A meeting of the **CORPORATE GOVERNANCE COMMITTEE** will be held in the **CIVIC SUITE (LANCASTER/STIRLING ROOMS), PATHFINDER HOUSE, ST MARY'S STREET, HUNTINGDON, CAMBS, PE29 3TN** on **WEDNESDAY, 16 SEPTEMBER 2026** at **7:00 PM** and you are requested to attend for the transaction of the following business:-

AGENDA

APOLOGIES AND SUBSTITUTES

1. **MINUTES** (Pages 7 - 12)

To approve as a correct record the Minutes of the meeting of the Committee held on 8 July 2026.

Contact Officer: Democratic Services - (01480) 388169

2. **MEMBERS' INTERESTS**

To receive from Members declarations as to disclosable pecuniary, other registerable and non-registerable interests in relation to any Agenda item. See Notes below.

Contact Officer: Democratic Services - (01480) 388169

3. **WHISTLEBLOWING POLICY** (Pages 13 - 28)

To receive a report presenting the Whistleblowing Policy for endorsement.

Contact Officer: L Harfield
(01480) 388569

4. **CHANGES TO THE CODE OF PROCUREMENT (PART 4 RULES OF PROCEDURE OF THE COUNCIL’S CONSTITUTION)** (Pages 29 - 122)

To consider a report presenting the proposed required replacement of the Council’s existing Code of Procurement with a new set of Contract Procedure Rules.

Contact Officer: M Parker
(01480) 388475

5. **SCHEME OF DELEGATION** (Pages 123 - 138)

To receive the Scheme of Delegation which has been reviewed to reflect changes in officer roles and posts and redrafted to enable a clearer understanding of the delegations that have been made by the Executive Leader and Full Council at the 2026 AGM.

Contact Officer: L Morrison
(01480) 388178

6. **CORPORATE RISK REGISTER** (Pages 139 - 154)

To receive a report presenting an update on the Council's Corporate Risk Register.

Contact Officer: C Oliphant
(01480) 388733

7. **LGR RISK REGISTER** (Pages 155 - 168)

To receive a report presenting the approach being taken to identify, access and manage risks associated with Local Government Reorganisation (LGR).

Contact Officer: C Oliphant
(01480) 388733

8. **INTERNAL AUDIT PROGRESS REPORT** (Pages 169 - 182)

To receive a report providing an update of the work of the Internal Audit Service since the last meeting and progress against the Internal Audit Plan 2026/27 that was approved by the Committee on 18th March 2026.

Contact Officer: L Morrison
(01480) 388178

9. **INTERNAL AUDIT ACTIONS UPDATE** (Pages 183 - 214)

To receive a report setting out the current position with respect to implementation of actions arising from Internal Audit reports.

Contact Officer: L Morrison
(01480) 388178

10. **CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT AND FUTURE WORK** (Pages 215 - 216)

To receive the Corporate Governance Committee Progress Report.

Contact Officer: Democratic Services - (01480) 388169

8 day of September 2026

Michelle Sacks

Chief Executive and Head of Paid Service

Disclosable Pecuniary Interests and other Registerable and Non-Registerable Interests.

Further information on Disclosable Pecuniary Interests and other Registerable and Non-Registerable Interests is available in the Council's Constitution

Filming, Photography and Recording (including Live Streaming) at Council Meetings

This meeting will be filmed for live and/or subsequent broadcast on the Council's YouTube site. The whole of the meeting will be filmed, except where there are confidential or exempt items. If you make a representation to the meeting you will be deemed to have consented to being filmed. By entering the meeting you are also consenting to being filmed and to the possible use of those images and sound recordings for webcasting and/or training purposes. If you have any queries regarding the streaming of Council meetings, please contact Democratic Services on 01480 388169.

The District Council also permits filming, recording and the taking of photographs at its meetings that are open to the public. Arrangements for these activities should operate in accordance with guidelines agreed by the Council.

Please contact Democratic Services, Tel: (01480) 388169 / email: Democratic.Services@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/Panel.

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.

Attending Council and Committee Meetings

Huntingdonshire District Council welcomes members of the public to attend meetings that are open to the public.

Members of the public may attend, film, photograph, and report on meetings that are open to the public. *

In some circumstances, a meeting may resolve to exclude the public and press to consider confidential or exempt information. Where this occurs, members of the public and press will be asked to leave the meeting room for that part of the meeting.

Most public meetings are webcast live, and recordings are available afterwards. This means you do not need to attend in person to follow proceedings.

The council permits public speaking at the Development Management Committee (planning) meetings.

View further information about **public speaking at Development Management Committees [PDF, 0.5MB]**

The council permits public questions at full council meetings. View further information about **submitting a question [PDF, 0.1MB]**.

Public access and seating

Meetings that are open to the public can be attended by anyone.
Seating in public areas is limited. Where demand exceeds the number of seats available, admission will be managed on a first-come, first-served basis, with priority given in the following order:

1. People who live, work or own property within the Huntingdonshire District
2. Other interested members of the public.

This means that attendees within each priority group will be admitted in the order they arrive, subject to the number of seats available.

Reserved seating

Council Meetings - If you have registered in advance to ask a public question at a meeting of Full Council in accordance with the Council's **Constitution [PDF, 1.5MB]**, a seat will be reserved for you.

Development Management, Licensing and Other Regulatory Hearings - If you have registered to speak or make representations in relation to an application or matter being considered by the Committee, a seat will be reserved for you.

You do not need to arrive early to secure your place.

When seating is full

Once all public seats are occupied, no further admission will be possible.
Standing is not permitted in meeting rooms. Additional seating cannot normally be provided, except where required as a reasonable adjustment for accessibility needs, including carers or support workers.
For meetings of the Development Management Committee, Licensing Committee and other regulatory hearings, priority will be given to applicants, objectors, registered speakers and other parties directly involved in agenda items.

Arrival, sign-in and security

All visitors must sign in on arrival.

If attendance is expected to exceed capacity, you may be asked to provide evidence that you live, work or own property within the Huntingdonshire District so that seating priority can be allocated fairly. In these circumstances, we would request a photographic ID and evidence of your address or work premises
We recommend bringing only essential items.

Bags and personal belongings may be subject to security checks. Where necessary, security staff may also conduct further searches.

These arrangements apply equally to all public attending and are intended to help ensure meetings can take place safely and without disruption.

Any personal information collected as part of the sign-in process will be used only for meeting management and safety purposes in accordance with the **Council's Privacy Notice**. Information will be retained no longer than is necessary.

Items not permitted

- Placards, banners, flags or similar items
- Knives, scissors or other sharp objects
- Whistles, air horns, loudhailers or other noise-making devices
- Bottles or other containers containing liquids, except drinking water intended for personal use during the meeting
- Any item that security staff reasonably believe could compromise safety or disrupt the meeting.

If you wish to bring large or specialist equipment into the meeting, such as recording equipment, please contact **Democratic Services** in advance via email to help avoid delays when entering the meeting.

Behaviour at meetings

Everyone attending a meeting is expected to treat others with courtesy and respect. Any form of verbal or physical abuse will not be tolerated. Anyone presenting such behaviour will be asked to leave immediately.

Accessibility

If you have any accessibility requirements, it would be helpful to contact **Democratic Services** before the meeting so we can fully support you.

Speaking at a meeting or asking a question

Members of the public may ask questions at meetings of Full Council.

Members of the public may also speak or make representations at meetings of the Development Management Committee, Licensing Committee, and other regulatory hearings where public participation arrangements apply.

Please note that this must be arranged in advance in accordance with the Council's Constitution.

Feedback

If you have concerns about how these arrangements were applied at a meeting, please contact **Democratic Services**.

Legal framework

*Public access to meetings, and the right to film, photograph, record and report proceedings, are governed by legislation including the Local Government Act 1972, Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, Local Audit and Accountability Act 2014 and Openness of Local Government Bodies Regulations 2014.

HUNTINGDONSHIRE DISTRICT COUNCIL

MINUTES of the meeting of the CORPORATE GOVERNANCE COMMITTEE held in CIVIC SUITE (LANCASTER/STIRLING ROOMS), PATHFINDER HOUSE, ST MARY'S STREET, HUNTINGDON, CAMBS, PE29 3TN on Wednesday, 8 July 2026.

PRESENT:	Councillor P J Hodgson-Jones – Chair. Councillors R Coogan, J A Gray, G Seeff, H Tobias, N Wells and M Young.
APOLOGY:	An apology for absence from the meeting was submitted on behalf of P Webb – Independent Member.
SUBSITUTES	Councillor N Wells substituted for Councillor S Claffey.
IN ATTENDANCE	Councillors J Harvey and N Hunt.

76. MINUTES

The Minutes of the meeting of the Committee held on 17 June 2026 were approved as a correct record and signed by the Chair.

77. MEMBERS' INTERESTS

No declarations were received.

78. DISPOSALS & ACQUISITIONS POLICY LAND AND PROPERTY - UPDATE ON THRESHOLDS

The Committee received a report (a copy of which is appended to the Minute Book) providing an update on the Disposals & Acquisitions Policy.

The Executive Councillor for Finance and Resources and the Facilities Manager - Hard Services introduced the report, advising that the purpose of the review was to improve accessibility, clarity and ease of reference by combining the two policies into one document. Reference was made to a tracked-changes version of the Policy which had been circulated as a Supplement to assist Members in identifying the amendments from the previous Policy.

In response to questions from the Committee, the Facilities Manager – Hard Services advised that references within the policy related to both land and buildings and that external professional valuers would continue to be commissioned where valuations were required. In terms of the governance arrangements relating to acquisitions and disposals undertaken under delegated authority, he outlined the processes in place to ensure appropriate audit trails, valuation evidence, consultation and financial oversight. Transactions were monitored through established governance processes, and input could be sought from the Treasury Management Capital Monitoring

Group where appropriate. Regarding delegation thresholds, the existing levels had been reviewed through the Constitution Review Working Group.

The Committee emphasised the importance of developing an Asset Management Plan, particularly in advance of Local Government Reorganisation. The Facilities Manager - Hard Services acknowledged the urgency of this work and confirmed that it was being prioritised. The Committee also suggested that the proposed review period of 24 months should be reconsidered in light of Local Government Reorganisation and proposed that a review be undertaken after 18 months.

The Committee further requested that consultation requirements within the policy be strengthened through the inclusion of Ward Members and neighbouring residents as consultees where appropriate.

Whereupon it was

RESOLVED

that

(1) the Committee commented on the report; and

(2) the thresholds be reviewed again in 18 months' time.

79. ANNUAL REVIEW OF FRAUD INVESTIGATION ACTIVITY

The Committee received a report (a copy of which is appended to the Minute Book) providing a summary of the activity undertaken by the Council's Corporate Fraud Team in 2025/26.

The Executive Councillor for Resident Services and Corporate Performance and the Corporate Fraud Manager introduced the report.

In response to questions from the Committee, the Corporate Fraud Manager explained that the Cambridgeshire Fraud Initiative focused primarily on the identification of Council Tax Single Person Discount fraud through data matching exercises undertaken jointly with other Cambridgeshire authorities. The most recent exercise had generated approximately 25,000 potential matches, although the majority were assessed as presenting no risk. Following detailed review, a number of frauds and errors had been identified and work remained ongoing. Cases classified as fraud were only recorded as such where sufficient evidence existed to demonstrate wrongdoing, generally following correspondence, interviews or other investigative enquiries. Errors were recorded separately where incorrect claims or payments arose through mistake rather than deliberate action. Procurement fraud represented a significant area of concern across both the public and private sectors, and references to these risks were contained within the Council's Counter Fraud Strategy. Whilst no such cases had been referred to the Corporate Fraud Team during the reporting period, preventative controls existed through procurement processes, contract management arrangements and fraud awareness activity undertaken across the organisation.

Regarding the identified losses which were ultimately recovered, the Committee were advised that the reported £586,000 represented a combination of recovered funds, prevented losses and financial outcomes arising from investigative work. Where fraud resulted in monies becoming repayable to the Council, recovery action was pursued through the relevant service area using established debt recovery arrangements. In relation to Council Tax fraud, amended liabilities were incorporated within revised Council Tax bills and subsequently managed through normal collection processes. It was not currently possible to isolate fraud-related debts from wider Council Tax collection data without undertaking significant manual analysis.

In response to questions concerning prosecution decisions, the Corporate Fraud Manager explained that all cases were assessed against the Council's own prosecution policy, which incorporated evidential and public interest considerations. Prosecution was not appropriate in every proven fraud case and factors such as financial impact, seriousness, deterrent value and proportionality were taken into account. It was further noted that prosecution costs could be significant and substantial delays continued to exist within the court system. Three cases were currently progressing through the courts and in at least one case, prosecution had been pursued despite there being no actual financial loss to the Council because of the seriousness of the conduct involved and the wider deterrent effect. There was currently no nationally recognised benchmarking framework for local authority fraud outcomes. While comparative information was available through professional networks and national counter-fraud bodies, meaningful comparisons were difficult due to significant variations in housing stock, demographics, service provision and levels of investment in fraud investigation teams between authorities. However, the value of benchmarking was noted, and work was underway nationally to improve consistency in reporting.

The broader social benefits generated through fraud investigation work, particularly in relation to tenancy fraud, were noted. Successful tenancy fraud investigations not only protected public resources but enabled properties to be returned to legitimate housing provision, helping to reduce pressure on waiting lists and temporary accommodation.

Whereupon, it was

RESOLVED

that the Committee commented on the content of the report.

80. INTERNAL AUDIT PROGRESS REPORT

The Committee received a report (a copy of which is appended in the Minute Book) presenting a summary of the work undertaken by the Internal Audit Service since the Committee last met in June 2026.

The Audit Manager, Alastair Foster of RSM introduced the report.

In response to questions from the Committee the Internal Audit

Manager drew attention to the fact that some residual risk would remain where recommendations had not yet been fully implemented. However, recent reviews had identified occasions where original target dates had been overly ambitious or impractical. In such circumstances, revised implementation timescales had been agreed to ensure that improvements were delivered effectively rather than simply meeting deadlines.

The Executive Councillor for Finance and Resources welcomed the progress that had been made and emphasised that, whilst timely implementation remained important, priority should be given to ensuring that actions were properly embedded and delivered to an appropriate standard.

The Committee sought assurance that the relationship between the Council and the Internal Audit provider remained effective and that opportunities existed for knowledge sharing and development of internal capacity. The Audit Manager advised that regular meetings took place between Internal Audit and Officers, including weekly liaison meetings. In addition, arrangements had recently been agreed for a member of the Council's internal team to shadow audit work undertaken by RSM in order to support skills transfer and organisational learning.

In response to questions from the Committee, the Audit Manager advised that there had been some capacity pressures and instances where debrief meetings had been postponed. However, no significant concerns existed regarding cooperation from services and there were no issues requiring formal escalation. He noted that a range of factors informed the prioritisation process and that recommendations were assessed according to the level of risk they posed to the Council. Both Officers and the Committee played a role in determining priorities within the annual Internal Audit Plan.

The Corporate Director – Finance and Resources advised that some requests for revised implementation dates had arisen following a review of outstanding actions undertaken after her appointment. In a number of cases, while deadlines may technically have been achievable, the associated work could not have been completed effectively within the timescales originally set.

The Audit Manager confirmed that adequate resources were in place and expressed confidence that the full work programme of reviews would be delivered. Members noted that some audits would commence later in the municipal year but were expected to conclude within planned timescales.

The Executive Councillor for Finance and Resources recognised that the substantial number of recommendations identified through recent audit work demonstrated robust scrutiny and provided a clear basis for driving further improvements. Members emphasised the importance of not only identifying weaknesses but also ensuring that agreed actions were implemented and embedded across the organisation.

Whereupon, it was

RESOLVED

that the Committee commented on and noted the update on work undertaken by Internal Audit to date.

81. INTERNAL AUDIT ACTIONS UPDATE

The Committee received a report (a copy of which is appended in the Minute Book) summarising the progress made in implementing management actions arising from final internal audit reports.

The Corporate Director – Finance and Resources introduced the report, advising that all six actions due for completion by 30 June 2026 had been completed. Three of four previously overdue actions had also been completed, with the remaining action, relating to key financial controls, continuing to be monitored. Officers reported that no matters required escalation and that progress continued to be made across all action plans.

Whereupon it was

RESOLVED

that the Committee commented on and noted the current position regarding actions arising from internal audit reports.

82. CORPORATE RISK REGISTER

The Committee received a report (a copy of which is appended in the Minute Book) informing it of the approach and work undertaken on the Corporate Risk Register including the latest heat maps relating to the corporate risks.

The Risk Manager introduced the report, advising that no risk score changes had occurred since the previous report, which reflected the short period of time since the Committee's previous meeting. Two actions associated with the Data Protection risk had been completed.

The Committee raised concerns regarding the significant gap between current and target risk levels, and whether the current target remained realistic in the context of Local Government Reorganisation (LGR), which Officers would review. Reference was also made to the risk associated with non-completion of mandatory training and Members queried whether the inherent risk rating adequately reflected the importance of training in areas such as safeguarding, fraud prevention and legal compliance.

The Committee also requested that a separate report be added as a standing item for each meeting, regarding a Risk Register specifically for LGR for ongoing monitoring, with a risk framework addressing LGR risks, and a greater breakdown of strategic, transitional and organisational risks.

Whereupon it was

RESOLVED

that the Committee commented on the reports in the appendices and progress with risk management and noted the risks to the organisation and whether they are being managed in line with the Risk Management Strategy.

83. ANNUAL REPORT OF THE CORPORATE GOVERNANCE COMMITTEE

Consideration was given to the Committee's draft Annual Report to Council summarising the work it had undertaken during 2025/26 and the issues that arose in the year. The report had been prepared by the Chair of the Committee during the period covered by the report and was scheduled to be presented at the next full Council meeting. A copy of the report is appended in the Minute Book.

RESOLVED

that the Corporate Governance Committee 2025/26 Annual Report be approved for submission to the Council

84. CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT AND FUTURE WORK

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

The Chair requested the scheduling of a further meeting of the Constitution Review Working Group to progress outstanding governance matters.

The Corporate Director – Finance and Resources advised of two reports that needed to be added to the agenda for the September meeting of the Committee, regarding the Procurement Code of Practice and the Scheme of Delegations review.

In response to concerns raised about the potential size of the agenda for the September meeting, the Corporate Director – Finance and Resources advised that Officers would be contacted regarding whether there were legislative deadlines for reports that meant they needed to be considered at that meeting, or if they could be deferred to help ease the number of items.

Chair

Agenda Item 3

Insert:
Committee – Corporate Governance Committee
16 September 2026

Report by: Head of HR and OD

Lead Cllr: Portfolio Holder for Workforce

Huntingdonshire
DISTRICT COUNCIL

Wards	Open / Exempt	Key Decision?
All	Open	No

Whistleblowing Policy

Executive Summary:

The revised Whistleblowing Policy strengthens the Council's framework for reporting and investigating concerns about wrongdoing, ensuring alignment with the Public Interest Disclosure Act 1998 and reinforcing the Council's commitment to openness, accountability and ethical governance. The policy clarifies the distinction between whistleblowing and other reporting mechanisms, and provides clear guidance on reporting concerns.

The policy introduces a number of governance enhancements, including stronger protections for whistleblowers, additional safeguards for concerns involving statutory officers through independent external oversight, defined investigation timescales, and enhanced arrangements for fraud referrals and investigations. It also establishes quarterly reporting of whistleblowing activity to the Corporate Governance Committee and ensures that any resulting organisational actions are monitored through Internal Audit follow-up processes. Collectively, these changes support transparency, public confidence and effective organisational governance whilst encouraging the timely reporting and investigation of concerns.

Recommendations

1.1. Corporate Governance Committee are requested to endorse this policy

	Key Corporate Plan Priorities
1	*Doing our Core Work Well*

Report Author(s)

Head of HR. Leanne.harfield@huntingdonshire.gov.uk

1. PURPOSE OF THE REPORT

1.1 This report provides a summary the policies that are being submitted for endorsement.

2. BACKGROUND & CONTEXT

2.1 The policies reviewed in this period:

Summary of the changes:

Policy	Amendments
Whistleblowing Policy	Review and update of entire policy, clarification of process, inclusion of timescales, inclusion of Statutory Officer section and clarity of responsibilities. New section on updated fraud legislation

3. ALTERNATIVE OPTIONS CONSIDERED & NOT RECOMMENDED

3.1 N/A.

4. COMMENTS OF OVERVIEW & SCRUTINY

4.1 N/A

5. POST-DECISION IMPLEMENTATION

5.1 Policies endorsed will be reviewed in line with the policy schedule.

6. IMPLICATIONS OF THE DECISION

6.1 Council Key Priorities and Performance

- Improving quality of life for local people
- Creating a better Huntingdonshire for future generations
- Doing our core work well

This policy supports the organisation to ensure that they are legally compliant and have the right processes and procedures in place to support staff to do our core work well and to delivery the Council's key Priorities.

6.2 Financial Implications

6.3 No additional financial implications identified

6.4 Policy Implications

6.4.1 These have been amended to ensure that they are in line with legislative updates and best practice.

6.5 Legal & Constitutional Implications

6.5.1 These have been amended to ensure that they are in line with legislative updates and best practice.

6.6 Community Impact

6.6.1 Equality Impact Assessment will be carried out following endorsement

6.7 Environment & Climate Change Implications

6.7.1 N/A

6.8 Equality & Diversity Implications

6.8.1 Equality Impact Assessment will be carried out following endorsement

6.9 Implications on Resources

6.9.1 N/A

6.10 Health & Wellbeing Implications

6.10.1 N/A

6.11 Local Government Reorganisation (LGR) Implications

6.11.1 LGR is taken into consideration for all policies that are reviewed or updated in line with legal requirements, and where possible, taking into consideration what neighbouring Council's approaches are.

7. RISK MANAGEMENT

7.1 This policy is designed to mitigate risk to the organisation and to allow consistent application across all service areas.

8. BACKGROUND PAPERS– LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

8.1 N/A.

Whistleblowing Policy

1.2

Version Control			
Version	**Author**	**Date**	**Changes**
1.1	Head of HR	01.09.2026	Review and update of entire policy, clarification of process, inclusion of timescales, inclusion of Statutory Officer section and clarity of responsibilities New section on updated fraud legislation

Name of Policy	Whistleblowing Policy
Person/posts responsible	Head of Internal Audit
Date approved/adopted	September 2026
Approved by	Corporate Governance Committee
Review Date	September 2028

Huntingdonshire District Council

Whistleblowing Policy

1.0 Policy Statement

This Whistleblowing Policy aims to:

- Encourage and enable any person to feel confident in raising serious concerns
- Set out how and to whom serious concerns can be raised
- Provide confidence to whistleblowers that all referrals will be dealt with in line with this policy
- Describe how to take the matter further if dissatisfied with the Council's response
- Reassure anyone making a referral that the Council will take all reasonable and practical steps to protect whistleblowers from reprisals, harassment, or victimisation.

A serious concern will not necessarily always constitute a whistleblowing referral which would be investigated under this policy. For example, there are separate processes to allow employees to lodge a grievance relating to their employment; for customers to complain about the service they receive; or for anyone to raise concerns about whether Members have breached the Member's Code of Conduct.

The Public Interest Disclosure Act 1998, called the "Whistleblowers Act" provides protection for employees who disclose information that might otherwise be regarded as confidential. The Act makes it clear that where the nature of such a disclosure falls into one of seven categories detailed below and the manner of the disclosure is one permitted by the Act; employees will have protection in law from detrimental action by the employer.

The seven categories are:-

- A criminal offence has been, is being, or is about to be committed
- A person is failing to comply with legal obligations
- A miscarriage of justice has happened or is likely to happen
- An individual's health and safety is or could be endangered
- The environment is, or is likely to be damaged
- Sexual harassment has occurred or is likely to occur if it is a criminal offence or a danger to health and safety.
- Information falling into one of the above categories which has been, is being or is likely to be, deliberately concealed

2.0 Scope

2.1 Huntingdonshire District Council (HDC) is committed to the highest possible standards of openness, probity and accountability. In line with that commitment the Council expects employees, councillors, organisational partners, contractors and members of the public to raise concerns about any impropriety or illegality in the Council's work.

2.2 If you are not a Council employee, the Council's Complaints Procedure should be used to raise complaints about Council services and activity via the website (Complaints - Huntingdonshire.gov.uk). Members of the public can contact the Council using the Whistleblowing Policy to report any serious concerns or disclosures over wrongdoing.

Where this policy refers to a "whistleblower", it refers to both employees and members of the public who make a disclosure. Unlike disclosures by employees, PIDA does not offer legal protection for disclosures made by members of the public. However, the Council will take reasonable and appropriate action to investigate appropriate concerns raised and to protect the confidentiality of members of the public when they make a disclosure.

2.3 This policy is not intended to be a substitute for other policies and procedures such as the complaints process or grievance procedures.

In the event a false or malicious concern is raised, the Council may consider taking disciplinary action.

3.0 Policy Objectives

3.1 This policy is intended to deal with serious or sensitive concerns about inappropriate behaviour, in the categories set out at paragraph 1.1 above.

3.2 Beyond the legal categories, the Council would encourage employees, members of the public, and any other interested parties to raise any significant concerns that they may have, as soon as they are reasonably aware of them. These concerns could be about any aspects of the Council's activities, e.g. with reference to Council employees, Members, or suppliers acting on behalf of the Council, and relate to issues that are either occurring now or likely to happen in the future.

There are other policies and procedures which can be relevant, such as the Complaints Policy. Whistleblowing may not be the most effective or appropriate course of action.

4.0 Fraud, Bribery and Corruption

4.1 The Council is committed to preventing, detecting and investigating fraud, corruption, bribery and other financial irregularities. Such matters are regarded as serious wrongdoing and fall within the scope of this Whistleblowing Policy.

4.2 For the purposes of this policy, fraud may include (but is not limited to):

- Theft or misuse of Council funds or assets
- False claims for payments, expenses, grants or benefits
- Procurement or contract fraud
- Bribery or corruption
- Deliberate falsification of records
- Abuse of position for personal gain

4.3 Any concerns or suspicions relating to fraud or financial irregularity should be reported as soon as possible. Concerns may be raised through the whistleblowing routes set out in Section 10

4.4 In addition, the Council has a dedicated Corporate Fraud Team, which is responsible for investigating all allegations of fraud against the Council. Referrals relating to suspected fraud may be directed to this team for assessment and investigation.

4.5 Individuals may report suspected fraud via:

- the whistleblowing routes outlined in this policy ; or
- directly to the Corporate Fraud Team: Report Fraud - Huntingdonshire.gov.uk

4.6 Where a concern relates specifically to fraud, the Council may:

- refer the matter immediately to the Corporate Fraud Team;
- involve Internal Audit as appropriate;
- Refer the matter to external agencies, including the Police, where criminal activity is suspected.

4.7 The Council may also share information with relevant external bodies for the purposes of preventing and detecting fraud, in accordance with legal requirements.

4.8 Individuals reporting fraud concerns under this policy will be afforded the same protections as any other whistleblower in line with the Public Interest Disclosure Act 1998.

5.0 Protection

5.1 In accordance with the Public Interest Disclosure Act 1998, Huntingdonshire District Council undertakes to protect, as best it can, an employee who blows the whistle from personal claims, victimisation, harassment or bullying as a result of their disclosure.

5.2 Any person taking any reprisal or similar action against a whistleblower because they have made a protected disclosure under this policy may be subject to disciplinary or other action by the Council.

5.3 The Council will, at the request of the whistleblower, keep the nature of concerns confidential. It will not reveal names or positions without permission, unless it has to by law, or an enquiry results in a criminal investigation in which the whistleblower might be required as a witness. Whistleblowers should be aware, however, that the fact that enquiries are being made might, of itself, result in their identity becoming known. Where possible, the Council will make a whistleblower aware if their identity is likely to be compromised through investigation.

5.4 All these matters will be explained at the time a concern is raised and the Council will also keep the whistleblower informed if the situation significantly changes.

6.0 Protection for Statutory Officers

6.1 The Council recognises the unique and statutory responsibilities of the Head of Paid Service, Chief Finance Officer (s151 Officer), and Monitoring Officer. To preserve their independence and ensure they can uphold core governance duties without fear of reprisal, the following additional organisational protections apply when they raise, or are the subject of, whistleblowing concerns.

6.2 The Council also has additional safeguards in place when a Statutory Officer is the subject of a Whistleblowing Concern. These additional safeguards include the following:

Mandatory External Oversight of Investigations

Any whistleblowing concern involving a Statutory Officer must:

- Be assessed by the Chief Executive (unless they are the subject), in conjunction with HR, and;
- Be independently reviewed through an **external party** or **mutually agreed partner authority**, with the support of Internal Audit (and where appropriate, HR) ensuring impartiality and public confidence.
- The organisation shall provide appropriate resources and oversight to ensure that it is investigated in a timely manner.

- Where the Chief Executive is the subject of the Whistleblowing allegation, the Executive Leader of the Council will assess the concern, in conjunction with HR in the place of the Chief Executive.

7.0 Anonymous Allegations

7.1 The Council acknowledges that in making a complaint under the Whistleblowing Policy, an individual may not wish to provide their details and thus may wish to remain anonymous. Concerns expressed anonymously will be considered at the discretion of the Council, and in certain cases may not be investigated. In exercising this discretion, the factors to be taken into account would include:

- Seriousness of the issue;
- Credibility of the concern;
- Likelihood of being able to obtain the necessary information to corroborate an allegation

8.0 False, Malicious or Vexatious allegations

8.1 The Council openly encourages whistleblowing done in good faith. Anyone who makes an allegation in good faith, which is not subsequently confirmed by the investigation, will continue to have protection under this policy from victimisation or harassment.

8.2 If a whistleblower makes a deliberately false, malicious or vexatious allegation, the Council will take appropriate disciplinary or legal action against them.

9.0 How to Raise a Concern

9.1 Whistleblowers should not attempt to investigate any concern themselves but raise their concern using one of the avenues shown below.

9.1.1 A Council employee should first raise a concern with their manager. If the concern is not resolved after discussion with their line manager, it should then be put in writing to the Head of Internal Audit.

9.1.2 In some cases, the nature or sensitivity of the concern means that this may not always be appropriate. If you feel you cannot raise their concern with your immediate manager, you may feel a whistleblowing disclosure is the most appropriate option. If you want to make a whistleblowing disclosure or discuss your concerns, you can contact:

- Head of Internal Audit
- Whistleblower@huntingdonshire.gov.uk
- S151 Officer
- Monitoring Officer

- Head of Health and Safety
- External Audit

9.2 Whistleblowers are encouraged to raise concerns promptly in writing, giving as much information as possible, such as relevant background, names, dates, places and the reason for their concern. The earlier a concern is raised, the easier it will be to take effective action.

9.3 A whistleblower will be expected to demonstrate that there are reasonable grounds for voicing their concern. Any whistle blower will be asked to declare any personal interest they may have in the concern being raised.

9.4 The Council has developed procedures as to how whistleblowing concerns will be reviewed and investigated, see appendix A. It is recommended that anyone who raises a concern refers to these to identify the next course of action that will be taken in response to the issue raised.

9.5 In matters concerning the health, safety and welfare of those on our premises (whether members of staff, contractors or visitors) anyone, including an elected safety representative, who becomes aware of a hazard (actual or potential) or dangerous occurrence should immediately notify the Health and Safety Advisor and Chief Executive before contacting any outside body, to ensure that immediate action can be taken if necessary to deal with the hazard. Contact can be made by telephone, email or the sending of a written report as appropriate to the situation.

10.0 Investigation Process

10.1 Once a whistleblowing complaint is received, the complaint will be reviewed and assessed to determine whether it falls under the criteria of Whistleblowing' **within 5 working days of receipt.**

10.2 Once the concerns raised have been understood and captured correctly, the Head of Internal Audit or other officer dealing with it will conduct an initial review to decide:

- Whether the issues raised fall within the Council's remit or powers to investigate. If they do not, the whistleblower will be advised of this (where possible);
- If so, whether the disclosure falls within the scope of the Whistleblowing Policy or would be more appropriately investigated under another policy or procedure. Where relevant, the disclosure will then be referred under the appropriate policy for consideration, and the whistleblower will be advised of this (where possible);
- If the disclosure does fall within the scope of the Whistleblowing Policy, the review will consider whether a full investigation is appropriate, taking into consideration the following:

- Seriousness of the concern: the review will assess if the concern is serious enough to warrant an investigation, taking into account factors such as the risk of harm, legal implications and impact on the organisation, and whether the resources required to conduct an investigation are proportionate to the potential outcomes;
- Feasibility of investigation: the review will assess whether it is possible to investigate the concern based on the information provided, including considering the availability of relevant evidence;
- If a full investigation is required, the review will determine what form it should take and confirm which officer will act as the investigating manager. Dependent on the nature of the concern, investigations may be referred to or carried out in conjunction with relevant directorate.

Further information may be sought from the whistleblower where necessary to assist the investigation. Where any meeting is arranged, whistleblowers have the right to be accompanied by a trade union or professional association representative or a work colleague (who is not implicated in the whistleblowing complaint).

10.3 We will aim to complete the investigation within 20 working days, however this will be dependent on the nature and complexity of the complaint

10.4 Once the investigation has been completed, a draft report will be completed by the Investigating Officer and where relevant will be shared with Internal Audit, and/or the relevant line manager/member of CLT

10.5 Once the investigation has been concluded and the report written, the Head of Internal Audit will confirm this to the person submitting the complaint, providing this was not submitted anonymously. Due to the potential confidential nature of the investigation, no further information will be provided to the person submitting the complaint.

10.6 All whistleblowing will be reported to the Corporate Governance Committee on a quarterly basis

10.7 The roles and responsibilities of those involved are detailed in Appendix A

11.0 Outcome of Whistleblowing Concern

11.1 Where a whistleblowing investigation identifies that any significant organisational action(s) are required, these will be captured in an investigation report, which must be shared with Internal Audit.

Implementation of these actions will then be monitored through the Internal Audit follow up process and reported to Corporate Governance Committee.

The amount of contact between the officers considering the issues and the whistleblower will depend on the nature of the concern, any legal constraints, and the clarity of the information provided.

11.2 The whistleblower will be informed when an investigation has concluded and where possible will be provided with some feedback on the outcome; however it should be noted that this may not always be possible (for example where disclosing the outcome of an investigation would involve sharing an individual's confidential employment information).

11.3 The Council will take appropriate steps to minimise any difficulties which a whistleblower may experience as a result of raising a concern and provide advice and support should they be required to give evidence, e.g., at a disciplinary hearing.

11.4 Whistleblowers who require reasonable adjustments due to a disability, health condition, or other personal circumstances may request these at any stage of the whistleblowing process. Requests will be considered sensitively and, on a case, -by-case basis, and where reasonably practicable, will be accommodated to ensure fair and equitable access to the whistleblowing process.

11.5 There is no right to appeal the outcome of the whistleblowing investigation, unless some new information comes forward at which point the concern can be raised again.

12.0 Raising issues with an external party

12.1 Concerns are most readily addressed where they are raised internally in the first instance. However, there may be situations where you feel it is inappropriate to raise the concern internally, or unable to do so. Alternatively, you may have already raised a concern and are dissatisfied with the outcome. In these situations, there are a number of other parties to whom you may turn:

- Relevant Regulatory Organisations (e.g. the Financial Conduct Authority, Health and Safety Executive or Local Government Ombudsman)
- The Police (where a criminal matter is involved)
- Protect on tel: 0203 117 2520

12.2 Before consulting an external party, the Council recommends that the whistle blower seeks independent legal advice (disclosure to a legal advisor is protected by law). The law most readily protects disclosures that are seen to be "reasonable", i.e. disclosures that are made within the Council, or to an appropriate regulator at an early stage. If the matter is taken outside of the Council, the whistle blower should ensure they do not disclose information about a third party that may be covered by a duty of confidentiality (e.g. commercially sensitive information or personal, private data).

13.0 Withdrawing your Allegation

13.1 You have the right to withdraw any allegation previously made under this policy and procedure. You should think very carefully before taking this course of action, bearing in mind an investigation may have started, and you may need to explain this change of decision. If it considered appropriate, despite the complainant withdrawing the allegation, the investigation of the allegation may continue if it is deemed necessary.

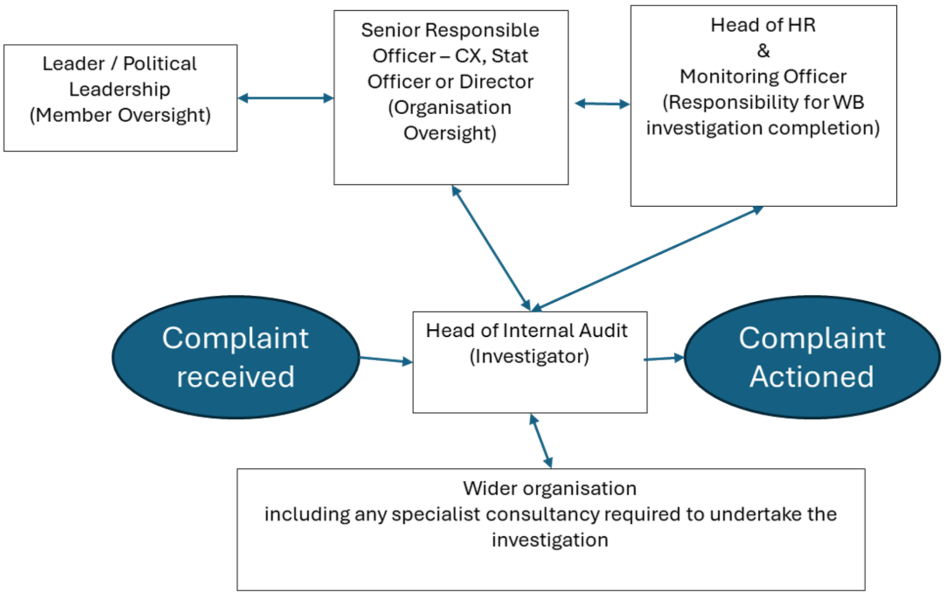
14.0 Advice and Support

14.1 HDC has a duty of care to both employees who are making a complaint under this policy and also to employees who are subject to a complaint. We will endeavour to manage the process and offer support and guidance in a supportive and considerate manner; however, this cannot be guaranteed as it may be influenced by the individual circumstances at play at the time.

14.2 There is support available through an Employee Assistance Programme, (EAP) service to ensure the welfare of an employee is supported in a positive manner. If you need further information on the support services available, please contact your line manager or the HR Team. The details of your referral will remain confidential to the HR Team.

14.3 Should any aspect of the investigation process cause difficulty because of a disability, language barriers or other difficulties, the Council will aim to support with the necessary help or assistance. Please contact your line manager or the HR Team if additional support is required.

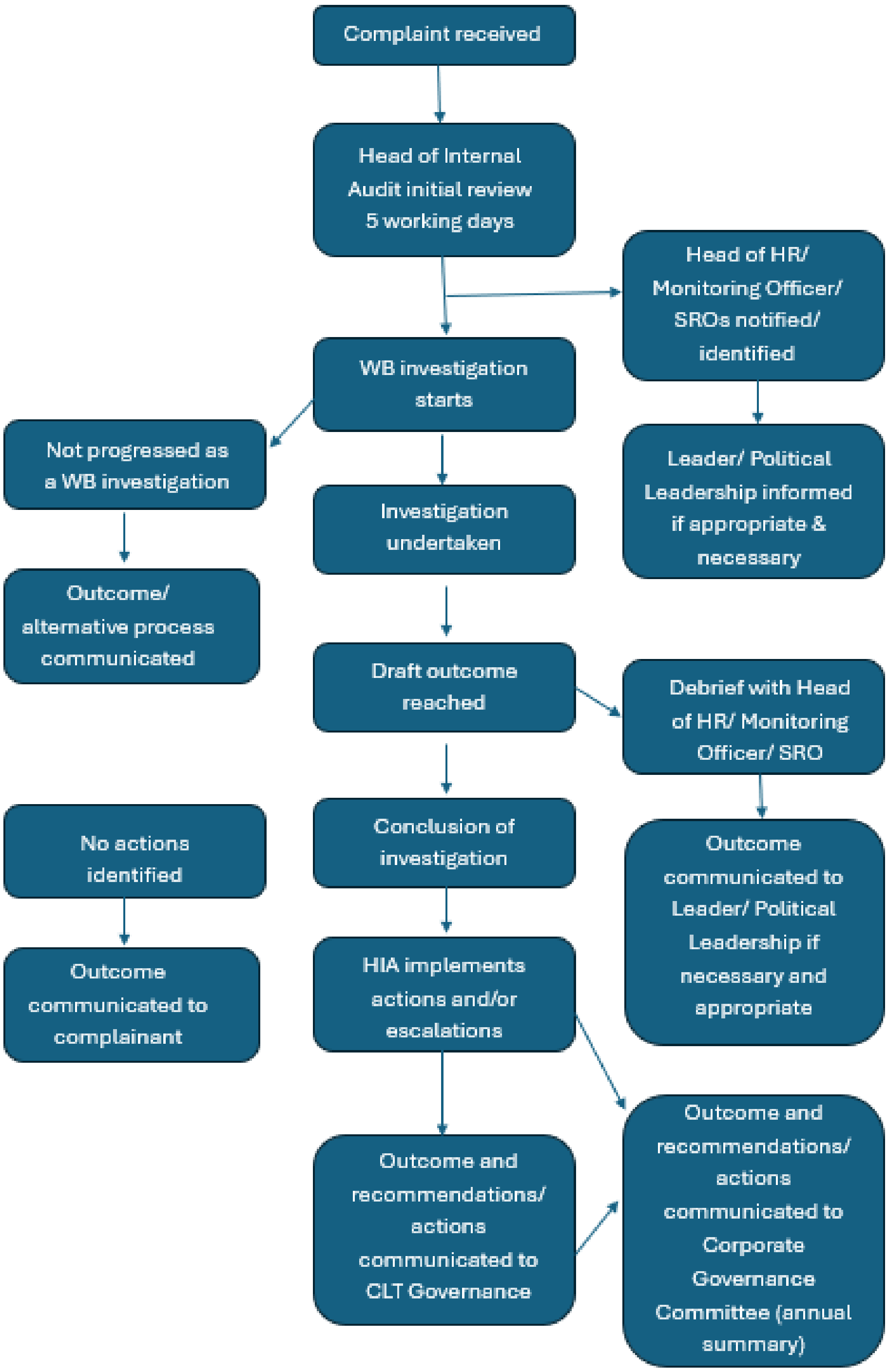
Appendix A – Reporting Procedures



<u>Roles & Responsibilities</u>
Head of Internal Audit – Responsible for receiving, investigating, and actioning (inc establishing recommendation) any complaints received. Where roles/individuals are implicated by the complaint, and may be conflicted, the HIA will work with other Officers in the Corporate Leadership Team to take on roles identified about for the purpose of the complaint.

Head of HR & Monitoring Officer – Responsible for supporting the Head of Internal Audit, enabling enquiries, and providing access to staff, policies, procedures, and legal advice.

Senior Responsible Officer (SRO) – To provide organisational oversight of the processing of the complaint; and be the link with Members (as necessary)


Complaint received
Head of Internal Audit initial review 5 working days
Head of HR/ Monitoring Officer/ SROs notified/ identified
WB investigation starts
Not progressed as a WB investigation
Leader/ Political Leadership informed if appropriate & necessary
Investigation undertaken
Outcome/ alternative process communicated
Draft outcome reached
Debrief with Head of HR/ Monitoring Officer/ SRO
No actions identified
Conclusion of investigation
Outcome communicated to Leader/ Political Leadership if necessary and appropriate
Outcome communicated to complainant
HIA implements actions and/or escalations
Outcome and recommendations/ actions communicated to Corporate Governance Committee (annual summary)
Outcome and recommendations/ actions communicated to CLT Governance

Corporate Governance Committee – 16th September 2026

Report by:
Mark Parker - Procurement Manager
Lead Cllr:
Stephen Claffey – Procurement Portfolio Holder

Wards	Open / Exempt	Key Decision?
ALL	Open	No

Changes to the Code of Procurement (Part 4 Rules of Procedure of the Council's Constitution)

Executive Summary: Following the introduction on 24th February 2025 of the Procurement Act 2023, the current Code of Procurement (Part 4 Rules of Procedure in the Council's Constitution) will require amendment to remain compliant. This report advises the Corporate Governance Committee on the proposed required amendments.

As the last review of the Council's procurement rules took place in February 2022, this is a significant update to the Code as the legislation has changed significantly.

The Code of Procurement will need to be replaced in its entirety with the new Contract Procedure Rules (CPRs). This will be supplemented by the Procurement Guidance.

Key Performance Indicators are also proposed to monitor compliance to the new CPRs.

Recommendations

1.1. Review the CPRs as set out at Appendix A.

1.2. Note the changes made between the existing Code of Procurement and the new CPRs in Appendix B.

1.3. Endorse the required amendments to the Constitution for the Council to remain compliant with procurement legislation.

1.4. Review and endorse the Procurement Guide as set out at Appendix C.

1.5. Review and endorse the draft Procurement Outcomes - the Social Value Policy at Appendix D.

	Key Corporate Plan Priorities
1	Creating a better Huntingdonshire for future generations
2	Doing Our Core Work Well

	Place Strategy Priorities
1	Inclusive Economy

Report Author(s)

Mark Parker, Procurement Manager, mark.parker@huntingdonshire.gov.uk

1. PURPOSE OF THE REPORT

1.1 The purpose of this report is to enable the Corporate Governance Committee to consider the proposed required replacement of the Council's existing Code of Procurement with a new set of Contract Procedure Rules (CPRs), attached at Appendix A. The proposed CPRs are intended to update Part 4 (Rules of Procedure) of the Council's Constitution by replacing the current Code of Procurement in its entirety and ensure that the Council's procurement governance framework remains compliant with legislation and reflects the requirements of the Procurement Act 2023 and the Procurement Regulations 2024.

1.2 The revised CPRs have been developed to provide a proportionate and compliant framework for the procurement of goods, services and works on behalf of the Council. They establish defined responsibilities, approval routes, procurement procedures and contract management requirements that support transparency, accountability, value for money and compliance with statutory obligations.

1.3 Appendix B highlights the principal changes between the existing Code of Procurement and the proposed CPRs.

1.4 Following endorsement by the Corporate Governance Committee this will progress through to a Council decision on 14th October 2026.

2. BACKGROUND & CONTEXT

2.1 The Council's current Code of Procurement (Appendix B) was last reviewed in February 2022 and was drafted to operate within the framework of the Public Contracts Regulations 2015 and associated procurement legislation.

2.2 The Procurement Act 2023 came into force on 24th February 2025 and was closely followed by the Procurement Regulations 2024, replacing the previous procurement regime for new procurement activities undertaken by contracting authorities. The new legislation represents the most significant reform of public procurement in a generation and introduces several new requirements relating to transparency, procurement procedures, procurement notices, contract management, publication of information and supplier engagement.

2.3 The Act also places greater emphasis on delivering value for money, maximising public benefit, acting with integrity and transparency, and ensuring that procurement processes are accessible to suppliers, including small and medium-sized enterprises (SMEs).

2.4 Social value also features in the Act, including the wellbeing of individuals and communities, social capital and the environment. The Council has a duty to have regard to social value evaluation criteria for procurements over the relevant UK Procurement Threshold.

2.5 Contracting authorities are additionally required to have regard to the National Procurement Policy Statement when conducting procurements.

2.6 A review of the Council's existing Code of Procurement concluded that while elements of the existing document remain relevant, the extent of legislative and procedural change is such that a comprehensive revision is required. Rather than making a series of amendments to the existing document, it is proposed that the Code of Procurement is replaced in its entirety with a new set of CPRs. The revised structure is intended to be more accessible, easier to maintain, more closely aligned to current procurement legislation and best practice across local government.

2.7 The proposed CPRs incorporate the Council's statutory obligations under the Procurement Act 2023 while also retaining local governance controls relating to delegated authority, procurement approvals, contract award decisions, use of waivers, conflicts of interest, contract registration and record retention. The CPRs provide a clear framework for undertaking procurement activity and seek to ensure that all procurement decisions are made consistently, transparently and in accordance with relevant legislation and constitutional requirements.

Current Policy Document	**New Policy Document**
Constitution Part 4: Code of Procurement (2022)	Constitution Part 4: Contract Procedure Rules
	Procurement Guide
Social Value Policy (2019)	Procurement Outcomes – the Social Value Policy (Appendix D)

2.8 The revised CPRs have also been developed to support the Council's wider strategic objectives. In particular, they reinforce the Council's commitment to:
- ensuring compliance with legal standards;
- securing value for money;
- maximising public benefit;
- embedding social value considerations;
- supporting local suppliers; and
- ensuring robust contract management arrangements throughout the life of a contract.

2.9 These principles especially align with the Council's Corporate Plan priority of "**Doing our Core Work Well**" through the delivery igh-quality, value-for-money services supported by strong governance and compliance arrangements.

2.10 Subject to the endorsement of the Corporate Governance Committee, the proposed CPRs will be submitted to Full Council for formal approval and adoption into the Constitution.

3. MEASURING PERFORMANCE

3.1 There are several performance indicators, proposed for six monthly reporting, to monitor adherence to the new CPRs:

- Awards over £50,000 categorised by:
    - Direct Award
    - Awarded by open tender process
    - Awarded procurement by framework
    - Awarded procurement by dynamic market
- Proportion and value of awards to suppliers with a registered business address within the PE postcode area; and
- Proportion and number of contracts operating under a waiver, including any retrospective waivers, with commentary.

- Updates on KPIs for any contracts that fall within section 12.13 of the Rules (contracts that fall under Procurement Act 2023 and are valued over £5m).

3.2 Feedback is sought from the Corporate Governance Committee on indicators that would assist scrutiny. Recommendations for further indicators will be assessed against officer time required to collect new data, resources required and value for money given a new Unitary vesting date of April 2028.

4. ALTERNATIVE OPTIONS CONSIDERED & NOT RECOMMENDED

4.1 It would be possible to make a series of changes to the existing Code of Procurement. The extent of legislative and procedural change is such that a comprehensive revision is required. This includes a revised structure to better reflect new legislation.

4.2 Do nothing – The Council would fail to be compliant with the Procurement Act 2023.

5. COMMENTS OF CORPORATE GOVERNANCE COMMITTEE

5.1 To be added following the meeting on 16th September 2026.

6. POST- DECISION IMPLEMENTATION

Following the Constitution Review Working Group's endorsement of this report with changes made to link terms & conditions to the website and strengthening wording around the use of standard terms and conditions and contract content this report (following Corporate Governance Committee will progress to Council on 14th October 2026.

7. IMPLICATIONS OF THE DECISION

7.1 Council Key Priorities and Performance

7.1.1 The proposed CPRs support the Corporate Plan priority of "**Doing our Core Work Well**" by strengthening the Council's procurement and contract management governance arrangements.

7.1.2 The revised Rules ensure compliance with the Procurement Act 2023 and Procurement Regulations 2024 whilst promoting value for money, transparency, integrity and effective stewardship of public funds. The CPRs establish clear responsibilities, approval processes and contract management requirements that will support good governance and compliance with statutory obligations.

7.1.3 The Rules also facilitate the delivery of wider Council priorities through the consideration of social value, public benefit and environmental outcomes within procurement activity. Overall, the CPRs provide a robust framework that supports efficient service delivery, effective risk management and organisational accountability.

7.2 Financial Implications

7.2.1 Effective Management and clear governance of the procurement of goods and services is essential to deliver the Council's responsibilities with the expenditure of public money and to meet the requirements of the Financial Regulations.

7.3 Policy Implications

7.3.1 Social Value Policy - In line with the proposed CPRs, work is underway to review and update the Council's Social Value Policy.

7.3.2 Community Health & Wealth Building Policy – The new CPRs and guidance reflect greater focus on the value of procuring from local businesses.

7.3.3 Climate Strategy – The new CPRs and guidance reflect greater focus on the environmental impacts of procurement.

7.4 Legal & Constitutional Implications

7.4.1 The proposed CPRs will replace the existing Code of Procurement in its entirety within Part 4 of the Constitution and provide an updated governance framework aligned to the Procurement Act 2023 and Procurement Regulations 2024. Full Council approval is required as the CPRs form part of the Constitution. Subject to a review of consequential amendments elsewhere in the Constitution, particularly Article 14 (Contracts) and references to the Code of Procurement within the Scheme of Delegation and Financial Regulations, no significant constitutional impediments to adoption have been identified. The CPRs strengthen the Council's procurement governance, transparency and compliance arrangements and reduce the risk of non-compliance with current procurement legislation.

7.4.2 The Rules include a section on the "Procedure for the Disposal of Assets." This is consistent with the existing Code of Procurement. Officers have taken the opportunity to update the thresholds in line with recent legislation. This is unique from land disposals, for which the council has an existing policy.

7.4.3 The guidelines that determine what is a reasonable justification for a waiver are currently being reviewed.

7.5 Community Impact

7.5.1 The new CPRs and guidance reflect greater focus on the value of procuring from local businesses, in line with this Council's Community Health & Wealth Building Policy.

7.6 Environment & Climate Change Implications

7.6.1 The new CPRs and guidance reflect greater focus on the environmental elements of social value in line with this Council's Climate Strategy.

7.7 Equality & Diversity Implications

7.7.1 N/A.

7.8 Implications on Resources

7.8.1 As part of the new CPRs, officers who are identified as the Contract Manager will be required to add the details of the contract/s that are awarded to the council's contract register and report (where needed) on the contract's performance over its lifetime.

7.8.2 The CPRs also enforce the requirement to have a central repository of all contracts and to ensure any new contracts which are let are saved to this.

7.9 Health & Wellbeing Implications

7.9.1 N/A.

7.10 Local Government Reorganisation (LGR) Implications

7.10.1 These revised CPRs will be more aligned to those of other councils within Cambridgeshire, our Council's potential future partners. The new Unitary Authority will review its procurement governance in line with the cross-council LGR Procurement workstream, in order to be safe and legal by the day of vesting.

8. RISK MANAGEMENT

8.1 The proposed CPRs are intended to reduce the Council's exposure to procurement, governance and compliance risks by providing an updated procurement framework which is compliant with the Procurement Act 2023 and Procurement Regulations 2024.

8.2 The principal risk associated with not approving the recommendations is that the Council would continue to operate under a Code of Procurement that was developed before implementation of the new procurement regime. This could increase the risk of procurement activity being undertaken in a manner that is inconsistent with current legislative requirements, resulting in legal challenge, audit findings, procurement complaints, reputational damage and reduced assurance over value for money.

8.3 The proposed CPRs introduce controls intended to mitigate these risks, including:

- Clear governance and approval requirements
- Defined procurement responsibilities
- Updated transparency and publication requirements
- Enhanced contract management provisions
- Strong contracts register obligations
- Clarified waiver and exemption processes
- Alignment with statutory obligations under the Procurement Act 2023

8.4 Implementation risks associated with officer awareness and adoption of the new procedures will be mitigated through guidance, training and ongoing support from the Procurement Team.

8.5 Following implementation of the revised CPRs, the residual risk is considered to be low and proportionate to the Council's normal procurement activities.

9. BACKGROUND PAPERS – LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

- Constitution Part 4: Code of Procurement (February 2022)
- Procurement Information and Opportunities, Huntingdonshire District Council website (June 2019)
- Community Health & Wealth Building Strategy (September 2024)
- Climate Strategy (February 2023)
- Anti-Fraud and Corruption Strategy (2021)
- Selling to our Council: A Guide for Suppliers, (June 2019)
- Contractor's Social Value Guide (June 2019)

10. LIST OF APPENDICES INCLUDED

- Appendix A: Contract Procedure Rules (Proposed)
- Appendix B: Code of Procurement (February 2022) – with commentary on proposed changes
- Appendix C: Procurement Guide (Proposed)
- Appendix D: Draft Procurement Outcomes - the Social Value Policy
- Appendix E: Example Procurement Plan

APPENDIX A

CONTRACT PROCEDURE RULES

1. INTRODUCTION

1.1. These Contract Procedure Rules (Rules) set out the rules that apply to all Officers, Members and agents acting for and on behalf of Huntingdonshire District Council (Council), involved in procurement and contract management for and on behalf of the Council and are established in compliance with S135 of the Local Government Act (1972) and S1-29 of Local Government Act (1999). These Rules must be read in conjunction with relevant laws, regulations and internal policies/procedures including the Financial regulations, Scheme of delegation, English law and any procurement guidance documents issued by the Council.

1.2. Throughout these Rules, reference to Manager shall mean all Directors, Heads of Services or Budget Managers as appropriate. A Manager shall be responsible for procuring all goods, services and works that require the quotation or tender procedures as set out in these Rules to be followed.

1.3. Officers involved in procurement and contract management activities and making procurement/contract management decisions must be fully aware of and comply with these Rules as they form part of the Council's Constitution.

1.4. The Council's Monitoring Officer, in consultation with the Council's Procurement Manager, is responsible for updates and amendments to these rules. Such a review would normally happen at least every two years.

1.5. Responsibility for monitoring and enforcement of these rules is as follows:

a) Procurements over £50,000 – The Council's Procurement Manager

b) Procurements under £50,000 – The Council's Heads of Service

1.6. All procurements and contracts must realise value for money through the optimum combination of whole life costs and quality of outcome delivered by the contract.

1.7. These Rules seek to protect the Council's reputation by minimising the risk of allegations of corruption, dishonesty and failure to meet legal obligations. As these Rules are required by law, failure to comply with them could lead to disciplinary action. If in doubt and/or if advice on compliance with legislative requirements is required, this may be obtained from the Council's legal advisers and/or the Procurement Manager.

1.8. Should a conflict be found between these Rules, the law and the Council's Procurement and Contracts Guidance, the order of precedence shall be the law, the Rules and then the guidance.

1.9. These Rules apply to contracts or agreements with external organisations where the Council pays for:

- Goods and/or services
- Works of any kind
- Hire, rental or lease of equipment, material and/or plant.

1.10. To apply these Rules, it is necessary to estimate the total value of the contract. Further details on establishing total contract value are available in the Procurement Guide. In summary, the estimate must include all proposed expenditure under the contract over its maximum term, including any extension periods. All thresholds/values referred to in these Rules are inclusive of VAT unless otherwise stated. Where the estimated value cannot be determined, the procurement must be managed as though it was over the relevant UK Procurement Threshold. Proposed expenditure should not be disaggregated to avoid thresholds in these Rules. In practice, this means Officers must not split a single contract requirement up into separate contracts with the intention of avoiding the thresholds and related tendering, invoice administration or internal approval requirements.

1.11. No Officer shall procure any goods, services or works valued at £5,000 or above unless they have:

a) either engaged with the appropriate budget manager or
b) attended Introduction to Procurement training and have detailed knowledge and understanding of these Rules and how they should be applied in respect of the total value of the procurement being considered.

1.12. The Procurement Team will create, maintain and deliver procurement training for Officers periodically throughout the year.

2. GOVERNING LEGISLATION

1.13. The Council's procurements are regulated by the Procurement Act (2023) and the Procurement Regulations (2024).

1.14. There is other legislation, such as the Social Value Act 2012, the Subsidy Control Act 2022 and the Local Government Transparency Code 2015, which also impacts on procurement and wider commercial activity, and it is important that officers are aware of the wider legislative framework. Officers must consider the application of the Subsidy Control Act 2022 at the outset of any procurement, contract, grant or financial assistance arrangement. Where a proposal may confer a subsidy, a documented subsidy control assessment must be completed and, where necessary, legal advice obtained before approval, award or implementation.

1.15. Where a procurement was started under the Public Contract Regulations (2015), governance for that procurement or contract continues to be those Regulations rather than the Procurement Act (2023). In the case of procurements/contracts started under the Public Contract Regulations (2015) they are governed by those Regulations until either:

- The end of the contract in question.

- For a framework/Dynamic Purchasing System, the end of the last call-off contract

3. OBJECTIVES

1.16. The Procurement Act (2023) sets out a series of objectives which procurements must have regard to, they are:

- Delivering value for money - Achieving the optimum balance of cost, quality and outcomes across the contract lifecycle.
- Maximising public benefit - Maximising positive economic, social, environmental and community outcomes from public expenditure and contracts.
- Sharing information for the purposes of allowing suppliers and others to understand the Council's policies and decisions - Providing transparent procurement information to help suppliers and stakeholders understand decisions, opportunities and policies.
- Acting, and being seen to act, with integrity - Conducting procurement fairly, ethically and transparently, maintaining trust and confidence in decision-making.

1.17. Procurements must also have regard to the National Procurement Policy Statement which sets out national priorities for procurement that are:

- Driving economic growth - Using procurement to support investment, innovation, productivity and sustainable economic growth opportunities.
- Delivering social and economic value - Securing wider social, economic and environmental benefits alongside the purchase of goods, services and works.
- Building commercial capability to deliver value for money and stronger outcomes - Developing procurement expertise, commercial skills and contract management capability to achieve better outcomes and value.

1.18. The Officer in the service area must complete a Procurement Plan with support from the Procurement Team. Completing this Procurement Plan documents the service area's consideration of the Procurement Act 2023 and National Procurement Policy Statement priorities.

4. PROCUREMENT BOARD

1.19. The Council operates an officer Procurement Board which provides governance, oversight and assurance in relation to procurement and contract management activity.

1.20. Procurements with an estimated total contract value of £50,000 or above must be presented to the Procurement Board prior to publication of the procurement.

1.21. The Procurement Board shall:

- review and endorse the proposed procurement approach and route to market;
- consider governance, commercial, financial, legal and procurement risks associated with the proposed procurement;
- review evidence of budget availability, funding arrangements and procurement planning;
- promote compliance with these Rules, the Procurement Act 2023, the Procurement Regulations 2024 and other relevant legislative requirements;
- support the delivery of value for money, public benefit and the Council's strategic objectives;
- review procurement pipeline activity and contracts likely to be impacted by Local Government Reorganisation;
- review approved waivers, direct awards, contract extensions and other matters referred to it in accordance with its Terms of Reference; and
- monitor contract management compliance and performance reporting where required by legislation.

1.22. The Procurement Board's role is advisory, assurance and governance focused. The Board does not hold delegated authority to approve procurements, contract awards, contract signatures or waivers. Formal approval remains within the Delegated Authorities Matrix.

1.23. Waivers, direct awards and contract extensions may additionally be referred to the Procurement Board in accordance with its Terms of Reference.

5. EXEMPTIONS

1.24. Procurements or contracts for the areas listed below are exempt from the application of these Rules but may fall under other sections of the Constitution.

- The acquisition of land or buildings
- The acquisition, development, production or co-production of material intended for broadcast and a contract for the broadcast to the public of material
- A contract to facilitate the provision of an electronic communications service or network
- A contract for the provision of arbitration, mediation or conciliation services
- A contract for any of the following exempt legal services:
  - Legal representation by a lawyer in judicial proceedings or other dispute resolution proceedings

  - Giving of advice by a lawyer in connection with any such proceedings
  - Document certification or authorisation services provided by a notary in circumstances where the certification or authorisation is required under an enactment or other law to be performed by a notary
  - Legal services provided by a person required to provide them under an enactment or an order of court or tribunal
- A contract for the lending of money or for carrying out of investment services by an investment firm or a qualifying credit institution
- A contract of employment
- A contract for the provision of research and development services where the services are intended to be for the benefit of the public and the contract does not also provide for the provision of goods or works
- Expenditure incurred directly as a result of an insurer led arrangement
- When procuring as part of a joint procurement, partner councils should agree in advance who will act as the Lead Authority. Where another Contracting Authority is acting as the procurement lead, officers must satisfy themselves that the procurement complies with all applicable laws. The Lead Authority’s rules will apply
- Membership/Subscriptions (other than software licensing) where the Council arranges to receive goods or services regularly by paying in advance and competition is absent for technical reasons
- Purchases made at public auction

6. MARKET ENGAGEMENT

1.25. Market engagement is permitted for the purposes of:

- Developing the Council’s requirements and approach to the procurement.
- Designing a procedure, conditions of participation or award criteria.
- Preparing the tender notice and associated tender documents.
- Identifying suppliers that may be able to supply the requirement (understanding the market).
- Identifying likely contractual terms.
- Building capacity amongst suppliers in relation to the contract.

1.26. Market engagement must not have the effect that suppliers participating are put at an unfair advantage or that competition is otherwise distorted. If an officer deems that a supplier has been put at an unfair advantage, they must contact the Procurement Team or 3C Legal Services/the Council’s legal advisors before progressing further with the procurement.

1.27. If the procurement is valued over the relevant UK procurement threshold, a preliminary market engagement notice must be published on the government's "Find a Tender" service.

1.28. Alongside any pre-market engagement, Officers should seek to understand how the Council could collaborate both internally with other departments and/or externally with neighbouring councils/public sector bodies across Cambridgeshire.

7. PROCURING VIA A FRAMEWORK

1.29. A contract of any value can be procured through a framework. If the proposed contract value is over £50,000 the Procurement Team must be consulted before the procurement is started.

1.30. A framework is considered a compliant procurement route when:

- It has been entered into by the Council in compliance with these Rules, or
- Another contracting authority, Public Sector Buying Organisation (PSBO) or central government has tendered the framework in compliance with national procurement law, and the Council is named as a potential user of the arrangement.

1.31. Where frameworks offer a further competition process, this should be used in the first instance. Where an Officer wishes to use a Direct Award, and the framework permits this, they must first seek approval from the Procurement Manager before proceeding with this approach. A clear justification must be provided in writing that demonstrates achievement of value for money using the Direct Award.

1.32. Approval to procure and award must still be sought in compliance with the Delegated Authorities Matrix at Appendix 1.

1.33. The contract must be signed/sealed in accordance with the Delegated Authorities Matrix. If the contract is valued over £10,000 a signed PDF copy must be sent to the Procurement Team.

1.34. Where a contract is valued over £30,000 a Contract Details Notice must be published on the government's "Find a Tender" service within thirty (30) days of the contract being entered into.

1.35. A Contract Award Notice will also be required if the contract value is above the relevant UK Procurement Threshold.

1.36. Officers should consider applying a voluntary standstill period where a framework award is high value, high risk, strategically significant, or where there is a heightened likelihood of challenge.

1.37. Where the contract is valued over £5m, a redacted copy of the contract must be published within ninety (90) days.

1.38. Where the Council is using an external framework and the total value of the contract is £5,000 (excluding VAT) or over, the Officer must add the contract to the Council's Contract Register to ensure compliance with the Local Government Transparency Code 2015. This must be done before raising a Purchase Order and the Purchase Order must be linked to the Contract Register entry.

1.39. The Purchase Order when raised must clearly state the Framework reference number for the avoidance of doubt.

8. PROCURING VIA A DYNAMIC MARKET

1.40. Dynamic Markets may only be used for above-threshold procurements, unless otherwise permitted by law.

1.41. A Dynamic Market is considered a compliant procurement route when:

- It has been entered into by the Council in compliance with these Rules, or
- Another contracting authority, PSBO or central government has tendered the Dynamic Market in compliance with national procurement law, and the Council is named as a potential user of the arrangement.

1.42. Dynamic Markets may only be used via a further competition and inviting bids from all suppliers. There is no possibility of making a Direct Award from a Dynamic Market.

1.43. Approval to procure and award must be sought in compliance with the Delegated Authorities Matrix at Appendix 1.

1.44. The contract must be signed/sealed in accordance with the Delegated Authorities Matrix. A signed PDF copy of the contract must be sent to the Procurement Team.

1.45. Officers should consider applying a voluntary standstill period where a framework award is high value, high risk, strategically significant, or where there is a heightened likelihood of challenge. A Contract Details Notice must be published within thirty (30) days of the contract being entered into.

1.46. Where the contract is valued over £5m, a redacted copy of the contract must be published within ninety (90) days.

1.47. Where the Council is using an external Dynamic Market, the Officer must add the contract to the Council's Contract Register to ensure compliance with the Local Government Transparency Code 2015. This must be done before raising a Purchase Order and the Purchase Order must be linked to the Contract Register entry.

9. PROCUREMENTS VALUED UNDER £10,000

1.48. Obtaining value for money is the primary objective of all procurements, however multiple quotations at this value are not essential. It is advised that multiple quotes are requested wherever possible though. If multiple quotes are requested, the Officer must also follow the steps provided at 10.3 below.

1.49. Quotations must be requested electronically via email and all quotes received must be in direct reply to this email request.

1.50. Approval to procure and award must be sought in compliance with the Delegated Authorities Matrix at Appendix 1.

1.51. The contract must be signed/sealed in accordance with the Delegated Authorities Matrix.

1.52. Where the total value of the contract is £5,000 (excluding VAT) or over the Officer must add the contract to the Council's Contract Register to ensure compliance with the Local Government Transparency Code 2015. If raising a Purchase Order this must be done beforehand and the Purchase Order must be linked to the Contract Register entry.

1.53. The terms of the Purchase Order should be sufficient for a contract of this value, unless the Officer believes the complexity of the requirement commands more bespoke terms. If so, these bespoke terms should be obtained from 3C Legal Services/the Council's legal advisors. The Purchase Order must clearly state what the Council requires from the supplier.

1.54. Where the purchase is being made via a Council Procurement Card, the Officer must ensure that payment is only made following contract signature.

10. PROCUREMENTS VALUED BETWEEN £10,000 AND £49,999

1.55. The Officer must seek a minimum of three (3) comparable written quotations, wherever possible at least two (2) of the quotations must be from local suppliers. Officers should evidence their findings on their Procurement Plan.

1.56. Quotations must be requested with a clear deadline for receipt electronically via email or the Council's e-tendering system. These quotations must be received via the same medium.

1.57. The written quotations must include the following information as a minimum:

- Details of the goods, services or works to be supplied;
- Where and when delivery is to take place;
- The total value of the contract; and
- Acceptance of the Councils terms and conditions that apply including payment terms.

1.58. Approval to procure and award must be sought in compliance with the Delegated Authorities Matrix at Appendix 1.

1.59. The contract must be signed/sealed in accordance with the Delegated Authorities Matrix. A signed PDF copy must be sent to the Procurement Team.

1.60. The Officer must raise a Purchase Order. The terms of this Purchase Order should be sufficient for a contract of this size/nature, unless the Officer believes the complexity of the requirement commands more bespoke terms. If so, these bespoke terms should be obtained from 3C Legal Services/the Council's legal advisors. The Purchase Order must include the information provided by the supplier as detailed in section 10.3 above.

1.61. The Officer must add the contract to the Council's Contract Register to ensure compliance with the Local Government Transparency Code 2015. This must be done before raising a Purchase Order and the Purchase Order must be linked to the Contract Register entry.

1.62. Where the total contract is valued over £30,000 a Contract Details Notice must be published on the government's "Find a Tender" service within thirty (30) days of the contract being entered into.

11. PROCUREMENTS VALUED BETWEEN £50,000 AND THE RELEVANT UK PROCUREMENT THRESHOLD

1.63. The Officer must consult with the Procurement Team before commencing the procurement or conducting any form of market engagement. A Procurement Initiation Form is available on the intranet. A Procurement Lead officer from the Procurement team will be assigned to support the procurement.

1.64. Approval for the procurement and the award of a contract must be sought in compliance with the Delegated Authorities Matrix at Appendix 1. Alongside this, a Procurement Plan must be developed by the Officer in consultation with the Procurement Lead, which a Corporate Director must approve before the procurement can be published.

1.65. If no suitable Framework or Dynamic Market is identified an open tender process must be followed. It is not possible to restrict the submission of tenders by reference to an assessment of suppliers' suitability to perform the contract. The Councils standard contract terms for goods or services must be used unless the Officer feels these are not sufficient. Where this is the case bespoke terms should be obtained from 3C Legal Services/the Council's legal advisors. All works related contracts will need to be bespoke in standard contract forms such as JCT (Joint Contracts Tribunal), NEC (New Engineering Contract) or similar.

1.66. The Council must have regard to the fact that small and medium sized enterprises may face particular barriers in competing for a contract and consider whether such barriers can be removed or reduced whilst remaining complaint with legislation.

1.67. The Officer must consider the inclusion of social value criteria in the evaluation methodology in discussion with the Procurement Lead.

1.68. All relevant procurement documentation, including details of the evaluation criteria, will be developed by the Officer in consultation with the Procurement Lead.

1.69. A Below Threshold Tender Notice must be published on the government's "Find a Tender" service.

1.70. Tenders must be evaluated according to the advertised evaluation criteria. Clarification questions may be asked of bidders providing the response would not have the effect of materially changing the tender received.

1.71. An award report will be prepared by the Procurement Lead and must be approved in accordance with the Delegated Authorities Matrix in Appendix 1 before the award can take place.

1.72. All bidders must be notified of the award decision simultaneously via the Council's e-tendering system whether their tender was successful or not, the Procurement Lead will prepare the relevant letters.

1.73. The contract must be signed/sealed by both parties before contract delivery starts, this should be done using the Council's e-sign software. The Officer must ensure that the Procurement Team is in receipt of a copy of the fully signed contract.

1.74. A Contract Details Notice must be published on the government's "Find a Tender" service within thirty (30) days of the contract being entered into.

1.75. The Officer must add the contract to the Council's Contract Register to ensure compliance with the Local Government Transparency Code 2015. This must be done before raising a Purchase Order and the Purchase Order must be linked to the Contract Register entry.

1.76. Relevant documentation from the procurement process, particularly the tenders received and the evaluation process, must be retained by the Officer in compliance with the Council's Retention Policy.

12. PROCUREMENTS VALUED ABOVE THE RELEVANT UK PROCUREMENT THRESHOLD

1.77. The Officer must consult with the Procurement Team before commencing the procurement or conducting any form of market engagement.

1.78. Approval for the procurement and the award of a contract must be sought in compliance with the Delegated Authorities Matrix at Appendix 1. Alongside this, a Procurement Plan will be developed by the Officer in consultation with the Procurement Lead. This Procurement Plan must consider the application of Lots. A Corporate Director must approve this Plan before the procurement can be published.

1.79. If no suitable Framework or Dynamic Market is identified either an open tender or competitive flexible procedure (multi stage) must be followed. The Councils standard contract terms for goods or services must be used unless the Officer feels these are not sufficient. Where this is the case bespoke terms should be obtained from 3C Legal Services/the Council's legal advisors. All works related contracts will need to be bespoke in standard contract forms such as JCT (Joint Contracts Tribunal), NEC (New Engineering Contract) or similar.

1.80. The Council must have regard to the fact that small and medium sized enterprises may face particular barriers in competing for a contract and consider whether such barriers can be removed or reduced whilst remaining compliant with the legislation.

1.81. The Officer must consider the inclusion of social value criteria in the evaluation methodology in discussion with the Procurement Lead.

1.82. Where preliminary market engagement is used to inform the procurement process, a Preliminary Market Engagement Notice must be published on the government's "Find a Tender" service.

1.83. All relevant procurement documentation, including details of the evaluation criteria, will be developed by the Officer in consultation with the Procurement Lead.

1.84. A Tender Notice must be published on the government's "Find a Tender" service via the Council's e-tendering system with associated tender documents.

1.85. Tenders must be evaluated according to the advertised evaluation criteria, clarification questions may be asked of bidders providing the response would not have the effect of materially changing the tender received.

1.86. An award report will be prepared by the Procurement Lead and must be approved in accordance with the Delegated Authorities Matrix in Appendix 1 before the award can take place.

1.87. All bidders must be notified of the award decision simultaneously via the Council's e-tendering system whether their tender was successful or not. The Procurement Lead will prepare the relevant assessment summaries. Once assessment summaries have been sent to bidders, a Contract Award Notice must be published on the government's "Find a Tender" service via the Council's e-tendering system.

1.88. The publication of the Contract Award Notice starts the mandatory eight (8) working days standstill period. If, during the standstill period, a challenge or request for feedback is received from an unsuccessful bidder, the standstill period must be paused until the matter is successfully resolved. No contract award can take place in the intervening period. The Officer in receipt of the challenge or request must contact the Procurement Lead and 3C Legal Services/the Council's legal advisors for advice before any response is made.

1.89. A Contract Details Notice must be published on the government's "Find a Tender" service via the Council's e-tendering system within thirty (30) days of the contract being entered into. Where the value of the contract is more than £5m, a redacted copy of the contract must be published within ninety (90) days of the contract being entered into. The Notice must contain details of the Key Performance Indicators (KPIs) (at least three (3)) that will be used to monitor the contract. These KPIs must be reported on annually by submitting a Contract Performance Notice on the government's "Find a Tender" service.

1.90. The contract must be signed/sealed by both parties before contract delivery starts, this may be done using the Council's e-sign software. The Officer must ensure that the Procurement Team is in receipt of a copy of the fully signed contract.

1.91. The Officer must add the contract to the Council's Contract Register to ensure compliance with the Local Government Transparency Code 2015. This must be done before raising a Purchase Order and the Purchase Order must be linked to the Contract Register entry.

1.92. Relevant documentation from the procurement process, particularly the tenders received and the evaluation process, must be retained by the Officer in compliance with the Council's Retention Policy.

13. EVALUATION OF TENDERS

1.93. The award criteria may be based on price alone or on that which represents the Most Advantageous Tender received. In relation to Contracts above the UK Procurement Threshold, any award must be weighted accordingly and based on the Most Advantageous Tender.

1.94. Tenders received within one hour after the fixed closing date and time or tenders which are not submitted in accordance with these Rules and any criteria set out in the procurement documentation will be disqualified unless otherwise agreed in writing by the Monitoring Officer.

1.95. If there is an obvious ambiguity or error in the tender and that ambiguity or error appears to have a simple explanation, bidders may be invited to correct their tender. Advice should be sought from the Procurement Manager before further action is taken.

1.96. Evaluation must be conducted in accordance with the published criteria and where the contract is valued above £50,000 it must involve individual evaluation followed by moderation to reach an agreed final tender score.

14. SOCIAL VALUE

1.97. The Public Services (Social Value) Act 2012 requires the Council to consider at the pre-procurement stage:

- How the proposed procurement might improve the economic, social, and environmental well-being of Huntingdonshire;
- How the Council may act with a view to securing that improvement in conducting the process of the procurement; and
- Whether it should undertake any community consultation on the above.

1.98. When undertaking a procurement of any value, Officers are required to review the Council's Social Value Policy and in doing so, ensure that the relevant process is followed that aligns to the total contract value.

15. ELECTRONIC SIGNATURES AND SEALS

1.99. The Council may execute, seal, or sign any agreement by electronic means.

1.100. For contracts that require a seal, the Monitoring Officer may adopt such means of sealing as from time to time they consider appropriate. This may include allowing electronic sealing in accordance with section 7A (1) of the Electronic Communications Act 2000 (or other subsequent legislation). Affixing of an electronic seal approved in this way shall be of the same legal effect as affixing the common seal of the Council by hand. The seal shall be attested by the authorised officer of the Council.

16. CONTRACT AWARD

1.101. Every contract entered into by the Council shall contain provisions appropriate to the nature, value and risk of the arrangement and, as a minimum, shall address:

a) The goods, services or works to be provided;
b) The contract term and any extension provisions;
c) Pricing and payment arrangements
d) Performance standards and, where appropriate, key performance indicators;
e) Contract management, monitoring and escalation arrangements;
f) Procedures for variations and modifications; and
g) Termination rights and exit arrangements.

1.102. Any contract award must be approved in accordance with the Delegated Authorities Matrix available in Appendix 1.

1.103. Contracts must be signed/sealed in accordance with the Delegated Authorities Matrix. The use of e-sign and electronic sealing are acceptable. Officers must ensure that a copy of the signed contract is sent to the Procurement Team.

1.104. All contracts valued over £5,000 (excluding VAT) must be added to the Council's Contract Register by the Officer and all related Purchase Orders must be linked to that contract.

1.105. The Officer named in the Contract Register will act as the Contract Manager and will be responsible for ensuring the obligations of these Rules and any relevant legislation are fulfilled. Further guidance is available in the Procurement Guide and the Contract Management Guidance.

1.106. A Contract Owner must also be recorded in the Contract Register entry who will be responsible for ensuring individuals details are kept up to date. These should be checked periodically but at least every six months.

17. CONTRACT PERFORMANCE AND MONITORING

1.107. Any contract award must be approved in accordance with the Delegated Authorities Matrix available in Appendix 1.

18. CONFLICTS OF INTEREST

1.108. Officers must take all reasonable steps to identify and keep under review any conflicts of interest or potential conflicts of interest.

1.109. Any person who influences a decision must be included in the conflict of interest review.

1.110. Officers must take all reasonable steps to ensure that a conflict of interest does not put a supplier at an unfair advantage or disadvantage. If the officer deems that the advantage or disadvantage cannot be avoided, they should contact the Procurement Manager before progressing further with the procurement. This obligation starts when the need for the procurement is first identified and continues until the termination of the contract.

1.111. Where the procurement is valued over £50,000 a conflicts assessment must be prepared in writing by the Officer in conjunction with the Procurement Lead before the procurement is published. This should include details of all conflicts or potential conflicts of interest for both officers and members.

1.112. This assessment must include any lobbying of members by bidders during a live procurement and any member involvement in evaluation. If members are approached by bidders, they must contact the Monitoring Officer immediately.

1.113. The assessment must also include any steps that the Council has taken or will take to mitigate that conflict of interest. This may include any steps taken to demonstrate that there is no conflict of interest where one might be perceived.

1.114. The conflicts assessment must be kept under review and revised as necessary during the procurement and throughout the contract term. The Contract Manager will consult with 3C Legal Services/the Council’s legal advisors, if a conflict should arise, to determine if the contract should continue, pause or end.

1.115. Any Officer who fails to declare a conflict of interest may be subject to disciplinary proceedings and risks being prosecuted under the Bribery Act 2010.

1.116. Any Member who fails to declare a conflict of interest may be subject to the Member Code of Conduct and the Monitoring Officer's standards process and risks being prosecuted under the Bribery Act 2010.

1.117. Officers and Members involved in a procurement will, at all times, act in a way that is consistent with the Employee Code of Conduct and Member Code of Conduct respectively.

19. RETENTION OF DOCUMENTS

1.118. All Contracts executed under seal (including the winning Tender/s and any documentation supplementary thereto) shall be held by the relevant Contract Manager for 12 years from the end date of the contract. A copy of the signed contract must also be kept alongside the contract register entry in the contracts database.

1.119. All other procurement documentation, including all expressions of interest, selection questionnaires, Invitations to Tender, unsuccessful Tenders, quotations, clarification responses, internal deliberations and recorded decisions shall be kept safe and secure by the relevant Contract Manager for a period of 3 years from the end date of the contract. At the end of this period, such documents shall be destroyed.

1.120. Contracts executed under hand shall be held by the relevant Contract Manager and again, a copy of the signed contract to be kept alongside the contract register entry in the contracts database for a period of 6 years from the end date of the contract.

1.121. All other procurement documentation as detailed above shall be retained for a period of 3 years.

1.122. For Contracts valued above £50,000 and where the Procurement Team are engaged to support the tender, all documents relating to the tender process including unsuccessful tender submissions will be retained by the Procurement Team for the required periods as detailed above.

20. PROCEDURE FOR THE DISPOSAL OF ASSETS

1.123. Where the appropriate Manager estimates the aggregate value of an asset or group of assets/goods to be worth less than £1,000, these may be donated to a recognised charity, voluntary or third sector organisation. “Manager” is defined at section 1.2. For the avoidance of doubt, the value shall be assessed based on the combined estimated value of all related assets or goods being disposed of at the same time. Assets or goods must not be separated into individual items, lots or donations for the purpose of circumventing the disposal thresholds contained within this section.

1.124. Where the value is estimated to be between £1,000 and £10,000 then the asset/s or goods may be sold on but in doing so, value for money must be achieved.

1.125. Where the value is estimated to exceed £10,000 fair market value must be sought. A valuer with relevant qualifications should be engaged to certify true worth, or appropriate market evidence gathered prior to the sale or disposal where applicable. When conducting the sale or disposal, this should be in one of the following ways using approved agents if appropriate:

- Sale by Tender
- Sale at a Named Figure
- Invited Offers
- Sale by Public Auction
- Part exchange or disposal as part of a replacement or aggregated transaction

1.126. If disposal to Officers is proposed, then the asset/s or goods shall be advertised internally to all Officers. Where a fixed price can’t be established; sealed bids must be sought.

1.127. Any disposal of assets should be reported to the Councils Finance Team regardless of any receipt of income from their sale.

21. INTERIMS, CONSULTANTS AND CONTRACTORS

1.128. The Hiring Manager responsible for appointing any Interim, Consultant or Contractor (ICC) must engage with the Council’s HR Recruitment Team in the first instance.

1.129. Following engagement with the HR Recruitment Team, the Hiring Manager is responsible for ensuring that any position deemed to be classed as Off-Payroll shall:

a) ensure that Off Payroll Working (IR35) regulations are applied prior to the supplier contract

b) complete the HMRC’s Check Employment Status for Tax (CEST) on a contract-by-contract basis, not just as a one-off exercise for a particular supplier

c) ensure an agreed statement of works, letter of agreement and Status Determination Statement (SDS) are in place to enable monitoring of the contracted work against our expectations

d) send all documents relating to the CEST, statement of works, letter of engagement and SDS to the Council’s recruitment team. These are legally binding documents and may be required in the future for audit purposes. This includes verification of Sole Traders/Self Employment.

1.130. If the ICC will be responsible to the Council for the management or supervision of a contract on its’ behalf, then the Manager shall provide the

ICC with a copy of these Rules and ensure that it shall be a condition of the engagement that the ICC shall:

a) comply with these Rules; and

b) any time during the carrying out of the contract produce to the appropriate Manager, on request, all the records maintained in relation to the contract; and

c) on completion of the contract transfer all records produced or received that relate to the contract to the appropriate Manager.

22. EXCEPTIONS TO THESE RULES

1.131. These Rules apply to every procurement carried out by or on behalf of the Council.

1.132. Exceptions will only be valid if the Council's online waiver system is used and appropriate approval has been sought and gained prior to the contract start date. Waivers should be sought as early as possible to ensure there is time to run a procurement process should the waiver be rejected.

1.133. Retrospective waivers are only permitted where:

a) it has been necessary to act urgently because of an unforeseen emergency which involves immediate risk of injury or damage; or

b) to prevent serious disruption to services.

1.134. Where a waiver valued over the relevant UK procurement threshold is required, advice must be sought from 3C Legal Services/the Council's appointed legal advisor as to the applicability of sections 41, 42 and 43 (and the associated appendices) of the Procurement Act (2023). The Council cannot be exempt from UK law.

1.135. Where a repeat or consecutive waiver is requested, the value of the proposed exception must be aggregated with the value of all preceding waivers relating to the same or substantially similar requirement and the appropriate Rule applied. For example, this may take the total value above the relevant UK procurement threshold (see 20.4 above). The officer seeking the waiver must explain why a compliant procurement process has not yet been completed and what actions are being taken to ensure future compliance.

1.136. Where the total value of the ensuing contract exceeds £5,000 (excluding VAT) it must be added to the Council's Contract Register to ensure compliance with the Local Government Transparency Code 2015.

1.137. Where the total value of the ensuing contract exceeds £30,000 a Contract Details notice must be published on the government's "Find a Tender" service.

APPENDIX A

APPENDIX 1 – DELEGATED AUTHORITIES MATRIX

	Budget Managers	**Heads of Service**	**Corporate Directors (CLT)**	**Chief Executive / Section 151 Officer**	**Cabinet*** **
Procurement Plan approval*	N/A	N/A	Up to £250k	Up to £500k	Above £500k
Contract Award approval**	Up to £30k	Up to £100k	Up to £250k	Up to £500k	Above £500k
Contract Signing / sealing	Up to £30k	Up to £100k	Up to £250k	Unlimited	N/A
Official Purchase Order	Up to £30k	Up to £100k	Up to £250k	Unlimited	N/A

* **Procurement Plan approval** – The Procurement Plan will detail the work that has been done to get to the point of going out to tender e.g.; assessment of routes to market, budget availability and approval etc. A tender must not be published until approved at the relevant level as defined in the matrix above.

** **Contract Award approval** – This is a detailed explanation of the quotation/tender process highlighting dates of publication and closure, number of bidders, quality/price scores and the recommendation of who should be awarded the contract. No contracts may be entered into until approved in writing at the relevant level.

*** **Cabinet approval –** Where Article 13, section 3.1(b) Key Decisions may apply. Consideration should be given for any time required for scrutiny of decisions within the Constitution.

APPENDIX 2 UK PROCUREMENT THRESHOLDS

These thresholds are effective from 1st January 2026 and are inclusive of VAT.

Goods and Services threshold: £207,720

Works threshold: £5,193,000

Concessions threshold: £5,193,000

Light Touch Regime threshold: £663,540

CODE OF PROCUREMENT

1. INTRODUCTION

1.1 The Code of Procurement defines the regulatory and legal framework for procurement. It has been adopted in accordance with the requirements of Section 135 (2) of the Local Government Act 1972.

1.2 Throughout the Code, reference to Manager shall mean all Directors, Heads of Services or Budget Manager as appropriate. A Manager shall be responsible for procuring all goods and services that require the quotation or tender procedures as set out in this Code to be followed.

1.3 No **Officer** shall procure any goods or services valued at £5,000 or more unless they have attended training and consider themselves to have such detailed knowledge and understanding of this Code and how it shall be applied in respect of the total value of the procurement being considered.

1.4 This Code applies to the procurement, commissioning, hire, rental or lease of –

- land and buildings, roads or other infrastructure;
- vehicles or plant;
- equipment, furniture and fittings;
- construction and engineering works;
- information and communication technology - hardware and software;
- goods, materials and services;
- repairs and maintenance;
- consultants, agents and professional services.

1.5 This Code does not apply to purchases made from internal management units or 3C's partners.

1.6 The Code also applies to the disposal of assets and goods by the Council. Where the appropriate Manager estimates that the assets or goods to be worth less than £1,000, then the goods or assets may be donated to a recognised Charity. If disposal to Officers is proposed, then the goods or assets shall be advertised internally to all Officers and sealed bids sought. Where the value is estimated as exceeding £1,000, fair market value must be sought.

1.7 The Council includes the Cabinet, Panels, Committees or other body or person(s) acting in accordance with delegated authority on behalf of the Council.

1.8 All procurements or sales made by or on behalf of the Council shall comply with this Code, subject to any overriding requirements of the Council's Rules of Procedure or Code of Financial Management or British or European Union law or regulation or applicable Crown Commercial Services' Procurement Policy Notices

1.9 Throughout the Code, reference to contractor(s) or sub-contractor(s) shall mean any person, company or supplier who has –

a) requested to be on an approved or ad-hoc approved list of tenderers; or
b) been approached to provide a quotation or tender; or
c) provided a quotation or tender; or
d) been awarded a contract in accordance with the provisions of this Code.

1.10 The Risks and Controls Group shall annually review all the financial values contained in the Code to take account of the impact of inflation and make any recommendation for any amendments to the values. Any approved changes will be communicated to Managers via the appropriate channels on a timely basis.

2. REPORTING AND ADVERTISING

2.1 Heads of Service / Assistant Directors shall provide the Procurement Manager details of new or additional requirements likely to meet or exceed £100,000 as they arise.

2.2 The Public Procurement Regulations 2015 (Statutory Instrument no. 102 2015) as amended The Public Procurement (Amendment etc.) (EU Exit) Regulations 2020 SI 1319 ("PP Amendment Regulations 2020" requires that contracts above the WTO threshold are advised in the UK e-notification service" -Find a Tender Service,

2.3 Public Procurement Notice (PPN) 03/15) now states: Publishing contract opportunity advertisements and contract award information on the new Contracts Finder portal (regulations 106 and 110) Contracting authorities must ensure that when they advertise a new procurement opportunity above certain thresholds, that the advert is placed on the new national Contracts Finder portal https://www.gov.uk/contracts-finder. This website must be used in addition to, or instead of any local or regional portals currently being used in addition, to or instead of any local or regional portals currently being used. Authorities must subsequently ensure that contract award information is placed on Contracts Finder once the contracts is awarded. The thresholds are as follows: Central Contracting Authorities: £10,000 Sub Central Contracting Authorities and NHS Trusts*£25,000 *Note: where existing standing orders in local government are in place that have a higher value for advertising opportunities, the higher value applies rather than £25,000.

(1 January 2018)

	Threshold		
Media	**Supplies and Services**	**Works and Concessions**	**Light Touch Regime Services**
Contracts Register	£10,000	£10,000	£10,000
Contracts Finder	£50,000	£50,000	£50,000
Find a Tender Service	£ 181,302	£ 4,551,413	£615,278

3. 'BEST VALUE' AND SOURCING POLICY

3.1 The Council seeks 'Best Value' in all procurement activity. 'Best Value' being:

- The opportunity to obtain leverage (better prices and) for volume.
- Transparent and efficient procurement processes.
- Appropriate social, environmental and equality outcomes
- Regulatory compliance.
- Minimum procurement overhead.

3.2 Achieving 'Best Value' needs valid competition and valid competition is dependent on the existence of an 'open' market with the selected contractors having the interest, capability and capacity for the work or business being offered. Wherever possible a minimum of three competitive tenders or quotations shall be sought. In selecting contractors to provide a tender or quotation Managers shall ensure that wherever possible –

a) the selection process used is fair and equitable, and that no favouritism is shown to any one contractor (e.g. the requirement is not an extract of a contractor's product specification).
b) checks are made to ensure that contractors are interested in this type of business;
c) repeat or 'automatic' invitations to the 'same' contractor or group of contractors are avoided, particularly where previously invited to bid and had failed to do so;
d) 'new' contractors are sought and invited to tender or quote;
e) the geographic area of the search for potential contractors is widened; and
f) 'no-bids' are checked for the reasons for a contractor's failure to bid.

3.3 Sourcing policy is determined by the needs of 'Best Value' and in order of preference is:

a) Adopted catalogues or framework contracts. An adopted catalogue or framework is the preferred contract for the Council's business within a defined category (a type or group of goods or service). The Procurement Manager shall make available adopted catalogues or framework contracts on the TechOne FMS or publish details of the contract or framework in Procurement Protocols & Guidelines. Managers shall ensure that orders for such categories are placed through the TechOne FMS using appropriate 'adopted' catalogue or framework contract. The Procurement Manager shall keep under review the continued suitability of any such catalogues, contracts or framework agreements.

b) Collaborative procurements with other public bodies or authorities.

c) Council let corporate contracts.

3.4 Some categories are managed corporately by specialist areas. The Procurement Manager shall provide a list of specialist categories and Managers shall ensure all requirements for such categories are referred to the relevant specialist.

Market Sounding

3.5 Market engagement is encouraged to help achieve Best Value through trying to understand the market, the suppliers, their business models and their costs.

3.6 Supplier Meetings/Briefings. To avoid the risk of unfair competitive advantage, any such meeting should be structured as an open event; all questions and answers recorded and with a minimum of 2 officers present. If pre-competition a minimum of 3 suppliers shall be invited and during a competition, all participating contractors shall be invited.

4. METHODS OF ORDERING

4.1 All orders shall be placed through one of the following recognised methods:

- A purchase order raised on the TechOne financial management system.
- A procurement card order.
- A manual purchase order.

4.2 Where there is an exception requirement and the relevant Senior Leadership Team member considers that the work is of an emergency nature necessary to enable the service to continue and none of the ordering methods are suitable, an alternative method may be used. The details of the exceptional requirement and the action taken must be recorded for future audit purposes.

5. CONTRACTS REGISTER

5.1 In compliance with the Local Government Transparency Code 2013, Managers shall keep a record using the Contracts Register, for all tenders and quotes greater than £10,000 (and subsequent contract extensions); of:

- the reasons (if appropriate) for not advertising on the Council's ‘Latest Opportunities’ internet site;
- all those contractors that were requested to quote or tender;
- the reasons why those particular contractors were selected to quote or tender;
- if applicable, the reasons why less than three contractors were selected to quote or tender;
- if the selected contractor is a Small or Medium Enterprise, voluntary or third sector organisation or charity;
- if the selected contractor is VAT registered;
- contract renewal date (if appropriate);
- summary details of a single tender/quote (if appropriate), and
- file or other reference to the contract and location of the documents and contract.

5.2 Any procurement estimated to exceed £100,000, which is not covered by the exceptions in paragraph 6 below, must be referred to the Procurement Manager before the procurement process is commenced. If a Manager does not wish to accept the Procurement Manager’s advice on any significant aspect the matter will be determined by the relevant Corporate Director / Assistant Corporate Director. The discussion will cover:

- Scope and objectives of the procurement;
- Budget and costing;
- Tender methods;
- Product and market information;
- Timescales; and
- Deliverables.

5.3 Where there is no adopted contract or framework, Managers shall, wherever practicable, seek to maximise contract values with other Managers to secure lower costs. The Council nevertheless wishes to balance the effort of going to the market with the effort and efficiency of the procurement process. Managers after determining the proposed contract’s total value shall then follow one of the procurement procedures detailed below. These procedures shall be used in all procurements or sales bar those exceptions at paragraph 6.

	Procedure	Estimated Total Value of Procurement	Requirement
(a)	Estimate	Up to £10,000	At least 1 written estimate or offer (email, web or paper) shall be sought and recorded.
(b)	Request for Price (Informal Quote)	£10,000 up to £50,000	At least 3 written estimates or offer (e-tendering, email or headed paperwork) shall be sought.
(c)	Tender	£50,000 to EU Procurement Threshold	Competitive tenders shall be obtained using one of the tendering options in this Code, and a formal written contract prepared in accordance with paragraph 13.1(f).
(d)	WTO tender	The WTO Threshold and above	The appropriate UK procurement directive shall be complied with.

5.4 Total value is the cost of all elements of the procurement (e.g. installation, testing, training, maintenance, etc). The Manager shall ensure that a procurement is not split or otherwise disaggregated and may choose to competitively tender requirements less than £100,000.

5.5 A Manager shall not invite quotations or tenders from any contractor or sub-contractor who has participated in the preparation of documentation or were involved in other preparatory work for the contract, unless they have, in writing, explained to the Monitoring Officer why this does not constitute an unfair competitive advantage or a conflict of interest and obtained agreement, in writing, that the contractor/sub-contractor may compete in the quote/tender process.

6. TENDER AND REQUEST FOR QUOTATION PROCEDURES

6.1 **Exceptions**. Nothing in this Code shall require tenders/quotes to be sought: -

a) for purchases made from a Public Purchasing Body (ESPO, PRO5, Crown Commercial Service) where:
there is a single supplier 'call-off contract' or catalogue created with fixed prices, or the contract is created to our requirements;

b) for purchases through local authority, government body or agency, police, health or other similar public authority, where the procurement rules of that organisation have been approved by the Procurement Manager and the contract is created in co-operation, agreed joint requirements or partnership;

c) for purchases made at public auction.

6.2 Provided that a compliant procurement process is underway a contract may be extended to complete procurement and contract negotiations by up to 3 months subject to agreement of the Procurement Manager.

6.3 **Single Tenders/Quotes.** All single tenders/quotes shall be reported to and recorded by the Procurement Manager in a register kept for that purpose.

6.4 **AD / Head of Service Approval. An** AD /- Head of Service can approve a single tender/quote:

a) if the Head of Service / Assistant Corporate Director considers that the work is of an emergency nature or is necessary to enable the service to continue and is reported to the next meeting of Cabinet.

b) for ongoing maintenance of propriety IT systems or where work to be executed or goods, services or materials to be supplied consist of repairs to or the supply of parts of existing proprietary machinery, equipment, hardware or plant and the repairs or the supply of parts cannot be carried out practicably by alternative contractors provided:

- there is evidence that it is a propriety system;
- the initial contract award was compliant with this Code;
- the renewal is for a period not greater than 4 years (this is the time interval used to calculate contract value for ongoing contracts);
- the total ongoing value does not exceed the WTO threshold.

c) where a single expression of interest is received for a competition run in accordance with the quote procedures (paragraphs 5.3 (a) & (b)) provided that:

- a clear description of the requirement has been advertised (paragraph 2.2) for an adequate period;
- the sole prospective supplier is kept unaware of their status;
- the process for seeking the quote is compliant.

d) where a new extension is proposed to a contract awarded under quote procedures (paragraphs 5.3 (a) & (b)) provided:

- the value of the proposed and all previous extensions to the contract are:

a. not greater than 10% of the advertised requirement for goods and services, or
b. or not greater than 15% of the advertised requirement for works;

- the extension does not materially change the nature of the contract;
- the initial contract award was compliant with this Code.
- the extension is recorded in the Contracts Register.

e) where the AD/ Head of Service considers a single quote is in the Council's best interest and:

- the total value is less than £25,000; and
- the details and justification are reported to the next Corporate Governance Committee.

6.5 **Monitoring Officer Approval.** An AD/ Head of Service after consulting the Monitoring Officer may obtain a single tender or quotation when no satisfactory alternative is available:

(a) Prices are wholly controlled by trade organisations or government order and no reasonably satisfactory alternative is available.
(b) Specialist consultants, agents or professional advisers are required and

- there is no satisfactory alternative; or
- evidence indicates that there is likely to be no genuine competition; or
- it is in the Council's best interest to engage a particular consultant, agent or adviser.

(c) Products are sold at a fixed price, and market conditions make genuine competition impossible.
(d) With the Monitoring Officer's agreement, considers that it is in the Council's best interest in negotiating a further contract for works, supplies or services of a similar nature with a contractor who is currently undertaking such work and is reported to the next meeting of cabinet.
(e) For reasons of interoperability/interchangeability or substantial duplication of costs.

6.6 If the single quote/tender option is used, the Manager shall:

(a) seek approval of the Monitoring Officer; and
(b) retain records that demonstrate that the best price or value for money has been obtained from the negotiations with the contractor.

7. LIST OF APPROVED TENDERERS

7.1 Tenders shall be invited from at least three contractors selected from an approved list established in accordance with this paragraph of the Code. Vetting is not normally required as the contractor was vetted to join the list.

7.2 The Council uses 2 types of list of approved contractors:

(a) Third party vetted lists of contractors that are compiled and maintained by an external organisation. Only external organisations approved by the Procurement Manager, after consultation with other relevant Manager(s) shall be adopted. The Procurement Manager shall ensure that the external organisation and approved list of contractors is detailed in Procurement Protocols & Guidelines.

(b) Ad-hoc list of approved tenderers. If a Manager believes that the approved list of tenders does not allow him to obtain sufficient competition for 'Best Value', the Manager shall write to the Procurement Manager seeking approval to source additional contractors or create an ad-hoc list of approved tenderers.

7.3 Subject to approval as required in paragraph 7.2(b) the Manager shall:

(a) issue a public notice inviting applications for inclusion on a specific approved list for the supply of goods, services or materials.
(b) vet (as detailed at paragraph 9.1) all contractors replying to the public notice or who have requested within the previous 12 months to be considered for work of a similar nature;
(c) only include contractors satisfactorily completing the checks;
(d) tell all potential suppliers how the approved list operates
(e) ensure the ad-hoc list shall only be used for seeking tenders for the supply of goods, services or materials specifically detailed within the original public notice.

7.4 The Procurement Manager in conjunction with the relevant Managers shall review the continued suitability of any List of Approved Tenderers periodically and at least prior to the third anniversary of its initial or further adoption.

8. FRAMEWORKS

8.1 All contractors on the framework (or lot if split into lots) shall be invited to submit a tender or quotation unless:

(a) the framework explicitly permits direct award;
(b) the proposed award is less than the tender threshold (£100,000); and
(c) the Head of Service / Assistant Corporate Director can show both objective reasons for the selection of a supplier and evidence of best value.

8.2 No public notice is required and general Terms & Conditions are set in the original framework contract but additional Terms & Conditions specific to the requirement may be permitted. Vetting is not normally required as the contractor was vetted as part of the original framework competition.

8.3 When advertising any contract or framework, Managers shall name any wholly publicly owned Local Authority Trading Company (LATC) if relevant to the contract.

9. COMPETITION

9.1 Shortlisting and Restricted Tenders

(a) Restricted (shortlisting) tenders are not permitted for competitions below the WTO threshold.

(b) Where allowed, the Manager shall undertake sufficient vetting to ensure that all contractors:

- comply with minimum standards of Insurance;
- have the necessary Health & Safety policy and performance and (where applicable) membership of the Contractor's Health and Safety Scheme or equivalent health and safety standard;
- are financially viable based on a risk-based assessment;
- have an appropriate environmental policy;
- comply with equalities legislation and policy; and
- possess the experience and capacity required.

(c) The Procurement Manager shall provide an appropriate questionnaire for the purpose of vetting contractors.

9.2 Open Tenders/Quotes

(a) Provided the Manager complies with paragraph 2.2 and is satisfied that Expressions of Interest received represent contractors with genuine interest and capacity, then no further public notice is required. Otherwise public notice may be given in one or more newspapers and/or in an appropriate trade journal. The notice shall state the nature and purpose of the contract, where further information and documentation can be obtained, and state the closing date for the process.

(b) An Invitation to Tender (ITT) or Request to Quote (RFQ) shall be sent to all contractors expressing an interest. ITTs and RFQs may include an appropriate suitability questionnaire. The Procurement Manager shall provide a suitable questionnaire.

9.3 Invitations to Tenders (ITT) and Requests for Quotations (RFQ)

Managers shall ensure that all ITTs and RFQs include;

(a) approved contract terms in accordance with paragraph 13.1 of this Code;
(b) a clear statement that explains if the bid is to be evaluated on the basis of the most economically advantageous tender (best value).

9.4 Evaluation Criteria

Except where the Cabinet decides otherwise, all formal quotations or tenders that are being sought shall:

(a) state explicitly all essential / mandatory / minimum requirements or award criterial. Any single failure or non-compliance with these requirements will result in rejection of the tender.
(b) list all desirable award criteria together with specific weightings applied to each.
(c) if appropriate, include a requirement for a performance bond and liquidated damages.

9.5 Social Value

All tenders that are being sought for services or works shall include a relevant social value requirement, such as:

(a) employment measures:
- new work opportunities including work experience, training and apprenticeships,
- back-to-work support (interviews skills, CV advice, and careers guidance),
- employment of disadvantaged groups (care leavers or ex-military or ex-offenders).

(b) community measures (including assisting community, voluntary and third-sector groups) by:
- contributing practical business support (e.g.: financial, legal, HR advice, etc).
- providing access to facilities and premises
- supporting the creation of new volunteering opportunities

(c) promoting environmental sustainability:
- improved environmental performance including low energy and water
- reducing the amount of waste generated
- the elimination (or reduced consumption) of substances hazardous to health,

5% of the marks available to any tender shall be for social value, provided the social value benefit is relevant to the subject matter of the contract and delivered within the District.

9.6 Non-Traditional Procurement

If a Manager believes that by following one of the procurement procedures detailed in paragraph 9 above that the procurement process will not provide him with the most appropriate method of delivery, the most competitive prices, allow for continuous improvements in delivery, or stifle innovation, then they may suggest alternative procurement strategies.

The Manager shall produce in accordance with guidance issued by the Procurement Manager and prior to proceeding with the procurement, a written acquisition strategy that shall be approved by the Monitoring Officer and the Cabinet.

10. SUB-CONTRACTS AND NOMINATED SUPPLIERS

10.1 Quotations or tenders for sub-contracts to be performed or for goods, services or materials to be supplied by nominated sub-contractors shall be invited in accordance with this Code.

10.2 The relevant Manager is authorised to nominate to a main contractor a sub-contractor whose quotation or tender has been obtained in full accordance with this Code.

11. RECEIPT AND OPENING OF TENDERS AND QUOTATIONS

11.1 Contractors shall be notified that tenders or formal quotations are invited in accordance with this Code. No tender or formal quotation will be considered unless –

(a) it has been received via the e-tendering ‘sealed quote’ facility; or

(b) it is contained in a plain envelope/packet which shall be securely sealed and shall bear the word “Tender” or “Quotation”, the Unique Reference Number (URN) from the Contracts Register; and the envelope shall not bear any distinguishing matter or mark intended to indicate the identity of the sender. Such envelope shall be addressed
  - impersonally to the 3Cs Head of Legal Practice if it contains a “Tender”, or
  - the appropriate Manager if it contains a “Quotation”; or

(b) RFQs (Formal Quotations) may be sent electronically to a specific e-mail address.

11.2 All Officers shall comply with the procedure note ‘Procedure for the Receipt of Tenders and Formal Quotations’ which can be found on the Procurement internet pages.

11.3 All tenders or quotations upon opening shall be recorded in writing on either a tender or quotation opening record unless the e-tendering system or Contracts Register is being completed contemporaneously. The format of the opening record shall have been previously agreed with the Monitoring Officer and 3Cs Head of Legal Practice.

11.4 Any tenders or quotations received after the specified time may in exceptional circumstances be accepted by 3Cs Head of Legal Practice, otherwise they shall be returned promptly to the contractor by the 3Cs Head of Legal Practice or his nominated officer in respect of tenders, or by the appropriate Manager or his nominated officer in respect of a formal quotation.

11.5 Late tenders shall be rejected once any other tender/quotation has been opened. The tender or quotation may be opened to ascertain the name of the contractor, but no details of the tender or quotation shall be disclosed.

12. ACCEPTANCE OF TENDERS AND QUOTATIONS

12.1 The appropriate Manager shall evaluate all the tenders or quotations received in accordance with the award criteria set out in the bid documentation and shall accept, subject to the provisos set out in this paragraph, the most economically advantageous tender or quotation, as evaluated against the award criteria.

12.2 Tenders or quotations exceeding the approved estimate may only be accepted once approval to further expenditure is obtained.

12.3 If the most economically advantageous quotation exceeds £100,000 but:

(a) is within 15% of the original estimate and budget, the appropriate Head of Service may accept the quotation without seeking further competition; or

(b) is in excess of 15% of the original estimate then the Head of Service shall consult the Procurement Manager and obtain the approval of the Monitoring Officer that the quotation can be accepted otherwise a competitive tender exercise in accordance with paragraph 9.1 above shall be carried out.

12.4 A tender or quotation shall not be accepted –

(a) where payment is to be made by the Council and it is not the most economically advantageous tender or quotation in accordance with the award criteria set out in the tender or quotation documentation; or

(b) if payment is to be received by the Council and the tender or quotation is not the highest price or value;

(c) unless –

- the Cabinet have considered a written report from the appropriate Head of Service/Service Manager, or
- in cases of urgency, the Monitoring Officer has consulted and obtained the approval of the relevant executive councillor. Tenders or quotations accepted

in this way shall be reported by the appropriate Manager to the next meeting of the Cabinet.

12.5 Arithmetical Errors and Post-Tender Negotiations

(a) Contractors can alter their tenders or quotations after the date specified for their receipt but before the acceptance of the tender or quotation, where examination of the tender or quotation documents reveals arithmetical errors or discrepancies which affect the tender or quotation figure. The contractor shall be given details of all such errors or discrepancies and afforded an opportunity of confirming, amending or withdrawing his offer.

(b) Post-tender negotiations shall not be used to degrade the original specification unless:

- the capital or revenue budget is exceeded; or
- other special circumstances exist;
- in which case the Monitoring Officer and Procurement Manager shall decide which of those contractors who originally submitted a tender or quotation shall be given the opportunity to submit a further bid based upon a degraded specification. This decision shall be recorded in writing.

(c) In evaluating tenders, the appropriate Manager may invite one or more contractors who have submitted a tender to submit a revised offer following post-tender negotiations.

(d) All post-tender negotiations shall:

- only be undertaken where permitted by law and where the appropriate Manager and Monitoring Officer and 3Cs Head of Legal Practice consider additional financial or other benefits may be obtained which over the period of the contract shall exceed the cost of the post-tender negotiation process;
- be conducted by a team of officers approved in writing by the Monitoring Officer and 3Cs Head of Legal Practice;
- be conducted in accordance with guidance issued by the 3Cs Head of Legal Practice; and
- not disclose commercially sensitive information supplied by other bidders for the contract.

(e) The appropriate Manager shall ensure that all post-tender negotiation meetings are properly minuted with all savings and benefits offered clearly costed. Following negotiations but before the letting of the contract, amendments to the original tender submitted shall be put in writing by the contractor(s) and shall be signed by him.

13. TERMS OF BUSINESS AND THE FORM OF CONTRACTS

13.1 All orders placed by the Council shall be on the Council's Standard Terms and Conditions (T&Cs) except for:-

(a) Any purchase at a public auction.
(b) Any framework or contract formally adopted by the Council.
(c) Purchasing Agency (e.g. ESPO, Crown Commercial Service) arranged contracts and orders.
(d) Orders of a total value of less than £ 25,000 where the goods or service are purchased on a 'retail' basis on terms available to the general public.
(e) Orders for software where the licence is for a 'standard' product but not where any form of modification, customisation, development or on-site service is required for the 'standard' product.
(f) Any contract where
- the estimated total value is likely to exceed £100,000; or
- significant risk to performance, cost or delivery is identified; or
- if a specialist category (e.g.: works, IT, professional services, concessions),

then the contract shall be in writing in a form approved by the 3Cs Head of Legal Practice. Managers shall ensure that advice of the 3Cs Head of Legal Practice is sought at a stage as early as practicable (normally before the issue of an Invitation to Tender).

13.2 Managers shall not use Contractor's documentation to order, acknowledge, instruct to proceed or make any other commitment where the documentation makes any reference to the Contractor's T&Cs. Except where permitted at paragraph 13.1, if a contractor formally insists on trading on T&Cs other than the Council's T&Cs, the Procurement Manager shall be informed.

13.3 In the case of any contract likely to exceed £100,000 for the execution of works or for the supply of goods, services or materials, the Manager after consulting with the Procurement Manager and the Monitoring Officer shall consider whether the Council should require security for its due performance and shall either certify that no such security is necessary or shall specify in the specification of tender the nature and amount of the security to be given. In the latter event, the Council shall require and take a bond or other sufficient security for the due performance of the contract.

13.4 Managers shall produce the final version of all contracts in 2 copies. Where the total value of a contract exceeds £100,000 both copies shall be presented to the Assistant Director, Corporate Services for signature. Once signed by the contractor, the signed contract, all original documents, including specifications, drawings, tender documents and correspondence relating to shall be forwarded by the 3Cs Head of Legal

Practice. Where the total value of the contract is less than £100,000 the relevant Manager shall make arrangements for the retention of all the original documentation.

13.5 Managers shall maintain a record (in the form detailed in the Procurement Protocols & Guidance) for their area of each contract or agreement (both written and verbal agreements).

13.6 Managers shall include one of the specific T&Cs listed in the Procurement Home Page in all contracts. Where a Manager considers a term or condition inappropriate, they shall seek advice of the 3Cs Head of Legal Practice on the modification or deletion of the term or condition.

14. LETTERS OF INTENT

14.1 Letters of intent provide a contractor with the authority to proceed prior to the award of a contract. However, letters of intent have two main disadvantages:-

(a) if the contract is not awarded the contractor is entitled to payment regardless as to whether the work was actually needed;
(b) the Council's negotiating position is weakened as the contractor may believe actual award of contract is a formality and therefore, the contractor may refuse to accept conditions that are seen as disadvantageous.

14.2 Managers shall ensure that:-

(a) all letters of intent are in a form approved by the 3Cs Head of Legal Practice; and
(b) all letters of intent are signed by the appropriate Budget Manager with sufficient authority for either the value of the intended contract or the estimated value of any 'extension' period defined in the letter of intent if below £100,000, otherwise by the Assistant Director, Corporate Services.

15. POST-COMPETITION DEBRIEFS

15.1 For all contracts greater than £50,000, Managers shall maintain records of selection and evaluation scoring and where requested by participating suppliers, provide a suitable post-tender debrief in writing. For contracts greater than £100,000 , unsuccessful tenderers shall be advised in writing of the winning supplier, the value of the contract awarded and the strengths and weaknesses of their tender and the advice of the Procurement Manager shall be sought on the format and scope of the debrief.

16. PUBLISHING CONTRACT AWARDS

16.1 Contract Award Notices shall be published within 90 days of contract award in the appropriate online system:

- Contracts Register if greater than £10,000, and.
- Contracts Finder if greater than £50,000 (including awards under mini-competition using a framework) or if advertised in Contracts Finder, and
- The Find a Tender Service if greater than the promulgated WTO threshold.

17. LOCAL GOVERNMENT ACT – COMMUNITY RIGHT TOCHALLENGE

17.1 The Local Government Act permits relevant bodies (charities, community bodies, town & parish councils and staff) to submit Expressions of Interest to provide Council services. The Procurement Manager shall maintain and publish a timetable for the submission of Expressions of Interest.

18. RETENTION OF DOCUMENTS

18.1 Managers shall ensure that every contract or quotation is assigned the Unique Reference Number (URN) from the Contract Register, which is to be used in all correspondence. Any Division or reference may be included in addition to the URN shall comprise abbreviation for the Division and year. Formal amendments to a contract or order should also be given unique numbers showing the order in which the amendments were made.

18.2 Documentation retention periods are dictated by the Statute of Limitations and (where applicable) EU requirements. The following rules apply:-

(a) retention for 12 years from the date of completion of the contract for contracts made under deed;

(b) retention for 6 years from the date of completion of the contract:-

- Contract Documents
- Hire/Rental Agreements
- Successful Tenders
- Summary of Tender Opening
- Disposal Board papers
- All selection and evaluation scoring and reports
- Goods Received Notes
- HM Customs and Excise Import documentation
- Invitations to Tender/Quotation Requests
- Maintenance/Software licence agreements
- Specifications
- Successful Quotations
- Suppliers' Advice Notes;

(c) retention for 3 years after the last entry:-

- Stock and Purchase Record Cards or Registers

(d) retention for 2 years after the financial year to which the document relates:-

- Unsuccessful Quotations.
- Unsuccessful Tenders.

19. FREEDOM OF INFORMATION ACT 2000 (FOIA)

19.1 Managers shall ensure that the handling of requests for procurement information complies with the detailed guidance published as Procurement Protocols & Procedures and the general FOIA guidance published by the Council's Freedom of Information Officer.

20. CONFLICTS OF INTEREST

20.1 Where a potential conflict is declared by an officer or otherwise recognised, the HoS shall ensure the relevant company and businesses areas are identified. Other business areas are exempt from the procedure.

20.2 The following procedure is applied according to value:

(a) Low value (less than £100,000)

- AD/HoS shall arrange for specifications/evaluation criteria written by the affected officer to be independently vetted;
- AD/HoS shall appoint 2 independent officers to evaluations were the relevant company participates; and
- AD/HoS shall ensure independent vetting of evaluations were the relevant company becomes the preferred bidder.

(b) High Value (greater than £100,000). Where the relevant company bids or is considered likely to bid the HoS / Assistant Corporate Director shall ensure participation by the affected officer is limited to providing specialist advice.

20.3 If a conflict of interest becomes apparent once a procurement is underway but before contract award the HoS shall seek the advice of the Procurement Manager and 3Cs Head of Legal Practice on how to proceed. If discovered after contract award, the HoS / Assistant Corporate Director shall refer the matter to the Monitoring Officer.

21. INTERIMS, CONSULTANTS AND CONTRACTORS

21.1 The Manager responsible for appointing any Interim, Consultant or Contractor deemed to be outside of the IR35 regulation (ICC) shall:

(a) if engaged through an agency, provide the agency with any information requested about the role.
(b) if engaged directly, use the HMRC's online employment status tool to check the ICC's tax status (IR35) and record the outcome. If the ICC is deemed an employee, then HR shall be provided with the details of the engagement.

21.2 If the ICC will be responsible to the Council for the management or supervision of a contract on its behalf, then the Manager shall provide the ICC with a copy of this Code and ensure that it shall be a condition of the engagement that the ICC shall:

(a) comply with this Code; and
(b) at any time during the carrying out of the contract produce to the appropriate Manager, on request, all the records maintained in relation to the contract; and
(c) on completion of the contract transfer all records produced or received that relate to the contract to the appropriate Manager.

22. PROCUREMENT TRAINING

22.1 The Procurement Manager shall create, maintain and arrange the delivery of training for Officers undertaking procurement duties.

22.2 Managers shall ensure that all Officers routinely undertaking purchasing or procurement duties where the gross value of the procurement is **£5,000** or more shall have undertaken appropriate training

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Huntingdonshire District Council

Procurement Guide

APPENDIX C

Contents

APPENDIX C

1 Introduction

This Guidance for Officers supports the practical application of the Council's Contract Procedure Rules (CPRs). The CPRs can be found in Part 4 of the Council's Constitution. If there is any conflict between this document and the CPRs, the CPRs will take precedence. This Guidance will give you practical support in managing the procurement cycle, but you will need to understand the CPRs to fulfil your responsibilities properly. Please note all thresholds referred to in these Rules are inclusive of VAT unless otherwise stated.

If your procurement is valued over £50,000 you must seek support from the Procurement Team before starting the procurement. If your procurement is valued below £50,000, please use this Guide, the flowcharts, and the template documents to manage your own process.

The higher the value of your procurement, the lengthier and more complicated the process will be. This Guidance covers all values of procurement as do the CPRs.

1.1 Definitions

Award Report	The document required for all contract awards valued over £50,000 which must be approved by the relevant Director before the contract can be awarded or standstill started.
Contract	The formal document that sets out the obligations of both parties in relation to the delivery of the requirement. It should always be signed by both parties before any delivery of the requirement begins.
Contract Management	The activities involved in actively managing a contract with a supplier. This will normally involve contract administration, performance management and building relationships with the supplier.
Contract Manager	The officer named in the Contract Register as being responsible for a particular contract. The officer responsible for the publication of the relevant contract management notices (post award).
Contract Procedure Rules (CPRs)	The part of the constitution that governs the way in which the procurement cycle must be managed.
Contract Register	The database on Technology One used to capture the details of all contracts the Council holds valued above £5,000.00
CLT	The Council's Corporate Leadership Team
Delegated Authorities Matrix	The table in the CPRs that shows authorisation levels relating to the procurement cycle. A copy of the matrix is included at the end of this guide.

APPENDIX C

Dynamic Market	Is a list of pre-selected suppliers, compliantly procured, which may be used to run a further competition for a requirement. Dynamic Markets cannot be used to do a direct award.
E Procurement System	This is the Council's electronic tendering system. Also referred to as In-Tend.
Evaluation	The process of assessing the quotes/tenders received in response to a procurement exercise to determine who is the winning bidder. This is normally the bidder with the highest evaluation score.
Find a Tender Service	The procurement platform, managed by central government, on which all procurement and contract management notices must be published.
Framework	Is an arrangement already procured by the Council or another public body and which the Council can use to run its own procurements.
Key Performance Indicator	A measurable indicator used to evaluate whether agreed objectives or outcomes are being achieved.
Local Supplier	A supplier whose business address is located with a 'PE' postcode.
Market Engagement	Pre-procurement engagement undertaken to develop requirements, understand the market, and inform the design of a procurement.
Notices	The Procurement Act (2023) requires the publication of various notices during procurement and contract management. The details of these notices and who is responsible for publishing them is contained within the body of this Guidance.
Procurement	The act of buying goods, services or works on behalf of the Council and then managing the ensuing contract.
Procurement Board	This officer Board provides oversight and assurance across HDC's procurement activity where the total contract value exceeds £50k. The Board ensures the process is well governed and is undertaken effectively, efficiently, and in a compliant, fair, and transparent manner in line with the councils Corporate Plan and public procurement regulations. Procurement Board Terms of Reference.
Procurement Team	This is the team at the Council responsible for supporting all procurement activity valued over £50,000. This includes support in planning the procurement.
Procurement Lead	The officer from the Procurement Team allocated to the procurement project.
Procurement Plan	The document required for all procurements valued over £50,000 which must be approved by the relevant Director before the procurement can be published.
Quality	The assessment of how well a tender meets stated requirements.
Quote	This is the offer made by a supplier to fulfil the requirements of a Specification and procurement process.

RFQ	Request for Quotation
Responsible Officer	The nominated lead from the service area who will be responsible for ensuring the procurement is delivered effectively and compliantly.
Social Value	This is the additional social, economic and environmental benefit generated through a procurement or contract that contributes to the Council's strategic objectives and community wellbeing.
Specification	This is the document that describes what you are procuring and how you are going to manage the delivery of the contract.
Technology One	The Council’s Finance and Contract Management platform.
Tender	This is the offer made by a supplier to fulfil the requirements of a Specification and procurement process.
TUPE	This is the legal process by which employees of an existing provider may be transferred to a new provider as a result of a procurement process. This process is managed by the providers themselves but there is a requirement to provide TUPE information (a template is available) as part of the procurement exercise.
UK Procurement Thresholds	The thresholds above which the full weight of the Procurement Act (2023) comes into force. The thresholds are detailed at the end of this guide and in the CPRs.
Value for Money	The most appropriate balance of cost and quality.
VAT	Value Added Tax. All thresholds/values referred to in this guidance and the Rules are inclusive of VAT unless otherwise stated
Waiver/Exception	Approved permission to depart from the CPRs in justified circumstances.
Weighting	The percentage importance assigned to an evaluation criterion when assessing tenders.
Whole Life Costs	The total costs of acquiring, operating, maintaining and disposing of goods, services or works throughout their lifespan.

1.2 The Procurement Cycle

The procurement cycle encompasses all elements of the commercial arrangements we have with our suppliers. The cycle will normally involve the following key stages:

- Identifying requirements/commissioning
- Premarket engagement
- Planning the procurement process
- Carrying out the procurement process
- Awarding the contract
- Contract management and performance monitoring
- Contract review

APPENDIX C

2 Flowcharts

The flowcharts below detail the required process for each threshold of spend taking you through the procurement cycle to the point of contract award. Contract management basic requirements are covered in this document, but more detailed advice is available in the Contract Management Guidance which is available to officers on the intranet.

Following these flowcharts will ensure your compliance with the CPRs and enable you to manage the procurement cycle effectively.

Flow Chart A

Procurement process for Goods, Services and Works with a value below £10,000

Understand and establish the requirement (seek advice from the Procurement Team if required, but this is not required for contracts valued under £10k. Ask if you are unsure).

▼

Confirm there is not already an existing agreement in place that can be used to meet the requirement. If not:

▼

You must obtain at least one written quotation in writing (email).
Where possible, the quote should be sought from a local supplier.

Required documentation: Specification, Terms and Conditions which must be our standard terms available on the internet unless using a framework

▼

Ensure the quote meets all the requirements — the Responsible Officer must ensure best value is obtained.

▼

Award contract using standard/ framework terms and attaching all relevant documents.
Ensure the contract is signed by both parties before any work begins.

▼

Add the contract to the Contract Register if valued over £5k and ensure all purchase orders related to the contract are linked in TechnologyOne. Procurement - Home

APPENDIX C

Flow Chart B

Procurement process for Goods, Services and Works with a value between £10,000 - £49,999.

Understand and establish the requirement (seek advice from the Procurement Team, but this is not required for contracts valued under £50k. Ask if you are unsure).

▼

Confirm there is not already an existing agreement or framework in place that can be used to meet the requirement. If not:

▼

You must seek to obtain at least three quotations in writing (email).
Where possible, at least two quotes should be sought from local suppliers.

Required documentation: Specification, RFQ, Terms and Conditions which must be our standard terms available on the internet unless using a framework

▼

Evaluate the returns in accordance with the criteria set out in the published documents (guidance on this is available). Ensure full records are kept.

▼

Notify successful and unsuccessful suppliers using Template Letters.

▼

Award contract using standard/framework terms and attaching all relevant documents.
Ensure the contract is signed by both parties before any work begins and in accordance with the Delegated Authorities Matrix.

▼

Add the contract to the Contract Register and ensure all purchase orders related to the contract are linked in TechnologyOne. The Procurement Team will support on publishing the Contract Details Notice which is required to be done within 30 days of contract signature.

APPENDIX C

Flow Chart C

Procurement process for goods, services and works with a value over £50,000.

Understand and establish the requirement.
Services must engage with the Procurement Team at the earliest opportunity. This could be up to 6 months prior to the requirement being needed depending on its complexity.

▼

Confirm there is not already an existing agreement in place that can be used to meet the requirement. If not:

▼

The Procurement Team will support the Responsible Officer to complete the Procurement Plan and gain approval as required by the Delegated Authorities Matrix and present the chosen approach at Procurement Board.

▼

Required documentation: Specification, Invitation to Tender (ITT), Terms and Conditions which must be our standard terms available on the internet unless using a framework or more bespoke terms are required.
The Procurement Lead and Responsible Officer will work together to draft these along with the Procurement Plan.

▼

Procurement Team to advertise on Find a Tender unless the use of a compliant framework or Dynamic Market is the agreed procurement process.

▼

Evaluate the tender responses in accordance with the criteria set out in the ITT; ensure complete records are kept of every stage of the evaluation process.

▼

Complete the Award Report and obtain sign off in accordance with the Delegated Authorities Matrix.

▼

Procurement Team will notify successful and unsuccessful bidders using the Template Letters.

▼

Award the contract using the Terms published with the procurement. The contract should be signed by both parties before any work begins and in accordance with the Delegated Authorities Matrix.

▼

The Responsible Officer will add the contract to the Contract Register and ensure all purchase orders related to the contract are linked in TechnologyOne.

3 Preparing for Procurement

3.1 Identifying the Requirement

3.1.1 Identifying what you want to achieve and how you will measure the successful delivery of the contract is key and should be thought about at the earliest possible stage. You will describe this in your Specification which can be as simple or as complicated as required to set out your requirement.

3.1.2 You should always consider the impact of:

- Budget and other financial constraints, such as grant conditions, savings targets, etc.
- The Council's Policy Documents including:
  - Corporate Plan
  - Community Health & Wealth Building Strategy
  - Climate Strategy
- Equalities
- Social Value including social, economic and environmental benefit (Social Value Policy in progress)
- Local Government Reorganisation (LGR)
- Modern slavery
- Data protection (GDPR)
- TUPE
- Health and safety

3.1.3 You may also want to review any existing Specifications or service models to see if they meet the requirements of your new procurement.

3.1.4 Obtaining information from customers/users can be extremely useful in helping to shape your requirement but it's important to understand the difference between their wants and their needs.

3.2 Understanding the Market

3.2.1 Understanding what potential suppliers can deliver is important when you are developing your Specification, and you can do this by consulting and researching the market.

3.2.2 The Procurement Act (2023) encourages market engagement in procurements which are above UK Procurement Thresholds, but it can be used for any procurement.

3.2.3 Market engagement can be used for the purposes of:

- Developing your requirements and approach to the procurement
- Designing a process and evaluation criteria
- Preparing the requirement notices and procurement documents
- Identifying likely contract terms
- Building capacity and / or capability among suppliers in relation to the contract being awarded
- Planning your procurement process effectively

3.2.4 Market engagement must not create inequalities, distort competition, or cause a lack of transparency so please bear in mind the following:

- That all suppliers engaged understand that you will be carrying out a competitive procurement in due course and that this engagement is to help with your procurement planning.
- That all suppliers are given the same information and where the value of the procurement is above the relevant UK Procurement Threshold, that a Preliminary Market Engagement Notice is published on the Find a Tender Service via the Council's e procurement system. The Procurement Team will support on this.
- Do not let suppliers steer the Council towards their specific solution.
- Do not promise suppliers they will get the work or have any advantage over any other potential supplier.
- Do behave ethically and do not accept anything that could be considered an inducement/bribe. The Council has an Anti-Fraud and Corruption Strategy, do have a look at it if you are in any doubt.
- Ensure there is a record of the market engagement undertaken, and the outputs. It is best practice to share these outputs with bidders to promote transparency and equal treatment, whilst taking care not to share commercially sensitive information.

3.2.5 It's important to be aware of the time it will take for a supplier to support such market engagement activities. For larger procurements, they may be able to afford the time, for smaller procurements perhaps not. So, think about what alternatives you might have to market engagement, such as speaking to other

Councils, or think about ways to minimise the time suppliers need to spend in engaging.

3.2.6 You can seek or accept advice from independent experts and/or from the market in general terms about the nature, level and standard of the market. You must not, however, seek or accept technical advice on the preparation of a procurement from anyone who might have a commercial interest in the outcome of the process where this might prejudice the equal treatment of all potential bidders, breach transparency or distort competition. Such involvement may preclude those suppliers from being involved in the ensuing procurement process.

3.2.7 Collaboration with other public bodies may benefit the Council. If another public body is leading a joint procurement, it is the rules of that body that will apply but you will need to ensure that those rules meet the requirements of the Procurement Act (2023).

3.3 Ensuring Value for Money is Achieved

3.3.1 The Council has an obligation to ensure that its procurements achieve value for money. There are some hints and tips for achieving value for money below:

- Ensure you understand what you need and what are ‘nice to haves’ which aren’t essential. It’s important not to simply re-use an existing Specification, needs change, technology develops and budgets change – what was right for the past is not the best guide for the future.
- Think about what the market can offer you. Is there a way of achieving what you need in a different way that may be more cost efficient or effective?
- Have you begun to think about appropriate performance mechanisms to ensure you get what you are paying for? These might also include continuous improvement clauses.

3.3.2 There is more advice on Specifications below, but it is important to ensure that you haven’t over-designed your requirement or any minimum standards. Doing so may rule out suppliers, lessen the competitiveness of your process and may also lead to increased costs.

3.4 Conflicts of Interest Assessments

3.4.1 The Procurement Act (2023) requires conflicts of interest assessments to be undertaken at the start of any procurement activity and for those assessments to cover both actual conflicts and potential conflicts of interest.

3.4.2 A template for this assessment is provided by the Procurement Team on the intranet. The initial assessment should be undertaken at this stage and then updated at each stage of the procurement and through the contract management phase

3.4.3 Please note that key information from this assessment must be included in Public Notices during the procurement.

APPENDIX C

4 <u>Procurement Planning</u>

4.1 The Contract Value

4.1.1 You need to calculate an accurate contract value to determine the procurement process to follow. The CPRs and the Procurement Act (2023) both rely on the accurate valuation of contracts.

4.1.2 The thresholds and therefore your valuation must **INCLUDE VAT.**

4.1.3 The contract value is calculated by multiplying the annual value by the term of the contract, including all potential extension periods. For example:

- The annual value is £40,000.
- One off implementation cost: £20,000
- Initial term: 3 years
- Extension options (total): 3 years
- Total contract value = £40,000 x 6 + £20,000 = **<u>£260,000</u>**

4.1.4 It is important that you don't minimise your estimates or split your requirement into smaller parts to avoid elements of the CPRs. Likewise, if you buy similar items regularly throughout the year(s), your total combined spend on those items will be your contract value.

4.1.5 You should also ensure that you have considered the whole life costs when calculating your contract value. This will ensure that you have a true picture of the costs you will incur so that you can judge whether the requirement is affordable. Some examples of whole life costs are:

- Installation or set up costs.
- Training
- Consumables
- Energy costs
- Replacement parts
- Maintenance
- Disposal/removal

4.1.6 Where you do not know the value of your procurement or it can't be calculated accurately, your procurement must be treated as though it is above the relevant UK Procurement Threshold.

4.2 Risk Assessment

4.2.1 All procurements valued over £50,000 will need a continuously reviewed and updated risk assessment. This will need to be established during the procurement planning phase and kept updated until the contract is terminated. The Responsible Officer will need to establish the risk assessment and keep it updated during the procurement phase and then pass it on to the Contract Manager so that it can be updated through the contract management phase.

4.2.2 For each risk you should establish the likelihood of it happening, the impact of it happening and any mitigations that can be put in place.

4.2.3 Maintaining a robust risk assessment is particularly important under the Procurement Act 2023. Where a risk identified in the tender notice (or transparency notice) subsequently materialises, the Act may permit a contract modification without re-procurement, provided the statutory conditions for modification are met.

4.2.4 Some example procurement risks are provided below but this list is not exhaustive.

- Not enough time to complete the procurement
- Insufficient resources to complete the procurement.
- Lack of a competitive market
- Supplier stability
- Poor performance
- Market inflation

4.3 Procurement Timetable

4.3.1 Developing a robust procurement timetable at an early stage will help to ensure that your procurement stays on track. Think carefully about the time you will need for each stage and remember to build in the Council's governance requirements.

4.3.2 It's also important to consider suppliers when developing your timetable. How long might they need to respond to market engagement, to submit a tender etc?

4.3.3 Some typical stages are summarised below, but the timing is just an example.

Drafting the procurement documentation, including the specification. Instructing legal support at this stage so they can draft the Contract for you	Up to 8 weeks
Authorisation of the procurement	3 to 4 weeks depending on the authorisations needed
Publishing the tender to market	No less than 4 weeks
Evaluating bids received	Up to 6 weeks depending on the number of bids received and the complexity of the evaluation process
Award process	2 to 4 weeks depending on the authorisations needed and whether a standstill period is required

4.4 Specification

4.4.1 Specifications fulfil 2 purposes; they communicate your requirements to the market and give you areas to measure performance against.

4.4.2 There are 3 different types of specification:

- Input Specification: describes the technical standards which need to be met and the different elements you expect the supplier to 'input' into their delivery of the requirement. It is most useful when the solution is known and no innovation or deviation is required. Be aware, though, if you have missed an input or require something different during the contract term, you are likely to have to pay more as it will sit outside the original specification.
- Outcome Specification: describes the outcomes that need to be achieved, not the means of achieving them. This allows the supplier to fulfil the contract in the best way for them and might deliver better value for money. However, you are likely to get very different bids which may make evaluation more difficult.
- Output specification: describe the function that needs to be performed and the outcomes required. This is a balance of an input and an outcome specification and is most often used.

4.4.3 Whilst you may wish to review the specification of the existing contract (if there is one), it is important that you don't just simply use it again. Remember you need to work hard to achieve value for money, reviewing specifications and ensuring that you are only asking for what you need. You don't want to build into the new contract mistakes from the previous one. You also want to explore partnership opportunities with other councils.

4.4.4 Please find below some hints and tips for developing your specification:

- Always use plain English and explain any acronyms.
- Be clear about the level of service or technical standards required.
- Ensure that all your performance requirements are capable of being measured.
- Ensure that any supporting documents needed to support your specification are available and clear.
- Be clear about what is essential and what is desirable, remember you may only be able to afford what is essential.
- Never assume that the Suppliers will know what you mean, be as clear as possible so that everyone would understand the requirement detailed.
- Never specify requirements that discriminate unfairly between suppliers, or which could be judged as being anti-competitive. The use of brand names or standards should never be used without the words 'or equivalent' and where possible the requirements should be described rather than using brand names or standards.
- If your procurement is below the relevant UK Procurement Threshold, you have a duty to consider the barriers that might be faced by SMEs and do what you can to reduce or remove those barriers. This is particularly important in relation to the specification.

4.5 Evaluation Methodology and Criteria

4.5.1 The evaluation process must be fully explained in your procurement documents, including detail on weightings and clarity around any pass/fail criteria.

4.5.2 Conditions of participation (previously known as selection criteria) can only be used as a separate stage in procurements valued above the relevant UK Procurement Threshold, or for works procurements valued over the Goods/Services threshold. When they are used, they must be proportionate and a way of ensuring that suppliers have the legal and financial capacity and technical ability to perform the contract. They look backwards at a supplier's experience and history.

4.5.3 For procurements valued over the relevant UK Procurement Threshold, a supplier's core information (economic and financial standing, exclusion grounds etc) will be held on the government's Find a Tender Service and will need to be accessed from there via the Council's e-procurement system.

4.5.4 Award criteria must be forward looking and allow you to determine how a supplier will deliver your contract. Usually, the criteria are a balance of cost and quality. If using price only criteria, they could be accompanied by a range of pass/fail quality questions.

4.5.5 Each scored quality question will need to be allocated a weighting depending on its importance and there should be a clear link between the specification and the quality questions asked. For example, if you have a quality question relating to Contract Management, you must have set out a baseline expectation of contract management within the Specification. It may be possible to create pass/fail quality questions although you will need to be clear when a bid may be rejected. It may also be possible to set a quality threshold under which bids may be excluded, again clarity is important. Advice should be sought from the Procurement Team should either pass/fail or thresholds be set.

4.5.6 You must ask for a price clearly and consistently, with breakdowns of total costs to be provided, so that bids can be easily compared.

4.6 Terms and Conditions

4.6.1 A document clearly stating the terms and conditions that will be utilised for the contract should be issued with the procurement. Advice on terms and conditions/contract is available from 3C Legal Services. You should ensure that the contract document meets the requirements of contract delivery including effective performance management and adequate allowance for modifications in line with the Procurement Act (2023).

4.6.2 Where your procurement is valued below the UK Procurement Threshold for goods/services and it is of a standard nature, the Councils template terms and conditions must be used. These are available on the internet.

4.6.3 Every contract entered into by the Council shall contain provisions appropriate to the nature, value and risk of the arrangement and, as a minimum, shall address:

a. The goods, services or works to be provided;
b. The contract term and any extension provisions;
c. Pricing and payment arrangements;
d. Performance standards and, where appropriate, key performance indicators (KPIs);

e. Contract management, monitoring and escalation arrangements;
f. Procedures for variations and modifications; and
g. Termination rights and exit arrangements.

4.7 Other Procurement Documents

4.7.1 It is usual to provide bidders with an instruction document. For procurements valued under £50,000, the Request for Quotation Template should be used. Where the requirement is above £50,000, the Procurement Team will work with the Responsible Officer to produce the full set of tender documents that will vary depending on the nature of the procurement.

4.8 Social Value

4.8.1 Social value is the wider financial and non-financial impacts that procurements may have in addition to the core delivery of the contract. This may include the wellbeing of individuals and communities, social capital and the environment.

4.8.2 The Council has a duty to have regard to social value evaluation criteria for procurements valued over the relevant UK Procurement Threshold. In practice, the inclusion of such criteria is considered where the value of the procurement is over £100,000 and a minimum of 10% is typically applied.

4.8.3 For example, a procurement over £100,000 might include a weighting of 50% quality and 50% price. If a social value weighting is also included, this falls within the 50% quality weighting, and the weighting applied to the social value question/s should equate to 20% resulting in the equivalent of a 10% social value evaluation criteria.

4.8.4 Refer to the Procurement Outcomes - the Social Value Policy for more guidance (currently in progress)

4.9 Environmentally Sustainable Procurement

4.9.1 Environmental benefits are a subset of the Social Value described above.

4.9.2 At the Full Council meeting on 22nd February 2023, Councillors agreed the formal recognition of a climate crisis and ecological emergency in Huntingdonshire. Council also adopted a Climate Strategy that sets out priorities and actions.

4.9.3 When undertaking a procurement exercise, officers should consider how the procurement can support the Council's Climate Strategy.

Procurement activity should seek to:

- Reduce greenhouse gas emissions
- Support energy efficiency and renewable energy adoption
- Reduce waste and increase reuse and recycling
- Minimise transport-related emissions
- Protect and enhance biodiversity
- Improve climate resilience
- Encourage innovation and low-carbon solutions

5 The Procurement Process

5.1 Advertising

5.1.1 If your procurement is valued over £50,000 but below the relevant UK Procurement Threshold, a Below Threshold Tender Notice must be published on the Find a Tender Service via the Council's e-procurement system unless you are using an existing framework. The Procurement Team will support on this.

5.1.2 Where your procurement is valued over the relevant UK Procurement Threshold, the Procurement Team will provide advice on what Notices are required to be published. Please therefore contact them before taking any action on an above threshold procurement, including market engagement.

5.2 The Flowcharts

5.2.1 Section 2 provides you with 3 flowcharts covering the main thresholds set out in the CPRs. They take you through, step by step, the process that you must follow depending on the value of your requirement.

5.2.2 If your procurement is valued below £50,000, you are responsible for managing your own process and need to follow the guidance contained here and elsewhere and use the Request for Quotation Template document. For clarity, you can only run a one stage (open) process – there can be no prequalification of bidders.

5.2.3 If your procurement is valued over £50,000 you will be supported by the Procurement Team to run a procurement that is compliant with the Procurement Act (2023). This may be a one stage (open) procedure or a Competitive Flexible Procedure that could include numerous stages where the value permits.

5.3 Clarifications

5.3.1 Bidders may ask clarification questions during the time defined in the instructions for the procurement. If a bidder considers the question to be confidential then they must state that when asking the question. Otherwise, an anonymised version of the question and response should be provided to all interested bidders. Please seek advice from the Procurement Team if you are unsure of how to validate any claim of confidentiality.

5.3.2 Information you provide in response to a clarification should not materially change the nature or scope of the requirement.

5.3.3 Below are some hints and tips on clarification questions:

- Clarifications should be responded to as quickly as possible.
- You should state a deadline for receipt of clarifications in your procurement documents so that you are able to manage the clarification process effectively.
- A record must be kept of all clarification questions asked, who by, the responses sent and whether responses were sent to all bidders or just the bidder in question.
- Clarifications must be raised in writing and where the procurement is being managed via the e-procurement system, using that system.
- Do not agree to meet individual bidders during the tender response period unless site visits are explicitly stated to be allowed and set up in accordance with the rules of the site visit contained within the procurement documents.

5.4 Evaluation

5.4.1 The evaluation must be carried out in accordance with the criteria and process that you set out in your procurement documents. There can be no deviation from the process or amendment of criteria once the procurement is live to the market. Remember to update your conflicts of interest assessment at this stage as necessary.

5.4.2 Normally, the tenders received should be evaluated by at least 3 evaluators. Evaluators should score separately and then come together as a Panel to moderate and agree a final score and comments.

5.4.3 A complete record of both the individual evaluations and the moderation meeting should be kept on file.

5.4.4 If there are areas of the bids that you feel need further clarification, please seek advice from the Procurement Team before seeking that clarification. There are limits on what can be asked by way of further information once the deadline for quote/tender returns has passed.

5.4.5 Normally the bidder with the highest score will be awarded the contract. If for some reason the outcome of the process suggests this will is not be the case, please contact the Procurement Team before taking any further action.

5.4.6 If you consider one (or more) of the prices submitted to be abnormally low, to the extent that you think the requirements of the contract may not be able to be fulfilled for the price submitted, you should seek advice from the Procurement Team. Usually, the Council will be required to inform the supplier that their price is abnormally low, and they should be given a reasonable opportunity to demonstrate that they will be able to perform the contract. If that information does not satisfy the Council, the tender may be excluded but advice should be sought from the Procurement Team/3C Legal Services before doing so.

5.4.7 Full guidance on evaluation is available on the Procurement intranet page.

6 Frameworks and Dynamic Markets

6.1 A framework is a contract between the Council or another public body and one or more suppliers that provides for the future award of contracts. A Dynamic Market is a list of qualified suppliers who have met the conditions of the market and so are eligible to participate in future procurements.

6.2 Frameworks and Dynamic Markets may be set up by the Council or by other public bodies for our use, for example ESPO or Government Commercial Agency (GCA).

6.3 A contract of any value can be procured using a framework agreement and, providing that the Council is eligible to use the framework and the rules of the framework are followed, the procurement will be compliant. Please remember that if your procurement is valued over £50,000, you will still need to contact the Procurement Team for support on your procurement.

6.4 If you are thinking about making a Direct Award via a framework, of any value, you will need to seek the approval of the Procurement Manager before doing so. This is because the Council can usually gain better value by running a further competition.

6.5 Dynamic Markets can only be used for contracts valued over the relevant UK Procurement Threshold and so the Procurement Team should always be contacted for advice before you consider using a Dynamic Market. Please note that Direct Awards are never available via a Dynamic Market or G-Cloud which is a GCA framework for cloud-based IT.

6.6 Please think about the following areas before using a framework or Dynamic Market:

- If the framework or Dynamic Market is owned by another public body, you will need to ensure that the Council is named as being able to use it before progressing.
- Please read the guidance documents for the framework/Dynamic Market carefully to ensure that it is suitable for your requirements.
- The guidance documents will detail how the framework or Dynamic Market can be used, sometimes even detailing what award criteria must be used, so again it’s important to understand this information before progressing.

- The option to Direct Award via a framework may mean this only applies to the top ranked supplier. If unsure, you can clarify this with the framework owner.
- Note the expiry date of the arrangement, can you complete your procurement before the expiry date? Are there any rules about how long call off contracts can run beyond the expiry of the actual framework or Dynamic Market?

7 Contract Award

7.1 Award Reports

7.1.1 For procurements valued over £50,000 once the winning bidder has been identified, an award report must be prepared to be signed off by the appropriate Director (as identified by the Delegated Authorities Matrix in the CPRs).

7.1.2 Once the award is approved, notification letters can be sent to the successful and unsuccessful bidders. Template notification letters are available on the intranet and should always be used.

7.2 Supplier Feedback and Notices

7.2.1 Where the value of the contract is between £30,000 and £50,000, the Responsible Officer is responsible for publishing a Contract Details Notice within 30 days of the contract being entered into. Support on this is available from the Procurement Team.

7.2.2 Where the procurement is valued over the relevant UK Procurement Threshold, assessment summaries must be completed for all bidders. For unsuccessful bidders, summaries will contain information about the evaluation of their own tender and that of the winning bidder. For successful bidders, they will contain feedback on the evaluation of their own tender. These will be prepared by the Procurement Team using the notes and scores from the moderation meeting. It is recommended that feedback is provided for tenders below the relevant UK Procurement Threshold and a voluntary standstill may be applied here.

7.2.3 Where the procurement is valued over the relevant UK Procurement Threshold, these assessment summaries will be sent to all bidders and then a Contract Award Notice must be published. This notice starts the mandatory 8 working day standstill period which must be observed before the contract can be awarded. The standstill period is designed to allow unsuccessful bidders to ask for further feedback or to challenge the award decision. Any communication of this sort must be shared with the Procurement Team who will advise what action should be taken.

7.2.4 Once the award decision has been made, the Responsible Officer must seek relevant due diligence information from the successful bidder(s). This information will need to be kept on record and updated throughout the term of the contract. This information may include but is not limited to:

- Insurance certificates
- Financial accounts or other financial statements.
- Accreditations
- Supplier policies, such as health and safety or equalities
- Licences, certificates or registrations
- DBS clearance checks

7.2.5 Once standstill has been completed, a Contract Details Notice must be published confirming details of the contract award.

7.3 Contract Formation

7.3.1 The terms and conditions that were used in the procurement will be the basis of the contract; these will be brought together with other documents from the procurement as the final contract. The key components of the final contract are:

- Specification
- All the winning bidders' responses to quality questions
- Any clarifications raised/answered that are deemed to be materially important in relation to the delivery of the contract
- Terms and Conditions of the contract (see 4.6.3)
- Performance measures and KPIs
- Payment schedule including service credits and/or other incentives
- Any bonds or parent company guarantees if required

7.3.2 Contracts should be signed by both parties (and sealed where appropriate) before delivery of the contract begins. It is preferable to use Docusign as this makes the signing process easier for both the supplier and the Council.

7.4 Contract Register

7.4.1 All contracts valued over £5,000 (excluding VAT) must be entered on to the Council's Contract Register (this is a requirement of the Local Government Transparency Code 2015). The Responsible Officer must ensure that this is done as soon as practical after the contract is awarded.

7.4.2 When you come to raise a requisition, you will be asked to select the relevant contract to align the requisition against. Your requisition may be rejected if this is not done correctly.

7.4.3 If your contract is valued over £50,000 you must send a signed copy of the contract to the Procurement Team as soon as possible to ensure compliance with the CPRs.

8 Contract Management

8.1 The Contract Manager is the person named on the Contract Register as responsible for the contract. The Contract Manager is responsible for proactively managing the contract throughout its term, including ensuring that the supplier fulfils their duties and performs at the levels required.

8.2 All contracts are required to have measurements for performance and escalation that are proportionate to the size and nature of the contract.

8.3 The Contract Manager is also responsible for updating the Contract Register as necessary including with the name of a new Contract Manager should that be required.

8.4 The Contract Management Guidance, available on the intranet, provides detailed and practical contract management advice. The information here is restricted to the minimum requirements that a Contract Manager is expected to fulfil.

8.5 If your contract includes any kind of uplift clause and that uplift clause is used, you should ensure that you update the value of the contract in the Contract Register.

8.6 You are limited in the modifications that you can make to contracts valued over the relevant UK Procurement Threshold or when your intended contract modification might take the contract above that threshold. If you wish to make a modification in these circumstances, please seek the advice of the Procurement Team before doing so.

8.7 Contract management, where the contract is valued over the relevant UK Procurement Threshold, is regulated by the Procurement Act (2023). The Contract Manager is responsible for ensuring that these requirements are complied with. A summary of the requirements is provided below, but Contract Managers are expected to familiarise themselves with the relevant sections of the Act and to seek further advice from the Procurement Team if they are unsure on the action they must take.

8.8 Contract Managers are responsible for publishing the following notices:

- If the contract is valued over £5m, a redacted copy of the contract must be published within 90 days of the contract being entered into. This document should be added to the Contract Details Notice already published, as detailed above. In addition, the Contract Manager must publish the details of at least 3 KPIs they are using to manage the contract. If KPIs are not a suitable means of managing the performance of the contract, further advice should be sought from the Procurement Team.

- Should the Contract Manager wish to make a contract modification that increases or decreases the contract value by more than 10% for good/services contracts or 15% for works contracts, they must publish a Contract Change Notice detailing the change being proposed. This must be published before the change takes place. If the contract is valued over £5m, a copy of the redacted modified contract must be published.
- Where the contract is valued over £5m, at least annually, the Contract Manager must publish a Contract Performance Notice detailing the supplier’s performance against the KPIs published at the start of the contract.
- A Contract Termination notice must be published at either the end of the contract’s term or in the case of early termination.

8.9 Contract Extensions

8.9.1 Contracts can only be extended where the contract contains express permission to do so. The original procurement should have stated clearly in the tender documents the term of the initial contract and details of any optional extension periods and how they can be entered.

8.9.2 The use of an extension may be a good opportunity to consider whether more value can be gained from the contract either through improved performance or lower costs.

8.9.3 Before taking up an extension option, the Contract Manager should consider the following:

- If there is provision for the extension in the original contract;
- Whether or not there is budgetary provision for the extension;
- Whether value for money can clearly be demonstrated; and
- If the value of the extension is above £200,000 the decision to take the extension must be presented to the Procurement Board for endorsement

8.9.4 Discussions about extending a contract should begin early enough (at least 6 months before or longer on complex contracts) that should an extension not be possible; a procurement can be completed before the end of the initial term. The contract should stipulate when notice must be given that you want to extend, this will need to be complied with.

8.9.5 The contract will need to be updated in the Contract Register by the Contract Manager, including the new end date and the new contract value.

8.9.6 Contracts that are not delivering value for money, are performing badly or are no longer required/linked to the Council's priorities should never be extended.

8.9.7 You are in breach of the CPRs and the Procurement Act (2023) if you continue to operate a contract which has legally expired.

8.10 Early Termination

8.10.1 If you are considering ending a contract before its expiry date, you must seek advice from 3C Legal Services before taking any action. The contract must allow for early termination but be aware of any penalties for doing so.

8.10.2 If you are ending the contract early because of poor performance, and the contract is valued over the relevant UK Procurement Threshold, you have additional responsibilities to report the poor performance in the Contract Termination Notice. Again, legal advice should be sought before any action is taken.

8.10.3 Your contract should contain clauses covering the action to be taken by both parties on early termination including final payment, TUPE, handover/transition arrangements.

9 Waivers and Emergencies

9.1 The CPRs allow Responsible Officers to apply for waivers in specific circumstances, these circumstances are listed in the Waiver e-form. There are very limited circumstances in which a waiver may be applied for retrospectively. All waivers must be applied for using the Council's Waiver e-form.

9.2 A waiver will never be approved if it is required because of lack of planning, for example the end of a current contract wasn't planned well enough so a new procurement cannot be completed in time.

9.3 You must wait until the waiver is fully approved before taking any further action. You will get automated emails at each stage when it has been reviewed/approved. The order in which the form will pass through review/approval is:

- Procurement Manager (for review/comment)
- 3C Legal Services (for review/comment)
- Head of Service (for approval/comment)
- Section 151 Officer (for final approval/comment)

APPENDIX C

DELEGATED AUTHORITIES MATRIX

	Budget Managers	Heads of Service	Corporate Directors (CLT)	Chief Executive / Section 151 Officer	Cabinet***
Procurement Plan approval*	N/A	N/A	Up to £250k	Up to £500k	Above £500k
Contract Award approval**	Up to £30k	Up to £100k	Up to £250k	Up to £500k	Above £500k
Contract Signing / sealing	Up to £30k	Up to £100k	Up to £250k	Unlimited	N/A
Official Purchase Order	Up to £30k	Up to £100k	Up to £250k	Unlimited	N/A

* **Procurement Plan approval** – The Procurement Plan will detail the work that has been done to get to the point of going out to tender e.g.; assessment of routes to market, budget availability and approval etc. A tender must not be published until approved at the relevant level as defined in the matrix above.

** **Contract Award approval** – This is a detailed explanation of the quotation/tender process highlighting dates of publication and closure, number of bidders, quality/price scores and the recommendation of who should be awarded the contract. No contracts may be entered into until approved in writing at the relevant level.

*** **Cabinet approval –** Where Article 13, section 3.1(b) Key Decisions may apply. Consideration should be given for any time required for scrutiny of decisions within the Constitution.

UK PROCUREMENT THRESHOLDS

These thresholds are effective from 1st January 2026 and are inclusive of VAT.

- Goods and Services threshold: £207,720
- Works threshold: £5,193,000
- Concessions threshold: £5,193,000
- Light Touch Regime threshold: £663,540

APPENDIX D

HUNTINGDONSHIRE DISTRICT COUNCIL

Procurement Outcomes - the Social Value Policy

Introduction and purpose

This policy sets out Huntingdonshire District Council's (HDC's) approach to Social Value and the implementation of the Public Services (Social Value) Act 2012 (the Act), as strengthened by the Procurement Act 2023 and the National Procurement Policy Statement. It explains how HDC will use procurement, commissioning, funding, partnerships and influence to create additional public benefit for residents, communities, businesses and the environment.

The policy is intended to define the outcomes HDC wants to achieve and provide a consistent policy basis for procurement and commissioning decisions. Separate procurement guidance and the Social Value Framework will provide operational detail on tender routes, evaluation questions, scoring, governance and contract management.

The policy will:

- define what Social Value means to HDC;
- set out the relevant legislative requirements that govern HDC's procurement processes;
- demonstrate HDC's commitment to delivering Social Value;
- introduce HDC's Social Value outcomes and objectives so that procurement outcomes are relevant and meaningful; and
- set out how Social Value will be built into procurement and commissioning activity in a way that is proportionate to the size, subject matter, duration and impact of the activity.

Definition of Social Value

Social value in procurement is about making sure that what we buy creates an overall positive impact on our people and communities, the local economy and the environment. For HDC, this is linked to both the Corporate Plan and Huntingdonshire Futures.

For practical purposes, Social Value can be divided into three main areas:

- social: improving the wellbeing of individuals and communities, encouraging interconnectedness and mutual support among people;
- economic: promoting economic policies and business practices that support society's wellbeing by strengthening the local economy through increased local spend, SME access and supplier diversity;
- environmental: encouraging sustainable processes that take care of the social and physical environment, ensuring a viable future for everyone.

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Corporate Plan priorities	Place Strategy journeys	What this means for Social Value
Improve quality of life for local people Create a better Huntingdonshire for future generations Do our core work well	Pride in Place Inclusive Economy Health Embedded Environmental Innovation Travel Transformed	Every significant opportunity should show how it contributes to locally important outcomes, not just compliance, price or outputs.

Outcomes that matter for Huntingdonshire

HDC will prioritise six Social Value outcomes. These are broad enough to apply across services, but specific enough to guide commissioning, grant-making, supplier engagement and partnership conversations.

Outcome	What HDC wants to see	Corporate Plan fit	Place Strategy fit
1. Stronger local economy and good growth	More local spend where lawful and proportionate; greater access for SMEs, VCSEs and local suppliers; stronger supply chains; support for entrepreneurship and business resilience.	Forward-thinking economic growth; doing core work well	Inclusive Economy; Pride in Place
2. Jobs, skills and opportunity for local people	Employment pathways, apprenticeships, work experience, return-to-work routes, volunteering, digital inclusion and skills linked to growth sectors and community need.	Quality of life; economic growth	Inclusive Economy; Health Embedded
3. Health, wellbeing and prevention	Activities that improve physical and mental wellbeing, reduce loneliness and social isolation, keep people out of crisis and support community resilience.	Improve quality of life; keeping people out of crisis	Health Embedded; Pride in Place
4. Strong, connected and inclusive communities	Support for resident-led activity, community organisations, volunteering, local networks, safer communities and places where people feel they belong.	Quality of life; helping people in crisis	Pride in Place; Health Embedded
5. Climate, nature and environmental resilience	Carbon reduction, sustainable supply chains, biodiversity, waste reduction, climate adaptation, active travel and support for lower-carbon communities and businesses.	Better Huntingdonshire; lowering carbon emissions	Environmental Innovation; Travel Transformed
6. Accessible and thriving places	Improvements that support town centres, rural communities, visitor economy, safe and accessible public spaces, community assets and pride in local identity.	Better Huntingdonshire; quality of life	Pride in Place; Travel Transformed

In prioritising these six outcomes, the Council will seek proportionate evidence of the Social Value achieved. This should demonstrate what changed, who benefited, how the learning will inform future decisions, and how the public benefit created compares with the Council's investment, expenditure or influence. The nature and level of evidence required will be proportionate to the scale, value, duration and potential impact of the activity.

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Legislative Requirements

The Public Services (Social Value) Act 2012 requires public authorities to have regard to economic, social and environmental well-being in connection with public services contracts. Under the Procurement Act 2023, contracting authorities must now also have regard to the importance of maximising public benefit when awarding all contracts, whether for goods, services or works.

In accordance with section 1 of the Public Services (Social Value) Act 2012, the Council will consider, before commencing a relevant procurement, how the proposed procurement might improve the economic, social and environmental wellbeing of the relevant area and how the procurement process might secure that improvement. Consideration will be limited to matters that are relevant to what is being procured and proportionate in all the circumstances. The Council will also consider whether consultation should be undertaken to help identify relevant needs, outcomes or opportunities.

This now represents a broader and stronger policy expectation, because it supports a move away from a narrow cost-focused approach and more towards procurement decisions that take account of wider public benefit, value for money and the Most Advantageous Tender.

The Procurement Act 2023 also strengthens planning, transparency and accountability by requiring Social Value to be considered early in procurement activity where relevant and proportionate. This includes considering whether larger contracts could be divided into Lots to encourage SME and VCSE participation and for relevant £5 million plus contracts, setting up and publishing at least three Key Performance Indicators.

Where Social Value commitments are captured as contract commitments or KPIs, they must be capable of monitoring through contract management arrangements and, where applicable, public reporting on supplier performance.

HDC commitment and policy principles

HDC is committed to making the most out of every pound it spends and will embed a Social Value approach into procurement and commissioning activity. The Council will pursue outcomes that contribute to Corporate Plan priorities, Huntingdonshire Futures and the needs of local communities.

The Huntingdonshire Futures Place Strategy is a long-term, community-shaped vision developed with residents, businesses and partners. HDC's Social Value approach will support delivery of the Place Strategy journeys through procurement, commissioning and partnership activity.

Integrating Social Value into procurement and commissioning should not only support delivery of the Council's Corporate Plan objectives, but also provide wider benefits, including greater supplier diversity, increased stakeholder engagement, improved collaboration and stronger, mutually beneficial relationships with the VCSE sector.

HDC will apply the following principles:

Principle	What this means in practice
Local relevance	Social Value should respond to Huntingdonshire's needs, not generic promises. Offers should be linked to one or more of the outcomes above.

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Principle	What this means in practice
Proportionality	Expectations should be relevant to the scale, duration, subject matter, and market for the activity, avoiding unnecessary barriers for SMEs and VCSE organisations.
Additionality	Benefits should go beyond normal contract delivery, statutory duties, or basic good practice wherever possible.
Partnership and co-production	Where outcomes affect communities directly, HDC will value approaches shaped with residents, community groups, town and parish councils and partners.
Transparency and evidence	Outcomes should be capable of being monitored through quantitative data, qualitative evidence, case studies, or Social Return on Investment analysis.
Learning and improvement	Monitoring should not just prove value; it should help HDC and partners understand what works, replicate good practice, and improve future decisions.

Applying Social Value through procurement and commissioning

This policy applies to all contracts whether or not the value of the contract is above the relevant threshold for goods, services or works. HDC will look to incorporate a Social Value element in procurement and commissioning activity where this is lawful, proportionate, and relevant to the subject matter and impact of the requirement.

Low value procurement processes below £100k

For lower value purchases, the focus will be on encouraging local supplier (PE postcode) participation where permitted, making the process straightforward and reducing unnecessary barriers for SMEs and VCSE organisations. Service leads should consider:

- inviting local suppliers where possible to participate in the procurement process;
- setting minimum requirements at an appropriate and proportionate level;
- ensuring specifications are achievable by smaller businesses while still meeting the Council's needs;
- engaging the market early where this will improve participation and outcomes; and
- supporting suppliers to understand HDC processes and systems.

Higher value or higher impact procurement processes above £100k

For higher value or higher impact procurements, HDC will take a more targeted approach. The Social Value Framework will assist commissioning leads and Procurement to identify relevant outcomes, design proportionate tender requirements and ensure commitments can be monitored.

Service leads and the Procurement Team will, during the pre-procurement stage, consider whether proportionate consultation or engagement is required and assess the market as appropriate. The decision, including where consultation is considered unnecessary, should be recorded in the procurement planning documentation. Where consultation or engagement is undertaken, it may involve relevant service users, residents, community and VCSE organisations, town and parish councils, internal stakeholders, partners or potential suppliers, depending on the nature of the requirement. This will assist the Council to establish:

- the Social Value outcomes that are relevant and proportionate to the contract;
- how the procurement process can be designed to encourage delivery of those outcomes;
- whether the contract should be divided into Lots to support SME/VCSE participation; and
- what evidence, KPIs or contract management arrangements will be needed to monitor delivery.

Where appropriate, HDC will consider dividing larger contracts into Lots to make opportunities more accessible to SMEs, VCSE organisations and specialist suppliers. Decisions will take account of the nature of the requirement, market capability, value for money, effective contract management and the need to avoid unnecessary barriers to participation.

Prospective suppliers will be required to provide evidence of a Social Value offer that aims to meet specified outcomes. HDC will typically apply a minimum Social Value weighting of 10% in applicable procurements, proportionate to the scope, value, risk, market and potential impact of the contract.

The weighting can be applied in one of two ways:

1. The Social Value weighting will form part of the overall Quality score. Where this applies, Officers should look to maintain the minimum 10% e.g., if the total Quality weighting is 50% and Price is 50% the specific Social Value question/s should have a minimum 20% weighting that sits within the Quality section
2. The Social Value weighting is standalone, outside of Quality and Price weightings. Where this applies, Officers should apportion specific weightings on Quality, Price and Social Value e.g., Quality 40%, Price 50% Social Value 10%

The Procurement Team will provide further practical guidance for suppliers to support transparency and equal access. HDC's Social Value outcomes and objectives will be clearly communicated through procurement documentation and supplier engagement activities so that suppliers can tailor their proposals accordingly.

Monitoring: Social Value Engine

The Social Value Engine will be HDC’s primary monitoring tool for Social Value outcomes. It will be used to evidence the impact of activity where outcomes need to be quantified, compared, reported or learned from across projects, grants, partnerships and relevant supplier commitments.

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The Social Value Engine is an online Social Return on Investment platform. In practical terms, it helps convert agreed outcomes into a consistent estimate of value by using recognised outcome measures and financial proxies. It supports both forecasting and post-delivery evaluation, enabling HDC to understand not only what was delivered, but what changed for residents, communities, businesses and the environment.

Monitoring through the Social Value Engine should be proportionate. Some activity will need detailed quantitative evidence; some will be better supported by narrative reporting, case studies, resident feedback or partner evidence. The key test is whether the evidence is sufficient to show the outcome achieved and to support learning and accountability.

The Council will identify appropriate officers to act as Social Value Engine Champions. These officers will support service leads, contract managers and procurement officers in identifying relevant outcomes, selecting suitable measures, reviewing evidence and ensuring consistent reporting.

Monitoring focus	Example evidence	Why it matters
Inputs and activity	Funding, spend, supplier commitments, volunteer hours, project reach	Shows what HDC and partners invested or enabled.
Outputs	People supported, businesses engaged, sessions delivered, tonnes of carbon avoided	Shows delivery against agreed commitments.
Outcomes and value	Wellbeing, resilience, employment, local income, carbon, community connection, SROI ratio	Shows whether activity made a meaningful difference.

Robust information on the type and impact of Social Value gained through the Council's procurement and commissioning activity will be reported annually as part of procurement governance and performance reporting. Reporting should summarise outcomes delivered, who benefited, where benefits were created, learning for future commissioning and opportunities to scale or replicate successful activity.

Direct investment in the Community Health and Wealth Building Fund (CHaWS)

Where a supplier, partner or organisation cannot reasonably make direct, contract-specific commitments - or where a financial contribution would create clearer and more locally targeted impact - HDC may invite or accept a direct investment into CHaWS as an alternative Social Value route. This must not be treated as a way to buy advantage in a procurement process; it is an outcomes-led option for delivering public benefit where it is proportionate, transparent and aligned to the Council's priorities. HDC should always look to encourage suppliers to make an impact through their individual direct action.

CHaWS sits alongside the Community Health and Wealth Building Strategy and supports community-led activity that improves quality of life by addressing the root causes of poor health and economic inequality. Direct investment into CHaWS enables contributions to be pooled and targeted at local projects with clear governance, monitoring and evidence of impact.

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Contributions into CHaWS should be monitored through the Social Value Engine wherever appropriate so that HDC can report value created, learn from funded activity and demonstrate how business investment is improving outcomes for Huntingdonshire communities.

CHaWS outcome focus	What investment should support	Policy fit
Economic resilience	Projects that help residents, community organisations and local places build financial confidence, skills, enterprise, volunteering and local income.	Inclusive Economy; quality of life; doing core work well
Social connection	Community-led activity that reduces isolation, strengthens volunteering, builds local networks and helps people participate in community life.	Pride in Place; Health Embedded
Physical and mental wellbeing	Initiatives that improve wellbeing, support prevention, build confidence and help keep people out of crisis.	Health Embedded; quality of life

Supplier engagement and inclusive access

The Procurement Team and Economic Development Team will work together to maximise knowledge of, and access to, local businesses. This will make it easier to identify local businesses, promote relevant opportunities, support suppliers to understand HDC procurement processes and encourage stronger relationships with SMEs, VCSE organisations and community-led providers.

HDC will seek approaches that reduce unnecessary barriers to participation while maintaining fair competition, transparency, value for money and compliance with procurement legislation.

Governance and review

Ownership of this policy should sit with the Council’s senior leadership arrangements for Social Value, with input from Procurement, Communities, Place and Climate, Finance, Performance, Legal and relevant service leads. Responsibility for Social Value does not sit solely within Procurement; it is a shared responsibility across commissioning, procurement, contract management and supplier delivery.

The policy should be reviewed alongside the Corporate Plan annual refresh, changes to the Place Strategy delivery plan, procurement legislation and learning from Social Value Engine reporting.

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Appendix A – Social Value Governance and RACI Matrix

The RACI matrix below sets out the respective roles and responsibilities for implementation of this policy. It should be used alongside the Social Value Framework and relevant procurement governance arrangements.

Activity	SL	P	ED	T	SRO	PB	CM	CD	SUP
Determine whether Social Value applies	R	C	C	I	A	I	I	-	-
Determine appropriate Social Value weighting	R	C	C	I	A	I	-	-	-
Approve exception or non-application of Social Value	C	C	I	I	R	I	-	-	-
Consider and record whether consultation or engagement is required	R	C	C	C	A	I	C	-	I
Undertake market engagement	R	R	C	I	A	I	-	-	I
Identify relevant Social Value outcomes	R	C	C	C	A	I	-	-	-
Develop Social Value questions and evaluation approach	R	C	C	I	A	I	-	-	-
Promote opportunities to local suppliers	I	C	R	I	A	I	-	-	-
Evaluate Social Value submissions	R	I	C/R	I	A	I	-	-	-
Approve award recommendation	C	C	I	I	A	I	-	R	-
Incorporate commitments into contract documents	C	R	I	I	A	I	-	-	-
Monitor delivery of Social Value commitments	I	C	I	C	I	I	R	-	R
Collect KPI and evidence data	I	I	I	C	I	I	R	-	R
Annual reporting on Social Value delivered	C	R	C	C	A	I	R	-	I
Review policy and framework	C	R	C	C	A	I	I	-	I

Key: R = Responsible, A = Accountable, C = Consulted, I = Informed

Abbreviation	Role	Abbreviation	Role
SL	Service Lead / Contract Owner	PB	Procurement Board
P	Procurement Team	CM	Contract Manager
ED	Economic Development Team	CD	Corporate Director
T	Transformation Team	SUP	Supplier
SRO	Senior Responsible Officer / Budget Holder		

Procurement Plan

Instructions for Completion

1. The Responsible Officer must complete as much as possible on this form in consultation with the Procurement Lead.
2. When editing this form, ensure that you have 'Open in Desktop' so that the text boxes are aligned.
3. The Responsible Officer must consider whether they have appropriate authority to award a contract, ensuring approval is gained from the relevant Corporate Director and Finance Business Partner as appropriate. If the contract is going to be capital funded, it must go to the Treasury and Capital Management Group.
4. 3C Legal Services/the Council's legal advisors should be instructed as soon as possible to provide legal support (if required). Failure to do so may lead to delays in the procurement.
5. All parts of the plan must be completed before approval can be sought to publish the procurement. For procurements valued above £50k, these must be presented to the Procurement Board in accordance with the Contract Procedure Rules before proceeding to tender.

The parts requiring completion are highlighted in blue for ease of reference.

1 Basic Information

Procurement Title	
Name of Responsible Officer	
Team/Directorate	
Contract Value (including VAT)[1]	
Total length of contract (in months)	
Initial term of contract (in months)	
Number and length of extension periods (in months)	
Type of confirmed funding	Choose an item.
Source of confirmed funding	Choose an item.
Finance Business Partner confirming budget	Choose an item.
Budget Code/s	
Allocated officer from Procurement Team	Choose an item.
Date award required by	Choose a date
Current Contract	
If so, when does the current contract end?	Choose a date
CPV Code (include breakdown if mixed procurement)[2]	
Which procurement regulations apply?	Choose an item.
Is this a joint procurement? if so state with whom.	

Brief Description of the Procurement:

[1] This should be the maximum possible value over the total term of the contract including any extension periods.
[2] CPV Codes - BiP Solutions

Describe your pre-market engagement, including what steps have been taken to understand what system/solution and direction of travel our neighbouring councils are taking (LGR) if this is not a unique requirement for HDC.

What outcomes does this procurement aim to deliver and how do they align to our Corporate Plan priorities for Huntingdonshire and the six key goals?

What barriers might be faced by SMEs/VCSEs in this procurement and how might you remove those barriers or reduce them. You should discuss your lotting strategy here as there is a duty to consider breaking your procurement into Lots.

APPENDIX E

2 Risk Assessment

Procurement risk[3]:

Summary of risk	Likelihood	Impact	Mitigation
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	

Contract Risk[4]:

Summary of risk	Likelihood	Impact	Mitigation
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	
	Select Score	Select Score	

[3] This should include all the risks presented by the procurement. These risks might be linked to the market, the price, the timescale or any other area.
[4] You should list any risks that may occur during the term of the contract. If your procurement is valued over the relevant UK Procurement Threshold, speak to the Procurement team about ensuring the risks are properly represented in the procurement documents.

3 Procurement Process

Which procurement process is being used? Expand further in the box below to explain decision.

Choose process

If you have chosen Competitive Flexible Procedure above, please detail the steps you are using within that process.

Weighting

Price	
Quality	
Social Value (if applicable)	
Price Per Quality Point	
Maximum ceiling price (if applicable)	
Minimum quality score (if applicable)	
Notes	

Procurement Timetable[5]

Event	**Person Responsible**	**Date**
Market engagement (optional)	Responsible Officer/Procurement Lead	
Develop Specification	Responsible Officer	
Develop ITT and other relevant procurement documents	Procurement Lead	
Issue ITT	Procurement Lead	
Deadline for clarification questions from suppliers	Bidders	
Deadline for tender returns	Bidders	

[5] These events can be amended as necessary depending on the type of procurement

Tender evaluation	Evaluation Panel (to include Responsible Officer)	
Moderation meeting	Chaired by Procurement Lead, attended by Evaluation Panel	
Approval of award	Officer with Delegated Authority	
Notification of award	Procurement Lead	
Due diligence	Responsible Officer	
Standstill period (if applicable)		
Contract award	Procurement Lead	
Finalisation of contract documents	Responsible Officer/ Procurement Lead	
Contract start date		
Contract award notices	Procurement Lead	
Add the contract to the Contract Register	Responsible Officer	

Evaluation Panel - Please provide the names and job titles of those who will take part in the evaluation process.

4 Contract Management

Type of contract being used:
Choose an item.

Please provide further details about the contract particulars, for example are you requesting a Parent Company Guarantee/Bond, levels of insurance requested etc.

Name of Contract Manager

5 Checklist

Check Item	Action Required	Response
Conflict of Interest assessments	Have all those involved in the procurement completed their Conflict of Interest declaration?	
Data protection	Has the Responsible Officer determined what the Data Protection/GDPR implications of the procurement are?	
Equality, Diversity and Inclusion	Has an Equality Impact Assessment (EIA) been completed?	
Legal Support	Does this procurement require legal support, either via 3C Legal Services or an external provider?	
TUPE / Pension Staff Transfers	Is there a possibility of staff transfer? If so, please speak to HR/3C Legal Services.	
New IT project	Has a new Transformation Hub project enquiry process been started?	
Environmental	Consider how to support the Council's delivery of its Net Zero targets through your procurement.	
Health and safety	Are there H&S implications in your procurement? If so, speak to the H&S team.	
Financial risk	Ensure that both the supplier financial risk and the budget financial risk are detailed in the risk assessment table above.	
Collaboration / access to contract	Will this contract be shared with others? If so, who and what governance has been put in place?	
Authority to award	The Delegated Authorities Matrix in the CPRs sets out who has the authority to award contracts, ensure that the relevant officer has been briefed.	
Governance	Do you need Committee approval to proceed? Speak to Democratic Services if unsure.	

6 Approval

Corporate Director's Approval to proceed
By signing this Procurement Plan the Corporate Director confirms that they have no conflict of interest associated with this procurement.

If the Corporate Director wishes to delegate authority to approve this plan, a reason for that delegation must be provided alongside the name and job title of the officer being delegated to.

Name of Corporate Director	
Date of approval	

Procurement Manager approval to proceed

Name of Procurement Manager	
Date of approval	

Delegated Corporate Director Approval

Name of Officer	
Job Title	
Reason for delegation	
Date of approval	

Endorsement from Procurement Board

Date of Procurement Board	
Procurement Board decision?	

Chief Executive / S151 approval – For contracts estimated to be up to £500k

Name	
Date of approval	

Cabinet Approval – For contracts estimated to be over £500k

Date of Cabinet meeting	
Cabinet decision?	

Corporate Governance Committee 16/09/2026
Council 14/10/2026

Report by: Interim Corporate Director (Finance & Resources)

Lead Cllr: Liam Dewey-Beckett
Executive Councillor for
Governance & Democratic Services

Wards	Open / Exempt	Key Decision?
ALL	Open	No

Scheme of Delegation 2026 - Updated

Executive Summary: Effective governance of a local authority requires the regular review and update of its Constitution, its Articles and Schemes to ensure it remains accurate and relevant.

The existing Scheme of Delegation has been reviewed to reflect changes in officer roles and posts and redrafted to enable a clearer understanding of the delegations that have been made by the Executive Leader and Full Council at the 2026 AGM.

This report is presented to the Corporate Governance Committee for review and then proceeds following any required amendments to Full Council in October.

Recommendations

1.1. To endorse the revised Scheme of Delegations as set out in Appendix 1 to the report now submitted; and

1.2. To recommend to Council the approval of the revised Scheme of Delegations as set out in Appendix 1 to the report now submitted.

	Key Corporate Plan Priorities
1	*Do our core work well*

Report Author

Lydia Morrison Interim Corporate Director (Finance & Resources)
(Lydia.Morrison@huntingdonshire.gov.uk)

1. PURPOSE OF THE REPORT

Effective governance of a local authority requires the regular review and update of its Constitution, its Articles and Schemes to ensure it remains accurate and relevant.

The existing Scheme of Delegation has been reviewed to reflect changes in officer roles and posts and redrafted to enable a clearer understanding of the delegations that have been made by the Executive Leader and Full Council at the 2026 AGM.

This report is presented to the Corporate Governance Committee for review and will then proceed following any required amendments to Full Council in October.

2. BACKGROUND & CONTEXT

2.1 The Council has operated a Constitution Review Working Group for many years which serves an important function in enabling healthy governance and effective decision-making processes to support elected members. The Working Group has reviewed the Scheme and, with some minor amendments, approved it for submission to the Committee.

2.2 The Council is facing a very busy immediate future with local government reorganisation, and an accurate and accessible constitution will be vital to support effective governance during this period.

2.3 External legal advice has supported the review of the Scheme of Delegation. The main changes proposed are accurate job titles and a different tabular layout is proposed to make the detail more accessible. Wording has been addressed that was confusing regarding the separation of the Council's Scheme of Delegation and the Executive Leader's Scheme. Much greater detail has been provided for members and residents regarding proper officer delegations and the applicable legislation.

2.4 It is not within the remit of the Corporate Governance Committee to alter the detail of the Scheme of Delegation that has been decided by the Executive Leader and Full Council. This review focuses upon updating out of date references to post or legislation and redrafting the text to make it more accessible.

2.5 The Council has separately adopted the new National Scheme of Delegation of Decisions on Planning Applications at is meeting in July 2026. The Council's overall scheme of delegation refers to the old provisions under old legislation. These have been deleted. A holding comment is in the text as the Development Management Committee is continuing with its work on the scheme which is hoped to be concluded in September. Once that has occurred and following an update report to the Constitution Review Working Group, that text will be amended to reflect the final position before the overall document proceeds to Full Council.

3. ALTERNATIVE OPTIONS CONSIDERED & NOT RECOMMENDED

3.1 There are no other options to reviewing and refreshing the scheme of delegation, when it has been acknowledged to be out of date and less than easy to interpret. That would be an abdication of duty to the Council. There may be alternative amendments and suggestions that the Committee might want to suggest,

4. COMMENTS OF OVERVIEW & SCRUTINY

4.1 N/A

5. POST-DECISION IMPLEMENTATION

5.1 This report will proceed onwards to the Full Council.

6. IMPLICATIONS OF THE DECISION

6.1 Council Key Priorities and Performance

6.1.1 Updating the council's scheme of delegation and making it more accessible will directly contribute to the effective delivery of the council's priorities.

6.2 Financial Implications

N/A

6.3 Policy Implications

N/A

6.4 Legal & Constitutional Implications

6.4.1 This report is entirely focused upon improving the accessibility and accuracy of the scheme of delegation.

6.5 Community Impact

N/A

6.6 Environment & Climate Change Implications

N/A

6.7 Equality & Diversity Implications

N/A

6.8 Implications on Resources

N/A

6.9 Health & Wellbeing Implications

N/A

6.10 Local Government Reorganisation (LGR) Implications

6.10.1 The review and updating of the scheme of delegation is to support effective governance during the period of reorganisation of the council.

7. RISK MANAGEMENT

7.1 Having an accurate and accessible scheme of delegation will minimise any risks on using the scheme inappropriately or inaccurately.

8. BACKGROUND PAPERS – LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

Document List	Custodian	File Location
Constitution – Update 08.04.26	Lisa Jablonska – Deputy Monitoring Officer	(Location / Link to document)

SCHEME OF DELEGATIONS TO OFFICERS

1. Introduction and General Principles

1.2 The Council can delegate any of its council functions to Committees, Sub-Committees and its Officers under Section 101 of the Local Government Act 1972. All executive functions and powers are vested in the Executive Leader of the Council under Section 15 of the Local Government Act 2000 (as amended) and he or she can delegate those executive functions to individual Executive Councillors, Cabinet or Officers.

1.3 The authority for the delegation of functions by the Licensing Committee is contained in Sub Section 10 (1) of the Licensing Act 2003. Certain other delegations are implicit in Standing Orders, the Code of Financial Management and Code of Procurement.

1.4 The Council operates a “cascade” principle of delegation to ensure that decisions are taken at the most appropriate level closest to those who will be affected. This means that the majority of the Council’s decisions and actions will fall into the category of operational day to day decisions taken by its Officers.

1.5 In order to ensure the smooth functioning of the Council and the efficient delivery of services, Full Council and the Leader of the Council have delegated to Officers the powers they need to perform their roles. The Scheme of Delegation in respect of Council functions is set out in Annex A and the Scheme of Delegation made by the Executive Leader of the Council relating to executive functions is set out in Annex B.

2. General Principles of Delegation

2.1 This Scheme gives the power for the Officers named therein to take decisions and institute any process or take any steps in relation to all of the functions in their area of responsibility except where:

2.1.1. any matter is reserved to full Council;

2.1.2. any matter which by law may not be delegated to an Officer;

2.1.3. a matter has been specifically reserved to Councillors or the Leader of the Council or excluded from delegation by this Scheme, by a decision of the Full Council, the Leader of the Council or a Committee or Sub-Committee;

2.1.4. any decision would change fees, charges or concession policies;

2.1.5 any decision would impact on permanent savings in a budget in relation to a specific matter;

2.1.6. the decision would make an order for the compulsory acquisition of land;

2.1.7. any power to acquire land in advance of requirements;

2.1.8. any power to confirm any order, or to issue or grant any permission, consent, licence or other determination, which is the subject of a statutory right of objection that has been duly exercised.

2.2 In respect of any matter falling within the parameters of this scheme, the Chief Executive Officer may in writing make such detailed delegations to officers concerning functions and activities within a given area of responsibility (“internal delegations”) as s/he considers appropriate.

2.3 The Chief Executive Officer may, in writing, delegate any executive function, non-executive function or local choice function, which has been delegated to him/her, and which is not otherwise delegated under this Scheme, and s/he may vary in writing any delegation made under this Scheme.

2.4 The cascade principle under which this Scheme operates means that any Officer given powers under this scheme can further delegate those powers to other Officers either:

2.4.1 through an “Internal Delegation” (which sets out in writing the detailed delegations given to Officers concerning functions and activities within a given area of responsibility).; or

2.4.2 through an “Individual Delegation” in relation to an individual decision which must be evidenced in writing using the agreed standard form, dated and signed by the Officer delegating the power and saved on the register of Individual Delegations maintained by the Interim Monitoring Officer. An Individual Delegation does not need to be given where an Officer is given delegated powers to action a particular decision by Council, Cabinet or a Committee or Sub-Committee.

2.5 All action taken under the terms of these delegations and not falling within the description of an Internal delegation or an Individual delegation shall be properly documented on the delegated Decision Report and Written Record of Decision in accordance with arrangements approved by the Interim Monitoring Officer from time to time.

2.6 Deemed delegations - Where in respect of a given function or activity, no delegation is in effect, and an officer has a management responsibility in relation to the exercise of that function or activity, the exercise of any delegated authority necessary to carry out the function or activity effectively shall be deemed to have been delegated to that post holder.

2.7 This scheme delegates powers and duties within broad functional descriptions. It includes powers and duties under all legislation, present and future, within those descriptions, and all powers and duties incidental to that legislation, as well as authorising the affixing of the Common Seal.

2.8 This scheme includes an obligation on Officers to keep Members of the Council and the Executive Leader of the Council (as appropriate) properly informed of activity arising within the scope of these delegations.

3. General Limitations

3.1 An Officer, in exercising delegated powers, shall consult other appropriate Officers, particularly the Interim Section 151 Officer and the Interim Monitoring Officer and shall have full regard to any advice received.

3.2 Any exercise of delegated powers must have regard to the Public Sector Equality Duty

3.3 Any exercise of delegated powers shall be subject to any policy framework approved by the Council, or the policies approved by the Cabinet from time to time, including the authority's employment policies and disciplinary procedures, equal opportunities policies, and any service delivery policies; and shall be guided by relevant Codes of Conduct or protocols produced or adopted from time to time by the authority (including any Code or Protocol which has been included within the authority's Constitution) and the Corporate Plan.

3.4 Any exercise of delegated powers shall be subject to any statutory restrictions, and to the provisions of Part 4 of the Constitution.

3.5 In exercising delegated powers, Officers may not go beyond the provision made in the revenue or capital budgets for their service, except to the extent permitted by the Financial Regulations, Contracts Standing Orders and the Code of Procurement.

3.6. The powers delegated to officers under this scheme do not include any power to take a decision which is properly a matter for the Council, a committee or sub-committee, or which is a Key Decision. Officers are, in the context of this scheme, responsible for the management of their services, the provision of advice to the Council and Members, and the implementation of Council policies and decisions. A decision which an officer takes, under a delegation made by or under this scheme, must:

3.6.1 implement a policy previously approved or decision previously taken, by the Council, or a committee or sub- committee (or by or with the Executive);or

3.6.2 facilitate, or be conducive or incidental to, the implementation of a policy or decision previously approved, or decision;

3.6.3 relate to the management of the human, material or financial resources made available for the functions for which the Council is responsible;

3.6.4 any officer exercising powers or duties in pursuance of full sub- delegation will be politically restricted under section 2(1)(g) of the Local Government and Housing Act 1989 (as amended).

3.6.5. Where a function or activity has been specifically delegated by or under this scheme to an officer, that function or activity shall not be exercised by another officer without the consent of the former, other than in circumstances of the death or incapacity of that officer or, in an emergency, where the officer to whom the delegation was made is absent or otherwise unavailable. If this situation arises, this will be recorded and notified to the Interim Monitoring Officer.

3.6.6 An authority delegated to officers includes management of the human and material resources made available for the service/portfolio areas and any function concerned; to the extent of that authority, within the limitations of this scheme, and subject to any specific delegations made by or in accordance with this scheme to another officer.

3.6.7 In each case, a delegated authority excludes any determination of policy, any exception to policy, or any decision being made which would be outside of any approved budget by the officer concerned.

3.6.8 Any delegation under the Scheme of Delegation in respect of Council functions and the Scheme of Delegation made by the Executive Leader of the Council relating to executive functions will be without prejudice to the overriding right of the Council or the Executive Leader of the Council/ Cabinet and any duly authorised Committee to withdraw or amend the powers or to decide any matter and, in particular, any Officer may, in any case, instead of exercising their powers under the Scheme, refer any matter back to the Council, Committee, the Executive Leader or Cabinet (in respect of executive functions) for a decision.

3.6.9 The Scheme of Delegation in respect of Council functions and the Scheme of Delegation made by the Executive Leader of the Council relating to executive functions will also be subject to the right of the Council (with respect to council/non-executive functions), the Executive Leader or Cabinet in respect of executive functions) to rescind the Scheme or any part or parts of the Scheme.

3.6.10 In the case of absence by an appropriate Executive Councillor, the requirement for an Officer to consult before carrying out any action or function shall be replaced by a requirement to consult with the Executive Leader of the Council.

3.6.11 In the case of absence by the Executive Leader of the Council, the requirement for an Officer to consult before carrying out any action or function shall be replaced by a requirement to consult with the Executive Deputy Leader of the Council. The term appropriate executive councillor means the Member appointed by the Cabinet to the position of executive councillor for those functions relative to the requirement for consultation to take place.

3.6.12 Regarding the functions of the 'Proper Officer' and unless otherwise referred to in the Scheme, the Head of Paid Service or in his or her absence, the Interim Monitoring Officer shall be appointed as the Proper Officer for the purposes of Section 270(3) of the Local Government Act 1972 and in relation to any other statute or matters indicated herein.)

4. STATUTORY OFFICERS

4.1 The Council is required by law to designate a number of Officers to discharge statutory functions. The legal provisions and the Officer designated by the Council to discharge each function are listed in the table below.

Legislative Provision	**Statutory Power delegated to an Officer**	**Officer designated as the Statutory Officer**
S4 Local Government and Housing Act 1989	Designate one of their officers as the Head of Paid Service	Chief Executive Officer
S151 Local Government Act 1972	Appoint an officer responsible for the administration of the authority's financial affairs	Interim Corporate Director Finance and Resources
S5 Local Government and Housing Act 1989	Designate one of their officers as the Monitoring Officer	Interim Monitoring Officer

S36 Freedom of Information Act 2000	Qualified Person in relation to S36 of the Act	Chief Executive Officer

5. PROPER OFFICER AND SPECIFIED OFFICER FUNCTIONS

5.1 Many legislative provisions require the appointment of a Proper Officer or Specified Officer to undertake formal responsibilities on behalf of the Council.

5.2 Statutory provisions and regulations are from time to time amended, replaced or re-enacted. When a statutory provision or regulation is so changed, the appointments in the table below shall be effective in relation to the new provision.

5.3 Substitutes are identified to act where the Proper Officer is absent otherwise unable to act.

5.4 The Chief Executive Officer /Head of Paid Service shall be the Proper Officer of the Council for the purposes of the Local Government Act 1972, the Local Government Act 2000 and all other statutory purposes unless:

5.4.1 such designation is given by the Council to any other Officer or

5.4.2 The Chief Executive Officer /Head of Paid Service, exercising the powers given to him/her by the Constitution, appoints another Officer of the Council to be the Proper Officer for a specific service area or function.

Statutory Requirement	Allocated to	Substitute
Local Government and Housing Act 1989 – Section 4 Head of Paid Service	Chief Executive Officer	Deputy Chief Executive/ Corporate Director (Place)
Representation of the People Act 1983 Section 8 – Electoral Registration Officer	Chief Executive Officer	A deputy, as appointed by the Electoral Registration Officer
Representation of the People Act 1983 Section 28 – Acting Returning Officer (Parliamentary**)**	Chief Executive Officer	As appointed by the Acting Returning Officer
Returning Officer – s.35 (1) Representation of People Act 1983 – Returning Officer (Local Elections)	Chief Executive Officer	Elections and Democratic Services Manager
Local Government and Housing Act 1989 Section 5 – Monitoring Officer	Interim Monitoring Officer	As appointed by the Interim Monitoring Officer
Local Government Act 1972 Section 151 – Chief Finance Officer	Interim Corporate Director (Finance & Resources)	As appointed by the Interim Corporate Director (Finance and Resources)

A table of designated Proper Officers is set out below:

Section of the Local Government Act 1972 and Proper Officer's Functions	Proper Officer	Alternative Proper Officer
Section 13 To act as a Parish Trustee	Chief Executive Officer	Deputy Chief Executive and Corporate Director (Place)
Section 83(1) to (4) Witness and receipt of Declarations of Acceptance of Office	Chief Executive Officer	Deputy Chief Executive and Corporate Director (Place)
Section 84 Receipt of Declaration of Resignation of Office	Chief Executive Officer	Deputy Chief Executive and Corporate Director (Place)
Section 86 Declare any vacancy in office	Chief Executive Officer	Deputy Chief Executive and Corporate Director (Place)

Section 88(2) Convening of meeting of Council to fill casual vacancy of the office of Chair	Chief Executive Officer	Deputy Chief Executive and Corporate Director (Place)
Section 89 (1) (b) Receipt of notice of casual vacancy from two local government electors	Chief Executive Officer	Elections and Democratic Services Manager
Section 99 Signature of summons to council meetings	Chief Executive Officer	N/A
Section 100B Exclusion of reports, etc from inspection	Interim Monitoring Officer	Deputy Monitoring Officer
Section 100C Written summary where minutes would disclose exempt information	Interim Monitoring Officer	Deputy Monitoring Officer
Section 100D Compilation of list of background papers	Interim Monitoring Officer	Deputy Monitoring Officer
Section 100F Exclusion from production to Councillors of documents disclosing exempt information	Interim Monitoring Officer	Deputy Monitoring Officer
Section115 (2) Receipt of money due from Officers	Interim Section 151 Officer	Deputy Section151 Officer
Section 146(1)(a) and (b) Declarations and service with regard to securities	Interim Section 151 Officer	N/A
Section 191 Functions with respect to Ordnance Survey	Deputy Chief Executive and Corporate Director (Place)	Head of Planning, Infrastructure and Public Protection
Section 210 (6) and (7) Charity functions of holders of offices with existing authorities transferred to holders of equivalent offices with new authorities or, if there is no such office, to Proper Officer	Chief Executive Officer	N/A
Section 223 Authorise Officers to appear in legal proceedings	Interim Monitoring Officer	Chief Executive Officer
Section 225 (1) Receipt and retention of documents deposited with the Authority	Chief Executive Officer	Interim Monitoring Officer
Section 228 (3) Making accounts open for inspection by any Member of the Council	Interim Section 151 Officer	Deputy Section151 Officer
Proper Officer for the purposes of the Local Authorities (Executive Arrangements) (Meetings and Access to Information)	Chief Executive Officer	Senior Information Risk Owner / Corporate Director (Communities)

(England) Regulations 2012.		
Section .229 (5) Certification of photographic copies of documents	Interim Monitoring Officer	Chief Executive Officer
Section .234 Authentication of documents	Interim Monitoring Officer	Chief Executive Officer
Section 236(9) and (10) To send copies of byelaws to Parish Council	Interim Monitoring Officer	Deputy Monitoring Officer
Section 238 Certification of byelaws	Interim Monitoring Officer	Chief Executive Officer
Section 248 Officer who will keep the Roll of Freemen	Interim Monitoring Officer	Deputy Monitoring Officer
Schedule 12 paragraph 4 ((1A) (b) Signature of summons to a Council Meeting	Chief Executive Officer	Interim Monitoring Officer
Schedule 12 paragraph 4 (3) Receipt of notice about address to which summons is to be sent	Chief Executive Officer	Interim Monitoring Officer
Schedule 14, paragraph 25 (7) Certifying resolutions applying or dis-applying provisions of Public Health Acts 1875-1961	Interim Monitoring Officer	Deputy Monitoring Officer
Section of the Local Government Act 1974	**Proper Officer**	**Alternative Proper Officer**
Section 30 (5) Local To give notice that copies of an Ombudsman's report are available	Chief Executive Officer	Interim Monitoring Officer
Section of the Local Government (Access to Information) Act 1985 amending the Local Government Act 1972 and the Proper Officer functions	**Proper Officer**	**Alternative Proper Officer**
Section 100B (2) Exclusion of whole or part of reports from public inspection	Interim Monitoring Officer	Deputy Monitoring Officer
Section 100B (5) Withholding of reports containing exempt information	Interim Monitoring Officer	Deputy Monitoring Officer
Section 100B (7) (c) Supply of papers to press	Interim Monitoring Officer	Deputy Monitoring Officer

Section 100C (2) Summaries of Minutes	Interim Monitoring Officer	Deputy Monitoring Officer
Section 100D Inspection of background papers	Interim Monitoring Officer	Deputy Monitoring Officer
Section 100F Councillors' right to papers	Interim Monitoring Officer	Deputy Monitoring Officer
Section of the Local Government Finance Act 1988 and Proper Officer functions	**Proper Officer**	**Alternative Officer**
Section 114 Duty to report etc	Interim Section 151 Officer	N/A
Section of the Local Government Act 2003 and Proper Officer functions	**Proper Officer**	**Alternative Officer**
Section 25 Inclusion of the Section 151 officer's judgement on the robustness of the estimates used in the budget calculations and the adequacy of the proposed financial reserves in the annual budget setting report.	Interim Chief Finance Officer / Section 151 Officer	Deputy Section 151 Officer
Section of the Local Government and Housing Act 1989 and Proper Officer functions	**Proper Officer**	**Alternative Officer**
Part 1 (s.2.4, 3. 4.5 and 15) and regulations made thereunder Functions relating to political management arrangements, member and officer conduct, politically restricted posts, designation of statutory officers, and associated proper officer responsibilities.	Chief Executive Officer	N/A
Section 2 and Section 3 Preparation and deposit of politically restricted posts and issue of certificate in respect of politically restricted posts	Chief Executive Officer	N/A
Section of the Public Health Act 1936 and the Public Health Act 1961	**Proper Officer**	**Alternate Officer**
Sections 84 and 85 of the Public Health Act 1936 Proper Officer functions	Public Protection Manager – Environmental Health	N/A
Section of the Food Safety Act 1990	**Proper Officer**	**Alternate Officer**

Section 5 Authorised Officer to act in matters arising under the Act	Public Protection Manager – Environmental Health	N/A
Section 27 Nomination of a Public Analyst	Public Protection Manager – Environmental Health	N/A
Section 49 Signature on documents authorised or required under the Act	Public Protection Manager – Environmental Health	N/A
Section of the Party wall etc Act 1996 and Proper Officer functions	**Proper Officer**	**Alternate Officer**
Section 10 (8) Appointing Officer	Chief Executive	N/A
Local Government Act 2000 and Regulations made thereunder and Proper Officer functions	**Proper Officer**	**Alternate Officer**
Proper Officer functions	Chief Executive Officer	Deputy Chief Executive Corporate Director (Place)
Section of the Freedom of Information Act 2000 and Proper Officer Functions	**Proper Officer**	**Alternate Officer**
Section 36 The "Qualified Person"	Chief Executive	Interim Monitoring Officer
Section of the Regulation of Investigatory Powers Act 2000 and Proper Officer Functions	**Proper Officer**	**Alternate Officer**
Part I Authorised Officers who may authorise, review or cancel the carrying out of directed surveillance or the use of covert human intelligence sources	Chief Executive Officer	Chief Executive Officer Corporate Directors
Part II Senior Responsible Officer	Corporate Fraud Manager	n/a
Miscellaneous: Statutory Provision and Proper Officer Functions	**Proper Officer**	**Alternate Officer**
Section 41 Local Government (Miscellaneous Provisions) Act 1976 Certifying true copies of evidence of resolutions and minutes of proceedings	Interim Monitoring Officer	Deputy Monitoring Officer
Section 321 (3) Highways Act 1990 Certifying copies of approved plans	Chief Executive Officer	Interim Monitoring Officer

Section 61 Building Act 1984 Receive notification of and having free access to repairs of drains	Head of Communities and Operational Housing	N/A
Section 149 Environmental Protection Act 1990 Discharging functions relating to stray dogs	Head of Communities and Operational Housing	N/A
Section 2 Planning (Listed Buildings and Conservation Areas) Act 1990 Lists of protected buildings	Deputy Chief Executive and Corporate Director (Place)	Head of Planning, Infrastructure and Public Protection
Proceeds of Crime Act 2002 Part 7 Nominated Officer to receive disclosures of suspected Money Laundering	Interim Section 151 Officer	N/A
To act as the Council's Senior Information Risk Officer.	Corporate Director (Communities)	Head of Service for Operational IT and Development
Prevention of Social Housing Fraud (powers to require information) Regulations 2014: Authorised Officer	Corporate Fraud Manager	N/A
Regulations 4 & 5 of the Council Tax Reduction Schemes (detection of Fraud and enforcement) Regulations 2013: Authorised Officer	Corporate Fraud Manager	N/A

6. DELEGATION OF COUNCIL FUNCTIONS AND LOCAL CHOICE FUNCTIONS WHICH ARE NOT THE RESPONSIBILITY OF THE EXECUTIVE

6.1 The Council has delegated the following powers (other than those reserved to Council) to the Officers as set out in Annex A below.

6.2 These functions can also be further delegated in accordance with paragraph 2.4 of this section.

6.3 All of the Officers identified in Annex A have authority to exercise the following functions:

6.4 To sign and seal any document on behalf of the Council and to witness the affixation of the Council's Common Seal to any document.

ANNEX A

7. CHIEF EXECUTIVE OFFICER

Function Delegated	Limit on delegation
To be Head of the Paid Service	None
To be the Electoral Registration Officer and Returning Officer for District Council Elections	As set out in any relevant policy.
Within the overall resources allocated by the Council and in direct support of the Council's objectives, to act on behalf of the Council on all matters including those which have been delegated to any other Officer	PROVIDED THAT the Chief Executive Officer may not exercise a power, which is reserved by statute to another Officer; before exercising the power of another Officer, the Chief Executive Officer shall consult with that Officer if available; the Chief Executive Officer when exercising any powers may authorise the incurring of expenditure in an emergency even if

	there is no specific provision in the budget of the Council.
To act in a case of urgency in respect of any matter affecting the Council/Cabinet respectively, subject to a report on the circumstances being made to the next Council/Cabinet meeting.	In consultation with the Executive Leader or in their absence with the Deputy Leader.
To keep under constant review the needs of the District and its community in relation to all those services provided by the Council and to take all such action which in his/her judgement is necessary to ensure that those needs are met within the framework of any policies and budget agreed by the Council.	As set out in any relevant policy.
To lead on strategies for change whether from within the authority or externally influenced / required.	As set out in any relevant policy.
To make arrangements for dealing with any matter raised by the Government or local authority association calling for a view or decision by the Council.	As set out in any relevant policy.
To be responsible for the overall organisational structure of the Council.	As set out in any relevant policy.
To be responsible via the Corporate Director (Place), Corporate Director (Communities) and Interim Corporate Director (Finance and Resources) for determining and issuing guidance to Officers for the management of human resources, including recruitment, training, conditions of service, staff development/appraisal, disciplinary matters, health and safety, employee welfare and any other matter concerning staff.	As set out in any relevant policy.
To ensure the provision of professional advice to all parties in the decision-making process.	As set out in any relevant policy.
Together with the Monitoring Officer to be responsible for a system of record-keeping for all local authority decisions.	As set out in any relevant policy.
To represent the Council on partnership and other bodies.	As set out in any relevant policy.
To be responsible for the health and safety of all employees of the District Council.	As set out in any relevant policy.
To sign any document on behalf of the Council and to witness affixation of the Council's Common Seal to any document.	
To make appointments to member bodies forming part of the Council's official structure and to fill casual vacancies on member bodies forming part of the Council's approved structure in accordance with Sections 15-17 of the Local Government and Housing Act 1989.	Following consultation with appropriate Members of the Council.
To be the Proper Officer of the Council, except where legislation or arrangements names another Officer.	As set out in any relevant policy.

Within the overall resources allocated by the Council and in direct support of the Council's objectives to act on behalf of the Council in all matters relating to the discharge of the Council's functions and responsibilities relating to corporate communication	As set out in any relevant policy.

8. DEPUTY CHIEF EXECUTIVE AND CORPORATE DIRECTOR (PLACE)

Function Delegated	**Limit of Delegation**
To exercise the functions of the Council in relation to common land, and town and village greens, as specified in paragraphs 51-53 of Part Two of Schedule 1 (Other Miscellaneous Functions) of the Regulations 70	
To exercise all the functions of the Council relating to town and country planning and development control specified in paragraphs 5-23 of Schedule 1A (Functions relating to town and country planning and development management) of the Regulations, except fin the circumstances set out in the Limit of Delegation opposite:	***N.B. Drafting note - On 15 July 2026, Full Council adopted the National Scheme of Delegation of Decisions on Planning Applications. The Development Management Committee is concluding its work on the matter and then the appropriate text will be placed here as part of the council's overall scheme of delegation in time for the overall scheme to be adopted at Full Council in October.***

9. **INTERIM CORPORATE DIRECTOR (FINANCE AND RESOURCES)**

Function Delegated	**Limit of delegation**
To exercise the proper administration of the Council's financial affairs under Section 151 of the Local Government Act 1972 Section 114 of the Local Government Finance Act 1988 and Regulation 5 of the Accounts and Audit Regulations 2003.	As set out in any relevant policy.
To be the Proper Officer under section 115 of the Local Government Act 1972.	As set out in any relevant policy.
To maintain an adequate and effective system of internal audit in accordance with Financial Regulations.	As set out in any relevant policy.

10. EXECUTIVE FUNCTIONS - SCHEME OF DELEGATION OF EXECUTIVE FUNCTIONS AND LOCAL CHOICE FUNCTIONS WHICH ARE THE RESPONSIBILITY OF THE EXECUTIVE LEADER AND CABINET

10.1 The Leader of the Council has delegated all executive powers other than those reserved by him/her or reserved to Cabinet by statute or this Constitution, as well as those local choice functions the responsibility of the Leader of the Council and the Cabinet to the Senior Leadership Team as set out in Annex B.

10.2 For the purposes of this section, the Senior Leadership Team consists of the Chief Executive Officer, Corporate Directors and the Heads of Service.

10.3 The Leader of the Council may rescind or amend the delegations set out in Annex B at any time and will notify the interim Monitoring Officer in writing of any changes which will be duly made to Annex B by the interim Monitoring Officer.

10.4 Annex B should be read in conjunction with Part 3 of the Council's Constitution, which delegates powers and duties in relation to executive functions and local choice functions to the Leader of the Council and the Cabinet. Where those powers and duties overlap portfolio responsibilities, Members of the Executive exercising individual decision making will consult accordingly.

10.5 In the event of the Council being without a Leader the Chief Executive Officer has delegated authority to exercise any necessary executive powers until a new Leader is elected in accordance with the general principles and limitations of this schedule.

10.6 This scheme delegates powers and duties within broad functional descriptions. It includes powers and duties under all legislation, present and future, within those descriptions, and all powers and duties incidental to that legislation, as well as authorising the affixing of the Common Seal.

10.7 An authority delegated to Officers includes management of the human and material resources made available for the service/portfolio areas and any function concerned; to the extent of that authority, within the limitations of this scheme, and subject to any specific delegations made by or in accordance with this scheme to another Officer.

10.8 In each case, a delegated authority excludes any determination of policy, or exceptions to policy, or of any budget by the officer concerned.

11. EXECUTIVE FUNCTIONS – DELEGATIONS TO OFFICERS

11.1 The following functions are delegated to the following officers by the Leader of the Council. These functions can also be further delegated in writing to service managers by the relevant member of the Senior Leadership Team, subject to compliance with the relevant provisions of recording and notification.

12. CHIEF EXECUTIVE OFFICER

12.1 The Leader of the Council has delegated all executive functions, subject to paragraph 10.1 and 10.3 above to the Chief Executive. The Chief Executive has further delegated the activities and functions to the Senior Leadership Team as set out in Annex B below.

ANNEX B

13. CORPORATE DIRECTOR (PLACE)

13.1 Within the overall resources allocated by the Council and in direct support of the Council's objectives to act on behalf of the Council on all matters relating to the discharge of the Council's functions relating to the following service delivery functions, unless that function has been specifically delegated to another Officer: Programme Delivery, Planning Services, Housing Strategy, Economic Development, Refuse, Recycling & Garden Waste Collections, Waste Management, Street Cleansing, Grounds Maintenance, Bulky Waste Collection Service, Workshop, Vehicle Fleet & Mechanical Plant. CCTV, sports and leisure centres, sports and active lifestyles and Health and Well-Being, Environmental Sustainability, Parks, Open Spaces & Amenity Areas, Arboriculture, Car Parks, Markets, including issuing and ensuring compliance with licenses on whatsoever nature other than those licenses falling within the responsibility of another Head of Service in accordance with a Scheme of Delegation of Officers as determined by the Licensing and Protection Committee or Licensing Committee unless that function has been specifically delegated to another officer.

13.2 To act on behalf of the Council on all matters relating to Building Control shared service client management.

14. CORPORATE DIRECTOR (COMMUNITIES)

14.1 Within the overall resources allocated by the Council and in direct support of the Council's objectives to act on behalf of the Council on all matters relating to the discharge of the Council's functions relating to the following service delivery functions, Customer Services, Revenues and Benefits, Corporate Fraud, Housing Needs, Community Services, Disabled Facilities Grants, Community Action Team, Crime and Disorder, Asylum Seekers, Residents Advice, Domestic Violence, Local Government Reorganisation, Corporate Transformation, Insight and Performance, Communications & Engagement & Marketing and the Document Centre unless that function has been specifically delegated to another officer.

14.2. To lead on behalf of the Council on all matters relating to programme and project management

14.3 Within the overall resources allocated by the Council and in direct support of the Council's objectives to act on behalf of the Council on all matters relating to the discharge of the Council's functions relating to: transformation, business intelligence and performance, and programme and project management.

14.4 In conjunction with the Chief Executive Officer to be responsible for a system of record keeping for all the local authority decisions.

14.5 To act on behalf of the Council on all matters relating to ICT shared service client management.

14.6 Within the overall resources allocated by the Council and in direct support of the Council's objectives to act on behalf of the Council in all matters related to the discharge of the Council's functions and responsibilities relating to the delivery of ICT Services, Information Management, Freedom of Information requests and street naming and numbering

14.7 To have overall responsibility for the Council's Information Management Systems.

15 INTERIM CORPORATE DIRECTOR (FINANCE AND RESOURCES)

15.1 Within the overall resources allocated by the Council and in direct support of the Council's objectives and policies to act on behalf of the Council on all matters relating to Accountancy, Internal Audit and Risk, Procurement, Property and Estate Management, Facilities Management, HR and Payroll, Democratic Services, Elections and Land Charges.

15.2. To have responsibility for the overall management of the internal audit function in accordance with the Accounts and Audit Regulations 2003 (or any amending or substituted legislation, or legislation with a similar purpose or made for similar purposes).

15.3. In consultation with the Head of 3C Legal Shared Service, to authorise the acquisition, re-use, appropriation and disposal of the Council's land and buildings, together with the granting or taking assignment or surrender of leases, tenancies, licences, easements, wayleaves and variations of rent of the Council's land and buildings.

15.4. To be responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare at work of all employees in accordance with the Health and Safety at Work Act, 1974.

15.5 To exercise the proper administration of the Council's financial affairs under section 151 of the Local Government Act 1972 and section 114 of the Local Government Finance Act 1988.

15.6. To be the Proper Officer under section 115 of the Local Government Act 1972

15.7. To have responsibility for borrowing and lending within limits approved by the authority.

15.8. To make various determinations on an annual basis relating to capital expenditure.

15.9 To manage administration of the Council's complaints including issues of maladministration.

16. MONITORING OFFICE AND HEAD OF LEGAL SHARED SERVICE

MONITORING OFFICER

16.1. To act as Solicitor to the Council and to settle on appropriate terms any litigation or claim taken by or against the Council.

16.2. In consultation with the Chief Executive Officer/relevant Corporate Director to authorise the institution, defence, withdrawal, compromise or any other action relating to claims or legal proceedings, civil or criminal (except in relation to prosecutions where the authorisation of prosecutions is expressly delegated to another Head of Service).

16.3. To authorise Officers of the Council to appear before Magistrates' Courts or County Courts.

16.4 To issue or serve statutory notices on behalf of the Council in relation to any of its functions.

16.5. To be the Proper Officer of the authority, except where legislation, or a delegation made by or under this scheme, names another officer; and to authorise the making and issue of any formal documents.

HEAD OF LEGAL SHARED SERVICE

16.6. To settle on appropriate terms any litigation or claim taken by or against the Council in consultation with the Monitoring Officer.

16.7. In consultation with the Chief Executive Officer/relevant Corporate Director or Monitoring Officer to authorise the institution, defence, withdrawal, compromise or any other action relating to claims or legal proceedings, civil or criminal (except in relation to prosecutions where the authorisation of prosecutions is expressly delegated to another Head of Service).

16.8. To authorise Officers of the 3C Shared Services to appear before Magistrates' Courts or County Courts.

16.9 To issue or serve statutory notices on behalf of the Council in relation to any of its functions.

16.10 To authorise the making and issue of any formal documents

Corporate Governance Committee – 16 September

Report by: Lydia Morrison – Corporate Director – Finance and Resources

Lead Cllr: Cllr Liam Dewey-Beckett Executive Councillor for Governance & Democratic Services

Wards	Open / Exempt	Key Decision?
All	Open	No

Corporate Risk Register

Executive Summary: This report provides the Committee with an update on the Council's Corporate Risk Register, presenting the current risk position, including summary reporting and heatmaps, and highlights those risks where the residual risk score remains above the target risk score.

The report also describes the ongoing work to strengthen the quality, consistency, and oversight of risk information.

Recommendations

1.1. That the Committee comment on the progress the Council is making in regard to its management of risk, including the summary and heatmap reports in the appendices, and identifies any matters requiring further consideration.

	Key Corporate Plan Priorities/Place Strategy Priorities
1	*Effective risk management is critical to ensuring the Council is efficient and effective at providing sustainable service delivery.*

Report Author(s)

Lydia Morrison – Corporate Director – Finance & Resources (lydia.morrison@huntingdonshire.gov.uk)

Cain Oliphant – Risk Manager (cain.oliphant@huntingdonshire.gov.uk)

1. PURPOSE OF THE REPORT

1.1 This report updates and informs the Committee of the approach taken to improve the Council's management of risk, in particular, for work undertaken on corporate risks where the residual risk score has not yet met the target risk score.

1.2 Heatmaps and a summary risk register are included as appendices to support the Committee's oversight of the Council's current corporate risk profile.

2. BACKGROUND & CONTEXT

2.1 Recent updates have been made to the Risk Management Strategy, and the wider approach to risk management to strengthen consistency and clarity across the organisation. These improvements are intended to strengthen the Council's risk management maturity and ensure that risk information is used as an active management tool to support decision-making, accountability and governance oversight. Some key changes are highlighted below:

2.1.1 Risk Titles: Have been revised to follow a clearer best practice structure of "cause>event>effect". This aims to provide clearer insight into what the risk is.

2.1.2 Risk Definitions: of Corporate, Directorate and Service risks are clarified to ensure risks are recorded at the appropriate level, and to support proportionate reporting and more effective escalation where needed.

2.1.3 Risk Training: Risk Management Training is being provided to teams across the organisation to embed the revised approach, improve shared understanding of risk management principles, and support a more consistent risk culture across services.

2.1.4 Workshops: Follow-up workshops from September aim to put the risk management training into practice, working with services/teams to identify and assess their risks, ensuring we have a considered picture of the risk landscape.

2.2 Changes to Corporate Risk Register

2.2.1 New Risk: **25 - Selection of Option D as final determination for LGR has major impact on services, finances, economic growth & strategic direction of Huntingdonshire.**

This has been added as a separate corporate risk because it captures the specific and cumulative strategic impact of option D. Additional service specific and directorate risks associated with Option D will be captured in the LGR programme risk register and continued to be monitored if Option D is chosen by HM Government; their scale and interdependency require corporate visibility, ownership and oversight.

2.2.2 Deescalated Risks: The following five risks have been de-escalated to the Directorate tier following discussion with the risk owner. While these risks remain relevant and have the potential to affect more than one service, directorate, or shared system, they do not have the potential to significantly impact or stop the achievement of corporate objectives. They will continue to be monitored by CLT; risks will be re-escalated where their severity or scope increases, controls become ineffective, or CGC intervention is required.

DIR01 Increase in complexity of Employee Relations cases
DIR02 Data breach involving Human Resources records
DIR03 System failure affecting payroll or Human Resources Information System
DIR04 High levels of sickness absence
DIR05 Mandatory Training – noncompletion

2.3 Narratives for Risks with Residual Scores > Target Scores

2.3.1 06 Inadequate preparedness and business continuity arrangements lead to an ineffective response to a major incident, disrupting critical services:

Emergency Planning:

Emergency Planning (EP) training was delivered to Cabinet Members during July and August 2026, focussing on their statutory responsibilities and leadership role during an incident. The session provided awareness and guidance to ensure Cabinet Members understand their responsibilities, including supporting affected communities, engaging with other elected Members such as ward councillors and responding appropriately to media enquiries. The training also highlighted the support, information and communication arrangements that Cabinet Members can expect from the Council during a response.

HDC's Community Resilience Officer continues to work with a number of Town and Parish Councils to develop Emergency Liaison Points (ELPs). These locations will provide residents with a place of support and information should they be required to leave their homes during an incident.

To further support this, a new Town and Parish Council Self-Help Guide has been produced. The EP Team is currently working with Brampton Parish Council to establish and exercise an ELP, with other Town and Parish representatives invited to observe the set-up process and gain a better understanding of the resources, commitment and local arrangements required.

HDC continues to offer reviews of Town and Parish Emergency Plans to improve alignment with HDC’s incident response arrangements and strengthen communication between councils during an emergency.

Business Continuity:

A comprehensive review and refresh of the Council’s BCPs is currently underway. Heads of Service are leading the review of their respective priority services to ensure that essential functions can continue during a disruption or emergency. Priority 1 action cards are being developed and to be tested against the highest risk areas.

The EP Team will conduct a series of desktop exercises to test proposed response arrangements, validate assumptions, and ensure all critical considerations have been addressed.

Internal Audit has issued an initial draft Business Continuity report, identifying 11 recommendations for improvement. Once finalised, recommendations will be presented to the Business Continuity Steering Group, which will develop an organisational action plan with clear ownership and delivery timescales. A further update will be provided upon receipt of the final audit report, and action plan agreed.

2.3.2 08 Insufficient awareness, capacity, and governance lead to regulatory non-compliance, resulting in intervention and disruption:

An interim Monitoring Officer has been recruited, and Full Council will be requested to approve the appointment on 9 September 2026. Additional resources have also been sourced to provide support to the council on governance and regulatory matters.

Three important updates to the Council's constitution are currently progressing through Committees in September: The 'Procurement Code', the overall 'Scheme of Delegation' and the new 'National Scheme of Delegation of Decisions on Planning Applications'. The first two of these will subsequently go to Full Council in October 2026.

2.3.3 09 Weaknesses in governance, oversight and controls enable fraud, corruption, bribery or theft, resulting in financial, operational, and reputational harm

Majority of teams have identified and assessed their fraud risks, inputting on 4Risk. The outstanding teams are being supported to complete this through the delivery or risk management training, which aims to build a consistent approach to identification, assessment, and management across the Council. This is to be followed by targeted workshops with service areas; for the relevant teams a priority will be fraud risk.

The fraud risk report and recommendations have been received and are under review by senior leaders to confirm/accept the findings. Regular monthly meetings are held with key stakeholders regarding the Fraud Strategy Action Plan. All actions are monitored and reviewed - the majority having now been completed ensuring the key elements of the Anti-Fraud, Bribery and Corruption Strategy are in place.

2.3.4 10 Weak information governance and security arrangements lead to a major confidentiality breach, causing regulatory, financial, and reputational harm:

All outstanding actions from the Cyber Essentials audit have now been completed and closed. Work is continuing across a number of M365 projects to strengthen information governance and security controls across the tenancy. Progress and the assurance provided by these improvements will be monitored and reported through the Information Assurance Board.

2.3.5 12 Insufficient workforce development and support lead to difficulties in recruitment and retention of skilled staff, reducing service capacity and quality:

The Council is coming to the end of the two-year project to deliver the actions associated with the Workforce Strategy. Good progress has been made: There are no actions to start. 44 actions are completed. 5 actions in progress, some of which will be completed by September 2026, and all have transitioned into BAU activity.

A closure report (of the Workforce Strategy) will be presented at the September 2026 Employment Committee.

2.3.6 16 Insufficient leadership, resources, and engagement lead to unsuccessful transformation, wasting resources, and limiting service improvement:

Resources have been allocated to maintain core service delivery while providing dedicated capacity to support/process Local Government Reorganisation, including the work required to assess and plan for disaggregation and aggregation of services. Resource requirements will continue to be reviewed as the LGR programme develops, enabling emerging pressures, capacity constraints, and competing priorities to be identified and addressed.

2.3.7 17 Weak safeguarding arrangements and awareness lead to safeguarding failure, causing harm and statutory non-compliance:

The Council continues to make positive progress in safeguarding training compliance, with strong engagement across the three key courses within the training programme. As at the end of Q1, all staff registered on the Learn module were up to date with basic Safeguarding Adults and Children training, including new starters and those due refresher training.

Intermediate Safeguarding Awareness training is currently being reviewed by the Learning and Development team following changes to the County Council's delivery model. This has affected monitoring of refresher training compliance for relevant roles, and an updated system is being developed. Progress will continue to be reported to the Safeguarding Board and CLT Governance.

Designated Safeguarding Officer (DSO) update training has been sourced for both adult and child contact. Existing DSOs will be offered the opportunity to attend and continue in role. Additional DSOs will be sourced to support existing teams. Training has been sourced to incorporate a variety of skills, including Professional Curiosity, which was a recommended theme and learning point from previous Safeguarding and Domestic Homicide Reviews.

The Council's Safeguarding Policy has also been reviewed, with no changes currently required. A report will be taken to Cabinet later in the year to confirm this position and complete the periodic policy review. An all-Member safeguarding briefing is planned to coincide with the Cabinet report.

2.3.8 18 Failure to embed Equality, Diversity, and Inclusion requirements in Council practices results in legal challenge, reputational damage, and reduced trust:

The EDI network is continuing to work towards reducing the risk factor further through data analysis, events, initiatives, and education. The team are also looking at accessible communications (such as the adjustments passport) through the Communications team and exploring where training would help with awareness and support for staff (e.g. neurodiversity and ED&I). They are also collaborating with other public sector organisations where they have established EDI practices to learn and share best practice.

2.3.9 19 Failure to effectively plan for Local Government Reorganisation results in ineffective delivery disrupting services, finances, governance, and a safe and legal handover:

The Council continues to plan for LGR while awaiting confirmation of the final determination from HM Government. The delay has significantly reduced the time available for the Council to deliver an effective transition to Vesting day as there has been no extension given to that date to compensate for the loss of time. Work remains underway to assess potential outcomes and maintain readiness, although the continuing uncertainty limits the extent to which detailed transition arrangements can be finalised.

Further service-level LGR risks have been identified (totalling 15), alongside the overarching corporate and existing LGR risks. A consolidated programme risk log is also being developed to coordinate the substantial volume of risks and issues identified across services and workstreams, enabling clear ownership, oversight, and escalation.

3. COMMENTS OF OVERVIEW & SCRUTINY

N/A

4. IMPLICATIONS OF THE DECISION

N/A

4.1 Implications on Resources

4.1.1 Risk Management is coordinated by the Risk Manager.

5. LIST OF APPENDICES

Appendix 1 – Corporate Risk Register Summary
Appendix 2 – Risk Heat Maps

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Appendix 1 - Corporate Risk Register - Summary

Huntingdonshire DISTRICT COUNCIL

Risk Register

Prefix	Risk Title	Risk Description	Risk Owner	Inherent Priority	Residual Priority	Target Priority
CORP0001	Inadequate cyber security arrangements lead to a successful cyberattack, resulting in service disruption, data loss, and financial harm.	Failure to maintain effective cyber security controls, monitoring, resilience, and user awareness may result in a successful cyberattack, leading to the compromise of council systems and data, disruption to critical services, regulatory penalties, financial loss, and reputational damage.	Corporate Director (Communities)	Very High (5:4=20)	High (5:2=10)	High (5:2=10)
CORP0002	Workforce and management weaknesses lead to inconsistent service quality, resulting in poor outcomes and reputational damage.	Unable to maintain and build quality and consistency in service provision by the Council	Corporate Director (Communities)	Very High (4:4=16)	High (3:3=9)	High (3:3=9)
CORP0003	Political priorities or policy changes are not anticipated, or responded to, resulting missed opportunities and failure to deliver Council objectives	Changes in national or local political priorities, policies, legislation or stakeholder expectations are not effectively anticipated, or responded to promptly and effectively. This could result in the Council failing adapt its plans, resources, service delivery, leading to missed opportunities, and failure to deliver in Council objectives.	Chief Executive	High (3:4=12)	Medium (3:2=6)	Medium (3:2=6)
CORP0004	Inadequate financial planning & management, alongside external pressures, could impact financial sustainability, resulting in overspends & deficits.	The Council's financial position may deteriorate where it lacks an agreed and current financial plan, financial information and forecasts are incomplete or out of date, assumptions are unreliable, or budget monitoring and financial controls do not operate effectively. External pressures, including changes to funding, income, demand and costs, may further increase the exposure. This could lead to unplanned overspends, use of reserves, additional savings requirements, and reduced ability to sustain services and deliver Council priorities.	Interim Corporate Director - Finance & Resources	Very High (4:4=16)	Medium (3:1=3)	Medium (3:1=3)
CORP0005	Inconsistent leadership, oversight, and governance arrangements lead to governance failures, resulting in poor decisions and intervention	Leadership, oversight and governance arrangements may be unclear, inconsistently applied or insufficiently effective (including gaps in accountability, scrutiny, decision-making, escalation and assurance). This could result in decisions being made without appropriate information or challenge, failures to identify and address significant issues, non-compliance, poor organisational performance, reputational damage, and intervention by regulators or other external bodies.	Chief Executive	High (4:3=12)	Medium (3:2=6)	Medium (3:2=6)
CORP0006	Inadequate preparedness and business continuity arrangements lead to an ineffective response to a major incident, disrupting critical services.	Inability to effectively respond to a major disruption / critical event	Corporate Director (Communities)	High (4:3=12)	High (3:3=9)	Medium (3:2=6)
CORP0007	Inadequate health, safety, and wellbeing arrangements lead to a serious incident, causing harm, enforcement action, and service disruption	Health, safety and wellbeing arrangements may be insufficient, unclear or inconsistently implemented, including weaknesses in risk assessment, training, safe working practices, monitoring, reporting and management oversight. Causing a serious health, safety, and well-being failure by the Council	Chief Executive	Very High (5:3=15)	High (5:2=10)	High (5:2=10)
CORP0008	Insufficient awareness, capacity, and governance lead to regulatory non-compliance, resulting in intervention and disruption.	This risk concerns the Council's ability to understand and comply with the legal, regulatory, and statutory requirements applying to its activities and services. It covers the arrangements for identifying obligations, assigning accountability, maintaining organisational awareness and overseeing compliance.	Chief Executive	Very High (4:4=16)	High (3:3=9)	Medium (3:2=6)
CORP0009	Weaknesses in governance, oversight and controls enable fraud, corruption, bribery or theft, resulting in financial, operational and reputational harm	The Council may be exposed to fraud, corruption, bribery or theft where governance, assurance, or control arrangements fail to prevent or respond effectively to such risks. As a result, significant incidents could lead to financial loss, service disruption, regulatory scrutiny, reputational damage and reduced public confidence in the Council.	Interim Corporate Director - Finance & Resources	High (4:3=12)	Medium (3:2=6)	Low (2:2=4)
CORP0010	Weak information governance and security arrangements lead to a major confidentiality breach, causing regulatory, financial, and reputational harm.	Major confidentiality breach on the part of the Council.	Corporate Director (Communities)	Very High (4:4=16)	High (4:2=8)	Medium (3:2=6)

Huntingdonshire DISTRICT COUNCIL

Prefix	Risk Title	Risk Description	Risk Owner	Inherent Priority	Residual Priority	Target Priority
CORP0011	Failure to meet environmental legislation and policy commitments results in non-compliance and harm to the environment.	The Council is required to respond effectively to environmental legislation, policy commitments and wider environmental responsibilities across its services and activities. Climate change is recognised as an important contributing factor, particularly where it impacts service delivery, assets, operations and community outcomes, but it is not the driving factor behind this broader risk. If environmental requirements are not identified, embedded, monitored, or responded to effectively, the Council may fail to meet its obligations, resulting in environmental harm, legal, or regulatory action, financial consequences and reputational damage.	Corporate Director (Place)	High (4:3=12)	High (4:2=8)	High (4:2=8)
CORP0012	Insufficient workforce development & support lead to difficulties in recruitment & retention of skilled staff, reducing service capacity and quality	This risk concerns the Council's ability to attract, develop, support and retain a skilled, capable and resilient workforce. It covers workforce planning, recruitment, learning and development, career progression, employee wellbeing and the transfer of organisational knowledge.	Chief Executive	Very High (4:4=16)	Medium (3:2=6)	Low (2:2=4)
CORP0013	Weak partnership governance and engagement lead to ineffective collaboration, reducing funding opportunities and achievement of strategic objectives	This risk concerns the Council's ability to establish and maintain effective relationships with external stakeholders/partnerships/organisations where collaboration supports shared priorities and outcomes. It covers partnership selection, shared objectives, roles and responsibilities, accountability, information sharing, engagement and oversight.	Chief Executive	Very High (4:4=16)	Medium (3:2=6)	Medium (3:2=6)
CORP0014	Inconsistent communication & engagement lead to ineffective stakeholder relationships, reducing trust, collaboration & support for Council priorities	This risk concerns the Council's approach to communicating with and engaging its stakeholders, including residents, communities, partners, businesses and other interested parties. It covers the coordination, clarity, accessibility, consistency and timeliness of communications, together with the mechanisms used to understand stakeholder needs, expectations and feedback.	Chief Executive	Very High (4:4=16)	Medium (3:2=6)	Medium (3:2=6)
CORP0015	Failure to plan for housing and infrastructure needs constrains growth and adversely affects communities.	The Council must understand and plan for current and future housing and infrastructure needs and support their timely development. If evidence, plans, resources, systems, or engagement with developers, investors, and infrastructure providers are insufficient, employment opportunities, housing and infrastructure may not meet local demand; constraining growth and investment, increasing pressure on public sector services and adversely affecting local businesses and communities.	Corporate Director (Place)	Very High (4:4=16)	High (4:2=8)	High (4:2=8)
CORP0016	Insufficient leadership, resources, and engagement lead to unsuccessful transformation, wasting resources, and limiting service improvement.	The Council fails to manage its transformation strategy (including digital)	Corporate Director (Communities)	Very High (4:4=16)	High (3:3=9)	Medium (3:2=6)
CORP0017	Weak safeguarding arrangements and awareness lead to safeguarding failure, causing harm and statutory non-compliance	This risk concerns the Council's arrangements to ensure there are robust systems in place to address safeguarding and prevent duty concerns. It covers organisational responsibilities, policies, professional awareness, information sharing and the identification, reporting and referral of safeguarding concerns.	Chief Executive	High (4:3=12)	High (3:3=9)	Medium (3:2=6)
CORP0018	Failure to embed Equality, Diversity and Inclusion requirements in Council practices results in legal challenge, reputational damage and reduced trust	This risk concerns how the Council supports and embeds its EDI ethos into its governance, workforce arrangements, decision-making and delivery of services. It covers organisational responsibilities, inclusive practices, equality considerations and the assessment of how policies, decisions and services may affect different communities and individuals.	Chief Executive	High (4:3=12)	Medium (2:3=6)	Low (2:2=4)
CORP0019	Failure to effectively plan for LGR results in ineffective delivery, disrupting services, finances, governance, & a safe & legal handover	Failure to effectively plan for Local Government Reorganisation (LGR) results in ineffective delivery, disrupting services, finances and governance; and the failure to deliver to the new authority a safe and legal handover of all Huntingdonshire's services, staff and assets. This risk concerns the Council's readiness for Local Government Reorganisation and its ability to manage the transition effectively. It covers programme governance, transition planning, organisational capacity, inter-authority coordination, financial planning, service continuity and the transfer of responsibilities, assets, data, systems and workforce arrangements.	Chief Executive	Very High (4:5=20)	High (3:4=12)	High (3:3=9)

Huntingdonshire DISTRICT COUNCIL

Prefix	Risk Title	Risk Description	Risk Owner	Inherent Priority	Residual Priority	Target Priority
CORP0025	National pay negotiations lead to Industrial Action, causing service disruption and reduced organisational capacity	Potential risk of industrial action over the current national pay negotiations	Head of HR & OD	High (3:3=9)	High (3:3=9)	Medium (3:1=3)
CORP0026	Selection of Option D as final determination for LGR has major impact on services, finances, economic growth & strategic direction of Huntingdonshire	If Option D is selected as the final determination for LGR in Cambridgeshire and Peterborough, there is a significant amount of associated risk. This includes: the significant splitting of systems and services disrupting service delivery; the loss of several operational assets vital to service delivery; significant impacts on Huntingdonshire's current investments and growth projects, including One Leisure development and Project Fairfax; and significant negative implications for the financial sustainability of the future authorities, affecting Huntingdonshire residents. The option will also have a significant impact on HDC's current workforce by causing additional uncertainty for the future as well as requiring additional capacity and resource.	Chief Executive	Very High (4:4=16)	High (3:4=12)	High (3:4=12)

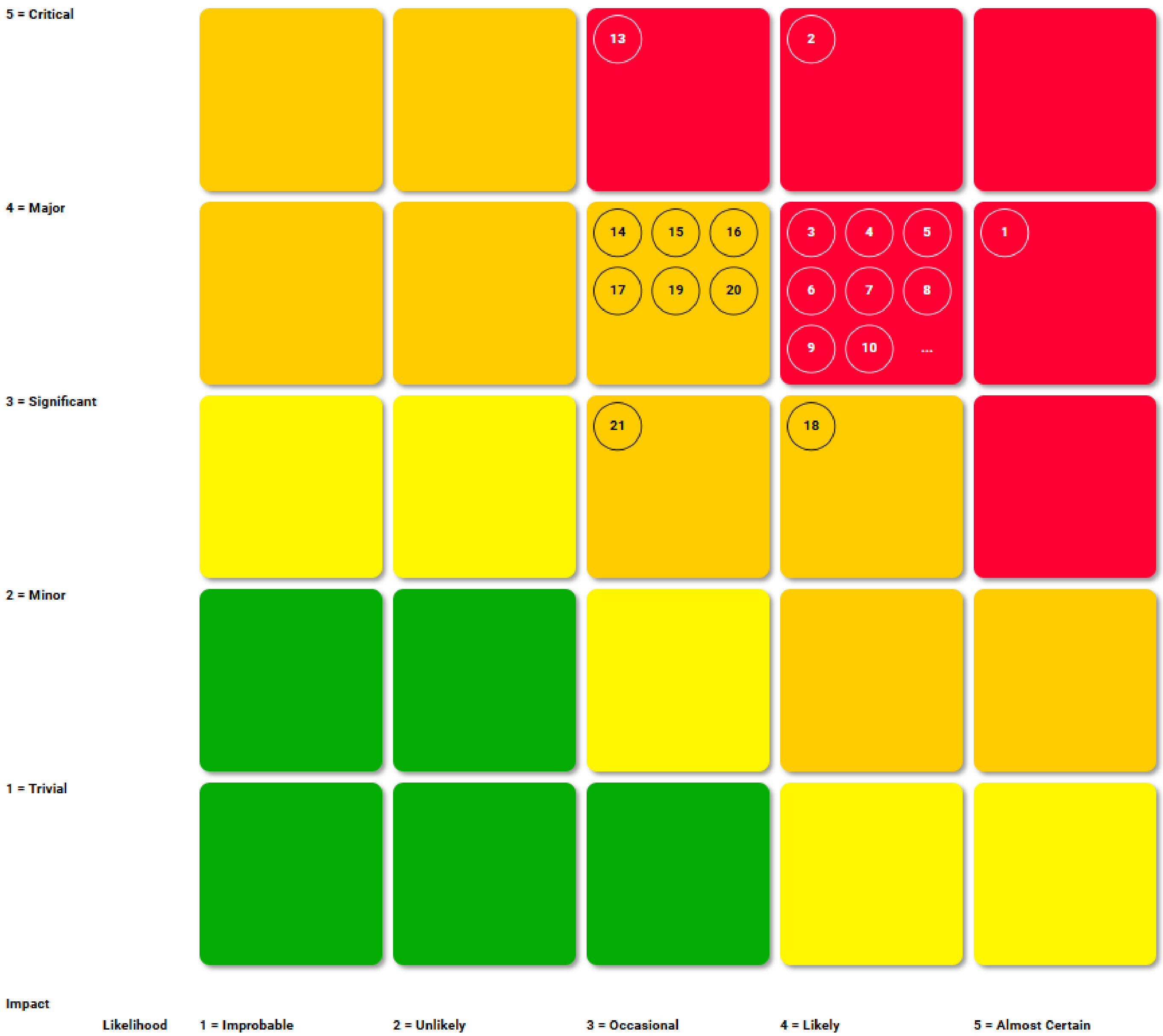
Appendix 2 – Risk Heat Maps

Key for Risk Heat Maps.
Please note, Matrix ID and Risk Reference Number do not match.

Matrix Id	Reference	Risk Title	Inherent	Residual	Target
1	CORP0019	Failure to effectively plan for LGR results in ineffective delivery, disrupting services, finances, governance, & a safe & legal handover	Very High	High	High
2	CORP0001	Inadequate cyber security arrangements lead to a successful cyberattack, resulting in service disruption, data loss, and financial harm.	Very High	High	High
3	CORP0026	Selection of Option D as final determination for LGR has major impact on services, finances, economic growth & strategic direction of Huntingdonshire	Very High	High	High
4	CORP0002	Workforce and management weaknesses lead to inconsistent service quality, resulting in poor outcomes and reputational damage.	Very High	High	High
5	CORP0008	Insufficient awareness, capacity, and governance lead to regulatory non-compliance, resulting in intervention and disruption.	Very High	High	Medium
6	CORP0016	Insufficient leadership, resources, and engagement lead to unsuccessful transformation, wasting resources, and limiting service improvement.	Very High	High	Medium
7	CORP0015	Failure to plan for housing and infrastructure needs constrains growth and adversely affects communities.	Very High	High	High
8	CORP0010	Weak information governance and security arrangements lead to a major confidentiality breach, causing regulatory, financial, and reputational harm.	Very High	High	Medium
9	CORP0013	Weak partnership governance and engagement lead to ineffective collaboration, reducing funding opportunities and achievement of strategic objectives	Very High	Medium	Medium
10	CORP0014	Inconsistent communication & engagement lead to ineffective stakeholder relationships, reducing trust, collaboration & support for Council priorities	Very High	Medium	Medium
11	CORP0012	Insufficient workforce development & support lead to difficulties in recruitment & retention of skilled staff, reducing service capacity and quality	Very High	Medium	Low
12	CORP0004	Inadequate financial planning & management, alongside external pressures, could impact financial sustainability, resulting in overspends & deficits.	Very High	Medium	Medium
13	CORP0007	Inadequate health, safety, and wellbeing arrangements lead to a serious incident, causing harm, enforcement action, and service disruption	Very High	High	High
14	CORP0006	Inadequate preparedness and business continuity arrangements lead to an ineffective response to a major incident, disrupting critical services.	High	High	Medium
15	CORP0017	Weak safeguarding arrangements and awareness lead to safeguarding failure, causing harm and statutory non-compliance	High	High	Medium
16	CORP0011	Failure to meet environmental legislation and policy commitments results in non-compliance and harm to the environment.	High	High	High
17	CORP0005	Inconsistent leadership, oversight, and governance arrangements lead to governance failures, resulting in poor decisions and intervention	High	Medium	Medium
18	CORP0003	Political priorities or policy changes are not anticipated, or responded to, resulting missed opportunities and failure to deliver Council objectives	High	Medium	Medium
19	CORP0009	Weaknesses in governance, oversight and controls enable fraud, corruption, bribery or theft, resulting in financial, operational and reputational harm	High	Medium	Low
20	CORP0018	Failure to embed Equality, Diversity and Inclusion requirements in Council practices results in legal challenge, reputational damage and reduced trust	High	Medium	Low
21	CORP0025	National pay negotiations lead to Industrial Action, causing service disruption and reduced organisational capacity	High	High	Medium

Corporate Risk Heat Map:

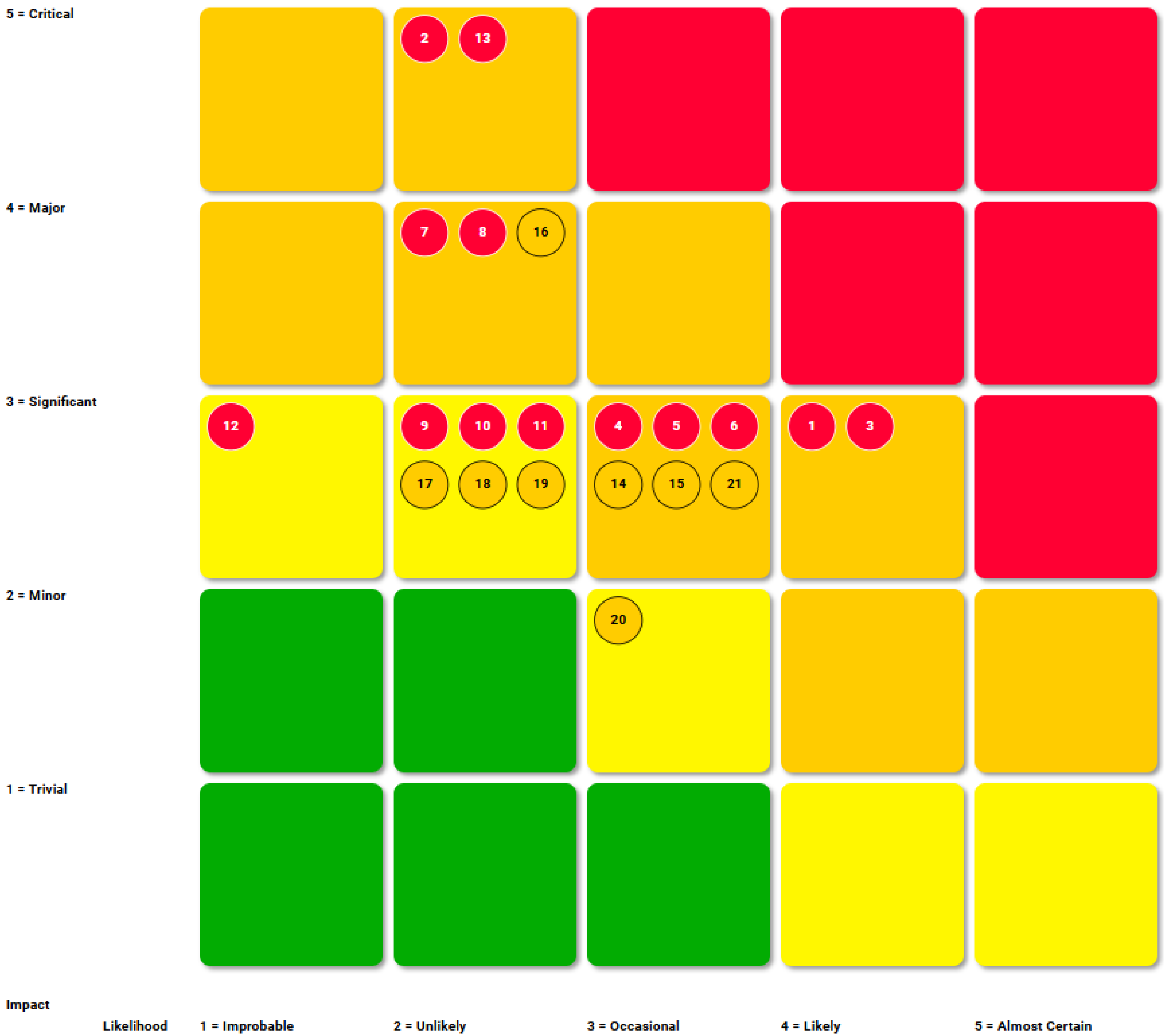
Inherent Risk Ratings



Appendix 2 – Risk Heat Maps

Corporate Risk Heat Map:

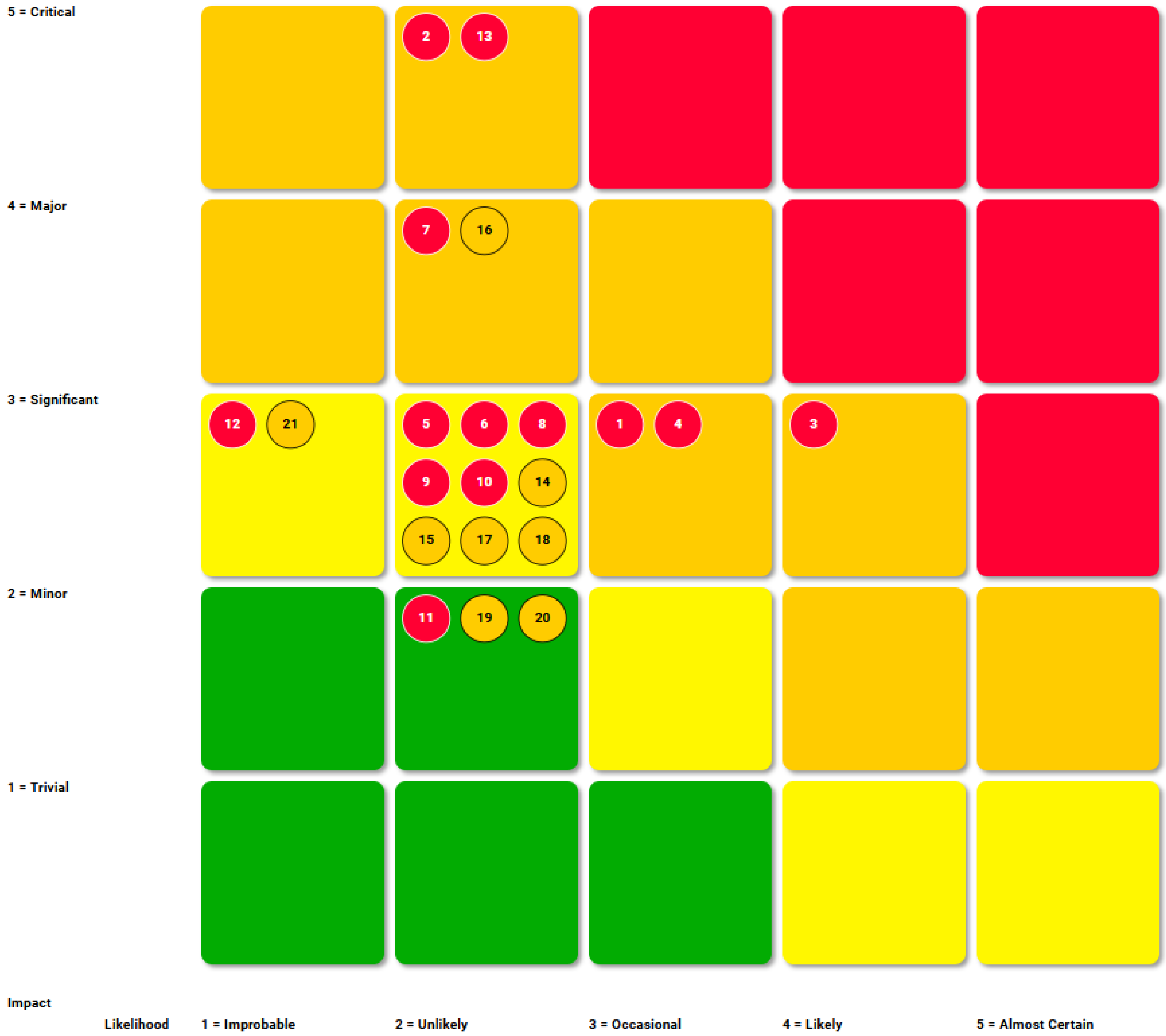
Residual Risk Ratings



Appendix 2 – Risk Heat Maps

Corporate Risk Heat Map:

Target Risk Ratings



Corporate Governance Committee – 16 September 2026

Report by: Lydia Morrison – Corporate Director – Finance and Resources

Lead Cllr: Cllr Liam Dewey-Beckett
Executive Councillor for Governance & Democratic Services

Wards	Open / Exempt	Key Decision?
All	Open	No

Local Government Reorganisation Risk Register

Executive Summary: This report provides the Committee with an update on the management of risks relating to Local Government Reorganisation (LGR), presenting the current risk position, including summary reporting and heatmaps. It provides the Committee with the opportunity to comment on and offer challenge as part of the active management of LGR risks.

Recommendations

1.1. That the Committee comment on the progress the Council is making in regard to its management of risk related to Local Government Reorganisation, including the summary and heatmap reports in the appendices, and identifies any matters requiring further consideration.

	Key Corporate Plan Priorities/Place Strategy Priorities
1	*Effective risk management is critical to ensuring the Council is efficient and effective at providing sustainable service delivery.*

Report Author(s)

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1. PURPOSE OF THE REPORT

1.1 This report updates and informs the Committee on the approach being taken to identify, access and manage risks associated with Local Government Reorganisation (LGR).

1.2 Heatmaps and a summary LGR risk register are included as appendices to support the Committee's oversight of the current LGR risk profile.

1.3 The two LGR Corporate Risks are discussed in the 'Corporate Risk Register Report – September 2026'

2. BACKGROUND & CONTEXT

2.1 Local Government Reorganisation presents a significant and evolving risk environment for the Council, with potential implications for service delivery, governance, finance, staffing, partnerships, community outcomes, and readiness for transition.

2.1.1 At regional level, nine workstreams currently support delivery of LGR. These are led by the seven Chief Executives, with support from relevant senior officers. Each workstream is responsible for managing the risks associated with its service areas, and the delivery of key actions to meet the required timelines.

These regional workstreams are complemented by the internal HDC workstreams, structured around three themes: Corporate Services; Place and Regulatory Services; and People and Communities. Several supporting sub-workstreams sit below these. The risk registers maintained within the internal workstreams will be aligned with the corresponding regional registers to support a consistent and coordinated approach, and to ensure all potential risks are monitored effectively.

2.1.2 The HDC LGR Programme Board will be established in October to provide internal oversight of the workstreams and supporting sub-workstreams. Reporting to the Board will include identified risks within the wider programme, milestones, actions, progress, and achievements. Risks, issues, or escalating concerns requiring further attention or intervention will be escalated on an exception-based approach. The Programme Board will be overseen by senior officers.

2.1.3 A regional core Programme Management Office (PMO) is in place for coordination and oversight of administration and project management of the nine regional workstreams. The PMO is overseen by Sarah Reed, the regional LGR Implementation Director, and comprises project managers and business analysts supporting delivery of the LGR programme.

The core PMO is developing a programme-wide risk management strategy intended to establish a consistent approach to the monitoring and management of risks across the regional programme.

2.2 Narratives for LGR Risk Register

As this is the first LGR risk report presented to CGC a narrative has been provided for each risk.

2.2.1 **01 LGR programme demands exceed available organisational capacity disrupting BAU services and delivery of Council priorities –** This risk will be monitored through the overall LGR programme board. Three actions have been identified, with aimed completion by October 2026. These include formalising the LGR workstream arrangements and progressing the associated resource and project planning. Actions and target dates will remain under review as the programme develops.

2.2.2 **02 Failure to meet statutory requirements leaves the Council exposed to legal challenges, impacting the successful delivery of the LGR transition –** This risk will be monitored through the Corporate Services workstream. There are five open actions, including reviewing the capacity of the Council's legal function and ensuring that appropriate plans are in place to manage legal compliance. These actions will also be incorporated into the wider LGR programme plan.

2.2.3 **03 Uncertainty over contracts and procurement delays LGR readiness, resulting in increased cost and service disruption –** This risk will be monitored through the Corporate Services workstream. Three actions have been identified, relating to project planning for the potential novation of contracts and commissioning and review our contract register. Completion of actions is expected by November 2026.

2.2.4 **04 LGR planning decisions fail to reflect local needs, and aspirations for growth, resulting in adverse outcomes for communities and businesses –** Monitored through the Place workstream. Five actions are currently in-progress, focused on increasing engagement with the Cambridgeshire and Peterborough Combined Authority, establishing a clear communication strategy, and ensuring growth considerations are factored into project planning. Completion of actions is expected by November 2026.

2.2.5 **05 Inadequate planning and coordination of ICT systems for LGR results in integration failures, incompatibility, service disruption and significant cost –** This risk will be monitored through the IT workstream. There are currently seven actions associated with forward planning for IT provision and capacity/resourcing needs. Completion of actions is expected by October 2026.

2.2.6 **06 External interference or influence alters the direction or delivery of LGR, delaying progress and adversely affecting Council and community outcomes –** This risk will be monitored through the Communications workstream and at overall programme level. Three actions have been identified, including ongoing scenario planning. Some actions relate to later stages of LGR once the final determination from HM Government is known. The risk and its associated actions will continue to be assessed as the external environment develops.

2.2.7 **07 Ineffective engagement throughout LGR leads to confusion amongst residents, reputational damage and poorly designed services. –** This risk will be monitored through the Communications workstream. Two ongoing actions have been identified, relating to the continuous review of the LGR communications plan as and the development of appropriate, and effective communication for each potential LGR outcome. The actions are scheduled for review and expected to be complete by the end of October 2026.

2.2.8 **08 Failure to carry out effective engagement with staff throughout LGR leads to industrial action, reputational damage, and damaged recruitment/retention –** This risk will be monitored through the Workforce and Human Resources (HR) workstream. There are currently six actions associated with HR capacity, workforce engagement planning, and data collection and comparison of the workforce. It is expected that these actions will be completed by end of October 2026, once HM Government has provided a final determination; or the actions will remain ongoing throughout the programme given their nature.

2.2.9 **09 Failure to carry out effective financial planning will impact the sustainability of new authorities, resulting in budget gaps that impact services –** This risk will be monitored through the Finance workstream. There are two ongoing actions, covering assessment and planning for financial impacts and budgets, and continued scenario planning. These actions are expected to be reviewed in October/November 2026 once a final determination is provided.

2.2.10 **10 Service/structure redesign does not align with partners or meet outcomes for future geographies resulting in missed opportunities for Value For Money/streamlining –** This risk will be monitored at overall LGR programme level. There are currently seven open actions. Progress on these actions is dependent upon HM Government's final determination. Actions are expected to remain ongoing throughout the programme for continuous review.

2.2.11 **11 Failure to manage partnership relations effectively results in reputational damage, missed opportunities for alignment and delay in the LGR programme –** This risk will be monitored through the Policy workstream and at overall LGR programme level. Four open actions are expected to be complete by end of November 2026. Timing and scope of these actions will be reviewed once HM Government's final determination is known.

2.2.12 **12 Failure to provide members with sufficient information may result in ineffective decision-making leading to sub-optimal outcomes and missed Value For Money –** This risk will be monitored through the Governance workstream. Five actions have been identified, with three scheduled for completion for the end of November 2026, and two scheduled for January 2027 to reflect the different stages of the LGR programme.

2.2.13 **13 LGR changes priorities and resources, preventing delivery of Corporate Plan commitments –** This risk has been recently identified and is being assessed to determine appropriate controls, dependencies and resource implications. Associated actions, responsibilities and target dates are being developed and will be submitted to the register once confirmed. This risk will be monitored at overall LGR programme level.

2.2.14 **14 Changes to boundaries and service arrangements weaken established community connections, reducing cohesion, participation, and local resilience –** This risk has been recently identified and is being assessed to determine appropriate controls, dependencies and resource implications. Associated actions, responsibilities and target dates are being developed and will be submitted to the register once confirmed. This risk will be monitored through the Communities workstream.

2.2.15 **15 Boundary changes weaken identification with Huntingdonshire and local places, reducing trust, representation and support for the new authority –** This risk has been recently identified and is being assessed to determine appropriate controls, dependencies and resource implications. Associated actions, responsibilities and target dates are being developed and will be submitted to the register once confirmed. This risk will be monitored at overall LGR programme level and through the Communications workstream.

3. COMMENTS OF OVERVIEW & SCRUTINY

N/A

(The comments of the relevant Overview and Scrutiny Panel will be included in this section prior to its consideration by the Cabinet.)

4. IMPLICATIONS OF THE DECISION

N/A

5. LIST OF APPENDICIES

Appendix 1 – LGR Risk Register Summary
Appendix 2 – Risk Heat Maps

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LGR Risk Register - Summary

Huntingdonshire District Council

Risk Register

Prefix	Risk Title	Risk Description	Risk Owner	Inherent Priority	Residual Priority	Target Priority
LGR0001	LGR programme demands exceed available organisational capacity disrupting BAU services and delivery of Council priorities	Fail to effectively manage the LGR change process alongside delivering services now (Business as Usual)	Chief Executive	Very High (3:5=15)	Medium (3:2=6)	Medium (3:2=6)
LGR0002	Failure to meet statutory requirements leaves the Council exposed to legal challenges, impacting the successful delivery of the LGR transition.	LGR requires the Council to comply with statutory, regulatory, governance, and contractual requirements relating to areas including decision-making, consultation, procurement, data, assets, and the transfer of services and liabilities. Failure to identify, understand and address these requirements promptly, could result in the Council facing legal challenge, financial liabilities, regulatory intervention and delays to the successful delivery of the LGR transition.	Corporate Director (Communities)	Very High (4:4=16)	High (4:3=12)	High (4:3=12)
LGR0003	Uncertainty over contracts and procurement delays LGR readiness, resulting in increased cost and service disruption.	The Council needs a clear understanding of its contracts, procurement activity, supplier dependencies and associated liabilities in preparation for LGR. Incomplete or inaccurate information, unclear ownership, unresolved procurement activity or uncertainty over contract transfer, variation, extension and termination arrangements could delay transition decisions, disrupt services, and result in additional costs, contractual disputes or unmanaged liabilities.	Interim Corporate Director - Finance & Resources	Very High (4:4=16)	High (4:3=12)	High (4:3=12)
LGR0004	LGR planning decisions fail to reflect local needs, and aspirations for growth, resulting in adverse outcomes for communities and businesses.	Planning and growth arrangements developed through LGR may not adequately reflect the needs and ambitions of Huntingdonshire's communities, population and businesses. If local evidence, priorities, and interests are not effectively represented or influence over key decisions is limited, future policies, investment and infrastructure may not support sustainable growth or deliver appropriate outcomes for the district. Failure to maintain delivery of growth can have longer-term impacts on aspiration, increased demand on public sector services, and negative affect on tax-base (council-tax, business rates).	Corporate Director (Place)	High (4:3=12)	High (4:2=8)	High (4:2=8)
LGR0005	Inadequate planning and coordination of ICT systems for LGR results in integration failures, incompatibility, service disruption and significant costs	LGR requires the timely identification, coordination and integration of ICT systems and infrastructure. Delayed planning, unresolved dependencies, incompatible systems or insufficient testing could lead to integration/migration failures resulting in the disruption of critical services, and incurring significant additional costs, and delaying the wider LGR transition.	Corporate Director (Communities)	Very High (4:4=16)	High (4:3=12)	High (4:3=12)
LGR0006	External interference or influence alters the direction or delivery of LGR, delaying progress and adversely affecting Council and community outcomes	This risk concerns external actions, decisions or influence that may affect the direction, scope or delivery of Local Government Reorganisation. It covers the Council's ability to monitor developments, represent its interests, engage with key stakeholders and respond to matters outside its direct control.	Chief Executive	Very High (5:5=25)	Very High (5:4=20)	Very High (5:4=20)
LGR0007	Ineffective engagement throughout LGR leads to confusion amongst residents, reputational damage and poorly designed services	Failure to engage effectively with our communities – the public, businesses, other stakeholders – about LGR results in reputational damage, lack of trust and poorly designed services if service users aren't engaged effectively. There is also the potential for legal implications and damaged partner relationships which could affect the delivery of the wider LGR programme.	Corporate Director (Communities)	Very High (4:4=16)	High (4:3=12)	High (4:3=12)
LGR0008	Failure to carry out effective engagement with staff throughout LGR leads to industrial action, reputational damage, and damaged recruitment/retention	Fail to secure staff support, engagement and understanding to effectively progress LGR. This will lead to increased staff uncertainty leading to more risk of industrial action, negative impacts on recruitment and retention and disruption to service delivery.	Chief Executive	Very High (4:4=16)	High (4:2=8)	High (4:2=8)
LGR0009	Failure to carry out effective financial planning will impact the sustainability of new authorities, resulting in budget gaps that impact	Fail to plan through LGR to be financially resilient and sustainable – for funding services, meeting obligations and assuring a medium-term future. This may result in reputational damage and an ability to meet the strategic and savings objectives of LGR.	Interim Corporate Director - Finance & Resources	Very High (4:5=20)	High (4:2=8)	High (4:2=8)
LGR0010	Service/structure redesign does not align with partners or meet outcomes for future geographies resulting in missed opportunities for VFM/streamlining	We design structures / services / policies in readiness for LGR/post-LGR that do not align with those of our partners or do not match anticipated future (i.e. post LGR) outcomes. This will lead to missed opportunities for streamlining and producing the best outcomes for residents that meet the needs of future geographies. This may also have a reputational impact amongst stakeholders and partners.	Corporate Director (Communities)	High (3:4=12)	High (3:3=9)	High (3:3=9)

Huntingdonshire DISTRICT COUNCIL

Prefix	Risk Title	Risk Description	Risk Owner	Inherent Priority	Residual Priority	Target Priority
LGR0011	Failure to manage partnership relations effectively results in reputational damage, missed opportunities for alignment and delay in the LGR	Fail to manage effective partnership relations in one or more interfaces with the Council which could have a significant impact on the delivery of the LGR programme due to reputational damage and missed opportunity through lack of partnership working. This could result in delays and may also have an impact on the future culture and coherence of new organisations.	Corporate Director (Place)	Very High (4:4=16)	High (4:3=12)	High (4:3=12)
LGR0012	Failure to provide members with sufficient information may result in ineffective decision-making leading to sub-optimal outcomes and missed VFM.	Ineffective and timely decision-making by Members caused by lack of sufficient information may result in negative outcomes for residents, reputational damage and missed opportunities for improving value for money. It could also have a financial impact to the LGR programme and result in delay if decision-making isn't timely.	Chief Executive	Very High (4:5=20)	High (4:2=8)	High (4:2=8)
LGR0013	LGR changes priorities and resources, preventing delivery of Corporate Plan commitments.	Disruption of transformation elements.	Corporate Director (Communities)			
LGR0014	Changes to boundaries and service arrangements weaken established community connections, reducing cohesion, participation, and local resilience.	Loss of Community: Because LGR may divide existing communities, alter established service relationships and disrupt connections between residents, voluntary organisations, businesses and public bodies, community networks may weaken, resulting in reduced social cohesion, lower participation in local activity and diminished capacity for communities to respond collectively to local needs.	Corporate Director (Communities)			
LGR0015	Boundary changes weaken identification with Huntingdonshire and local places, reducing trust, representation and support for the new authority.	Loss of identity: Because LGR may replace existing governance arrangements, change administrative boundaries and reduce the visibility of Huntingdonshire within a larger successor authority, residents and communities may feel that their local identity, heritage and distinct priorities have been diminished, resulting in reduced trust, weaker democratic connection and lower support for the new organisation.	Corporate Director (Communities)			

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Appendix 2 – LGR Risk Heat Maps

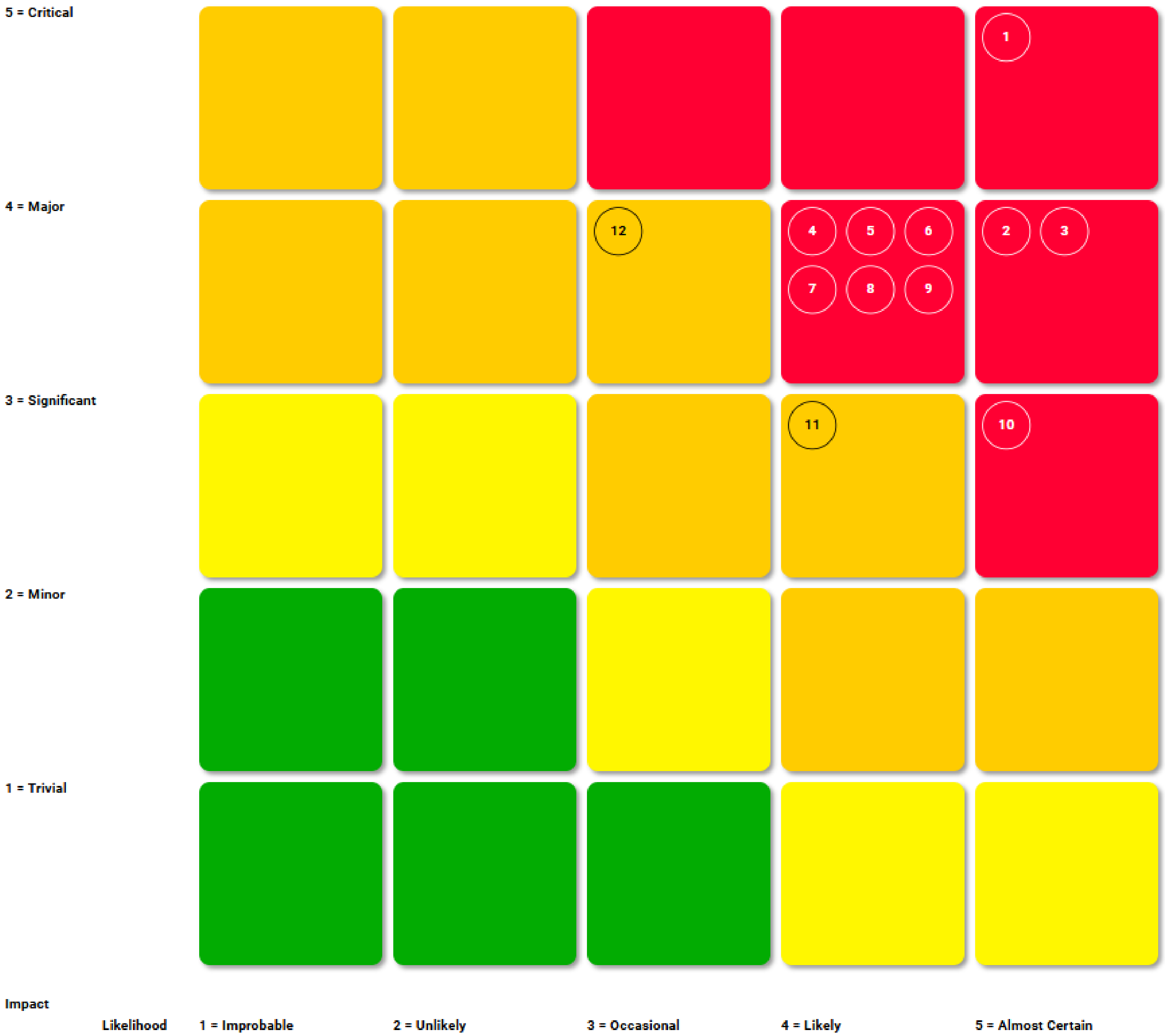
Key for Risk Heat Maps.
Please note, Matrix ID and Risk Reference Number do not match.

Matrix Id	Reference	Risk Title	Inherent	Residual	Target
1	LGR0006	External interference or influence alters the direction or delivery of LGR, delaying progress and adversely affecting Council and community outcomes	Very High	Very High	Very High
2	LGR0009	Failure to carry out effective financial planning will impact the sustainability of new authorities, resulting in budget gaps that impact services	Very High	High	High
3	LGR0012	Failure to provide members with sufficient information may result in ineffective decision-making leading to sub-optimal outcomes and missed VFM.	Very High	High	High
4	LGR0011	Failure to manage partnership relations effectively results in reputational damage, missed opportunities for alignment and delay in the LGR programme.	Very High	High	High
5	LGR0007	Ineffective engagement throughout LGR leads to confusion amongst residents, reputational damage and poorly designed services	Very High	High	High
6	LGR0002	Failure to meet statutory requirements leaves the Council exposed to legal challenges, impacting the successful delivery of the LGR transition.	Very High	High	High
7	LGR0003	Uncertainty over contracts and procurement delays LGR readiness, resulting in increased cost and service disruption.	Very High	High	High
8	LGR0005	Inadequate planning and coordination of ICT systems for LGR results in integration failures, incompatibility, service disruption and significant costs	Very High	High	High
9	LGR0008	Failure to carry out effective engagement with staff throughout LGR leads to industrial action, reputational damage, and damaged recruitment/retention	Very High	High	High
10	LGR0001	LGR programme demands exceed available organisational capacity disrupting BAU services and delivery of Council priorties	Very High	Medium	Medium
11	LGR0010	Service/structure redesign does not align with partners or meet outcomes for future geographies resulting in missed opportunities for VFM/streamlining	High	High	High
12	LGR0004	LGR planning decisions fail to reflect local needs, and aspirations for growth, resulting in adverse outcomes for communities and businesses.	High	High	High

Appendix 2 – LGR Risk Heat Maps

Corporate Risk Heat Map:

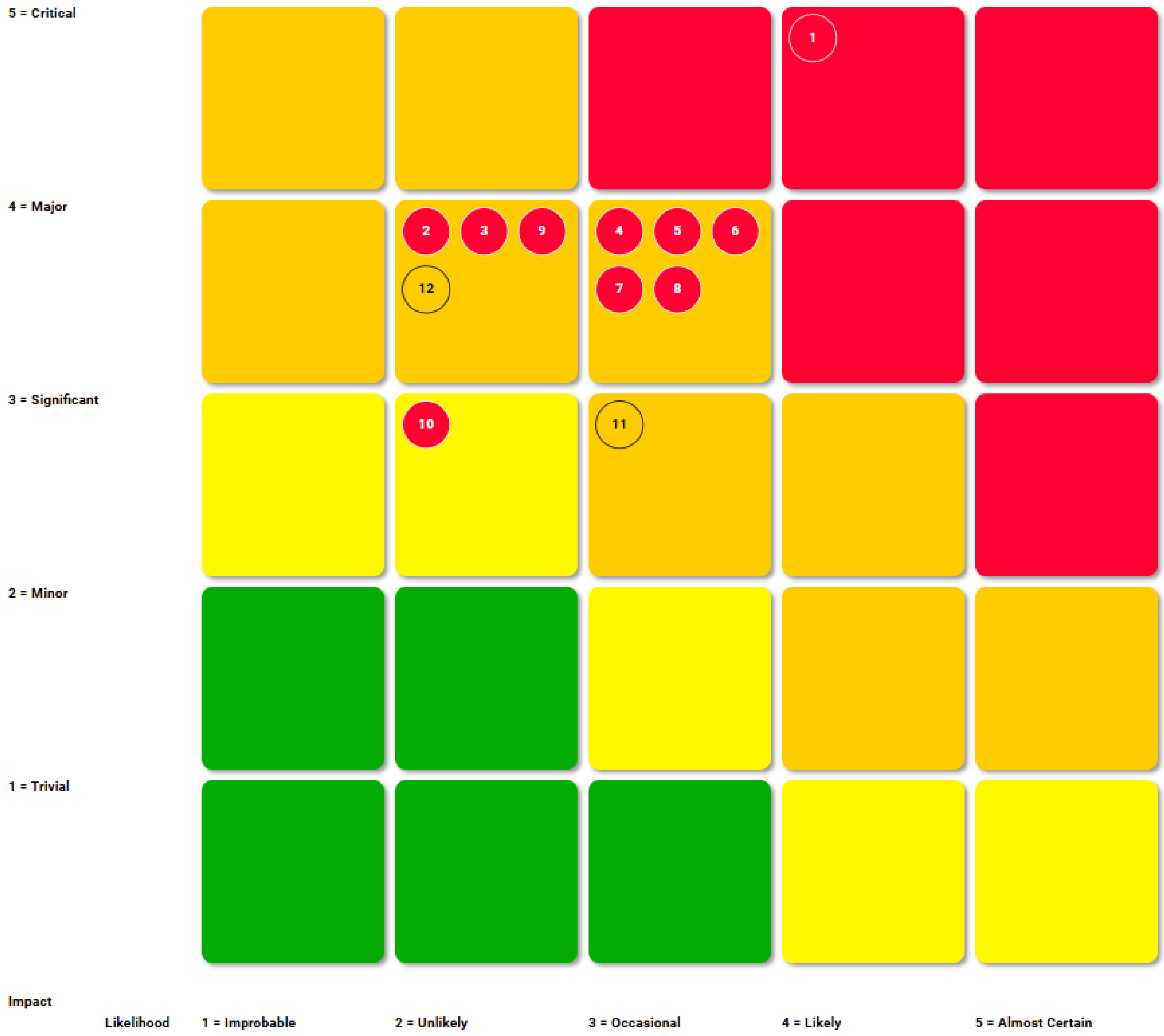
Inherent Risk Ratings



Huntingdonshire DISTRICT COUNCIL

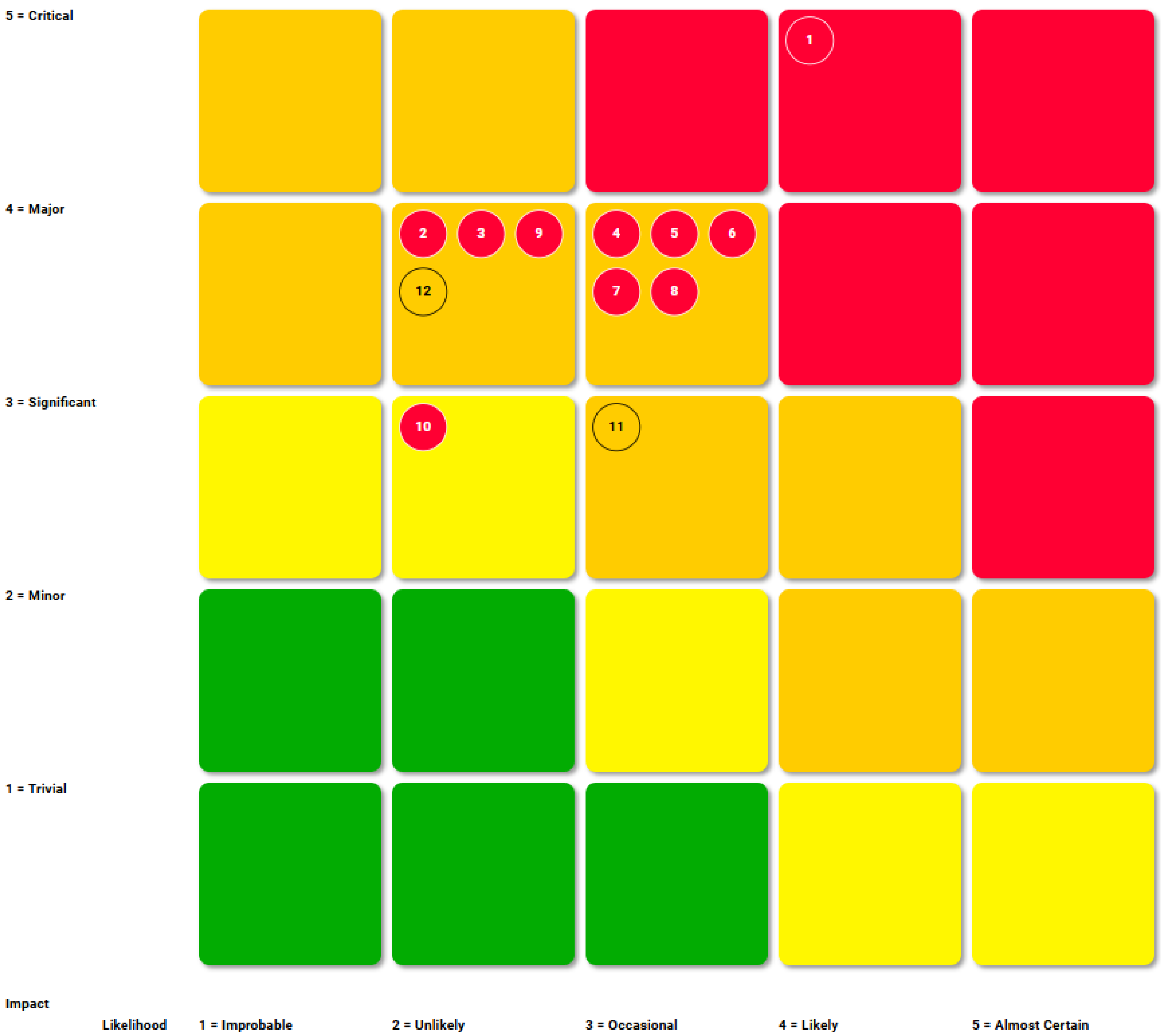
Corporate Risk Heat Map:

Residual Risk Ratings



Corporate Risk Heat Map:

Target Risk Ratings



Corporate Governance Committee – 16 September 2026

Report by: Dan Harris (RSM) – Internal Audit Manager
Lydia Morrison – Corporate Director – Finance and Resources (On behalf of Corporate Leadership Team

Lead Cllr: Cllr Liam Dewey-Beckett
Executive Councillor for Governance and Democratic Services

Wards	Open / Exempt	Key Decision?
All	Open	No

Internal Audit Progress Report

Executive Summary: This report sets out a summary of the work undertaken by the Internal Audit Service since the Committee last met in July 2026.

Recommendations

1.1. To comment on and note the update on work undertaken by Internal Audit to date.

Report Author(s)

Lydia Morrison – Corporate Director – Finance & Resources
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1. PURPOSE OF THE REPORT

1.1 The purpose of this report is to provide an update of the work of the Internal Audit Service since the last meeting and progress against the Internal Audit Plan 2026/27 that was approved by the Committee on 18th March 2026.

2. BACKGROUND & CONTEXT

2.1 The activities of the Internal Audit Team are pivotal to the organisation's governance and control processes. The findings of audit reviews demonstrate compliance with controls and processes or identify where improvements need to be made. This is an inherent element of Priority 3 of the Corporate Plan (2023-2028) which is about 'doing our core work well' through 'delivering good quality, high value-for-money services with good control and compliance with statutory obligations'.

2.2 RSM will, in the capacity of the Internal Audit Service, be present at the meeting to present the report.

3. IMPLICATIONS OF THE DECISION

3.1 Legal & Constitutional Implications

3.1.1 None.

3.2 Implications on Resources

3.2.1 No additional resource requirements arise from this report.

LIST OF APPENDICES INCLUDED

Appendix 1 – Internal Audit Progress Report from RSM LLP

HUNTINGDONSHIRE DISTRICT COUNCIL

Internal Audit Progress Report

Corporate Governance Committee – 16 September 2026

This report is solely for the use of the persons to whom it is addressed.
To the fullest extent permitted by law, we will accept no responsibility or liability in respect of this report to any other party.

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CONTENTS

Appendices

KEY MESSAGES

The internal audit plan for 2026/27 was approved by the Corporate Governance Committee (CGC) in March 2026. This report provides an update on progress against that plan and summarises the results of the work completed by to date.

2026/27 Internal Audit Plan – We have issued the folllowing internal audit reports as final since the last meeting:

- Licensing and Environmental Health (2026/27) – **Reasonable Assurance**
- Data Quality – Human Resources (2026/27) - **Partial Assurance**
- Health and Safety – Open Spaces and Countryside (2026/27) **– Partial Assurance**

We have also issued the following review in draft and are awaiting a final management response:

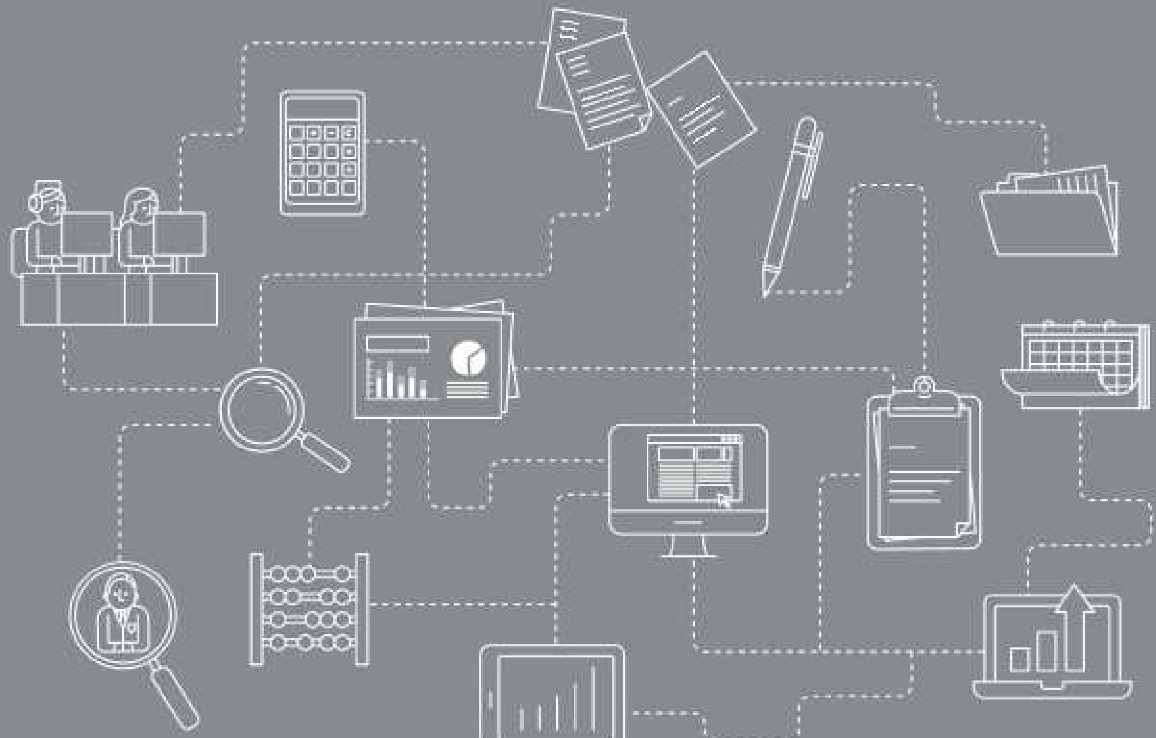
- Business Continuity Planning. **[To note]**

The Debt Management review has been completed and a draft report due to be issued w/c 7 September 2026.

Details of the progress made, and scheduling of the 2026/27 internal audit plan are included at Appendix A. **[To note]**

Final Reports

01



1. FINAL REPORTS

1.1 Summary of the key issues arising from the final reports being presented to this Committee

This section summarises the reports that have been finalised since the last meeting.

Assignment	Opinion issued	Actions agreed L	M	H
Licensing and Environmental Health (2025/26) The audit found that core governance processes within Taxi Licensing and Skin Piercing registraton are generally well established and operating effectively, with several areas of good practice identified. Information on taxi and private hire licensing, as well as skin piercing registrations, is clearly presented on the Council's website, including application requirements, relevant policies, conditions, and access to online application systems. Sample testing (10 practitioner and 5 premises skin piercing registrations; 5 each of taxi driver, vehicle and operator licences) confirmed that fees were correctly applied in line with those approved by Full Council. All sampled taxi licences were appropriately supported by evidence of required checks, including DBS, right to work, safeguarding training, DVLA and insurance verification, and vehicle safety requirements. All skin piercing registrations sampled were completed promptly following inspector approval. For taxi licensing, performance is monitored via a monthly KPI reported to the Performance Board chaired by the Corporate Director (Communities); review of January to March 2026 reports confirmed that 100% of licences were issued within five working days of validation, verified to system records. The review did, however, identify opportunities to further strengthen governance arrangements, and **one low** and **one medium priority** management actions have been agreed. While policies and procedures relating to taxi licensing and skin piercing registration are generally comprehensive and provide clear guidance, key elements of document governance such as defined ownership, version control, and formal approval are not applied consistently. This creates a risk that outdated or unauthorised guidance may be used. Sample testing of 10 practitioner and 5 premises skin piercing registrations also identified some inconsistencies in the application of established procedures. These included variations in the issuing of standard pre-registration advisory communications, use of the standard inspection report template, and evidence of checks to confirm that associated premises were appropriately registered when processing individual applications. **No high priority actions**	Reasonable Assurance	1	1	0
Data Quality – Human Resources (2026/27) Overall, we found that the Council's arrangements for the maintenance and reporting of employee data are partially effective. Whilst a framework of controls is in place to support the maintenance and reporting of employee data, these controls are not applied consistently across all areas reviewed. We identified weaknesses in employee records management, the accuracy and maintenance of employee start date records, and the maintenance of job descriptions.	Partial Assurance	2	1	1

Assignment	Opinion issued	Actions agreed L	M	H
We noted weaknesses in how certain aspects of employee data are documented and governed in practice. In particular, roles and responsibilities for maintaining data accuracy are not clearly defined within guidance, and documentation does not consistently include version control or review information. In addition, weaknesses were identified in the governance and maintenance of employee records. In particular, arrangements for maintaining, reviewing and updating job descriptions are not operating effectively, resulting in missing, outdated and undated documentation, while inconsistencies were also identified in the recording of employee start dates. Arrangements were in place to maintain employee records within the iTrent system, supported by electronic personnel files and regular workforce reporting to the EC. Core employee data fields tested were generally supported by underlying documentation, and communications were in place to prompt staff to review and update their information. In addition, workforce reporting is produced on a regular basis and subject to established governance arrangements, and key HR processes are supported by system functionality and underlying records. While these issues do not indicate that employee data is fundamentally unreliable, they may affect the consistency of workforce information required to support LGR activity. This is particularly important in the context of LGR, where accurate and up-to-date workforce data will be essential to support organisational planning and transition. **High priorty management action:** Management will undertake a comprehensive review of all job descriptions to ensure that they are up-to-date and aligned to the role structure and records held within iTrent in preparation for Local Government Reorganisation. For those employees for which there is no valid job description, these will be developed in a timely manner and communicated to staff. **Responsible Owner:** Leanne Harfield, Head of HR **Deadline:** 31 December 2026				
Health and Safety – Open Spaces and Countryside (2026/27) Overall, we identified a number of weaknesses in the design, operation and oversight of health and safety controls across the areas reviewed. There was insufficient evidence to demonstrate that key health and safety information, including incidents and near misses, was subject to effective scrutiny and challenge through the appropriate governance channels. Local procedures lacked consistent version control, formal review and approval, and clear alignment to the overarching corporate Health and Safety Policy. In addition, risk assessment arrangements were not operating effectively, with overdue and incomplete assessments identified and an assessment tracker that did not clearly record all required assessments or their review dates. We also identified gaps in both mandatory corporate and site-based health and safety training records, limiting assurance that all staff had completed the training necessary to undertake their roles safely. However, we did identify some positive aspects of the control framework. The Council has established an overarching Health and Safety Policy, documented governance arrangements, defined responsibilities and escalation routes, and local Safe	Partial Assurance	2	6	1

Assignment	Opinion issued	Actions agreed L M H
Working Practice guidance for open spaces and countryside activities. Risk assessments were in place for the areas reviewed and generally documented relevant hazards and existing control measures. We have therefore concluded a partial assurance opinion. While the framework is established, the recurring weaknesses identified reduce assurance over the consistent operation of health and safety controls in practice, particularly in relation to governance reporting, risk assessment reviews and training compliance. Management actions have been agreed to address these areas, comprising one high, six medium and two low priority actions. **High priorty management action:** We will ensure all mandatory health and safety training is identified and all staff still required to complete the training are reminded. Compliance will be regularly monitored, and persistent non-compliance will be reported to line managers and the appropriate governance forum. Appropriate action will be taken against persistent non-compliance with relevant employees. **Responsible Owners:** Robbie Bratchell Nick Massey Jo Peadon Karen Martin-Peters **Deadline:** 31 January 2027		

Appendices

02

APPENDIX A: PROGRESS AGAINST THE INTERNAL AUDIT PLAN 2026/27

	Assignment	Status / Opinion issued / Start date	Actions agreed			Target CGC	Actual CGC meeting
			H	M	L		
1	Recruitment and Retention	Final Report – Reasonable Assurance	0	2	2	July 2026	July 2026
2	**Licensing and Environmental Health**	**Final Report – Reasonable Assurance**	**0**	**1**	**1**	**July 2026**	**September 2026**
3	**Data Quality – Human Resources**	**Final Report – Partial Assurance**	**1**	**1**	**2**	**July 2026**	**September 2026**
4	**Health and Safety**	**Final Report – Partial Assurance**	**1**	**6**	**2**	**September 2026**	**September 2026**
5	Business Continuity	Draft Report issued 11/08/2026				November 2026 (was Sept 2026)	
6	Debt Management	Debrief held, in QA				November 2026 (was Sept 2026)	
7	Community Health and Wealth Fund	Fieldwork in progress				November 2026	
8	Capital Expenditure Follow Up	Fieldwork in progress				November 2026	
9	Creditor Payments Follow Up	Fieldwork in progress				November 2026	
10	Disabled Facility Grant Verification	September 2026				November 2026	
12	Insurance	October 2026				January 2027	
13	Mandatory Training	October 2026				January 2027	
14	Transformation Follow Up	November 2026				March 2027	
15	Safeguarding	December 2026				March 2027	
16	General Ledger Follow Up	January 2027				March 2027	
17	ICT Budget Management Follow Up	January 2027				March 2027	
18	Risk Management	January 2027				March 2027	
19	Preparedness for LGR	February 2027				June 2027	
19	IT Disaster Recovery	February 2027				June 2027	
20	Full Follow Up	February 2027				June 2027	

APPENDIX B: OTHER MATTERS

Changes to the Internal Audit Plan since the last meeting in July 2026

For the 2026/27 plan, we have agreed some minor changes to the scheduling of internal audits, following discussions with management. The LGR audit has been moved to February 2027 at the request at the CEO, the General Ledger Follow Up has been scheduled for January 2027 (to take account of deadlines for actions), and the CHAWS audit has been brought forward (fieldwork in progress).

Detailed below are the changes to the 2026/27 plan previously reported to the Committee

Note	Auditable area	Reason for change
1	**Various audits - 2026/27**	For the 2026/27 plan, we have agreed some minor changes to the scheduling of internal audits, following discussions with management. This includes the **BCP** internal audit being brought forward to July 2026, the **Mandatory Training** audit moving back to October 2026, the **Transformation Follow Up** moving to September 2026 and the **General Ledger Follow Up** moving forward to August 2026.
2	**Various audits - 2026/27**	For the 2026/27 plan, we are in the process of scoping audits and agreeing timeframes with management. At the March 2026 meeting we submitted a draft and oversubscribed internal audit plan. We can confirm that the following audits have been removed from 2026/27 programme of work following discussions with management as these were not deemed slightly lower priority areas for 2026/27. These areas will be reconsidered as part of the 2027/28 internal audit planning process and kept under review during the next few months **(Car Parking Enforcement, Sickness Absence Management, Planning).**

Head of Internal Audit opinion 2026/27

We have issued two negative opinion to date from our final reports (Data Quality – Human Resources and Health and Safety – Open Spaces and Countryside). We will continue to update the CEO, S151 Officer, other CLT members, and the CGC as and when reports are issued and if there is any potential impact to the year-end opinion. We will also provide updates at future CGC meetings.

Quality assurance and continual improvement

To ensure that RSM remains compliant with the IIA standards and the financial services recommendations for Internal Audit we have a dedicated internal Quality Assurance Team who undertake a programme of reviews to ensure the quality of our audit assignments. This is applicable to all Heads of Internal Audit, where a sample of their clients will be reviewed. Any findings from these reviews being used to inform the training needs of our audit teams.

The Quality Assurance Team is made up of; the Head of the Quality Assurance Department (FCA qualified) and an Associate Director (FCCA qualified), with support from other team members across the department. This is in addition to any feedback we receive from our post assignment surveys, client feedback, appraisal processes and training needs assessments.

APPENDIX C: ASSURANCE OPINIONS

Minimal Assurance

Taking account of the issues identified, the board cannot take assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Urgent action is needed to strengthen the control framework to manage the identified risk(s).

Reasonable Assurance

Taking account of the issues identified, the board can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).

Partial Assurance

Taking account of the issues identified, the board can take partial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Action is needed to strengthen the control framework to manage the identified risk(s).

Substantial Assurance

Taking account of the issues identified, the board can take substantial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

FOR FURTHER INFORMATION CONTACT

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Corporate Governance Committee – 16 September 2026

Report by: Lydia Morrison – Corporate Director – Finance and Resources (On behalf of Corporate Leadership Team

Lead Cllr: Cllr Liam Dewey-Beckett
Executive Councillor for Governance and Democratic Services

Wards	Open / Exempt	Key Decision?
All	Open	No

Internal Audit Actions – Update Report

Executive Summary: This report summarises the progress in implementing management actions arising from final internal audit reports. Implementation of the actions are the responsibility of the relevant managers with oversight from Corporate Leadership Team. Further information relating to the Internal Audits carried out will be reported in a separate paper.

Recommendations

1.1. To comment on and note the current position regarding actions arising from internal audit reports

	Key Corporate Plan / Strategic Priorities
1	Corporate Priority 3 – Doing our core work well.

Report Author(s)

Lydia Morrison – Corporate Director – Finance & Resources
Lydia.Morrison@huntingdonshire.gov.uk

1. PURPOSE OF THE REPORT

1.1 This report sets out the current position with respect to implementation of actions arising from Internal Audit reports.

2. BACKGROUND & CONTEXT

2.1 This report summarises the position regarding audit actions arising from final Internal Audit reports. Progress on the completion of audit actions remains under regular review. While the additional pressures arising from Local Government Reorganisation have created some capacity challenges, Officers remain confident in their ability to deliver the required actions within acceptable timeframes. Officers will continue to monitor workloads closely and, where any capacity issues do arise in relation to audit actions, will ensure the Committee is appraised.

3. OVERALL PROGRESS SINCE THE LAST COMMITTEE MEETING

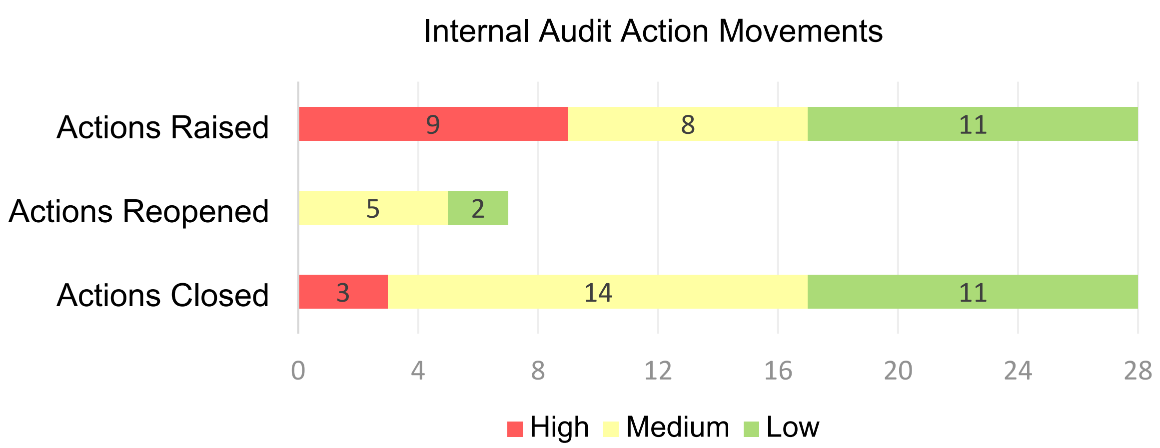
3.1 The most recent full update on internal audit actions was presented at the June Committee meeting, when there were 42 open actions. A full update was not provided at the subsequent meeting in July due to the short reporting period.

Since that update, 28 new actions have been raised from completed audits. A further 7 previously closed actions were reopened following the Follow-Up Audit Part Two.

During the same period, 28 actions were closed. This includes six of the seven actions reopened following the follow-up audit.

As a result, there are currently 49 open actions, representing a net increase of 7 since the previous full update.

The bar chart below provides a visual summary of internal audit actions raised, reopened and closed since the previous full update, split by priority.



Note: The closed total includes six reopened actions.

4. CURRENT OPEN ACTIONS POSITION

4.1 There are currently 49 open internal audit actions, comprising of 10 High, 25 Medium and 14 Low priority actions.

4.2 Appendices 1 and 2 sets out all the actions that remain open from final internal audit reports. It includes the agreed management actions, original and revised target dates, and the latest updates provided by action assignees.

5. ACTIONS CLOSED SINCE LAST COMMITTEE MEETING

5.1 Since the last full update in June, 28 internal audit actions have been closed, comprising of 3 High, 14 Medium and 11 Low priority actions.

5.2 Of the 28 closed actions, 19 were closed on or before their agreed target dates, and 9 were closed after their expected completion dates.

5.3 Full details of actions closed since the last Committee meeting, including closure dates and closure comments, are provided in Appendices 3 and 4.

6. ACTIONS WITH REVISED TARGET DATES

6.1 This section highlights internal audit actions where target dates have been revised. There are currently 16 open actions operating to revised target dates, none of which have had their target date revised since the previous full update to the Committee in June.

6.2 Details of all currently open actions, including historic target date revisions, are provided in Appendix 1.

7. IMPLICATIONS OF THE DECISION

7.1 Implications on Resources

7.1.1 There are no additional resource requirements arising from this paper.

8. RISK MANAGEMENT

8.1 Corporate Leadership Team continues to have oversight of completed audits and the actions raised through the Council’s internal audit reporting arrangements.

8.2 Internal Audit continues to monitor progress against agreed actions, seeking updates and supporting evidence from responsible officers where required. Any significant capacity pressures or delays impacting delivery will continue to be reported to the Committee as appropriate.

9. LIST OF APPENDICES INCLUDED

Appendix 1 - Open Internal Audit Actions
Appendix 2 - Open Internal Audit Actions (Restricted)
Appendix 3 - Closed Internal Audit Actions
Appendix 4 - Closed Internal Audit Actions (Restricted)

Appendix 1 - Open Internal Audit Actions

Huntingdonshire DISTRICT COUNCIL

Generated Date	Sep-26
Action Criteria	
Project	Internal Audit

Recruitment and Retention

Reference	Priority Level	Action Detail	Original Target	Revised Target	Update Details
5684	Medium	We will review and update the Recruitment Policy to reflect current practice in relation to references, ensuring that the minimum requirement is clearly defined.	30 Sep 2026	30 Sep 2026	Description: Policy updated and is scheduled for Employment Committee to endorse on 23rd September Further Information: Update Date: 11 Aug 2026
5685	Medium	We will ensure that, where references are not obtained, approval from hiring manager to proceed is formally documented and retained prior to the employee's start date, in line with other pre-employment checks.	31 Aug 2026	31 Aug 2026	Description: Policy updated and is scheduled for Employment Committee to endorse on 23rd September Further Information: Update Date: 11 Aug 2026
5683	Low	We will obtain formal approval for the Recruitment and Selection Policy from the appropriate individual or governance forum and update the policy to accurately reflect this.	31 Aug 2026	31 Aug 2026	Description: Policy updated and is scheduled for Employment Committee to endorse on 23rd September Further Information: Update Date: 11 Aug 2026
5686	Low	We will consider how exit questionnaire data can be periodically reviewed and summarised to identify any emerging themes, and whether this insight can be shared with senior management to support retention activities.	31 Dec 2026	31 Dec 2026	Description: A plan has been agreed on the type of information to share with Employment committee and CLT. Currently designing report based on Q1 data for review Further Information: Update Date: 11 Aug 2026

Data Quality - Human Resources

Reference	Priority Level	Action Detail	Original Target	Revised Target	Update Details
5689	High	Management will undertake a comprehensive review of all job descriptions to ensure that they are up-to-date and aligned to the role structure and records held within iTrent in preparation for Local Government Reorganisation. For those employees for which there is no valid job description, these will be developed in a timely manner and communicated to staff.	31 Dec 2026	31 Dec 2026	Description: A review of all staff files is currently being undertaken, once this has been completed, once missing job descriptions have been identified, work will be carried out with managers to ensure that they are in place Further Information: Update Date: 15 Aug 2026
5688	Medium	Management will undertake a comprehensive review of all employee records to ensure that start dates recorded in iTrent are accurate and align with the corresponding contractual documentation, in preparation for Local Government Reorganisation.	30 Apr 2027	30 Apr 2027	Description: This piece of work will be started once the job descriptions have been reviewed Further Information: Update Date: 15 Aug 2026
5687	Low	Clear guidance will be implemented to define roles and responsibilities for maintaining employee data accuracy and completeness within the HR system, including responsibilities for employees, managers, and HR. All HR system guidance will include version control and defined review dates to ensure it remains current and accurate	31 Oct 2026	31 Oct 2026	Description: Work is progressing, with system checklists for key processes in place. Further Information: Update Date: 24 Aug 2026

Capacity Planning					
Reference	**Priority Level**	**Action Detail**	**Original Target**	**Revised Target**	**Update Details**
4831	High	Consider the development of a proportionate, corporate approach for assessing capacity and resource availability across all service areas. This should support services to: • Set out their BAU activity, planned change work and expected future pressures • Understand the time and effort involved in BAU tasks, including typical volumes and peaks• Record the resources they have available, such as people, time and skills • Compare workload with available capacity so they can identify gaps, pressures or risks of overcommitting. • Provide clear capacity information to support decision making, rather than relying solely on professional judgement. Capacity assessments should be reported and monitored through an agreed route so that risks are visible and the Council can see where support or prioritisation is needed.	30 Sep 2026	30 Sep 2026	Description: In progress and on target for Sept 26. The Business Analysts have drafted an initial report to implement an approach for capturing capacity based on 'service category types' and 'demand archetypes'. The next step is to share the report wider for approval and implement the guidance and associated tools. Further Information: Update Date: 20 Aug 2026 Description: In progress and on target for Sept 26. The Business Analysts have drafted an initial report to implement an approach for capturing capacity based on 'service category types' and 'demand archetypes'. The next step is to share the report wider for approval and implement the guidance and associated tools. Further Information: Update Date: 30 Jun 2026 Description: No progress to report, on schedule to meet target date in Sept for implementing capacity planning. To align to LGR Further Information: Update Date: 19 May 2026 Description: No progress to report, on schedule to meet target date in Sept for implementing capacity planning. To align to LGR Further Information: Update Date: 27 Mar 2026 Description: The Business Analyst Team have started to investigate the options and will be carrying out a survey of management to establish current approaches taken. Still on schedule to bring back recommendations by June 2026. Further Information: Update Date: 04 Mar 2026

4834	Low	Develop guidance or a checklist to support services in considering Local Government Reorganisation(LGR) as part of the 2027/28 Service Planning cycle. It should: • Highlight key areas for services to consider, such as statutory duties, future operating models, resource implications and dependencies. • Provide prompts to help managers assess these impacts in a consistent and proportionate way. • Include a straightforward way for services to record assumptions, risks and uncertainties	31 Dec 2026	31 Dec 2026	Description: In progress and on target for Dec 26 - The baseline information regarding 'Day 1 requirements' has now been collated in the 'Taxonomy datasheets' across all services and 7 Authorities. Now waiting for Regional PMO to provide initial analysis across all authorities. The Regional workstreams and sub-workstreams are working on 'Workstream Initiation Documents' (WIDs). These will detail the roadmaps for safe and legal for Day 1. Once submitted, will be analysed and shared across authorities. Further Information: Update Date: 20 Aug 2026 Description: In progress and on target for Dec 26 - The baseline information regarding 'Day 1 requirements' has been collated as initial draft in the 'Taxonomy datasheets' across all services. The next step is to analyse this information and develop into a programme of work based on day 1 priorities. Further Information: Update Date: 30 Jun 2026 Description: Regarding capacity and service planning for 2027/28 and impact of LGR - All HoS have been asked in April 26 to put forward any capacity issues regarding key staff releasing time for LGR. The additional resource requests are being considered by Leadership. All HoS have also been shared 'Minimum requirements for Day1' for new unitary organisation. This is the baseline that will help identify priorities for service planning for 2027/28. Further Information: Update Date: 19 May 2026 Description: Regarding capacity planning and impact of LGR - The baseline data set per a service has been created to highlight current demand due to transformation projects, business as usual including statutory projects, corporate compliance requirements, external LGR working groups and internal data quality working groups. This baseline information is being used to bring challenge regarding project priority. The new HoS for Transformation will also be meeting all HoS in March to discuss being prepared for LGR and capacity implications. Further Information: Update Date: 04 Mar 2026 Description: Relevant service leads have been identified for workstreams (internal and external) and progress will be reported to transformation board. An overview of key workstreams and resources needed will be presented at this board alongside engagement with Heads of Service to encourage them to start thinking about managing BAU alongside LGR. This will feed into the creation of the checklist in service planning process. Further Information: Update Date: 20 Feb 2026

Capital Programme

Reference	Priority Level	Action Detail	Original Target	Revised Target	Update Details
3729	Medium	To ensure robust governance and compliance with the capital budgeting process, management will implement controls to ensure a capital bid form is completed for all capital items. In cases where the expenditure relates to a recurring asset replacement programme, management will ensure that the anticipated annual replacement is either: • Approved via a completed Capital bid form • Clearly documented as part of an appropriately approved rolling capital programme • Covered under a pre-approved budget or contract framework	31 Jul 2025	28 Feb 2027	Description: Description: A new governance process has been introduced as part of the 2027/28 budget setting process. Full details of the process including supporting documentation has been shared with Laura Petkeviciute on 5th August 2026. this action needs to be marked as completed: Update Date: 04 Sept 2026Further Information: Update Date: 04 Sep 2026 Description: A new governance process will be approved, as part of the 2027/28 budget setting process. This will ensure that all new capital bids are submitted via a capital bid form and approved via an appropriate forum. The approving forum will be dependent on the size of the bid and the funding source. New bids will only be added to the rolling capital programme after a bid has been formally approved, and a source of funding has been identified. The new bid form will require services to complete a range of information, including a section to document its review and endorsement. Further Information: Update Date: 03 Jun 2026 Description: Reopened: Action Re-Opened following a Follow Up Part One Audit - We were advised by the Head of Finance and Deputy S151 that a new governance process will be approved, as part of the February 2026 budget report, which will ensure that all new capital bids are submitted via a capital bid form and approved via an appropriate forum. The approving forum will be dependent on the size of the bid and the funding source. New bids will only be added to the rolling capital programme after a bid has been formally approved, and a source of funding has been identified. The new bid form will require services to complete a range of information, including a section to document its review and endorsement. However, we were advised by the Head of Finance and Deputy S151 that this new process had not been developed or documented yet, with the intention it will be finalised in January 2026.The action has not been implemented. Further Information: Update Date: 19 Feb 2026 Description: Action update Further Information: Email sent to service detailing requirement to complete bid form for rolling programme of replacement Update Date: 28 Jul 2025

3730	Medium	Action addition from a Follow Up Part One Audit Report 19 Feb 2026 - The Council will continue to develop and document the new capital bid process to be approved as part of the February 2026 budget report. Original Action -Management will ensure capital bids are reviewed and approved by an appropriate forum. The capital bid form will be updated to include a section for documenting the forum's review and endorsement decision.	30 Jun 2025	28 Feb 2027	Description: Description: A new governance process has been introduced as part of the 2027/28 budget setting process. Full details of the process including supporting documentation has been shared with Laura Petkeviciute on 5th August 2026. this action needs to be marked as completed: Update Date: 04 Sept 2026Further Information: Update Date: 04 Sep 2026 Description: A new governance process will be approved, as part of the 2027/28 budget setting process. This will ensure that all new capital bids are submitted via a capital bid form and approved via an appropriate forum. The approving forum will be dependent on the size of the bid and the funding source. Further Information: Update Date: 03 Jun 2026 Description: Reopened: Action Re-opened following a Follow Up Part One Audit. We were advised by the Head of Finance and Deputy S151 that a new governance process will be approved, as part of the February 2026 budget report, which will ensure that all new capital bids are submitted via a capital bid form and approved via an appropriate forum. The approving forum will be dependent on the size of the bid and the funding source. However, a paper has not yet been drafted to summarise the revised process and we have not been provided with evidence to confirm this new process has been implemented yet.The action has not been implemented. Further Information: Update Date: 19 Feb 2026
3734	Medium	We will review and formalise the capital programme governance framework by: • Updating The Financial Procedures (included within the Constitution) and Budget Process: A Guide for Budget Managers to reflect current practices, including the role of the Informal Cabinet in capital bid review. • Ensuring both documents are subject to formal approval and made readily accessible (e.g. via the Council intranet). • Developing comprehensive procedures that clearly outline the end-to-end capital programme process, including capital bid approvals, in-year amendments and monitoring procedures, record keeping and roles and responsibilities	31 Dec 2025	28 Feb 2027	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026Further Information: Update Date: 04 Sep 2026 Description: A new governance process will be approved, as part of the 2027/28 budget setting process. This will ensure that all new capital bids are submitted via a capital bid form and approved via an appropriate forum. The approving forum will be dependent on the size of the bid and the funding source. Further Information: Update Date: 03 Jun 2026 Description: As per the comments, action has been moved to 28/02/2027 as per Head of Finance request Further Information: Update Date: 09 Mar 2026 Description: This action is part of the wider plan to implement a new bid and approval process for the capital programme which the HoF will work on during 26/27 and have fully implemented in time for the 27/28 budget bid process. Further Information: Update Date: 09 Mar 2026 Description: Sandra Beard will be updating the document as the new head of service Further Information: Update Date: 30 Dec 2025

Creditor Payments					
Reference	**Priority Level**	**Action Detail**	**Original Target**	**Revised Target**	**Update Details**
4171	Medium	Management will: •Develop and maintain a formally documented scheme of delegation and financial approval register, setting out the authorised approval limits for each role. •Ensure the document is approved by senior management, reviewed periodically, and updated where changes occur, with all amendments documented and approved. •Share the approved register with Heads of Service so they can confirm staff limits are appropriate for their teams.	31 Dec 2025	31 Aug 2026	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026 Further Information: Update Date: 04 Sep 2026 Description: Hello, We are currently in the process of developing the process for this via Power Automate and Sharepoint which will create a register for all users in technology one including their delegation limits. The process will work via an automated report delivered to the outlook inbox of the requesting user from Technology One. The user will then run the first power automate flow which reformats the data for the next step in the flow. The next flow will then compare the latest details run against the 'User Audit History' and highlight any records which shows a change in the delegation/profile which will also leave a flag on the record the account needs to be reviewed. The final flow that needs to be run will then segregate each of the records via department in seperate spreadsheets uploaded onto Sharepoint. The requested user would then need to allocate each of the spreadsheets to the corresponding HOS's to be reviewed. When they update the spreadsheet it would then feed into a master spreadsheet which allows us to monitor whether these changes have been reviewed as well as action any changes required where the limit is incorrect. I've attached a sample of the first report draft (It will contain data which does not need to be on the spreadsheet so the final outcome will look different). I have also included a sample of two spreadsheets that are created from the UserAuditMaster Report. As stated earlier, a vast amount of the data currently in the tables will be excluded from the final report and we are still at the stage of testing the concept. I'd anticipate a more finalised version in at least 4 - 6 weeks time. Thanks, Tashan Further Information: Update Date: 03 Sep 2026 Description: As per below comments and request from Head of Finance, the action target date has been moved to end of August Further Information: Update Date: 03 Jun 2026 Description: There has been significant difficulty in filling the internal Systems Accountant role and therefore no capacity to complete this. We have a new starter on 01/07/26 and this task will be part of their role. Further Information: Update Date: 03 Jun 2026 Description: As per below comments and request from Head of Finance, action due date is being moved to 31/05/2026 Further Information: Update Date: 09 Mar 2026

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4173	Medium	The Head of Finance will introduce regular monitoring reports in TechOne comparing invoice date to PO approval date and review the results. Exceptions will be escalated to the Corporate Director (Finance and Resources), who will present them to CLT for review. CLT will be responsible for challenging services and reinforcing compliance with the No PO No Pay policy. In the meantime, communications will be issued to services advising staff that retrospective ordering is not permitted under the No PO No Pay policy and that this will be monitored and reported to CLT.	31 Mar 2026	31 Aug 2026	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026 Further Information: Update Date: 04 Sep 2026 Description: Hello, I've attached a report we are able to generate from T1 with the inclusion of a few lookups. This report shows the invoices loaded into T1 against the PO numbers they have been attached to including the date they were approved. Column H contains a formula which checks if the approval date for the PO is after the invoice date and if this is true it returns 'YES'. The report can then be filtered on all transactions that return 'YES' and can be separated out if required by department and sent to the respective HOS/Director. This list would contain some invoices where it may not be feasible to raise a PO beforehand (I.e. Energy Bills) so we can restrict this further. Let me know your thoughts. Kind regards, Tashan Edwards Further Information: Update Date: 02 Sep 2026 Description: As per below comments and request from Head of Finance, the action target date has been moved to end of August Further Information: Update Date: 03 Jun 2026 Description: There has been significant difficulty in filling the internal Systems Accountant role and therefore no capacity to complete this. We have a new starter on 01/07/26 and this task will be part of their role. Further Information: Update Date: 03 Jun 2026 Description: As per below comments and request from Head of Finance, the action due date has been moved to 30/06/2026. Further Information: Update Date: 09 Mar 2026

General Ledger

Reference	Priority Level	Action Detail	Original Target	Revised Target	Update Details
4630	Medium	Management will undertake a formal review and update of its Financial Procedure Rules within the Constitution to ensure they remain current, fit for purpose, and aligned with relevant legislation and best practice. The council will implement a formal review cycle for its Financial Procedure Rules, ensuring they are reviewed at least every two years, or sooner if there are significant changes in legislation, financial systems, or governance arrangements.	30 Jun 2026	28 Feb 2027	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026 Further Information: Update Date: 04 Sep 2026 Description: A new governance process will be approved, as part of the 2027/28 budget setting process. This will ensure that all new capital bids are submitted via a capital bid form and approved via an appropriate forum. The approving forum will be dependent on the size of the bid and the funding source. Further Information: Update Date: 03 Jun 2026 Description: As per below comments and request from HoF, the due date has been moved to Feb 2027 Further Information: Update Date: 09 Mar 2026 Description: the new HoS will be implementing a new approval and governance process for both capital and revenue during 26/27, to be fully implemented in time for the 27/28 budget setting process. Deadline to be extended to 27/02/27 to match the deadline for the same capital action. Further Information: Update Date: 09 Mar 2026 Description: To be undertaken in the New Year so as to ensure completion by the due date. Further Information: Update Date: 22 Dec 2025

4632	Medium	Management will develop and implement a formal journal processing policy that: • Defines segregation of duties and journal approval requirements. • Specifies permitted exceptions and their rationale. • Requires supporting documentation to be attached to all journals to ensure a complete and accessible audit trail is maintained. • Is approved by the Head of Finance and communicated to relevant staff.	31 Mar 2026	28 Feb 2027	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026 Further Information: Update Date: 04 Sep 2026 Description: A new governance process will be approved, as part of the 2027/28 budget setting process. Further Information: Update Date: 03 Jun 2026 Description: As per below comments and request from HoF, the action due date has been moved to end of Feb Further Information: Update Date: 09 Mar 2026 Description: The new HoS will be implementing a new governance and approval process during 26/27 which will be in place in time for the 27/28 budget setting process. Deadline to be extended to 27/02/27 to match the other actions for this issue. Further Information: Update Date: 09 Mar 2026 Description: I have inherited this from my predecessor. I will speak to the relevant staff members to understand the ask and ensure that it is implemented by the due date. Further Information: Update Date: 22 Dec 2025
4633	Medium	We will introduce review and sample checking of high value journals.	31 Mar 2026	28 Feb 2027	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026 Further Information: Update Date: 04 Sep 2026 Description: A new governance process will be approved, as part of the 2027/28 budget setting process. Further Information: Update Date: 03 Jun 2026 Description: As per below request from Head of Finance, action has been moved to end of Feb 2027 Further Information: Update Date: 09 Mar 2026 Description: This will form part of the new governance and approval process that will be implemented by the HoS during 26/27 and which will be in place in time for the 27/285 budget setting process. Deadline to be extended to 27/02/27 to match the other actions within the overall requirement. Further Information: Update Date: 09 Mar 2026 Description: I have implemented this from my predecessor. I will speak to the relevant staff members to understand the ask and ensure that it is implemented by the due date. Further Information: Update Date: 22 Dec 2025

4634	Medium	Management will review the current process and consider splitting the responsibilities for daily cash postings and bank reconciliations between different personnel to strengthen segregation of duties.	31 Mar 2026	28 Feb 2027	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026 Further Information: Update Date: 04 Sep 2026 Description: As per below request from Head of Finance, action has been moved to end of Feb 2027 Further Information: Update Date: 09 Mar 2026 Description: This will be a part of the wider governance and approval process that will be introduced by the HoS during 26/27 and in place in time for the 27/28 budget setting process. Deadline to be extended to 27/02/27 to match the other items within the wider requirement. Further Information: Update Date: 09 Mar 2026 Description: I have inherited this from my predecessor. I will speak to the relevant staff members to understand the ask and ensure that it is implemented by the due date. Further Information: Update Date: 22 Dec 2025
4631	Low	Management will implement a formal document control process to ensure all procedures are updated to include version history, review dates, responsible individuals, and defined review frequency. Management will ensure procedures are subject to regular review.	31 Jan 2026	28 Feb 2027	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026 Further Information: Update Date: 04 Sep 2026 Description: A new governance process will be approved, as part of the 2027/28 budget setting process. Further Information: Update Date: 03 Jun 2026 Description: As per below comments and request from HoF, action due date has bene moved to end of Feb 2027 Further Information: Update Date: 09 Mar 2026 Description: the new HoS will be implementing a new governance and approval process during 26/27 to be in place in time for the 27/28 budget setting process. Deadline to be extended to 27/02/27 to match the other actions on this. Further Information: Update Date: 09 Mar 2026 Description: Head of Finance has requested completion date be moved forward to 31 March 26 Further Information: Update Date: 03 Mar 2026

4636	Low	Management will: - Implement a formal review process for payroll reconciliations. - Include payroll reconciliation as a mandatory item in the Finance month-end checklist. - Record the date of completion and review on all reconciliations to evidence timeliness.	31 Jan 2026	28 Feb 2027	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026 Further Information: Update Date: 04 Sep 2026 Description: As per below comments and request from Head of Finance, action due date has been changed to to end of Feb 2027. The action has also been re-assigned to Head of Finance. Further Information: Update Date: 09 Mar 2026 Description: This will be incorporated into the wider review of the approval and governance process that will be implemented by the HoS during 26/27 and in place in time for the 27/28 budget setting process. Deadline to be extended to 27/02/27, to match the date of the other actions within the wider requirement. Further Information: Update Date: 09 Mar 2026 Description: 1. The team is currently testing the methodology, we are on track for timely implementation.2. Will be included from following month-end. On track.3. This is done automatically by T1 (our financial system). Further Information: Update Date: 15 Jan 2026
4641	Low	Management will implement a formalised approval process for the creation and amendment of GL codes. This process will include: - Defined roles and responsibilities for initiating, reviewing, and authorising changes. - Documented approval records retained for audit purposes. - Integration of the approval step into existing financial controls, such as the month-end checklist.	31 Mar 2026	28 Feb 2027	Description: Description: A new governance process will be approved, as part of the 2027/28 budget setting process. An additional resource has been brought in to undertake this work and it is currently underway: Update Date: 04 Sept 2026 Further Information: Update Date: 04 Sep 2026 Description: As per below comments and request from Head of Finance, the action due date has been moved to end of Feb 2027. Further Information: Update Date: 09 Mar 2026 Description: this will be included within the wider review of the governance and approval process which will be implemented during 26/27 by the HoS and in place in time for the 27/28 budget setting process. Deadline to be extended to 27/02/27 to match the other actions within the overall requirement. Further Information: Update Date: 09 Mar 2026 Description: I have inherited this from my predecessor. I will speak to the relevant staff members to understand the ask and ensure the it is implemented by the due date. Further Information: Update Date: 22 Dec 2025

ICT Budget Management and Efficiency Savings

Reference	Priority Level	Action Detail	Original Target	Revised Target	Update Details
5409	High	Management will implement strengthened forecasting requirements to ensure compliance with the CDIO’s documented direction. Budget Holders will be required to provide specific, evidence-based monthly re-forecasts, including clear rationale, underlying assumptions, and supporting detail. The ICT Finance and Contracts Manager will introduce a standardised narrative template and review mechanism to ensure that all forecasts adhere consistently to the defined expectations.	31 Jul 2026	31 Jul 2026	Description: Action is now an Objective for relevant Officers, and is being monitored Further Information: Update Date: 01 Jul 2026

5411	High	The CDIO will work with L&D colleagues to determine the best approach to undertaking a training needs analysis and to develop a comprehensive training programme for Budget Holders	31 Jul 2026	31 Jul 2026	Description: Some initial discussion undertaken, no 'exact' fit courses available. Further Information: Update Date: 01 Jul 2026
5412	High	We will agree a clear methodology for identifying, approving and monitoring achievement of efficiency targets for a three year period. These proposals will be subject to review and approval by CLT, with periodic reporting on progress. To achieve this, a governance mechanism will be established, by the ICT Finance and Contracts Manager and Portfolio Delivery Manager, to quality assurance savings proposals to achieve these are realistic, achievable and can be measured.	30 Sep 2026	30 Sep 2026	
5413	High	The ICT Finance and Contracts Manager will develop a robust mechanism for recording and measuring efficiency savings within the TechOne financial ledger.	30 Sep 2026	30 Sep 2026	
5414	High	A verification process will be established to validate that actual savings have been achieved by the Portfolio Delivery Manager. If specific savings are planned, these will be measured and checked in Finance. A process of reporting and tracking savings will be followed each month	30 Sep 2026	30 Sep 2026	
5416	High	The ICT Leadership team, led by the CDIO, will develop, approve and communicate a formal overtime policy that clearly sets out managerial and staff responsibilities to ensure consistent application of good practice in record keeping, checking and approval.	30 Sep 2026	30 Sep 2026	
5422	High	A mechanism will be developed, by the Portfolio Delivery Manager, to monitor utilisation of the 3C ICT establishment specifically for change delivery projects, with outputs available for improved oversight and reporting.	30 Jun 2026	30 Jun 2026	Description: Action is being progressed. A new ICT Leadership post and PMO Manager post created, this alongside the adoption of a new delivery tool (verto) will resolve this issue longer-term. Further Information: Update Date: 29 Jun 2026
5417	Medium	Specific guidance on the correct treatment of overtime relating to capital projects, including requirements for accurate project coding and appropriate allocation between revenue and capital activities will be produced by the Portfolio Delivery Manager. The guidance will be communicated to staff and reviewed in accordance with established review cycles.	30 Sep 2026	30 Sep 2026	
5418	Medium	The CDIO will review the current overtime recording arrangements and determine the most appropriate method to be used going forward, which will then be implemented by the ICT Portfolio Delivery Manager.	30 Sep 2026	30 Sep 2026	
5424	Medium	The Portfolio Delivery Manager will revise the project proposal guidance to require assessment of overtime for all projects where work is likely to occur outside standard working hours.	30 Jun 2026	30 Jun 2026	
5425	Low	The Portfolio Delivery Manager will ensure that line managers evidence-check the purpose and business need of each overtime claim prior to approval, confirming whether the work relates to revenue activity or a capital project	30 Jun 2026	30 Jun 2026	
5426	Low	The Portfolio Delivery Manager will ensure that overtime claims are reviewed in a timely manner to confirm whether the work relates to capital project activity.	30 Jun 2026	30 Jun 2026	

Market Towns Programme

Reference	Priority Level	Action Detail	Original Target	Revised Target	Update Details
5293	Low	Management will define and document variance thresholds and escalation routes for future programmes to ensure material variances from approved budgets are identified, reported, and escalated consistently.	30 Sep 2026	30 Sep 2026	Description: In progress and on target for Sept 26 - The 6Ds project lifecycle has been implemented across the Council, with clear expectations regarding approvals and gating for new projects and change requests. The Project Governance for the Council has been approved, and due to commence with the Corporate Delivery Programme Board in July 2026; including Market Towns. The threshold for reporting material cost variance is still to be agreed and approved. Further Information: Update Date: 30 Jun 2026 Description: In progress and on target for Sept 26 - The project methodology has been agreed regarding process, decision and gating. The threshold for reporting material cost variance is still to be agreed and approved. Further Information: Update Date: 19 May 2026 Description: Market Towns delivery programme comes under the wider Transformation Programme governance. The Transformation Framework was approved by Cabinet in Nov 25. The programme and project toolkit including processes, documentation and controls was launched end of March 26 for services. The next step is to ensure alignment to these new ways of working. The HoS is to put in place the Market Town Programme Delivery Board by June 26 aligning to Transformation Board governance. SPECIFIC ACTION - This will include processes for managing change controls and approvals. Further Information: Update Date: 27 Mar 2026

Risk Management

Reference	Priority Level	Action Detail	Original Target	Revised Target	Update Details
5284	Medium	Management will ensure that the updated Risk Management Strategy 2026–2028 is reviewed and approved through the appropriate governance forums at the earliest available meeting. The draft strategy will be circulated in advance, along with a summary of key changes, to support an informed decision-making process. Following approval by the relevant governance forum(s), the strategy will be progressed through the formal reporting route for adoption in line with established governance procedures.	31 Aug 2026	31 Aug 2026	Description: Risk Management Strategy has been reviewed and updated by new Risk Manager. Has now been through CLT and received comments. Updates completed and now being progressed to next step - to be shared with Portfolio Owner first. Further Information: Update Date: 14 Aug 2026 Description: New Risk Manager in post and progressing with action. Further Information: Update Date: 29 May 2026
5286	Medium	Management will ensure that the revised risk management approach, which has already been applied to the Corporate risk register, is fully embedded across the organisation by completing updates to all remaining service-level risk registers. Management will also ensure that routine reviews incorporate quality-assurance checks to confirm ongoing alignment with the updated strategy.	31 Aug 2026	31 Aug 2026	Description: This action relies on the general Risk Management Training being delivered to ensure a consistent, understood approach across the organisation. Most service-level registers are now present on the system, but for the majority this revolves around Fraud risk. There is further input needed on what level of risk needs to be inputted, as some service registers are now too bloated and unmanageable. Workshops will be held with services/functions after the training sessions. Further Information: Update Date: 14 Aug 2026 Description: New Risk Manager in post and progressing with action. Further Information: Update Date: 29 May 2026

5288	Medium	The Council will establish a reporting route and mechanism for service level risk registers to be considered within the governance structure. This could include a schedule of review by SLT, with the forum considering service level risk registers to an agreed schedule or timetable.	31 Aug 2026	31 Aug 2026	Description: Risk Manager is working with Interim Corporate Governance lead to look at the structure of reporting and escalation, and introducing a suitable governance board where service-risks can be reported. This is a priority action. Further Information: Update Date: 14 Aug 2026 Description: New Risk Manager in post and progressing with action. Further Information: Update Date: 29 May 2026
5289	Medium	We will continue to complete and actively monitor the gap analysis, updating and recording progress against all areas currently recorded as 'Needs Reviewing'.	31 Aug 2026	31 Aug 2026	Description: Work to achieve this action continues to progress. The review of the Risk Management Strategy has aligned closer with the best practise guidance of HMT Orange Book. Alongside Risk Management Training, Workshops and other pieces of work we continue to address the gaps identified. Further Information: Update Date: 14 Aug 2026 Description: New Risk Manager in post and progressing with action. Further Information: Update Date: 29 May 2026
5285	Low	Management will finalise this training schedule, ensure the approach is formally documented, and embed it across all relevant service areas, including establishing consistent review periods and responsibilities for maintaining the schedule.	31 Aug 2026	31 Aug 2026	Description: Risk Management Training is now being provided via group sessions to all risk owners and assignees, alongside any other SME's from teams that may be involved in the risk management process or workshops. This training is being recorded by Learning and Development. A final schedule will need to be finalised for follow-ups and other sessions such as specific Risk Software training; this will be done once the general introductory sessions are complete and feedback received. Further Information: Update Date: 14 Aug 2026 Description: New Risk Manager in post and progressing with action. Further Information: Update Date: 29 May 2026
5287	Low	Quarterly communications will be issued by the risk manager to prompt the review and update of service-level risk registers.	31 Aug 2026	31 Aug 2026	Description: Continuing with action. Further Information: Update Date: 14 Aug 2026 Description: New Risk Manager in post and progressing with action. Further Information: Update Date: 29 May 2026

Code of Procurement Audit 24.25

Reference	Priority Level	Action Detail	Original Target	Revised Target	Update Details
3371	Medium	The Code of Procurement reform changes need to be expedited on the back of this audit and the Procurement Act 2023 updates due to happen in early 2025 to ensure effective and efficient procurement thresholds. The Procurement Lead with the support of the Monitoring Officer to document, review and update (as applicable) a full suite of Procurement documentation to include the Code of Procurement, the Procurement Aide Memoire and supporting procedure notes. Internal Audit recommends that this documentation is reviewed (and is subject to appropriate approval) once every 3 years, or when regulations change (if they change before 3 years). The procurement documentation will be updated by the Procurement Lead/team after discussions with the Monitoring officer and will be reviewed and approved by Director of Finance and Corporate Services. (Amber-Medium).	28 Apr 2025	31 Oct 2026	Description: The revised Code of Procurement is scheduled to go to the Constitution Review Working Group on 03/09/26 then CGC 16/09/26 and on to Council 14/10/26 Further Information: Update Date: 23 Aug 2026 Description: Variable target date extended to 31 October 26 following request from Procurement Manager to bring due date in line with the Full Council meeting as this will hopefully be the final signoff of the Code of Procurement. Further Information: Update Date: 22 May 2026 Description: The CoP is in its final stages and will be progressed for approval via the Constitution Working Group, CGC and Full Council as these become available in the coming weeks/months. Further Information: Update Date: 19 May 2026 Description: Draft Code of Procurement was sent to 3C Legal for comment/feedback. Awaiting response before progressing. Further Information: Update Date: 20 Feb 2026 Description: As per below comments, due date has been moved with agreement from Interim S151 Officer - see email attachment for audit trail. Further Information: Update Date: 12 Jan 2026
3373	Medium	Updated action following a Follow Up Part Two audit - Management will ensure the process for review and approval of £100k payments, and the supporting due diligence checks are evidenced and documented. Original Action - Ensure alignment between the contracts, payments made, and purchase orders raised. Consider introduction of a no PO no pay policy by 1st April 2025. Procurement team and/or finance team appointed staff to conduct a quarterly review of a sample of significant payments including both payments through POs as well as without POs or contracts (over £100K values) to confirm that the POs comply with their respective contracts and had the appropriate level approvals and identify if there are any significant payments without POs and contracts which should be investigated. Any compliance issues should be highlighted and reported to SLT. (High-Red).	28 Apr 2025	30 Jun 2026	Description: Description: Reopened: Follow Up Audit Part Two concluded that the action is partially implemented. The No PO No Pay policy has been introduced and management advised that payments exceeding £100k are subject to review and approval by the Head of Finance. However, the due diligence checks undertaken as part of the approval process are not currently evidenced or documented. The action has therefore been reopened and revised to reflect the remaining work required. The Head of Finance is now ensuring that written evidence is obtained when payments above £100k are approved. Priority Level has been changed to Medium Further Information: Update Date: 04 Sept 2026Further Information: Update Date: 04 Sep 2026 Description: Reopened: Follow Up Audit Part Two concluded that the action is partially implemented. The No PO No Pay policy has been introduced and management advised that payments exceeding £100k are subject to review and approval by the Head of Finance. However, the due diligence checks undertaken as part of the approval process are not currently evidenced or documented. The action has therefore been reopened and revised to reflect the remaining work required. Priority Level has been changed to Medium Further Information: Update Date: 15 Jun 2026

Committee Governance Structure 24.25

Reference	Priority Level	Action Detail	Original Target	Revised Target	Update Details
3716	Medium	The Constitution Review Working Group will evaluate the current scheme of delegation to identify gaps, ambiguities and areas where further detail is needed. This should include an assessment of roles, responsibilities, and authority at each level of the Council. Key stakeholders may need to be engaged throughout the process. Specific delegated authorities should be clearly defined within a clear, structured document. The authority, responsibilities and limits of decision making for each individual, committee or department should be clearly outlined. The delegation should include levels of financial authority, operational decisions and strategic responsibilities as appropriate.	31 Mar 2026	31 Jul 2026	Description: The review of the Scheme of Delegation has been completed. The outcome has been endorsed by the Constitution Review Working Group and has been submitted to the Corporate Governance Committee on 16th September seeking a recommendation that the Council should incorporate the Scheme into the Constitution. Further Information: Update Date: 04 Sep 2026 Description: Comments provided by Head of Democratic Services & Monitoring Officer - The Constitution Review Working Group will undertake a comprehensive examination of the current scheme of delegation to identify gaps, ambiguities, and areas requiring further clarification. This review will include an assessment of roles, responsibilities, and decision making authority across all levels of the Council, with engagement from key stakeholders as required. As part of the preparatory work, initial professional support and advice has been sought from the Association of Democratic Services Officers, who have been actively engaged in preliminary conversations. Internal Officers are also contributing to the early stages of the review. Given the complexity and breadth of this work, additional time and resource is required to complete the review to the necessary standard. It is therefore proposed that the target date for this action is revised to reflect a more realistic and achievable timescale. It is intended that delegated powers will be set out within a clearly structured and comprehensive document, providing explicit definitions of the authority, responsibilities, and decision making limits assigned to each individual, committee, or department. This will include financial thresholds, operational decision making powers, and strategic responsibilities where appropriate. The developing proposals will be brought forward to the Constitution Working Group in due course. Due date has bee moved to 31/07/2026 Further Information: Update Date: 04 Mar 2026 Description: Comments provided by Head of Democratic Services & Monitoring Officer - Officers have engaged the Association of Democratic Services Officers (ADSO) to provide technical support on updating the Constitution. Officers and ADSO are currently working through the existing Scheme of Delegation with key stakeholders, and it will be taken through the Constitution Working Group, CGC and Full Council as soon as possible. This is a complex piece of work which will require the new draft to align to other areas of the Constitution as well as the existing organisational structure. The Monitoring Officer will keep the Committee updated on progress towards the target date. Further Information: Update Date: 09 Jan 2026 Description: The Constitution Review Working Group continues to work with the Association of Democratic Service Officers who are currently undertaking a review of this chapter of the Constitution. Further engagement is planned with key stakeholders. This will be presented to the Working Group in due course. Current draft has been provided by ADSO for further review internally with SLT and HoS Further Information: Update Date: 11 Nov 2025 Description: The Constitution Review Working Group is working with the Association of Democratic Service Officers who are currently undertaking a review of this chapter of the Constitution. Further engagement is planned with key stakeholders. Further Information: Update Date: 04 Sep 2025

Key Financial Controls 24.25					
Reference	**Priority Level**	**Action Detail**	**Original Target**	**Revised Target**	**Update Details**
3381	High	The finance team should engage with Tech 1 to agree on a clear resolution plan, including a timeline for when and how the issue will be resolved. If Tech 1 fails to offer a satisfactory outcome within the agreed timeframe, senior management involvement may be necessary to escalate the matter and ensure a prompt resolution.	31 Mar 2025	31 May 2026	Description: the permanent replacement is undertaking training to become more confident on Tech1 and is currently working with Tech1 to identify a solution to this issue. Please extend the due date to the end of October. Further Information: Update Date: 04 Sep 2026
					Description: A permanent placement has been made in the role of the Systems Accountant with a start date of 1st July 2026. The successful applicant is currently undertaking on Technology 1 and when more confident in the role will be in a position to pick up this task. Further Information: Update Date: 07 Jul 2026
					Description: There has been significant difficulty in filling the internal Systems Accountant role and therefore no capacity to complete this. We have a new starter on 01/07/26 and this task will be part of their role. Further Information: Update Date: 03 Jun 2026
					Description: As per below comments and request from Head of Finance, action due date is being moved to 31/05/2026 Further Information: Update Date: 09 Mar 2026
					Description: New interim Systems and Transactional Accountant in place who will pick this item up going forward. They will need time to bed in and familiarise themselves with the issue and so I propose extending the deadline. Further Information: Update Date: 09 Mar 2026

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Appendix 3 - Closed Internal Audit Actions

Generated Date	Sep-26

Licensing and Environmental Health

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
5682	Medium	Management will take steps to help ensure that all stages of the skin piercing registration process are consistently followed, including the use of standard templates and completion of all required checks, with clear audit trails maintained. This could include reiteration of process to team members, revision of the inspection report so that it is more user friendly or introduction of intermittent management sampling of registrations.	31 Aug 2026	31 Aug 2026	24 Aug 2026	Closure Details: Closed: This has been completed Further Information:
5681	Low	Management will undertake a comprehensive review of all Licensing and Environmental Health policies and procedures to ensure a consistent and robust approach to document governance. All documents will clearly set out key information, including document ownership, approval authority and review frequency. Version control, including version number, brief overview of changes made and the approving body or individual, along with the approval date will also be logged. It may be beneficial to present this information in a clear, standardised table format to enhance usability and transparency.	31 Aug 2026	31 Aug 2026	24 Aug 2026	Closure Details: Closed: This action has been implemented Further Information:

Data Quality - Human Resources

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
5690	Low	Management will implement a formal control to ensure all job descriptions are formally dated and subject to periodic review	31 Aug 2026	31 Aug 2026	15 Aug 2026	Closure Details: Closed: The job description template has been updated with this information for all new roles going forward Further Information:

Capacity Planning

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
4832	Medium	Create a single Service Planning Methodology that sets out the full process for preparing, reviewing and approving and monitoring of Service Plans. It should explain: • The steps in the process and who is responsible at each stage. • What Service Plans must include, covering BAU activity, planned change, pressures, risks, dependencies and resourcing. • The approval route and how decisions are recorded. • The supporting guidance, templates and timelines.	30 Jun 2026	30 Jun 2026	30 Jun 2026	Closure Details: Closed: Action Complete – The Service Planning process has been fully aligned to the Council's 6D Project Lifecycle and project intake arrangements. All new project proposals are now required to progress through the formal project gating process, which includes priority scoring, review by key corporate services, strategic alignment assessment against the Corporate Plan, and governance approval before resources are committed. Clear guidance and supporting processes have been introduced covering project submission, review, classification, risk assessment and progress reporting requirements. Supporting evidence includes the new Service Planning Guidance and Project Enquiry Submission process documentation Further Information:
4833	Medium	Document the process for reviewing and challenging Service Plans, including how the Transformation Team undertakes the review, who is involved and what the purpose of the review is. The team should also develop internal guidance or a simple checklist to ensure that key checks are carried out consistently and that decisions and follow-up actions are recorded.	30 Jun 2026	30 Jun 2026	30 Jun 2026	Closure Details: Closed: Action complete - Service Planning has been aligned to the Council's 6D Project Lifecycle and project gating process. All new projects are now subject to formal review by the Project Management Office to ensure request is sufficiently clear, strategically aligned and ready to proceed for scoring and Gating Panel decision. The scoring is based on the following categories: - Corporate Plan alignment, - Service demand and efficiency impact, - financial potential, - technology and digital fit, - capacity and resource viability, and - compliance, risk and regulatory considerations. New guidance has been developed, supporting evidence attached, Further Information:
4835	Medium	Set clear standards for updating the Transformation Programme tracker so that monitoring of actions is consistent and reliable. This should include: • Clear definitions for RAG ratings • Minimum requirements for commentary, particularly where actions are delayed or at risk Periodic review to check that updates have been submitted as expected and that information is complete and accurate.	30 Jun 2026	30 Jun 2026	30 Jun 2026	Closure Details: Closed: Action Complete – The Council's PMO and Corporate Transformation service have been strengthened, with a greater focus on project initiation, planning and governance. This has improved project oversight, reporting, challenge and collaboration with services, supporting more effective project delivery. Updated guidance for Project Managers has been produced and is attached as evidence Further Information:

Housing Benefits

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
3929	Low	We will continue to: • Complete the update and migration of all Housing Benefit procedures into the new standardised format and template • Address any remaining gaps in procedures identified during the update process • Implement and follow a clear timeline to coordinate the completion of this work, using the central tracking spreadsheet to monitor progress	31 Mar 2026	30 Jun 2026	30 Jun 2026	Closure Details: Closed: Migration of HB procedures onto new standardised format complete. There will be a rolling review of procedures to implement any updates as and when they occur. Further Information:

Market Towns Programme

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
5294	Medium	Management will formally document and consolidate the current governance and reporting arrangements for the remaining Market Towns projects, including how oversight sits within Transformation Board governance. Management will also establish or confirm a clear mechanism for recording and tracking programme-level actions and decisions and ensure that relevant project documentation (including PIDs) is updated where appropriate to reflect the revised governance arrangements and reporting routes.	30 Jun 2026	30 Jun 2026	30 Jun 2026	Closure Details: Closed: Action Complete – Programme governance arrangements have been reviewed and approved by Leadership in June 2026. The Market Town Programme is now aligned to the Corporate Delivery Programme Board, with clear governance links to the Council's 6Ds project lifecycle (gating) and escalation routes through the Corporate Leadership Team Governance Meeting, strengthening oversight, assurance and decision-making. Further Information:

Payroll

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
3974	Medium	The Council will finalise and approve the Claiming Additional Hours and Overtime guidance, incorporating clear procedures for claim submission, authorisation, thresholds, and TOIL agreements, and ensure it is effectively communicated to all staff.	31 Mar 2026	31 Mar 2026	02 Jul 2026	Closure Details: Closed: This has been endorsed at Employment Committee and is now a live document Further Information:

Workforce Development Strategy

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
4836	Low	At the conclusion of the Leadership Development Programme in March 2026, management will prepare a closure report to summarise, attendance and compliance against all modules, key outcomes and action plan to move into BAU	31 Mar 2026	31 Mar 2026	07 Jul 2026	Closure Details: Closed: Action closed Further Information:

Overtime 21.22

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
1625	Medium	The published policy for Expenses and Allowances (including Overtime) will be reviewed and updated to ensure that it is fit for purpose, and accessible to staff and managers. This will support working arrangements prior to a longer term, fundamental review of our policy.	31 Mar 2025	30 Apr 2026	02 Jul 2026	Closure Details: Closed: This has been endorsed at employment committee and is now a live document Further Information:

Chief Digital and Information Officer						
Reference	**Priority Level**	**Action Detail**	**Original Target**	**Revised Target**	**Closed**	**Closure Update**
5423	High	Huntingdonshire District Council will: • Clarify the Chief Digital and Information Officer (CDIO) remit and authority with the Partner Councils and embed the agreed expectations across leadership structures. • Set clear priorities between remediation and Local Government Reorganisation (LGR), and allocate CDIO capacity and support transparently. • Increase operating-model capacity (e.g. Enterprise Architect/Business Partnering and interim/deputy support) to reduce single-point dependency.	30 Sep 2026	30 Sep 2026	02 Sep 2026	Closure Details: Closed: Closed as per comments provided by Head of Service Operational IT and Development "The recommendation has been addressed through clarification of governance responsibilities, implementation of revised leadership arrangements following the CDIO departure, recruitment of Digital Business Partner capacity, creation of an Enterprise Architect function and introduction of prioritisation mechanisms to balance remediation, operational requirements and LGR activity. Collectively these actions have reduced single-point dependency and strengthened organisational resilience in line with the intent of the recommendation.The CDIO remit, authority and governance responsibilities have been formally reviewed and documented, including clear decision-making boundaries and escalation routes across the Partner Councils. Leadership and governance arrangements have been updated to reinforce accountability and engagement with Chief Executives, leadership teams and governance boards. A formal prioritisation approach has been implemented to balance remediation activity, service delivery and Local Government Reorganisation (LGR) requirements. In addition, operating model resilience has been strengthened through the introduction of distributed leadership arrangements, Deputy CDIO capability, development of Enterprise Architecture capacity and Business Partnering proposals, reducing reliance on a single leadership postholder. Evidence supporting these changes has been produced through governance reviews, leadership transition arrangements and operating model design activity.Following the departure of the CDIO, the Partner Councils reviewed the leadership model and determined that replacing the post on a like-for-like basis was not the most effective approach. Instead, responsibilities have been redistributed across the ICT Leadership Team with defined areas of accountability and escalation through the Service Directors. This has reduced reliance on a single individual, increased leadership resilience and provided greater visibility of priorities across service delivery, improvement activity and LGR.Additional operating model capacity has also been introduced through the recruitment of Digital Business Partner roles, strengthening engagement with the Councils and reducing dependency on senior leadership intervention. An Enterprise Architect role has been created and recruitment activity undertaken to provide strategic architecture capability in support of LGR and future operating model requirements. While this post remains vacant, the required organisational commitment and operating model design have been implemented. " Further Information:

ICT Budget Management and Efficiency Savings

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
5421	Medium	The CDIO will formalise and document the ongoing intervention undertaken by establishing a structured support and development plan for the post-holder(s). This will include clearly defined expectations for the process, documented actions and deliverables, timelines for completion, and regular review points. The plan will also incorporate any further training or guidance required to ensure the process can be operated consistently and to the required standard	30 Jun 2026	30 Jun 2026	29 Jun 2026	Closure Details: Closed: Plan in place. Further Information:
5408	Low	Each vacancy authorisation form will include evidence of authorisation from the Budget Holder and CLT. If this information is not required on the forms in use, then the forms will be updated accordingly	30 Jun 2026	30 Jun 2026	29 Jun 2026	Closure Details: Closed: Change to process has been actioned. Further Information:
5415	Low	Management will ensure that all Partner Councils' S151 Officers formally agree recharge arrangements in future periods, in line with the Partnership Agreement	31 Jul 2026	31 Jul 2026	01 Jul 2026	Closure Details: Closed: Confirmed existing agreement continues Further Information:
5419	Low	121 meeting and progress reviews against objectives will be evidenced, by the CDIO, in relation to the ICT Finance and Contracts Manager and Portfolio Delivery Manager.	30 Jun 2026	30 Jun 2026	29 Jun 2026	Closure Details: Closed: Process changed. In place. Further Information:
5420	Low	Appraisal and 121 documentations will be signed by line manager and employee, in relation to the ICT Finance and Contracts Manager and Portfolio Delivery Manager.	30 Jun 2026	30 Jun 2026	29 Jun 2026	Closure Details: Closed: On-going and process changed. Further Information:

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Transformation

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
3764	Medium	The PMO will ensure that all Project Managers have completed a Benefits Realisation Plan, including benefit owners, measurable outcomes, and timelines for realisation.	31 Mar 2026	30 Jun 2026	30 Jun 2026	Closure Details: Closed: This action has now been completed. The Transformation PMO have put in place an updated Business Case documentation to capture relevant benefit information including owner, outcomes and timescales. This is being captured in a structured data list. Evidence attached (Business case and collation list) Further Information:

Home and Hybrid Working 24.25

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
3515	Medium	Update action following a Follow Up Part Two audit - We will undertake and document a review of cleanliness standards for desks and shared office spaces within the office environment. The review should define the expected standards and ensure appropriate monitoring arrangements are in place to confirm that these standards are maintained Original Action - Additionally, a review of cleanliness standards should be undertaken to ensure all desks and shared spaces are regularly cleaned and maintained to an acceptable standard.	31 Aug 2025	30 Jun 2026	15 Jun 2026	Closure Details: Closed: Actions completed Further Information: Closure Details: Closed: Sani Stations in place Further Information: Sani stations have now been installed
3518	Low	Updated action following a Follow Up Part Two audit - Human Resources will issue a corporate communication to all staff confirming the required approach for recording working hours. Managers will also be reminded of their responsibility to review and validate working time records in line with the Flexible Working Policy Original Action - We will implement a consistent method for tracking working hours across all teams.	30 Sep 2025	30 Jun 2026	20 Aug 2026	Closure Details: Closed: This action is complete Further Information: Closure Details: Closed: This is in place via I trent and managers are being supported on accessing this Further Information: This is in place via I trent and managers are being supported on accessing this

Commercial Estates Rent Review Processes and Invoicing 24.25

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
3547	Medium	Update action following a Follow Pp audit Part Two - The Interim Head of Property and Facilities will introduce periodic portfolio wide reporting of the completion status of rent reviews to enable oversight by Director of Finance and Corporate Resources. Six monthly reports will be issued that will note how many reviews have been completed, and how many are outstanding. Of those outstanding the numbers intentionally not implemented for tactical reasons will be noted. The Head of Property and Facilities will introduce periodic portfolio wide reporting of the completion status of rent reviews to enable oversight by Director of Finance and Corporate Resources. Once the Masterdata sheet is up to date and complete, quarterly reports will be issued that will note how many reviews have been completed, and how many are outstanding. Of those outstanding the numbers intentionally not implemented for tactical reasons will be noted.	30 Sep 2025	30 Jun 2026	11 Aug 2026	Closure Details: Closed: Completed. report now available from Monday.com. initial report provided and will be provided 6 monthly or sooner on demand Further Information: Closure Details: Closed: Update issued to Suzanne. Future reports will presumably be done by my successor. Further Information:

3548	Medium	Updated action following a Follow Up audit Part Two - The Rent and Estates Officer will implement and retain formal evidence of the monthly line-by-line review of invoiced rental amounts, such as an annotated spreadsheet, to ensure a complete audit trail and demonstrate that the control is operating effectively Rent and Estates Officer to ensure invoicing controls are appropriately evidenced as follows: •The reconciliation of total amount invoiced between prior quarter and current quarter will more clearly documented for both modern and traditional invoices on the invoicing spreadsheet. •The total of all invoices raised on Tech 1 will be agreed to the total per the invoicing spreadsheets and a screenshot from Tech 1 saved to the spreadsheet as evidence. •Line by line check between current month and previous month rent amounts for monthly invoiced tenants will be evidenced within additional column added to spreadsheet.	30 Sep 2025	15 Jun 2026	15 Jun 2026	Closure Details: Closed: As per Final Report from Follow Up Part Two audit, the action has been marked as now implemented Further Information: Closure Details: Closed: All 3 points are now actioned and are evidenced clearly on the invoicing spreadsheets. I've attached a copy of the previous quarters completed spreadsheet which shows this. The reconciliation mentioned in point 1 can be found below the list of invoicing and the totals. I now include a screenshot of Tech1 on the 'pre-run' tab which shows the total on T1 matching the spreadsheet. Finally, column O shows that a line by line check has been completed comparing to the previous invoicing spreadsheet, if it doesn't match a comment is provided in Column Q explaining why. Further Information:

Key Financial Controls 24.25

Reference	Priority Level	Action Detail	Original Target	Revised Target	Closed	Closure Update
3387	Medium	Updated action following a Follow Up Part Two audit - We will ensure monthly reconciliations for Creditors and Debtors, and Council Tax and NNDR, are completed, reviewed by the responsible manager and shared with Finance within an appropriate timeframe following month end. Original Action - Implement a process to ensure timely sign-off of balancing and reconciliation documents by relevant managers at month-end for both Creditors and Debtors within Revenues and Benefits, as well as Council Tax and NNDR, to enhance accountability and improve financial reporting accuracy. Regular reminders or a tracking system could help facilitate prompt approvals. To further support this, it is recommended to mirror the reconciliation sign-off process for Creditors and Debtors within Revenues and Benefits to that of Council Tax and NNDR, where a team member prepares the reconciliation and the appropriate manager is responsible for reviewing and signing it off.	30 Apr 2025	30 Jun 2026	15 Jun 2026	Closure Details: Closed: Action Completed Further Information: Closure Details: Closed: Action Completed Further Information: New process now in place, and reminder to all to complete monthly
3385	Low	Updated action following a Follow Up Part Two audit - The annual Capita user access review will be enhanced to ensure service manager responses are centrally recorded and that the review formally assesses whether the level of access assigned to users remains appropriate for their roles. Original Action - Implement a regular monitoring process to review user access levels within Capita system and ensure their appropriateness for respective roles. This review could coincide with the annual audit already conducted for Tech 1 (finance system), ensuring that both systems' user access reviews are aligned and conducted systematically.	30 Jun 2025	30 Jun 2026	16 Jun 2026	Closure Details: Closed: Updated in previous progress update, and all audit requirements have been met. Further Information: Closure Details: Closed: User Review Completed Further Information: The review of AccessSuite Paye.Net (Capita) users has been completed. The review will be completed again in 1 year.

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CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT AND FUTURE WORK

Committee	Decisions	Date for Action	Action Taken	Officer Responsible	Delete from future list
N/A	**Constitution Review Working Group** Constitution Review Working Group appointed at Annual Council on 21 May 2026.	N/A	A meeting took place on 3rd September 2026. The Scheme of Delegation was approved for submission to the Committee and comments were made on the Code of Procurement for inclusion, prior to its submission to the Committee	Elections & Democratic Services Manager	No
08/07/26	**Corporate Risk Register** Request from the Committee to include an LGR Risk Register as a standing item for future meetings.		To include an item on the Agenda for future meetings regarding an LGR Risk Register. The item is on the Agenda for the September meeting.	Risk Manager	Yes

CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT AND FUTURE WORK

Forward Agendas

Meeting Date	Items Currently Scheduled
18 November 2026	• Corporate Risk Register (Standing item) • LGR Risk Register (Standing item) • Internal Audit Progress Report (Standing item) • Internal Audit Actions Update (Standing item) • Annual Governance Statement and Annual Financial Report • Code of Conduct – Annual Update • Annual Complaints Report • Update on Code of Conduct and Register of Disclosable Pecuniary Interests • Annual Report on HDC Compliance with the Information Rights Acts (Freedom of Information Act, Environmental Information Regulations and UK GDPR) and Information Governance
20 January 2027	• Corporate Risk Register (Standing item) • Internal Audit Progress Report (Standing item) • Internal Audit Actions Update (Standing item) • Internal Audit Plan / Internal Audit Charter
17 March 2027	• Corporate Risk Register (Standing item) • Internal Audit Progress Report (Standing item) • Internal Audit Actions Update (Standing item)