports; a recent surge effort by IA has via escalation to Corporate Leadership level has improved response.</p>

<b>Information Governance Training</b>	<p>The ability to monitor which staff have completed which training courses needs improvement. Decisions on mandatory training and frequency of courses needs to be decided. There is a risk that employees may not have sufficient training or awareness.</p>	<ul style="list-style-type: none"> <li>• New Information Governance Manager in post</li> <li>• IT and IG policies are being reviewed</li> <li>• IG training modules are being reviewed</li> <li>• Ownership of training attendance to be assigned</li> <li>• A system for monitoring all training</li> </ul>	<p>Policies are currently being reviewed.</p> <p>IG training modules have been reviewed. HR are due to roll out these modules as part of the Learning Mgt System (LMS) – the contract has been signed and due to go live by 15<sup>th</sup> March.</p> <p>There is difficulty extracting exception reports on those employees who have not completed each IG course, and this is being examined by the Transformation team.</p> <p>Responsibility for the monitoring of completion of courses is still undecided.</p> <p>Progress is being reported to and overseen by the IG Board.</p>	<p>The IG Training Needs has been developed and communicated to the IG Group.</p> <p>The LMS System is now live;</p> <p>The IG team are currently working with the Transformation team and HR on reporting.</p> <p>An update on the outcome of this will be reported to the Information Governance Committee in May.</p>
<b>Covid-19 risks, levels of debt, loss of income etc</b>	<p>Since mid-March 2020, the Council has diverted its resources to focus on providing active support across Huntingdonshire as part of its response to Covid-19. There is a risk that costs incurred outweigh the levels of funds received from Central Government.</p>	<p>Assess 2020/21 budget and income streams for non-deliverable items and link to overall 2020/21 Financial monitoring and the 2021/22 MTFS requirements.</p> <ul style="list-style-type: none"> <li>• Robust risk management processes followed to ensure effective monitoring of key risks whether relating to response to Covid-19 or return to</li> </ul>	<p>At present, Gold command is still active to help respond and provide resources for continued support within the community in relation to the Covid 19 pandemic.</p> <p>A separate cost centre was set up to capture costs associated with responding to Covid 19 pandemic.</p> <p>During 20/21, central government has provided significant support in</p>	<p>Continuing as per last update.</p>

	<p>Emergency procedures put in place need to be reviewed to ensure that effective governance is in place to protect Council / users etc</p>	<p>business as usual.</p> <ul style="list-style-type: none"><li>• Gold, Silver and Bronze command were stood up to manage critical responses/issues in response to the pandemic.</li></ul>	<p>terms of the one-off costs associated with responding to the pandemic, this support will continue in 21/22.</p> <p>Recognition has also been provided by central government in support loss of income for services affected by the closure of leisure and retail activities. The Income Compensation Scheme has provided Local Authorities affected by this to claim back 75p in the £1, after deducting 5% of the total expected budgeted income for that activity.</p> <p>NNDR and CTAX will continue to be a concern going into 21/22 with ongoing pressure around collections. Central Government have provided mechanisms to spread 20/21 deficits over 3 years and will also allow Local Authorities to claim compensation for irrecoverable losses.</p> <p>Balanced budget has been approved (Feb 21).</p>	
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**Public**  
**Key Decision - No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Whistleblowing (Policy, Guidance and Concerns Received)

**Meeting/Date:** Corporate Governance Committee – 9th June 2021

**Executive Portfolio:** Executive Councillors for Strategic Finance and Corporate Services

**Report by:** Deborah Moss, Internal Audit Manager

**Wards affected:** All

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### **Executive Summary:**

The purpose of whistleblowing law is to protect individuals who make 'protected' disclosures of wrongdoings in the public interest without fear of reprisals from their employer.

The Whistleblowing Policy and Guidance have been reviewed and it is recommended that they remain unchanged. The outcome of this review will be included in the Local Code of Corporate Governance. The Policy and Guidance are included within the Councils' Code of Conduct.

Only Council employees, contractors or suppliers providing services under a contract to the Council are classified by law as whistleblowers. There have been four whistleblowing allegations received during 2020/21 that related to disclosures received internally from staff.

An additional two disclosures have been received throughout the year from members of the public, neither of these relating to allegations about staff, and these do not come under whistleblowing rules.

The whistleblowing allegations have not resulted in any heightened risk or concern that needs to be brought to the Committee's attention.

### **Recommendation:**

The Committee is invited to comment on the contents of this report and to acknowledge the annual review of the Whistleblowing Policy and Guidance as still fit for purpose.

## **1. PURPOSE OF THE REPORT**

- 1.1 To confirm to the Committee the number of whistleblowing allegations received in the year, both internally and from members of the public.
- 1.2 To restate / refresh the Whistleblowing Policy and Guidance as part of an annual review, and to approve any amendments.

## **2. WHY IS THIS REPORT NECESSARY/BACKGROUND**

- 2.1 The Whistleblowing policy and guidance notes were both introduced in 2000 in response to the Public Interest Disclosure Act 1998. Both documents are reviewed annually to ensure they continue to be fit for purpose.

## **3. ANALYSIS**

- 3.1 Four whistleblowing allegations (as per the definition in the Policy) were received in the year 2020/21. All cases were dealt with internally either through service manager investigation or disciplinary procedure and were concluded to the satisfaction of the Internal Audit Manager.
- 3.2 No common themes were identified amongst these whistleblowing complaints. However, one allegation of 'misappropriation/possible theft' of a council laptop when added to another theft of a laptop identified a possible heightened risk in this area. *IA plan to review the inventory and logging of council laptops to ensure adequate control around laptop custodianship.*
- 3.3 Another two allegations were received from members of the public. These were passed to the relevant Services to investigate and have not caused any further issue or impact that needs consideration and are not classified as Whistleblowing reports.

## **4. REASONS FOR THE RECOMMENDED DECISIONS**

- 4.1 The policy requires an annual report be presented to the Committee. After reviewing the policy and guidance, they are deemed still fit for purpose and effective. Remote working has not required any change to the guidance and access to the Whistleblowing Hotline is still performed remotely.

## **5. LIST OF APPENDICES INCLUDED / BACKGROUND PAPERS**

Whistleblowing Policy  
Whistleblowing Guidance

## **CONTACT OFFICERS**

**Deborah Moss**  
Internal Audit Manager  
[Deborah.Moss@huntingdonshire.gov.uk](mailto:Deborah.Moss@huntingdonshire.gov.uk)



## Huntingdonshire District Council Whistleblowing Policy

Huntingdonshire District Council recognises that those that it employs and provides services to are often in the best position to know when the interests of the public are being put at risk. They can act as an early warning system on matters of health and safety or help to uncover fraud and mismanagement.

The Council also recognises that these people may not wish to express their concerns for a number of reasons. They may think it is disloyal to do so or they may fear reprisals, or they may not expect any action to be taken, or they may not know the best way to proceed. They may therefore find it easier to ignore their own concerns, or to “blow the whistle” to someone outside the Council.

The Council wants to build an environment of trust and openness so that individuals are prepared to whistle blow knowing that their concern will be treated confidentially and investigated appropriately.

This Policy has been prepared in response to the Public Interest Disclosure Act 1998 and other legislation<sup>1</sup> and the Code of Practice issued by Public Concern at Work<sup>2</sup>. The latest version was adopted by the Corporate Governance Committee on behalf of the Council on 30 September 2020.

### SCOPE OF THE POLICY

This policy applies to all Council employees and those contractors working for the Council on its premises. It also covers suppliers and those providing services under a contract with the Council in their own premises.

The term ‘individual’ is used throughout this policy and includes all of the above.

### POLICY STATEMENT

The Council is committed to the highest possible standards of openness, probity and accountability and to dealing with all fraud and other forms of malpractice reported.

Any individual with serious concerns about any aspect of the Council’s work shall be encouraged to come forward and voice those concerns without fear of victimisation, subsequent discrimination or disadvantage or dismissal. Concerns may relate to issues that are occurring now, took place in the past, or are likely to happen in the future.

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<sup>1</sup> Enterprise and Regulatory Reform Act 2013

<sup>2</sup> Public Concern at Work is a charity. It is the leading independent supporter of whistleblowers and a provider of best practice guidance and advice

All concerns received will be treated in confidence, examined and investigated in accordance with this policy.

## **PROTECTED DISCLOSURE**

Any individual who raises a concern shall be treated as though they are making a protected disclosure if they disclose any information which they reasonably believe is made in the public interest and relates to any of the areas listed below:

- fraud and corruption
- any customers that we deal with, particularly children, being mistreated or abused
- an unlawful act
- the health and safety of any individual has been, or is likely to be endangered
- damage to the environment
- discrimination of any kind; or the
- deliberate concealment or suppression of any information that falls into any of the areas above.

This list is not exhaustive.

Individuals who make a protected disclosure will be protected from victimisation, subsequent discrimination or disadvantage or dismissal.

## **CONCERNS NOT COVERED BY THE POLICY**

The Council wants all serious or sensitive concerns to be raised. This policy is not intended to replace existing policies or procedures.

- Individuals who have a concern about their own personal circumstances or how they are being treated at work should first raise their concerns informally with their line manager who will attempt to resolve the concern<sup>3</sup>. If that is not possible then the grievance or dignity at work policy should be followed.
- Members of the public who wish to raise a concern should use the complaints procedure.
- If the concern refers to the misconduct of a Councillor, the procedure set out in the Member Code of Conduct should be followed.

If an individual raises a protected disclosure concern under the wrong policy or procedure, it will be treated as though it was made correctly.

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<sup>3</sup> Certain types of personal circumstance concerns may still be classed as protected disclosures if the public interest test is satisfied. Please contact the Internal Audit Manager for more information.

## **IMPLEMENTING THE POLICY**

The Council shall take appropriate action to publicise the policy so that all individuals:

- feel confident that they are able to contact the Council and raise their concerns about Council practices
- realise that concerns should be raised about any individual, councillor, supplier or anyone who provides services to the public on the Council's behalf
- are aware of the different ways they can inform the Council of their concerns
- understand that concerns will be received in good faith and taken seriously
- are aware that anonymous concerns may not be investigated
- who have provided their contact details understand that they will receive a response to their concerns and how to take the matter further if they are dissatisfied with the response
- are reassured that they will be protected from victimisation, subsequent discrimination or disadvantage.

A guidance note shall be made available setting out the actions that will normally be taken when a concern is received.

## **RAISING A CONCERN**

THE COUNCIL WILL MAINTAIN A NUMBER OF DIFFERENT CHANNELS THAT ALLOW CONCERNS TO BE RAISED. FULL DETAILS ARE CONTAINED IN THE GUIDANCE NOTE.

The Council will encourage individuals to raise their concerns openly and reserves the right not to investigate anonymous concerns.

## **INVESTIGATING OFFICER**

All concerns received under this policy shall be reported immediately to the Internal Audit Manager who will be responsible for reviewing the concern, deciding upon the action to take, leading and directing investigations, preparing any subsequent reports and liaising with the individual raising the concern.

## **UNTRUE CONCERNS**

No action will be taken against any individual who raises a concern that they have reason to believe to be true.

If during the course of an investigation it is felt that the concern has been raised frivolously, maliciously or for personal gain, appropriate disciplinary action will be taken.

## **SAFEGUARDS**

The Council will not dismiss or subject any individual to detriment of any kind, due to them making a 'protected disclosure'.

The identity of the individual raising the concern will remain confidential. If disclosure is required for any reason then this will be discussed with the individual concerned.

The Council will not tolerate the harassment or victimisation (including informal pressures) of any individual who has raised a concern.

The Council's disciplinary procedures will be used against anybody who is found to be harassing or victimising the individual raising the concern or who has disclosed the name of that individual to anybody other than the Council's Managing Director, the Corporate Director (People) or the Internal Audit Manager.

## **WHISTLEBLOWING EXTERNALLY**

Whilst the Council would like all concerns to be raised with it initially, it recognises that the Public Interest Disclosure Act 1998 allows for concerns to be made to "prescribed persons". The guidance note will provide information on how an individual can whistle-blow to a prescribed person.

## **MONITORING AND REVIEW**

The Corporate Director (People) will be responsible for monitoring the implementation and effectiveness of this policy and guidance note. This will include an annual review, and an annual report to the Corporate Governance Committee on the effectiveness of the arrangements that have been introduced. The Local Code of Corporate Governance shall contain details of the outcome of the annual review and the effectiveness of the whistleblowing arrangements.

End.

Version:	June 2021.
Frequency of review:	Reviewed annually
Approved by:	Corporate Governance Committee

## Huntingdonshire District Council Guidance Note for Whistleblowers

This guidance has been prepared to accompany the [Whistleblowing Policy](#). (needs updated link following approval). It explains how the Council will deal with whistleblowing concerns that it receives.

We realise that for some individuals it will take a great deal of courage to raise a concern. If you honestly and reasonably believe what you are saying is true, you will have nothing to fear by telling us your concern. We would much rather be told about a concern and investigate it, even if the investigation shows your concern was unfounded, than not know about the matter in the first place.

Your concern will be treated in confidence. We will not tolerate the victimisation of anyone who reports an issue to us. Without exception, we will take disciplinary against anyone who victimises any individual.

Concerns received may require different responses. This guidance is intended to provide you with an idea of the steps we will generally follow when a concern is received.

### WHAT YOU NEED TO TELL US

If you have a concern then please raise it with us openly rather than anonymously. Openness makes it easier for us to assess the issue, work out how to investigate the matter and if required, obtain more information. It is best if your concern is raised in writing and that you provide your name and some contact information. An email address or telephone number would be sufficient.

You need to tell us as much as you can about your concern. Please try and provide some background information and all the names, dates and places that are relevant. If you have any documentary evidence to support your concern that should be also be provided. The more information you are able to provide the easier it will be for us to investigate your concern.

If you are uneasy about putting your concern in writing then contact us using one of the methods below and ask for a meeting. This doesn't have to be at the Council's offices. If you wish you can bring other people to the meeting if that will reassure you (e.g. legal representative, colleague, Staff Council or Union representative).

## HOW TO CONTACT US

There are a number of ways in which you can raise a concern.

You can:

- speak to your line manager, a member of the Internal Audit team, a Head of Service or the Corporate Director (People).
- complete the [online form](#)
- send an email to [whistleblower@huntingdonshire.gov.uk](mailto:whistleblower@huntingdonshire.gov.uk)
- leave a message on the 24 hour telephone hotline: [01480 387080](tel:01480387080).
- write a letter, clearly marking the envelope Strictly Private & Confidential to:

Internal Audit Manager  
Huntingdonshire District Council  
Pathfinder House  
St Mary's Street  
Huntingdon  
PE29 3TN

## WHO WILL INVESTIGATE YOUR CONCERN?

All concerns received are passed to the Internal Audit Manager. They are the only person who can see what has been written on the electronic forms or in emails. They are also the only person who can access messages left on the telephone hotline. Post that is marked 'strictly private and confidential' will be passed unopened to them.

The Internal Audit Manager will use their discretion when deciding if an anonymous concern is to be investigated, taking the following factors into account:

- The seriousness of the issue raised
- The amount of information provided to support of the concern
- Whether the individual may be required to provide further information
- The ability to trace the individual if the concern is considered malicious.

## **WHAT WE WILL DO**

Once we have received your concern the Internal Audit Manager will initially assess the information you have provided and consider what action should be taken.

If the concern is valid but should not be classed as a protected disclosure (e.g. bullying) within the terms of the whistleblowing policy, they will contact you and ask whether you want the information to be passed to the appropriate manager for further action. You will also be asked if you wish your name to be disclosed or not.

Depending on the outcome of the initial assessment it may be that your concern is valid but that we have insufficient information to continue with the investigation. If this happens we will try and obtain further information to allow us to continue with the investigation. If this is not possible and no other option is available to us, we may request you to gather additional information on our behalf. You are under no obligation to do this however.

Once we have validated your concern and have sufficient information to continue, your concern will be investigated.

All meetings, decisions and actions taken in dealing with the concern will be recorded in writing.

## **LETTING YOU KNOW WHAT WE'RE DOING**

If you have provided contact information we will contact you within 10 working days, summarising your concern and telling you:

- whether an investigation will take place and if not, why not;
- who will be handling the matter and how you can contact them;
- how long we estimate the investigation will take;
- whether your further assistance may be needed; and
- providing you with information on the support that is available to you; and

When the investigation has been completed we will contact you again and provide you with as much detail about the investigation as we are able to. It may be that we aren't able to tell you the precise action we have taken, as this may infringe a duty of confidence owed by us to someone else.

## **WHAT IF YOU ARE UNHAPPY WITH OUR RESPONSE**

If:

- you believe that we have not properly investigated your concern; or
- you are unhappy with the outcome of any investigation

you should contact the Council's Managing Director or Corporate Director (People). They will decide if any further action is to be taken.

## WHO TO REPORT TO EXTERNALLY

If you

- remain unhappy with the decision reached by the Council's Managing Director or Corporate Director (People); or
- sincerely believe that by raising your concern with us you will be subject to detriment (victimisation or reprisals) of whatever sort, or that evidence to support your concern will be destroyed, then you should raise the matter with an external organisation, known as a "prescribed person".

The Government has issued a [list of prescribed persons](#) who you can make a disclosure to.

If you wish to report externally, but are unsure of what to do then please contact either the Internal Audit Manager or the Corporate Director (People). They will be able to advise you on what you need to do, without asking for details of your concern.

Alternatively you can contact **the Council's external auditors, Ernst & Young** on [01223 394 400](tel:01223394400).

When raising a concern externally remember to make it clear that you are raising the issue as a whistleblower.

## MAINTAINING CONFIDENTIALITY


We will do our utmost to protect your identity. If it has to be disclosed to allow us to undertake disciplinary or other more serious action against any wrongdoer, then we will discuss this with you. In some circumstances, especially if the Police are involved, we may be legally obliged to disclose your identity without your consent. Again, we will discuss this with you.

If you feel that you have suffered detriment or been in any way disadvantaged because you have raised a concern then you must let us know. We will take action to protect you as long as we believe that your concern was raised in the public interest and that you have not intentionally provided us with false information.

## FURTHER INFORMATION AND ADVICE

If you want further information or advice about whistleblowing then please contact either:

Deborah Moss, Acting Internal Audit Manager  
or  
Oliver Morley, Corporate Director (People)

 01480 388475

 [01480 388103](tel:01480388103)

Version:	June 2021.
Frequency of review:	Reviewed annually
Approved by:	Corporate Governance Committee



**Public**  
**Key Decision – No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Annual Report of the Committee

**Meeting/Date:** Corporate Governance Committee – 9th June 2021  
Council – 21st July 2021

**Executive Portfolio:** Strategic Resources: Councillor J A Gray

**Report by:** Deborah Moss, Internal Audit Manager

**Wards affected:** All Wards

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### **Executive Summary:**

The Committee presents an annual report to the Council on the work that it has undertaken each year.

The draft annual report in respect of the 2020/21 is attached at Appendix 1. It has been prepared by the Internal Audit Manager. It summarises the work undertaken by the Committee during 2020/21 together with any issues that relate to the year.

If, after considering the draft report, the Committee wish to make any changes, it is proposed that the Chairman be given authority to agree any amendments. The report will be presented to the next Full Council meeting.

The report will be uploaded onto the Council's website once it has been approved.

### **Recommendations:**

It is recommended that the Committee:

1. Review the draft annual report and decide what changes, if any, they wish to make;
2. Authorise that the Chairman of the Committee approve any amendments to the draft report.

### **CONTACT OFFICER**

Deborah Moss, Internal Audit Manager  
Tel No: 01480 388475  
Email: [deborah.moss@huntingdonshire.gov.uk](mailto:deborah.moss@huntingdonshire.gov.uk)

**Corporate Governance Committee**

**Chairman's Annual Report to Council  
for the year ending 31st March 2021**



## **Introduction by the Chairman of the Corporate Governance Committee**

This report summarises both the Committee's activities during 2020/21 and issues that arose in that financial year. It is intended to:

- reassure the Council and other stakeholders that it is undertaking its responsibilities properly and in a way that allows it to exercise effective oversight; and
- demonstrate to the Districts residents and other stakeholders the importance that the Council places on good governance, openness and probity in public life. The report sets out the contribution the Committee makes to achieving those aims. The Committee's meetings are open to the public and its report are available on the Council's website.

This report is my first as Chairman of the Committee and I have followed my predecessor in focussing upon the following key issues.

1. To continue to make progress in resolving issues raised in previous annual governance statements.
2. Identify lessons to be learned and applied from those issues.
3. Receive assurance that business continuity plans are in place.
4. Continually review and enhance the controls necessary to deal with cyberattacks.
5. Continue to increase the percentage of internal audit actions completed on time.

To this list I have added a sixth key issue. The Committee must be assured that probity and accountability are being maintained during this time of pandemic when the majority of offices are closed, remote working is in place and face to face meetings are not being held yet services continue to be delivered.

During the course of the year the Committee has considered these and other issues, maintaining oversight and continuing to review and challenge to satisfy itself that the Council is operating to the highest standards. I pay tribute to the members, and particularly, the officers of the Council who have worked so conscientiously during these difficult circumstances.

I would also thank the members of this Committee who have worked so diligently and made such a contribution to maintaining and improving governance arrangements. I am grateful to all those officers who have supported the Committee. Finally I would like to pay particular thanks to those members and officers who have supported me in my role as Chairman.

Councillor Graham Bull  
Chairman, Corporate Governance Committee  
May 2021

## **Introduction**

The Committee is required to discharge the functions of the Council in relation to both the corporate governance of the Council and the conduct of elected Members.

The Committee oversees the Council's governance and financial arrangements and the promotion and maintenance of high standards of conduct amongst the Council and Town and Parish Councils within the District of Huntingdonshire. This includes advising the Council on the Code of Conduct for Members, agreeing a Code of Conduct for Planning matters and considering reports by the Local Government Ombudsman.

Functions relating to the conduct of Members are considered by a Standards Sub-Committee (which will report to the main Committee).

The functions of the Committee are listed in Appendix A.

## **Effectiveness**

An effective Corporate Governance Committee can bring many benefits, including:

- raising greater awareness of the need for internal control and the implementation of agreed audit recommendations;
- increasing public confidence in the objectivity and fairness of financial and other reporting;
- reinforcing the importance and independence of internal and external audit and other similar review process; and
- providing additional assurance through a process of independent and objective review.

The Committee's work activities have been designed so that they not only provide assurance to the Council and allow it to discharge its functions, but also allow the Committee to make a positive contribution towards maintaining good governance practices across the Council.

## **Committee training**

A skills and training needs assessment form has not been completed by Committee members for some years and training needs have not been identified. Members need to understand their ongoing personal obligation to training and should engage with training in order that they can equip themselves with the requisite knowledge to be effective on this important governance forum.

Members were invited to an on-line training session on Fraud and RIPA (Regulation of Investigatory Powers) in November 2020. Two members of CGC attended this training.



**Corporate Governance Committee  
Functions: Approved by Council 29 March 2017**

**Matters considered**

The table below groups into six categories the significant issues considered by the Committee during 2020/21. A brief summary of the issues considered within each of the categories is included on the following pages.

Please note that owing to the COVID-19/coronavirus pandemic, the Committee cancelled its scheduled meetings in March and June 2020. Annual Committee appointments were made on 17 June 2020 at the Annual Council Meeting which had been delayed from May 2020.

		2020		2021	
		Jul	Sept	Jan	Mar
<b>1</b>	<b>Constitution</b>				
	Code of Financial Management	■			
<b>2</b>	<b>Governance issues</b>				
	Approval for Publication of the Annual Governance Statement	■			
	Annual Complaints Report 2019/20				■
	Progress on Annual Governance Statement 2019/20 – Significant Issues				■
<b>3</b>	<b>External Audit (EA) &amp; Financial Reporting</b>				
	Draft 2019/20 Annual Financial Report	■			
	External Audit Plan 2019/20	■			
	Approval for Publication of the 2019/20 Annual Governance Statement and the Annual Financial Report			■	
<b>4</b>	<b>Internal Audit</b>				
	IA Service: Annual Report 2019/20	■			
	Internal Audit Plan 2020/21	■			
	Internal Audit Plan 2021/22 & Internal Audit Charter				■
<b>5</b>	<b>Standards</b>				
	Code of Conduct Complaints - Update		■	■	
	Update on Code of Conduct and Register of Disclosable Pecuniary Interests		■	■	
<b>6</b>	<b>Fraud</b>				
	Review of Fraud Investigation Activity 2019/20		■		

**Corporate Governance Committee  
Functions: Approved by Council 29 March 2017**

**Reviewing the Constitution**

**Code of Financial Management**

The Committee is responsible for proposing to Council changes to the Council's Constitution. The Code forms part of the Constitution. Minor changes were proposed and endorsed for submission to the Council in October 2020.

**Governance of the Council**

**Approving the Annual Governance Statement on behalf of the Council**

The Committee approved the 2019/20 Annual Governance Statement (AGS). The format of the AGS changed to one aligned with accepted best-practice agreed with external audit.

**Significant governance issues**

10 significant governance issues were identified for inclusion in the AGS. The Committee received a detailed update on the progress made against each significant issue at its March and June 2021 meetings.

**Complaints**

The Committee received an annual report on the outcome of any complaints referred to the Local Government & Social Care Ombudsman as well as complaints that had been dealt with under the Council's own procedures, Details of compliments received were also reported. Members are able to request further information. Reports included any key lessons learnt from complaint resolutions as well as a summary of complaint themes.

**External Audit matters**

**Approving the 2019/20 Annual Financial Report**

The 2019/20 financial accounts was externally audited and approved by committee in January 2021. Updates were also made to the AGS at this time. No material amendments were made to the accounts since presented to committee in January and the accounts were published in April 2021.

**External Audit Plan 2019/20**

The Committee has noted the External Audit Plan 2019/20 and raised the issue of the scale of audit fees. The latter is subject to national discussions at Public Sector Audit Appointments.

**Corporate Governance Committee  
Functions: Approved by Council 29 March 2017**

**Internal Audit**

**Receiving the annual audit opinion**

*The annual opinion of the Internal Audit Manager as at 31 March 2020 was that the Council's internal control environment and systems of internal control provided adequate assurance over key business processes and financial systems.*

The Committee noted that the 2019/20 adequate assurance opinion was unchanged from 2018/19. It acknowledged the decrease in resources available throughout the year which limited the audit coverage and application of the Plan.

There have been 2 substantial assurance, 5 adequate assurance, 3 limited assurance internal audit reports issued in 2019/20 and a further 2 reviews where no opinion was given. In addition, the 7 key financial systems were reviewed quarterly but end of year reports not completed due to COVID.

**Approving the internal audit work plan and Internal Audit Charter**

Due to the COVID pandemic situation, which had a major effect from March 2020, audit planning has had to adopt a more flexible and risk-based approach. A flexible Audit Plan 2020/21 (to take account of diminished resources) was agreed, with a minimum commitment to complete control reviews on the key financial areas to provide assurance on these areas.

The Audit Plan 2021/22 was discussed and approved in March 2021.

The Internal Audit Charter was refreshed with only minor updates and approved by Committee in March 2021.

**Standards**

**Ensuring good standards are maintained throughout the District**

The Committee has received four reports during the year on various standards matters:

- The adoption of Codes of Conduct by Town and Parish Councils
- The receipt and publication of register of interests forms on behalf of District, Town and Parish Councillors
- Updates on complaint cases regarding alleged breaches of the Code of Conduct by Members within the Council and Town and Parish Councils.



**Corporate Governance Committee**  
**Functions: Approved by Council 29 March 2017**

**Countering Fraud**

**Corporate Fraud Team  
(CFT)**

The CFT's main priorities changed significantly this year with the onset of the Coronavirus pandemic. Following the announcement of financial assistance to businesses by the government the Team were seconded to assist in this work like so many other teams and services. The main aim to support our local communities and businesses. The government over the last 14 months has brought out around 15 different schemes each with their own eligibility and criteria which has made the delivery of these grants a mammoth and complex procedure for all involved. With each grant there has been guidance requiring checks to be carried out either pre or post payment to address the concern of potential fraud and check businesses were still actively trading and that payments were going to the correct bank account which was verified by using a bank verification tool by the National Fraud Initiative.

The issues above deal with the core business of the Committee. A number of reports and other issues were also considered during the year that had a direct impact upon governance systems and processes across the Council:

- Reviewing the Council's compliance and performance in respect of responses to enquiries received under both the Freedom of Information and Environmental Impact Regulations.
- Receiving and noting an update on the actions identified as part of the Data Protection gap analysis review undertaken by 3C ICT.
- Considering whistleblowing allegations received and changes to the whistleblowing policy and procedure.
- Considering the progress made by managers to introduce agreed internal audit actions on time.
- Consideration of single tenders/quotes approved by Heads of Service/Assistant Directors
- Endorsement of new Procurement Waiver Procedure and oversight of its usage

**Corporate Governance Committee  
Functions: Approved by Council 29 March 2017**

**Committee membership & attendance**

		2020 June	July	Sept	2021 Jan	Mar
Chairman	Cllr G J Bull	■	■	■	■	■
Vice-Chairman	Cllr P L R Gaskin	■	■	■	■	■
	Cllr S M Burton	■	■	■	--	
	Cllr E R Butler	■	■	■	■	■
	Cllr J C Cooper-Marsh					■
	Cllr D A Giles	■	--	■	■	■
	Cllr K P Gulson	■	■	■	■	■
	Cllr P Kadewere	■	■	■	■	■
	Cllr H V Masson	■	■	■	■	■
	Cllr L W McGuire	■	■	■	■	--
	Cllr J P Morris	■	■	--	■	■
	Cllr R J West	■	■	■	■	■
	Cllr Mrs S R Wilson	■	■	■	■	--
Key:		■ attended	-- absent		Not a Cttee Member	

The following appointments were made to the Committee by the Council.

17 June 2020      Councillors    G J Bull,      S M Burton,      E R Butler,  
Dr P L R Gaskin,    D A Giles,    K P Gulson,    P Kadewere,  
H V Masson,    L W McGuire,    J P Morris,    R J West    and  
Mrs S R Wilson.

24 February  
2020              Councillor J C Cooper-Marsh in place of Councillor S  
Burton.

**Corporate Governance Committee**  
**Functions: Approved by Council 29 March 2017**

To discharge the functions of the Council in relation to the Corporate Governance of the Council and to be the Council's "Audit" Committee.

These responsibilities include:

- |                                    |   |
|------------------------------------|---|
| <b>Constitution</b>                | Considering proposals to change the Council's Constitutional arrangements and making appropriate recommendations to the Council.  |
| <b>Governance</b>                  | Regularly reviewing the Council's Code of Corporate Governance and recommending any changes to the Council and approving the annual governance statement and reviewing the achievement of any outstanding improvements.<br><br>Ensuring there are effective arrangements for the management of risk across the Council.<br><br>To consider the arrangements to secure value for money and review assurances and assessments on the effectiveness of these arrangements.<br><br>Through the Chairman, the Committee will provide the Council with an Annual Report, timed to support finalisation of the financial statements and the Governance Statement, on how it has discharged its responsibilities. |
| <b>Internal and External Audit</b> | Fulfilling the Board responsibilities of the Public Sector Internal Audit Standards and ensuring effective internal audit is undertaken in accordance with those Standards.<br><br>Receiving and considering external audit reports including the adequacy of management response to issues identified.   |
| <b>Final Accounts</b>              | Approving the accounting policies, statement of accounts and considering any matters arising from the external audit.   |
| <b>Countering Fraud</b>            | Reviewing and monitoring the policy and procedure and arrangements for investigating disclosures under the Public Interests Disclosure Act 1999.<br><br>Monitoring the Anti-Fraud and Corruption Strategy and receive annual updates on countering fraud.   |
| <b>Standards</b>                   | The promotion and maintenance of high standards of conduct within the Council.<br><br>To advise the Council on the adoption or revision of its Codes of Conduct for Members.  |

**Corporate Governance Committee**  
**Functions: Approved by Council 29 March 2017**

The promotion and maintenance of high standards of conduct within the town and parish councils within Huntingdonshire.

To advise the Council on the adoption or revision of a Protocol for Member/Officer relations.

To advise the Council on the adoption of a Code of Conduct for Planning and monitoring operation of the Code.

**Complaints**

Consideration of reports by the Local Government Ombudsman including compensatory payments.

**Electoral matters**

Consider the periodic electoral review and review District and Parish electoral arrangements including boundaries and other electoral matters.

Determination of Community Governance Reviews.

The Monitoring Officer, in consultation with the Chairman of the Corporate Governance Committee is authorised to appoint to the Standards Sub-Committee as and when it is required to be convened.

**Standards (Hearings) Sub-Committee**

Functions relating to standards of conduct of members under any relevant provision of, or regulations made under, the Localism Act 2011.

3 Members of the Corporate Governance Committee plus Independent Person.

## CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT

Committee	Decisions	Date for Action	Action Taken	Officer Responsible	Delete from future list
27/01/2021	<p><b>Data Protection Compliance: Update on Action Plan</b></p> <p>Agreed that quarterly reports on data protection compliance be submitted at future meetings.</p>	TBC	Report to be submitted to a future meeting.	Information Governance Manager	No
24/03/2021	<p>No longer necessary for quarterly reports but a future report to be submitted once all actions have been concluded successfully.</p>				
27/01/2021	<p><b>The Code of Procurement Waiver Procedure</b></p> <p>Digest of all uses of the waiver procedure to be presented to the Committee.</p>	At future meetings as required.	An update, if relevant, will be provided at the meeting.	Assistant Director, Corporate Services	No
N/A	<p><b>Code of Procurement: Status and Forward Plan</b></p> <p>Item added at request of Assistant Director, Corporate Services.</p>	30/09/2021	Report tentatively expected to the Committee's September 2021 meeting.	Assistant Director, Corporate Services	No

## CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT

<b>N/A</b>	<b>Code of Financial Management</b> There is a constitutional requirement to review this code each year. Code was last reviewed in July 2020.	9/06/2021	Chief Finance Officer has confirmed that no changes to the Code are required at present.	Chief Finance Officer	No
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