



Annual Governance Statement

Islington Council

2022/23

Executive Summary

Good governance lies at the heart of Islington Council's ability to achieve the ambitions it sets out in the Islington Together 2030 plan. In a time of increasing financial pressures and with recent examples of governance failures in the local government sector, it has never been more important to have strong governance arrangements in place. The council is committed to acting in the public interest, in managing its finances, and making inclusive, robust decisions and plans that ultimately deliver improved outcomes for those it serves.

The Annual Governance Statement (AGS) is a valuable means of explaining to the community, service users, taxpayers and other stakeholders the council's governance arrangements and how the controls it has in place manage the risk that it will fail to deliver its strategic outcomes. A description of the council's main governance arrangements is provided in section 2 of this AGS.

The council is required by law to conduct a review, at least once a year, of the effectiveness of its governance arrangements, and communicate this publicly in an annual governance statement. Details of the council's 2022/23 review are provided in sections 3 and 4 of this AGS. The review process has been undertaken in an open and honest manner, and has considered the council's performance across all of its activities.

The review has identified a number of areas where arrangements can be strengthened, and these are summarised below:

- The council has identified where its Constitution needs to be updated to make it accessible, internally consistent, legally compliant and fit for purpose.
- The council has a significant backlog of stage 2 complaints with the response times for these complaints increasing significantly. This is coming under greater scrutiny from the Housing Ombudsman and the Local Government and Social Care Ombudsman.
- 15 of the council's schools are in deficit as of 31 March 2023 (29% of maintained schools). Internal Audit have also raised high priority recommendations in relation to some schools in their annual audit plan.
- The council needs to ensure it has adequately prepared for the introduction of the new Procurement Bill, which is expected to come into force in 2024. The Bill will introduce changes to requirements placed on public sector buyers, including greater requirements to publish information about procurement and contract-related decisions.
- The council is not currently complying fully with the requirements of the Local Government Transparency Code, which requires local authorities to publish on its website specific information about the council including lists of expenditure over specified values, and statutory notices for contract awards and extensions.

Islington Council - 2022/23 Annual Governance Statement

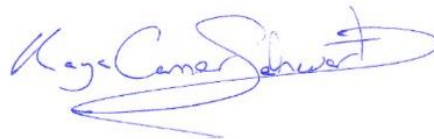
- The external audit opinion on the 2021/22 accounts has not yet been issued, reflecting sector-wide delays in publishing audited accounts.
- Following the recent de-merger of the public health department from a joint arrangement with Camden Council, a review of governance arrangements within the new single-borough department of Public Health is required to ensure arrangements are up to date and reflect best practice.
- There is scope to strengthen the arrangements for submitting and monitoring business cases for new capital schemes.

The council is committed to addressing each of these governance issues and has prepared an action plan to enable this, shown in section 4 of the AGS. Progress in implementing the action plan will be carefully monitored during the year ahead, and an update will be reported in next year's AGS.

Signed by:



Victoria Lawson
Chief Executive



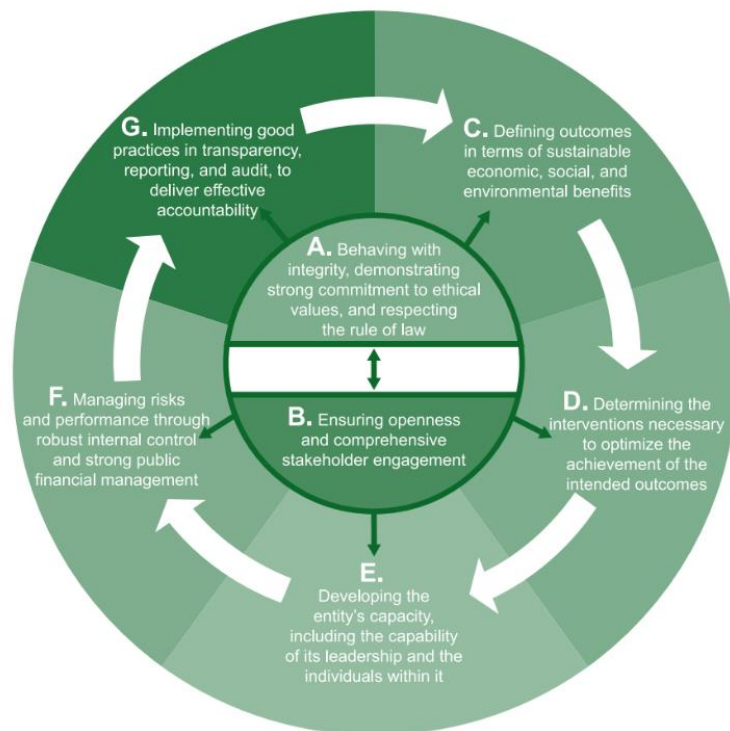
Councillor Kaya Comer-Schwartz
Leader of the Council

Date: XX March 2024

1. Introduction

- 1.1 Good governance is about how an organisation such as a local authority ensures that it is doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner.
- 1.2 The *Delivering Good Governance in Local Government: Framework* (2016), published by the Chartered Institute of Public Finance and Accountancy (CIPFA), in association with the Society of Local Authority Chief Executives and Senior Managers (SOLACE), sets the standard for local authority governance in the United Kingdom.
- 1.3 The framework is designed to help local authorities develop and implement high standards of governance, to ensure that:
 - resources are directed in accordance with agreed policy and priorities;
 - there is sound and inclusive decision making; and
 - there is accountability for the use of resources to achieve desired outcomes for residents and communities.
- 1.4 The framework sets out seven core principles, as illustrated in **Figure 1** below, that underpin good governance in the public sector. It shows that achieving good governance is a continuous process of evaluation and review.

Figure 1 – Delivering Good Governance Core Principles



1.5 This Annual Governance Statement (AGS) demonstrates how Islington Council's governance arrangements deliver these seven principles in practice. It is divided into the following sections:

- Section 2 – explains the key elements of Islington Council's governance framework.
- Section 3 – describes how the council has reviewed the effectiveness of its governance arrangements in 2022/23 and gives the main findings of this review.
- Section 4 – summarises the actions the council will take in the year ahead to address the main governance issues identified in the review of effectiveness.

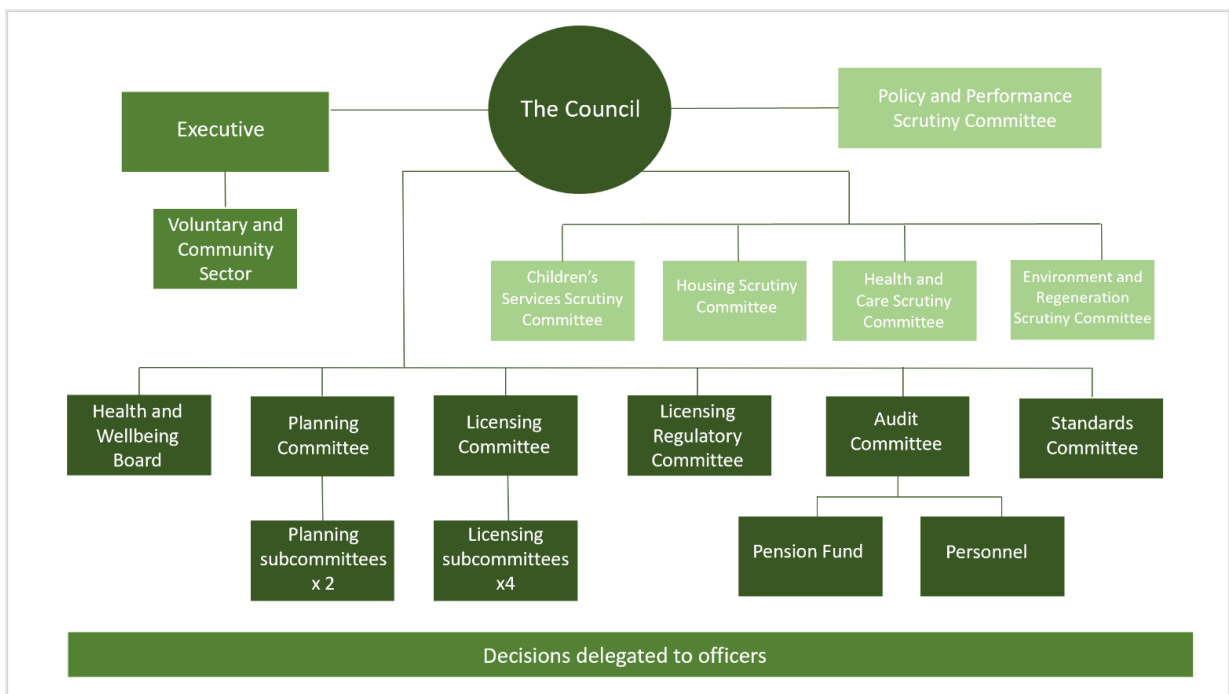
2. Islington Council's Governance Framework

2.1 Islington Council is responsible for ensuring that its business is conducted in accordance with the law and that public money is safeguarded and properly accounted for and used in a way that represents value for money. Additionally, the council has a duty under the Local Government Act 2003 to make arrangements to secure continuous improvement in

the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

- 2.2 In discharging these responsibilities, Islington Council is responsible for putting in place proper arrangements for the governance of its affairs and the effective management of risk. To achieve this, the council has adopted a code of governance which is consistent with the seven principles of the CIPFA/SOLACE *Delivering Good Governance in Local Government: Framework* (2016).
- 2.3 The council’s code of governance consists of a number of policy documents and procedures and is underpinned by an ethos and shared values in which the highest standard of conduct is expected from all Members and officers.
- 2.4 A key component of the code of governance is the council's written Constitution. This sets out how decisions are made and the procedures which are followed to ensure efficiency, transparency, and accountability to residents. A copy of the council’s constitution can be found on the council’s website: [Islington Council Constitution](#).
- 2.5 The Constitution defines the roles and responsibilities of the executive, non-executive, scrutiny and chief officer functions. **Figure 2**, below, illustrates the council’s policy and decision-making processes, as defined by the Constitution.

Figure 2 – Islington Council’s decision-making structure chart



- 2.6 The Audit Committee is a key component of the council’s governance framework. Its purpose is to provide an independent focus on the adequacy of governance, risk and internal control arrangements. It has right of access to all the information it considers

necessary and can consult directly with internal and external auditors. The Audit Committee's responsibilities include:

- reviewing the external auditor's reports and annual audit letter;
- approving internal audit's annual Audit Plan and reviewing its reports;
- approving the council's Annual Governance Statement; and
- considering the council's arrangements for risk management.

- 2.7 The Local Government Act 2000 requires all councils to establish a Standards Committee to consider the standards of conduct and behaviour of councillors. It advises on the Members' Code of Conduct, hears cases on potential breaches, grants dispensations in certain circumstances and hears complaints that have been referred by the Monitoring Officer.
- 2.8 Section 3 of this Annual Governance Statement reviews the effectiveness of the Audit Committee and Standards Committee in 2022/23.
- 2.9 Another significant aspect of the council's code of governance is its system of internal control, which is designed in accordance with the council's key rules and procedures, including the Constitution, Code of Conduct for Employees and Financial Regulations. The system of internal control is intended to identify the risks that threaten the achievement of the council's strategic aims and objectives, to evaluate the likelihood and impact of those risks, and to manage them efficiently, effectively and economically.
- 2.10 Appendix A sets out in more detail the core elements of the council's code of governance and demonstrates how these align to the seven principles of the CIPFA/SOLACE framework.
- 2.11 The rest of section 2 highlights certain aspects of the council's governance arrangements that have seen significant developments in 2022/23.

The Council's Corporate Governance Review

- 2.12 In mid-2022, the council commissioned a comprehensive review of the council's governance arrangements. This review made several recommendations, which the council has turned into a programme of work, starting in January 2023.
- 2.13 The first phase of the programme is a detailed review of the council's Constitution, to ensure it is up to date and fit for purpose. The current Constitution is a large and unwieldy document that is difficult to navigate and internally inconsistent. An initial statutory compliance health check, presented to the Audit Committee in March 2023, identified several areas where the Constitution needs to be updated to make it legally compliant.

- 2.14 A Constitution Review Working Group was set up to steer the review and update of the Constitution. The overall aim is to recommend to Full Council a revised version of the Constitution in 2023. By September 2023, the review aims to:
- Ensure the Constitution is compliant with relevant legislation;
 - Review the Terms of Reference for Committees;
 - Update Schemes of Delegation, Procurement Rules and Financial Regulations, including researching best practice;
 - Through the Standards Committee, update the Code of Conduct for Members and the Arrangements for dealing with member complaints; and
 - Seek member input on the Constitution's review at the member development sessions on governance.
- 2.15 The Constitution Review Working Group comprises the Chair of the Audit Committee, the Executive member for Resources, the Monitoring Officer, Deputy Monitoring Officer, the Chief Lawyer (Governance), the Head of Democratic Services and Governance, and the Committee Services Manager.
- 2.16 Additional working groups are being set up to cover specific aspects of the work above.
- 2.17 The programme of work also includes:
- providing training for Members and legal staff on governance issues.
 - reviewing report and procurement templates and guidance to cover options appraisals, data, insight and officer advice to support recommendations.
- 2.18 The council is also considering extending the corporate governance review programme in 2023/24 to look at scrutiny arrangements across the council and the governance of integrated care partnerships.
- 2.19 The council will continue to monitor this programme of work in the year ahead. This is summarised in section 4 of this AGS.
- 2.20 The corporate governance review has prompted senior management within directorates to begin reviewing local schemes of delegation and internal control arrangements, to further strengthen these arrangements.

Complaints Process

- 2.21 Complaints are an important way for an organisation to be accountable to the public, as well as providing valuable prompts to review organisational performance and the conduct of the people that work within and for it.

- 2.22 The council has a formal two-stage process for managing complaints with the process set out on the council's website. At stage 1, a complaint is passed to the relevant department, who investigate and aim to respond within ten working days. Departmental complaints officers record and report on all complaints, and the service response is monitored. If having received a Stage 1 response, the complainant is dissatisfied, they can ask that within one month the Corporate Customer Service Team at Stage 2 (Chief Executive) of the complaints process look at their concerns, and, if necessary, carry out an independent investigation on behalf of the Chief Executive. The council aims to respond within 20 working days.
- 2.23 The council's aim is to ensure that when things go wrong, it responds quickly to put things right. The council is committed to learning from and improving its performance in response to customer feedback.
- 2.24 Since the pandemic, Islington Council has seen a doubling in the number of complaints made to the council, compared to pre-pandemic levels, and its response times have increased significantly. The council now has a significant backlog of stage 2 complaints to process.
- 2.25 To address the backlog, the council increased the capacity of the corporate complaints team from three complaints officers to 17 (plus a manager and a business support officer), to assist with the increased volumes. It has also implemented an improvement plan to address the issue. This has included the introduction of daily meetings with key staff between 5pm and 7pm each evening, for a detailed assessment of the backlog, to identify quick and effective solutions, and actions required.
- 2.26 A bi-weekly Complaints Review Project Board led by the Corporate Director of Resources and Corporate Director of Community Engagement and Wellbeing was established, to provide oversight and governance. The Project Board reviews the weekly highlight report, examines progress in reducing the backlog and oversees the service review.
- 2.27 The council commissioned an independent consultancy, 31ten, who have a team experienced in this field, to complete a full review of the council's management of complaints and to put forward options for management going forward. The council has also employed a project manager for six months to help drive the complaints turnaround phase.
- 2.28 Section 4 of the AGS explains how the council will monitor the implementation of this plan in the year ahead and details further actions the council is proposing.

Responding to the impact of high inflation

- 2.29 As outlined in Appendix A, the council has robust arrangements in place to set a balanced annual budget and medium-term financial strategy (MTFS). The council's financial management processes are agile and able to respond to changes in the

external environment in order for outcomes to be achieved, despite significant and changing pressures on resources.

- 2.30 In 2022/23, the Consumer Prices Index rose to a peak of 11.1% in October 2022, the highest annual inflation rate since 1981. This high inflation had a significant impact on the council's financial planning, eroding available resources, and acting as a constraint on budgets while many residents were also struggling with rising prices. The sections below set out how the council has responded to energy inflation specifically and the cost-of-living crisis.

Energy Inflation

- 2.31 The council's energy supply contracts for the period 2020-2024 were awarded in December 2019, with an estimated total value of £32m over four years. This covered energy supplied to council buildings, landlord supplies in housing properties, Greenwich Leisure Ltd (GLL) leisure centres and most of the borough's primary schools.
- 2.32 Due to the large increase in energy prices during late 2021 and early 2022, exacerbated by the Ukraine War, it was likely that the £32m threshold would be exceeded before the end of the 2022/23 financial year. Therefore, a contract modification notice under the Public Contracts Regulations (PCR) 2015 (Regulation 72) Part G Annex 5 was published.
- 2.33 The Energy Risk Management Committee, who make decisions on when to trade, was expanded to add representatives from Corporate and Housing finance given the significant increase in energy prices. Governance and assurance were also strengthened by the creation of an Energy Steering Group, attended by service and corporate directors and representatives of the finance and energy teams.
- 2.34 The financial impact to the council of sharp increases in gas and electric prices were significant in 2022/23, with annual energy costs rising by nearly 200% (and could have been as high as 350% had the government not intervened with the Energy Bill Relief Scheme for the October 2022 to March 2023 period).
- 2.35 In order to mitigate the price rises and access lower prices, the council terminated its existing energy contracts and joined a Public Buying Organisation (PBO) for 2023/24 and 2024/25. The PBO uses professional traders to purchase energy on behalf of the council. In addition, a Corporate Energy Savings Programme was launched, which reduced expected costs by around 10% in the first three quarters of the year.

Cost-of-Living Crisis

- 2.36 The cost-of-living crisis continues to have a significant impact on Islington's residents and businesses. The council is committed to helping the borough's most vulnerable residents through the cost-of-living crisis. In addition to a core offer of support that has been protected despite many years of funding pressure, significant new activity was introduced to maximise the effectiveness of the council's local response, as outlined below:

- ongoing delivery of the council's core offer of financial and other support for residents and businesses;
- maximising the effective targeting of relevant government grants, such as the Household Support fund, and ensuring they were rapidly distributed;
- a one-off £1m Hardship Fund to support working households on low incomes who are facing large rent rises, launched in advance of the 2023/24 financial year;
- working with voluntary sectors partners to maximise the borough's collective offer, with a particular focus on a network of warm spaces;
- measures across all directorates to monitor the impact of the crisis, to help assess if the council's actions are making a difference and to understand and to respond to what will inevitably be a disproportionate impact on some local communities;
- a communications campaign to maximise awareness and take up of the support available, including a Cost-of-Living Summit and dedicated area on the council's website; and
- a new Cost of Living Board to coordinate this activity and ensure that the council and partners are doing all they can to support residents and businesses.

Cyber and Data Security

2.37 A key element of good governance is having effective arrangements in place for the safe storage, use and sharing of data. Cyber crime continues to grow in intensity fuelled by the global political tensions that have continued over the last year. The council's ongoing programme of activity to reduce cyber risk has progressed well.

2.38 Recent activity of significance has included:

- The transition of many key business applications to the cloud including the Taranto parking system and all the NEC (Northgate) products, encompassing the departments for Public Protection, Planning and, Revenues and Benefits. This reduces the likelihood and impact of a cyber attack;
- An initiative to move the secondary data centre out of the council's premises in Newington Barrow Way to other third-party hosting arrangements, including Azure, which is a group of unique physical buildings located all over the globe that house a group of networked computer servers.
- A cloud-based Security and Incident Management (SIEM) system;
- Continued achievement of Public Sector Network Certification (PSN);
- An ongoing training programme on cyber security for all staff; and

- The appointment of a new Head of Cyber Security.

Commissioning and Procurement

- 2.39 The council has strong governance arrangements in place in relation to commissioning and procurement practices, to allow it to focus on maximising value for money, and on delivering high-quality procured services that meet contractual commitments and are based on strong supplier relationships.
- 2.40 The council has a clear direction for Commissioning and Procurement as set out in the Progressive Procurement Strategy 2020/27, agreed by the Executive on 15 October 2020: [Progressive Procurement Strategy 2020/27](#). The strategy sets out the council's general approach regarding money spent with third parties. It covers all aspects of supply chain management and is divided into three themes. These themes are active leadership, progressive supply partnerships and achieving community benefits.
- 2.41 The strategy is supported by the council's Procurement Rules and individual service and commissioning plans. The Strategic Procurement and Supply Assurance service supports officers to comply with the legislative and governance framework for procurement and supply. That service includes highly qualified and experienced senior officers. Extensive suites of guidance, templates and forms ensure that important aspects of the procurement and supply process are clearly set out and available to all officers.
- 2.42 Internal challenge is delivered on significant decisions by a Commissioning and Procurement Board, incorporating an Executive Member, senior managers from all areas of the council and specialist experts. A board of operational managers form the Supply Chain Practitioners Group which reviews working practices and champions key priorities for service departments like social value and net zero carbon.
- 2.43 In 2022/23, the council invested in a new contracts register to improve controls, data quality, transparency and future financial tracking, which will be launched in 2023/24.
- 2.44 The council is preparing for the new Procurement Bill becoming law, which is expected in late 2023/24. The new Procurement Bill aims to establish a single digital platform for both buyers and suppliers to access procurement data, and a public debarment list for excluded suppliers.
- 2.45 While value for money will remain the core objective of procurement, the Bill will require public sector buyers to take account of national strategic priorities such as creating new (local) jobs, tackling climate change, improving the diversity of their suppliers and innovation.
- 2.46 Enhanced transparency requirements under legislation include publishing information about future procurement ahead of time, and publicising new contract opportunities, procurement results and information on contract performance.

2.47 The council’s preparedness for the implementation of the new Procurement Bill is considered in section 4 of the AGS.

Capital Programme and Governance

2.48 The council’s [Corporate Asset Strategy](#), introduced in March 2020, is designed to deliver a strategic, long-term approach to managing and enhancing the council’s community asset base. Alongside a formal three-year capital programme, the council also includes in the annual budget setting report the latest indicative capital expenditure estimates over the next 10 years.

2.49 Oversight and governance of the capital programme is supported by a framework of advisory boards with member and officer involvement, as shown in **Figure 3**:

Figure 3 – Capital programme oversight



- Corporate Asset Delivery Board (CADB) – This consists of officers and Members and oversees, and scrutinises, the council’s capital programme and the overall delivery of the corporate asset strategy. It has oversight of the other capital boards. It has no decision-making authority. Executive/Council approval is required for any capital investment decisions in line with the Constitution and Financial Regulations.
- Major Projects Delivery Board – This is an officer Board and is accountable for initiating and monitoring delivery of significant mixed-use developments. This includes those led by development partners, as well as smaller but complex schemes cutting across different directorates and/or with complex stakeholder management issues.
- Housing Delivery Board - consisting of officers and Members, integrating the governance of new homes delivery and major works across the council’s existing stock.

- Borough Investment Panel - consisting of officers and Members and accountable for recommending approval of all Community Infrastructure Levy (CIL) / section 106 investment decisions, and overseeing spend.
- A series of Directorate level programme delivery (officer) boards are accountable for all other asset development and capital programme activity and are subject to wider directorate governance arrangements.

2.50 As part of setting the 2022/23 budget, a new process was introduced requiring officers to submit a new bid form for all proposed capital schemes, which asked for detailed financial information and an explanation of how the scheme would achieve the council's strategic priorities. These forms were reviewed by CADB. In addition, all current and new schemes were reviewed and listed in priority order, and the list then compared to an affordability envelope to determine which could proceed and which would be moved to the reserve list.

2.51 Despite these arrangements being in place, the council has identified some areas of concern in relation to the capital programme. These include:

- the process for submitting business cases;
- a lack of budget for feasibility studies;
- inconsistent monitoring of expenditure against budget;
- ineffective challenge of under/overspends; and
- programme slippage.

2.52 The council is undertaking a programme of work to address these concerns. It has agreed a new Terms of Reference for CADB, which formalises the requirement for a business case for new capital schemes. This business case process is currently being finalised and will be rolled out as part of the 2024/25 capital budget setting process.

2.53 These new arrangements have been noted in section 4 of the AGS.

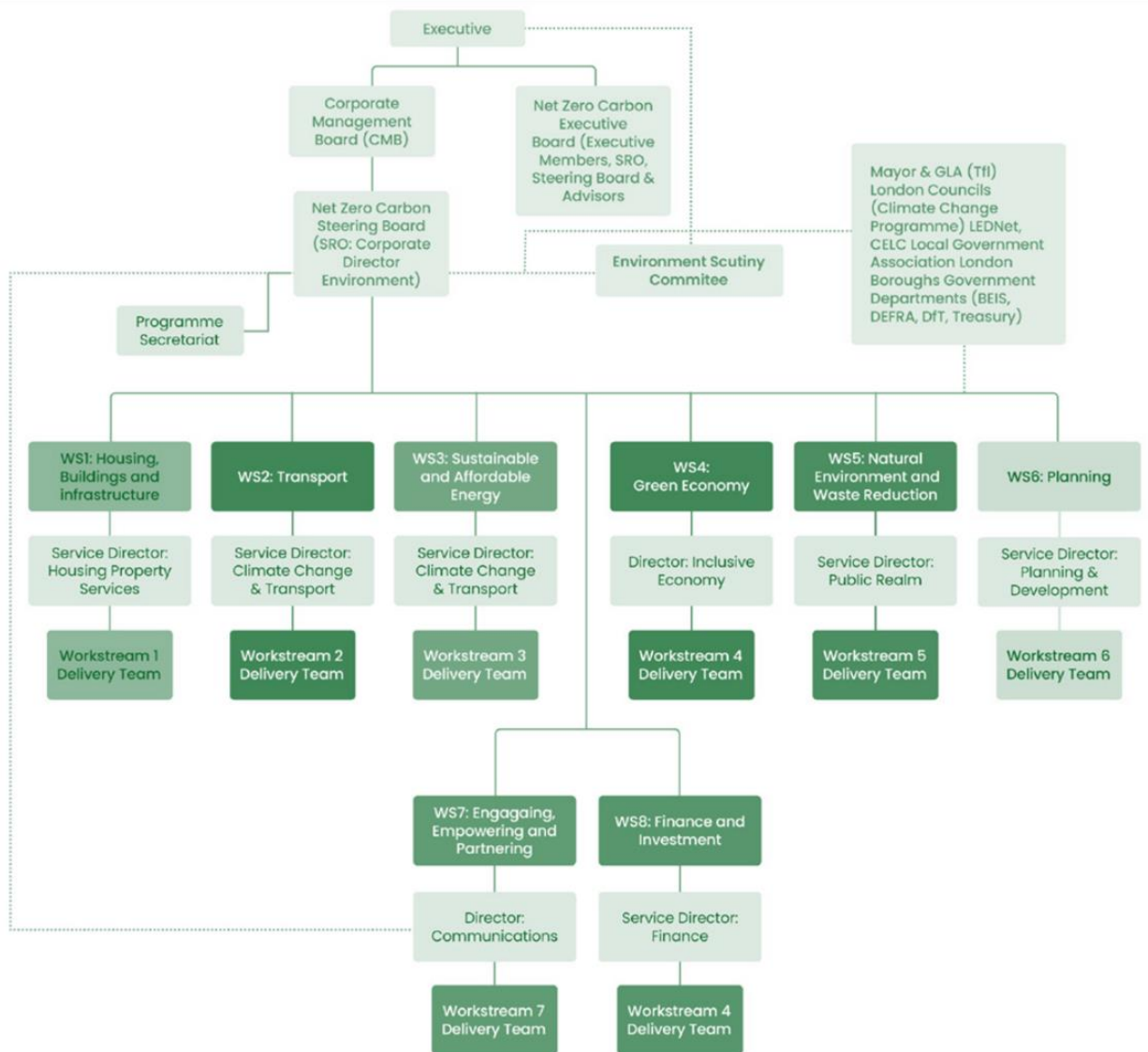
Vision 2030: Building a Net Zero Carbon Islington by 2030

2.54 The long-term nature and impact of many of local government's responsibilities mean that it should plan for sustainable outcomes that are within its financial means, and take a longer-term view when making decisions that balance the combined social, economic and environmental impact of policies.

2.55 The council demonstrates this in one of its five strategic missions, to achieve a greener, healthier Islington by 2030, as set out in the Islington Together 2030 Plan. A key strand of this mission is to deliver a net zero carbon Islington by 2030, as outlined in the Net Zero Carbon strategy - [Vision 2030: Building A Net Zero Carbon Islington By 2030](#). An annual review of progress to date and updated action plans was published in June 2022 ([Vision 2030: Annual Review](#)).

2.56 Vision 2030 recognised the importance of establishing a cross-departmental governance structure that extends across the organisation. The key elements of that structure are set out in Figure 4 below. The programme is split into eight workstreams, labelled WS1 to WS8 in Figure 4:

Figure 4: Governance Arrangement for the Net Zero Programme



2.57 The Environment and Regeneration Scrutiny Committee receive quarterly performance updates from the boards, detailing the progress against the published commitments in Vision 2030. Each Scrutiny Committee meeting has also included a Scrutiny Review dedicated to different elements of the Net Zero Carbon programme.

2.58 The council is working collaboratively with other local authorities in the London Councils Climate Change Programme to share best practice, join up activity, and grasp economies

of scale. It is also engaging with partners in the Net Zero Carbon Task and Finish Group to consider options such as joint communication campaigns, bulk procurement and monitoring and funding.

- 2.59 In April 2023, the council held a special public meeting of the Environment and Regeneration Scrutiny Committee to engage local stakeholders on the council's net zero carbon strategy. This was an opportunity to explain the council's programme and hear from stakeholders on how to take the work forward.
- 2.60 To help reach net zero carbon by 2030, in September 2022, Islington Council's Pension Fund rebalanced its equity holdings by reducing its shares in UK companies (thereby reducing its ownership of UK energy companies) and adopting a 'Global Paris-Aligned Index' for all passively managed equities. The council's pensions team with advisors executed a large transaction in which it sold UK shares in a Financial Times Stock Exchange (FTSE)-based Index and acquired £164m in a new Paris-Aligned Index fund.
- 2.61 Achieving net zero carbon by 2030 will require an unprecedented level of funding. The Cities Commission for Climate Investment (3Ci) is a partnership between Connected Places Catapult, Core Cities UK, London Councils and other local authorities across the UK aimed at supporting local authorities secure the necessary long-term finance for achieving net zero. In 2022/23, Islington Council submitted its return to 3Ci in which it identified potential projects totalling £1.490bn that are necessary to achieve a net zero carbon Islington by 2030. One of the council's Net Zero workstreams is addressing this.

3. Review of Effectiveness

- 3.1 The council has a responsibility to conduct, at least annually, a review of the effectiveness of key elements of its governance framework including the system of internal control. The council has undertaken this review in accordance with the CIPFA/SOLACE *Delivering Good Governance in Local Government: Framework* (2016). The review has drawn on the following sources of information:
- The council's corporate governance review, detailed in section 2.12 of this AGS
 - External Audit outcomes
 - Internal Audit outcomes, and the Head of Internal Audit's annual opinion
 - Audit Committee and Standards Committee reports
 - Reports from inspectorates and Ombudsmen
 - Scrutiny arrangements
 - Risk management arrangements
 - Information governance arrangements

- Performance and budget monitoring information
- Self-assessments undertaken by Directors in April and May 2023

3.2 Further details on some of the key sources of information considered in the review are set out below. In addition to this annual review, senior leadership and management routinely review elements of the governance arrangements throughout the year, to streamline and improve processes and make sure these arrangements remain fit for purpose.

External Audit

- 3.3 The council’s external auditors, Grant Thornton have not yet issued their audit opinion on the 2021/22 Statement of Accounts. They have, however, substantially completed their audit work on the 2021/22 accounts and have provided updates on progress to the Audit Committee in 2022/23. In these updates, external audit have not reported any significant governance issues, or highlighted any material errors in the financial statements. It is anticipated they will issue an unqualified audit opinion, subject to the successful completion of their remaining audit work, in 2023. In previous years external audit has consistently provided an unqualified audit opinion on the council’s statement of accounts and statutory grant claims, with few adjustments required to the statements and claims as a result of their audits.
- 3.4 In their Interim Auditor’s Annual Report in December 2022, Grant Thornton did not identify any significant weaknesses in the council’s financial sustainability, its governance arrangements or in its arrangements for improving economy, efficiency and effectiveness in 2021/22. This was reiterated in external audit’s progress report to the Audit Committee in March 2023. They made three recommendations to strengthen arrangements, shown in Table 1 below.

Table 1 – External audit recommendations

External audit recommendation	Response
There should be enhanced reporting on savings delivery to Members to show progress on delivery of savings	The council implemented this recommendation as part of its budget monitoring in 2022/23.
Consideration should be given to rationalising the number of risks in the corporate risk report, and to developing a training module for all staff, to raise awareness of risk across the organisation	Given the breadth of the council’s responsibilities, the challenging external environment and the ambitious mission in the strategic plan, the council does not believe it has an unreasonable number of risks within its corporate risk report. The

	<p>council follows the risk framework in terms of deciding if a risk fulfils criteria for corporate level. The council did close six principal risk during the last year providing evidence that it is working to incrementally tighten up the corporate risk profile.</p> <p>The council will consider how best to develop and deploy a training module to raise risk awareness across the organisation.</p>
<p>The council should develop a data quality strategy. Directorates set their own KPIs. Information passed to the corporate performance team is signed off as accurate by the relevant director but there is nothing in place which outlines how data will be verified as accurate, complete and timely.</p>	<p>The council will seek to develop a data quality strategy.</p>

- 3.5 External audit did not consider the matters above to be significant governance issues.
- 3.6 The statutory deadline for publishing audited 2021/22 accounts was 30 November 2022. Delays in signing audit opinions are widespread across the local authority sector and were first highlighted by Sir Tony Redmond’s independent review of local authority financial reporting and external audit in 2020. In the National Audit Office’s report ‘Progress update: Timeliness of local auditor reporting on local government in England’ (January 2023), it states that auditors gave opinions on just 12% of local authority 2021/22 financial statements by the November 2022 deadline – down from 45% in 2019/20 and 97% in 2018/19.
- 3.7 Although undoubtedly affected by the COVID pandemic, the reasons for the continuing delay in publishing audited accounts are complex. Recent uncertainty over how to value infrastructure assets meant many audit opinions were delayed. Whilst CIPFA has now provided clarity on infrastructure assets, in the meantime a significant backlog of audits has built up, and a lot of audit resource is being absorbed in resolving the backlog. Other factors contributing to the delays include capacity problems within audit firms and difficulties retaining experienced auditors, the increasing complexity of local audit work, and the lack of a sector leader for local government audit to co-ordinate and respond efficiently to emerging risks and issues where a national steer is required.
- 3.8 The timely completion of external audits is vital in providing local authorities with accurate and reliable financial information to plan and manage their services and finances

effectively. It ensures local authority financial arrangements, including whether value for money is being achieved, are transparent to the taxpayer, and facilitates assurance for the public sector more broadly through the audit of the Whole of Government Accounts. The governance risk this delay poses for Islington Council is considered in section 4 of the AGS.

Internal Audit

- 3.9 The council's Internal Audit annual plan sets out a programme of work designed to provide assurance to the Section 151 Officer, management and Members that, in relation to areas included in the audit plan, the council complies with relevant laws, regulations, internal policies and procedures and has taken action to mitigate principal risks.
- 3.10 The 2022/23 Internal Audit plan included 750 planned days of audit work. This resulted in the delivery of 33 audits, covering all the council's directorates, as well as cross-cutting themes. The 2022/23 Interim Internal Audit Report was presented to the Audit Committee in January 2023 and the Annual Internal Audit Report will be presented to the Audit Committee in September 2023. In 2022/23, 33 audits were delivered as follows:
- Eight principal risk audits;
 - Four key financial systems audits;
 - 11 establishment audits (five schools, five tenant management organisations and one voluntary sector organisation);
 - One control design assessment;
 - Six grant certification audits; and
 - Three extended follow ups of limited and no assurance audits from prior years.
- 3.11 The work undertaken during 2022/23 has enabled the Head of Internal Audit to form a reasonable conclusion on the council's control framework, risk and governance arrangements. For the year ended 31 March 2023, the Head of Internal Audit's opinion is that there is Moderate assurance over the adequacy and effectiveness of the council's arrangements – overall the council's systems for control, risk and governance are generally adequate with some improvement required.
- 3.12 Follow up of audit recommendations in 2022/23 demonstrated an improved level of engagement from directorates. Several recommendations were found to be implemented or partially implemented at follow up, with a further programme of work being undertaken in the first quarter of 2023/24 to assess the implementation of open actions. Residual risks will be closely monitored through follow-up audits and the Controls Board, and Corporate Management Board (CMB) monitoring, in 2023/24.
- 3.13 The Internal Audit service continues to be effective, complies with Public Sector Internal Audit Standards (PSIAS), and provides the necessary skills and expertise to deliver a cost effective, value added, service to the council, its partners, and stakeholders. The Shared Internal Audit Service (SIAS) underwent an external quality assessment as part of the London Audit Group's independent peer review process in 2021/22. The review

assessed the SIAS as Generally Conforming to the PSIAS, which is the highest available level of assessment for local authorities. Practices and working protocols in place during the review in 2021/22 continued into 2022/23. In 2022/23, the Internal Audit service continued to benefit from ongoing networking and benchmarking across the Cross Council Assurance Service (a consortium of London boroughs drawing on the same framework agreement for co-sourced assurance services).

Audit Committee minutes and reports

3.14 As an advisory body, the effectiveness of the Audit Committee can be measured by looking at the degree to which it supported and influenced the development of an effective control environment and governance arrangements. The minutes of committee meetings, published on the council's website, include several examples of how the Audit Committee has made a positive contribution, including:

- Supporting and advising on the council's review and update of the Constitution;
- Reviewing risk management arrangements through regular updates from internal audit and regular deep-dives on individual risks in the Principal Risk Report. This has included a deep-dive on the volatility in the energy market (in September 2022) and on health and social care integration and social care market instability (in January 2023);
- Providing a robust review of the council's Annual Governance Statement and the assurances underpinning it;
- Actively monitoring reports and the implementation of recommendations made by auditors;
- Reviewing and confirming the terms of reference for the Audit Committee and the Pensions Sub-Committee.

Standards Committee Reports

3.15 The Standards Committee is responsible for considering whether complaints about a breach of the Code of Conduct for Members should be investigated, and for hearing complaints which have been investigated. A report to the March 2023 Standards Committee revealed that 24 complaints about councillors were received in the three years from 2019/20 to 2021/22. Whilst the Standards Committee was not convened to consider any complaints during this period, the Audit Committee received an annual report from the Monitoring Officer detailing the complaints made against councillors. In March 2023, the Standards Committee approved a revision to the 'Arrangements for Dealing with Standards Allegations' (2012), to make the procedure for dealing with complaints about councillors clearer, more accessible and fit for purpose. The revised procedure, called the 'Arrangements for Dealing with Complaints under the Members' Code of Conduct', gives greater clarity on the role of the Standards Committee, which has now resumed responsibility for hearing complaints.

- 3.16 In January 2023 the Standards Committee found, on a balance of probabilities, that an Islington Councillor improperly communicated confidential information, and brought the council into disrepute, contrary to paragraphs 4 and 5 of the council's Code of Conduct for Members, and in breach of the Nolan Principles of Integrity, Accountability and Leadership. This case demonstrates the strengthening role of the Standards Committee in visibly upholding ethical conduct.

Principal Risk Report and Risk Management Strategy and Framework Report

- 3.17 The Principal Risk Report and a revised Risk Management Strategy and Framework was agreed by the Audit Committee in June 2022. An update on the Principal Risk Report was presented to the Audit Committee in January 2023. This update highlights the following key risks:

- Financial stability and resilience - High inflation and demand for Council services are having a significant impact on the council's budget. The budget setting process for the 2023/24 financial year has been particularly challenging amidst great economic and political uncertainty. There is a significant budget gap to close over the medium-term outlook to 2025/26.
- Volatility in the energy market - An unpredictable fuel and energy market has given rise to significant risk to the council's energy purchasing, and is expected to remain high until the end of the war in Ukraine.
- Declining financial resilience of residents - the cost-of-living crisis is likely to remain over the next few years and will present challenges for residents to remain financially resilient, a significant proportion of whom already face long term income deprivation.

- 3.18 Section 2 of the AGS set out the arrangements the council has in place to manage these risks, including flexible and robust medium term financial planning arrangements. The CIPFA Financial Management Code (FM Code) provides guidance for good and sustainable financial management in local authorities. By complying with the principles and standards within the FM Code authorities can demonstrate their financial resilience in meeting foreseen demands and unexpected financial shocks.

- 3.19 Islington Council undertook a self-assessment against the FM Code as part of its 2022/23 and 2023/24 budget setting process. The latest assessment (informing the 2023/24 budget) showed the council achieves a high level of compliance against 94% of the FM Code statements of standard (or best) practice. Where there is only a medium level of compliance (6%), actions have been identified to take the council to high level.

Information Governance Arrangements

- 3.20 In 2022/23, the council received 1,958 Freedom of Information (FOI) requests, a decrease of 35 requests compared to the prior period. The council responded to 88% of

requests within 20 working days, just below the Information Commissioner's Office (ICO) target of 90%. The council received 553 Individual Rights Requests, an increase of 49 requests compared to the prior period and responded to 74% within the target timeframe. At least 50% of the Individual Rights Requests are for historic children's social care files which are complex and often involve a significant number of paper files that must be scanned and reviewed. This is a complex process which can exceed the statutory timeframe.

- 3.21 The council's response time remains higher than that of central government bodies over the same period. A restructure is underway (in April 2023) which will centralise the teams that deal with Freedom of Information and Subject Access Requests under the corporate Information Governance team. It is expected that this will improve response times.
- 3.22 The ICO carry out compulsory audits or ask organisations to participate in a 'consensual' audit. The council has not been required to participate in any audits by the ICO in 2022/23. The council are required by law to refer data breaches to the ICO where they meet the threshold for reporting. The council reported one incident in 2022/23, which was closed with no further action as the ICO was satisfied with the mitigating actions taken by the council.
- 3.23 Individuals are entitled to escalate complaints to the ICO, where they have a Freedom of Information or Data Protection concern, for example a late/incomplete subject access request, or alleged data breach of data protection legislation. The ICO can issue a decision notice in response to an FOI complaint (this can be for or against the council). The ICO can also issue practice recommendations or fines in relation to breaches of data protection legislation. There have been no decision notices or practice recommendations issued against the council in 2022/23.
- 3.24 Individuals are entitled to appeal an ICO decision notice or data protection complaint to the First Tier Tribunal (FTT). Whilst these appeals are against the ICO, the council can be added as a second respondent by the ICO or the FTT. The council was not added as a second respondent to any FTT complaints in 2022/23.

Care Quality Commission and Ofsted

- 3.25 The Care Quality Commission (CQC) is an independent regulator of health and social care in England. On the CQC website, none of the council's services have been assessed as inadequate or requiring improvement. Most recently, the CQC assessed Islington Council's Supported Living Service for Adults with Learning Disabilities as good. This was based on a full review in 2019, and a reassessment of the data in April 2023. The Islington Reablement Service and Islington Council Shared Lives service were assessed as good in CQC's latest inspections (reported in 2019).
- 3.26 Ofsted is a government department that inspects services providing education for learners of all ages. Ofsted reports are published on its website. The latest Ofsted reports show that of the council's maintained schools:

- 14 schools are Outstanding (26% of all maintained schools)
 - 39 schools are Good (72% of all maintained schools)
 - 1 school is Inadequate (2% of all maintained schools)
- 3.27 Ofsted carried out a focused visit in October 2022, inspecting the council's arrangements for care experienced children and young people. It concluded that arrangements were strong, making one recommendation that the council improve the consistency of recording actions in supervision records and align them to findings from case audits. No significant governance issues were identified in this report.

Local Government and Social Care Ombudsman and Housing Ombudsman

- 3.28 The Local Government and Social Care Ombudsman (LGSCO) conducts independent, impartial investigations of complaints about service failure and maladministration in local authorities, in line with Part III of the Local Government Act 1974. The LGSCO sends the council annual reviews of its performance, which the council signposts on its website: [Local Government and Social Care Ombudsman Reports | Islington Council](#). These are reviewed by the Audit Committee.
- 3.29 The latest available Annual Review letter (2022), covering the period 2021/22, shows the LGSCO upheld 73% of complaints against the council (compared to a sector average of 71%), and were satisfied the council had successfully implemented its recommendations in all cases. The council provided a satisfactory remedy before the complaint reached the Ombudsman in 27% of upheld cases (compared to an average of 11% in similar organisations).

The Housing Ombudsman (HO) resolves disputes involving the tenants and leaseholders of social landlords and is the final stage for complaints that have already been responded to as part of the council's internal complaints process. The latest available report on the HO website shows that in 2021/22, 21 cases were determined by the HO, though none were cases of severe maladministration. The council complied with all HO orders within six months and paid out £9,728 in compensation.

- 3.30 Whilst these reports, from 2021/22 do not highlight any significant governance issues, in 2022/23 the council has become the subject of increasing scrutiny from the HO and LGSCO. Since the pandemic, Islington Council has seen a significant increase in the number of complaints made to the council and in its response times, to a point where the council now has a significant backlog of complaints to process. Measures already taken by the council to try and address this were highlighted in section 2 of the AGS.
- 3.31 In August 2022, the council received notification from the LGSCO of their intention to investigate the delay in response times under section 26D of the Local Government Act 1974. The council is in contact with LGSCO about the matter, to highlight the actions the council has already taken and are proposing to take to address this issue.

- 3.32 In December 2022, the HO informed the council of its decision to launch a Section 49 investigation into Islington's handling of damp and mould complaints. In January 2023, the HO enquired about the stage 2 investigation backlog and the council's plans to resolve this.
- 3.33 The council has implemented a plan to address the backlog of complaints and is proposing further improvements to the arrangements in the coming year. Section 4 of the AGS summarises the actions proposed.

Performance and budget monitoring information

- 3.34 A strong system of financial management is essential for the implementation of policies and the achievement of intended outcomes, as it enforces financial discipline, strategic allocation of resources, efficient service delivery and accountability.
- 3.35 This is demonstrated in the Provisional Outturn report for 2022/23, which showed an overall net, break-even position for the General Fund. The council had sufficient levels of reserves it could call upon to achieve this outturn position, and it continues to monitor the levels of reserves (through the setting and monitoring of the 2023/24 budget and MTFS) to ensure they provide the financial resilience the council needs.
- 3.36 The provisional outturn for the Housing Revenue Account (HRA) was an in-year deficit of £12.987m, which was balanced by contributions from HRA reserves. The deficit was primarily due to a temporary use of Revenue Contribution to Capital Outlay (RCCO) towards the financing of new build and property acquisitions programmes, aligning with the council's treasury management strategy to delay external borrowing and as such the associated interest charges by utilising HRA reserves to finance HRA capital expenditure.
- 3.37 90% of the capital programme was delivered (with capital expenditure of £152m delivered against a revised 2022/23 budget of £169m). The variance against the budget was due to a variety of delays across the programme, for example where clarity was needed on the Net Zero Carbon strategy.
- 3.38 The financial position of Islington's schools remains challenging, mirroring the national picture with schools facing increasing cost pressures. Individual school balances in Islington have been declining since 2018/19, when they totalled £11.732m, down to £6.291m at the end of 2022/23. There were 15 schools in deficit as of 31 March 2023 (29% of maintained schools). The Education and Skills Funding Agency gives guidance on the level of balances schools should hold. In Islington, only 17 schools had balances above the suggested level as at 31 March 2023, down from 21 schools at the start of the year.
- 3.39 The main causes for the decline in schools' balances have been reported in the 2022/23 Provisional Outturn report:

- Reducing pupil numbers. 90% of school funding is pupil-led – each reduction in pupils equates to an average loss of funding per pupil of £5,430 in primary and £8,040 in secondary schools.
- Increased numbers of elective home educated pupils – there are currently 356 elective home educated pupils, at a cost of £1.9m in lost funding for the council's schools. This is an increase of 197 from before the pandemic, and 270 since 2016/17.
- Increasing numbers of pupils with Special Educational Needs and Disabilities (SEND). Education health and care plans increased at a rate of 10.4% per annum in Islington in 2021/22.
- Below inflation per-pupil increases in funding under the national funding formula. This is significantly less than the increases in energy costs and likely staff pay awards in schools, as well as other cost pressures.

3.40 The council is currently reviewing the scrutiny arrangements for schools' finance and formulating recovery plans to ensure their future sustainability. This issue will be monitored through section 4 of the AGS.

Self-Assessment

3.41 In accordance with the CIPFA/SOLACE *Delivering Good Governance in Local Government: Framework* (2016), a self-assessment of the effectiveness of governance arrangements was completed in April and May 2023 by each directorate, at Director level, to inform the AGS. Where these self-assessments identified particular governance issues or areas where improvements are needed, these are detailed in section 4 of the AGS.

4. Governance Issues

4.1 A key element of the annual governance statement is to identify any significant governance issues. Table 2 below summarises the governance issues which management will continue to monitor and address in the year ahead.

Table 2 – Governance issues to monitor in the year ahead

Governance issue	Action	Responsible Officer	Target Date
<p>The council is undertaking a review of its Constitution, and this has identified areas where changes and updates are needed.</p> <p>Without these changes, the Constitution may not be legally compliant, up to date, or internally consistent.</p> <p>Updating the Constitution would make the document more accessible and would help Members and officers take decisions more robustly with more clarity over who takes which decisions.</p>	<p>Complete the review of the council’s Constitution.</p> <p>The Constitution Review Working Group will oversee this work and recommend to Full Council a revised version of the Constitution, including all its parts upon completion of the review.</p> <p>The Constitution Review Working Group will also review report and procurement templates and guidance.</p>	<p>Corporate Director of Resources</p>	<p>December 2023</p>
<p>The council has a significant backlog of stage 2 complaints, and the response times for these complaints has increased significantly. It is coming under increasing scrutiny from the Housing Ombudsman and the Local Government and Social Care Ombudsman.</p> <p>The complaints process is an important way service users and the public can hold the council to account. A deterioration in this process can erode the council’s ability to demonstrate ethical conduct and the delivery of desired outcomes.</p>	<p>Implement and monitor delivery of an improvement plan to address the backlog of stage 2 complaints. This plan includes increasing the capacity of the corporate complaints team, changes to working practices, a full review by an external consultancy, and the establishment of a bi-weekly Complaints Review Project Board to monitor progress and implementation of the plan.</p> <p>Other plans include implementing:</p>	<p>Corporate Director of Community Engagement and Well-being</p>	<p>December 2023</p>

Islington Council - 2022/23 Annual Governance Statement

Governance issue	Action	Responsible Officer	Target Date
	<ul style="list-style-type: none"> • A performance dashboard for the department to track progress, risks, issues and mitigation plans across the financial year. • Bi-weekly Department Management Team meetings focussing on business governance • Quarterly Department Management Team feedback reporting on complaints, Subject Access Requests and Member Enquiries. 		
<p>There were 15 schools in deficit as of 31 March 2023 (29% of maintained schools).</p> <p>Internal Audit have also raised high priority recommendations in relation to some schools in their annual audit plan.</p>	<p>Formalise scrutiny arrangements for schools' finance, and recovery plans to ensure the future sustainability of Islington's schools</p>	<p>Corporate Director, Children's services</p> <p>and</p> <p>Corporate Director of Resources</p>	<p>March 2024</p>
<p>The council has identified areas where it could strengthen governance arrangements surrounding the approval of business cases for new capital schemes.</p>	<p>Implement the new Terms of Reference for the Corporate Asset Delivery Board, which</p>	<p>Corporate Director of Resources</p>	<p>April 2024</p>

Islington Council - 2022/23 Annual Governance Statement

Governance issue	Action	Responsible Officer	Target Date
	sets out the business case requirements for all new capital schemes.		
The new Procurement Bill is expected to come into force in 2024. This will introduce changes to requirements placed on public sector buyers, including greater requirements to publish information about procurement ahead of time, and publicise new contract opportunities, procurement results and information on contract performance.	Review current procurement rules, written procedures and forms to ensure compliance with the new Procurement Bill. Ensure officers receive adequate training and guidance on the requirements of the Bill and the operational and governance changes that will be required.	Corporate Director of Community Wealth Building	April 2024
The council is not currently complying fully with the requirements of the Local Government Transparency Code, which requires local authorities to publish on its website specific information about the council including lists of expenditure over specified values, and statutory notices for contract awards and extensions.	Ensure information on the council's website is fully compliant with the Local Government Transparency Code.	Corporate Director of Resources	March 2024
External audit's opinion on the 2021/22 accounts has not yet been issued, reflecting sector-wide delays in publishing audited accounts. To be able to effectively plan and budget for the future, the council needs accurate and timely information about its	Work with Grant Thornton to plan and co-ordinate the delivery of the 2021/22 and 2022/23 audits, to complete both audits by the 30 September 2023 statutory deadline for publishing audited 2022/23 accounts. Prepare an action plan based on lessons	Director of Finance	30 September 2023

Islington Council - 2022/23 Annual Governance Statement

Governance issue	Action	Responsible Officer	Target Date
<p>financial position, which is confirmed in the publication of audited accounts.</p> <p>Untimely audits can contribute to governance failure if warning signs are not communicated in time, or with sufficient clarity. Continued delays could erode transparency and public confidence in how taxpayers' money is spent.</p>	<p>learnt in the previous audit visit, to ensure a smooth audit engagement in July 2023.</p>		
<p>Islington Council's Public Health department de-merged from Camden Council at the end of 2022/23, while retaining a small range of shared functions via a memorandum of understanding agreement.</p> <p>Additional governance measures were introduced during 2022/23 to ensure that the de-merger was handled effectively. A Commissioning and Governance group within the council, with specific responsibility and focus on matters of governance, reports directly to the Directorate Management Team.</p> <p>The department will need to undertake a post-implementation review to ensure governance arrangements under the new structure are robust.</p>	<p>Review governance and internal control arrangements within the new single-borough department of Public Health to ensure arrangements are up to date and reflect best practice.</p>	<p>Director of Public Health</p>	<p>December 2023</p>

5. Conclusion

- 5.1 The council has identified a number of governance issues and has proposed a set of actions to address them, as outlined in Table 2 above. It will continue to monitor and address these in the year ahead, and report progress in next year's Annual Governance Statement.

Appendix A – Summary of Islington Council’s Governance Framework – CIPFA/SOLACE Principles

This section details the key elements of the council’s governance framework, and demonstrates how these align to the core principles of good governance set out in the CIPFA/SOLACE *Delivering Good Governance in Local Government: Framework* (2016).

Core Principles of the CIPFA/SOLACE framework	Examples of the governance arrangements the council has in place
<p>Principle A: Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law</p>	<p>Islington Council expects the highest standard of conduct and behaviour from all its Members and officers. This expectation is formally set out in the Codes of Conduct for Members and Employees, which are underpinned by the Seven Principles of Public Life (the Nolan Principles). The Code of Conduct for Members is currently being reviewed as part of a wider review of the Constitution. This will ensure the Code complies with the recent report by the Committee on Standards in Public Life titled “Leading in Practice: A Review by the Committee on Standards in Public Life” (January 2023). The review is also considering the Local Government Association’s Model Councillor Code of Conduct. A revised Code of Conduct for Members will be recommended to the Standards Committee in June 2023, and to Full Council in July 2023.</p> <p>The Standards Committee is responsible for considering whether complaints about a breach of the Code of Conduct for Members should be investigated, and for hearing complaints which have been investigated. The council’s ‘Arrangements for Dealing with Complaints under the Members’ Code of Conduct’ was reviewed and approved by the Standards Committee in March 2023.</p> <p>The interim Director of Law and Governance is the Monitoring Officer. The Monitoring Officer advises Members on the scope of powers to take decisions, maladministration, financial impropriety, and budget and policy framework issues, and can report to Full Council (or to the Executive) if they consider any proposal or decision has or would give rise to unlawfulness.</p>

Appendix A – Summary of Islington Council’s Governance Framework – CIPFA/SOLACE Principles

Core Principles of the CIPFA/SOLACE framework	Examples of the governance arrangements the council has in place
	<p>Compliance with policies and legislation is managed through a range of corporate written rules and procedures which define how decisions are taken and the processes and controls required to manage risk and act in the public interest. These include:</p> <ul style="list-style-type: none"> • The Constitution • Financial Regulations (Part 6 of the Constitution) • Procurement Rules (Part 6 of the Constitution) • Code of Conduct for Members (Part 6 of the Constitution), including procedures on the Register of Interests • Code of Conduct for Employees • Anti-Fraud and Corruption Policy • Corporate Complaints Policy • Members Allowance Scheme (Part 7 of the Constitution) <p>The council is undertaking a detailed review of the Constitution. Further details are provided in section 2.12 of this AGS.</p> <p>The council is undertaking a review of the Anti-Fraud and Corruption Strategy and Policy in line with best practice. This is due to be presented to Audit Committee in July 2023.</p>

Appendix A – Summary of Islington Council’s Governance Framework – CIPFA/SOLACE Principles

Core Principles of the CIPFA/SOLACE framework	Examples of the governance arrangements the council has in place
	<p>The council has an established whistleblowing policy in accordance with the requirements of the 1998 Public Interest Disclosure Act. Whistleblowing arrangements are a key element of the council’s overall governance arrangements. It is the mechanism to empower the honest majority in the fight against fraud and corruption. The council’s Whistleblowing Officer is the Head of Internal Audit, Investigations and Risk Management.</p> <p>Several other policies are also in place and available to officers via the council’s Intranet pages, including Human Resources (HR) policies (including discipline procedures), information governance policies and service-specific policies. All key policies and guidance for officers, including the Code of Conduct for Employees, are highlighted to new starters as part of the corporate induction process, and compliance is monitored through the council’s performance management processes.</p>
<p>Principle B:</p> <p>Ensuring openness and comprehensive stakeholder engagement</p>	<p>Ensuring Openness</p> <p>The council is committed to transparency and believes residents have a right to see what is going on and to hold the council to account. Council meetings are open to the public; the only exception is for agenda items that are exempt or confidential within the terms of the Constitution. The time, date and location of public meetings are displayed on the council’s website. The Forward Plan, published on the council’s website, lists the key decisions the council will make over the next four months. All committee minutes and decisions are documented on the council’s website in a timely manner, and the criteria, rationale and considerations used in any decisions are clear. The financial, legal, and environmental implications of all key decisions must be considered and publicly reported on the council’s website, as is an equality impact assessment for each key decision.</p>

Appendix A – Summary of Islington Council’s Governance Framework – CIPFA/SOLACE Principles

Core Principles of the CIPFA/SOLACE framework	Examples of the governance arrangements the council has in place
	<p>In the Islington Together 2030 Plan, the council commits to further modernising and opening up the way it communicates with residents, and will publish a new Communications and Campaigns Plan in 2023/24 to accelerate this change.</p> <p>Stakeholder and Community Engagement</p> <p>The council regularly engages and consults with residents and the wider community on a diverse range of issues. Various communication channels are used, including the council’s websites, email, social media channels, public meetings and the quarterly magazine, IslingtonLife, delivered to residents. Throughout the pandemic and now in relation to the cost-of-living crisis, the council has engaged extensively with community groups, using their insight to shape its communications materials and approach so that the council can make sure important messages reach the right people through channels they trust.</p> <p>Examples of engagement include targeted communications once covid vaccinations had started such as ‘Near Neighbours’, as well as the launch of the ‘We are Islington’ helpline earlier in the pandemic. Surveys of residents are undertaken to test perceptions of the council, its services, and the priorities for residents. The findings are used to shape policy and communications. The Resident Survey of 1,000 residents provides insight into resident perception and satisfaction which is used to inform service planning. The council recognises that regular ongoing engagement is essential to keeping residents’ experiences at the forefront during decision making.</p> <p>As part of Let’s Talk Islington, from November 2021 to August 2022, the council engaged with more than 6,000 residents to understand their perceptions and experiences of inequality and their priorities and aspirations for Islington. The council assembled an Inequality Taskforce of civic, academic, and business leaders to bring new perspectives in tackling inequality. The findings and reports from these initiatives, published on the council’s website, helped shape the Islington Together 2030 Plan.</p>

Appendix A – Summary of Islington Council’s Governance Framework – CIPFA/SOLACE Principles

Core Principles of the CIPFA/SOLACE framework	Examples of the governance arrangements the council has in place
	<p>More recently, the council’s Challenging Inequality action learning sets provide an opportunity for residents to work closely with councillors and council officers to act on the direct feedback of Islington residents. A model of ongoing community conversations will be rolled out with the publication of the Community Power Framework in 2023.</p> <p>The council facilitates a number of networks with community partners, in particular for voluntary sector organisations and faith communities working to promote equalities outcomes for communities with protected characteristics. These organisations, funded through the Voluntary and Community Sector (VCS) Partnership Grants Programme 2021-2024, can be viewed on the council’s website. Under this programme, the council has made commitments of £2.7m per year until March 2024. This is supplemented by an annual programme of community and equality events delivered in partnership with the borough’s voluntary and community sector as well as some delivered directly by the council. All voluntary organisations that receive awards are required to comply with the council’s minimum standards for VCS organisations and are subject to proportionate grant monitoring that aligns with the council’s audit approach.</p> <p>Islington’s 16 ward partnerships are led by ward councillors and give residents, community groups and businesses the opportunity to shape services and improve their neighbourhoods. Ward partnerships act as a forum for community engagement – bringing together ward councillors, service providers, and local communities to identify and address issues and priorities relevant to the ward. They are an essential arena for the resident’s voice and views to be heard, and an important arena for civic participation, where local issues are raised.</p> <p>In 2022, the council launched the Thriving Neighbourhoods programme, which gives local people the opportunity to submit suggestions for improvements to the shared spaces on the council’s estates. Over 200 projects so far have been funded by the Thriving Neighbourhoods programme, including improved playgrounds and community centres.</p> <p>The Islington Youth Council, set up in 2011, is made up of 14 youth councillors who have been elected to represent the views of children and young people in Islington. By attending meetings, taking part in consultations, and engaging other</p>

Appendix A – Summary of Islington Council’s Governance Framework – CIPFA/SOLACE Principles

Core Principles of the CIPFA/SOLACE framework	Examples of the governance arrangements the council has in place
	<p>young people through social media, the Youth Council helps determine how money is spent on services for children and young people and plays an important role in holding Council leaders and decision makers to account.</p> <p>Governance arrangements for partnerships with institutional stakeholders are formally documented in Memorandums of Understanding or other formal terms of reference. This ensures the purpose, objectives and intended outcomes for each partnership is clear, and resources can be used optimally to achieve the desired outcomes. Examples include the council’s pooled funds arrangements with other health providers under Section 75 of the National Health Service Act 2006, details of which are reported in the council’s Statement of Accounts.</p>
<p>Principle C:</p> <p>Defining outcomes in terms of sustainable, economic, social and environmental benefits</p>	<p>Defining Outcomes</p> <p>The central aim of the council’s administration is to create a more equal future in Islington. The council’s priorities to achieve its vision of a more equal borough are set out in the Islington Together 2030 Plan which sets out the strategic framework that will drive the council’s work with its partners over the coming years. The council’s biggest ever engagement programme called Let’s Talk Islington informed the council’s vision and priorities in the Islington Together 2030 Plan.</p> <p>The Islington Together 2030 Plan sets out five key missions in order to create a more equal future for Islington by 2030:</p> <ul style="list-style-type: none"> • Child Friendly Islington: Islington is a place where all children and young people are rooted in a community where they feel safe, can thrive and are able to be part of and lead change. • Fairer Together: Everyone in Islington who needs extra help can access the right support for them at the right time and in the right place

Appendix A – Summary of Islington Council’s Governance Framework – CIPFA/SOLACE Principles

Core Principles of the CIPFA/SOLACE framework	Examples of the governance arrangements the council has in place
	<ul style="list-style-type: none"> • Safe Place to Call Home: Everyone in Islington has a safe, decent, and genuinely affordable place to call home. • Community Wealth Building: There is a sustainable, inclusive, and locally rooted economy in Islington, where wealth is fairly shared and residents and businesses feel they have a stake in their community. • Greener, Healthier Islington: People in Islington can live healthy and independent lives and enjoy London’s greenest, cleanest, and healthiest neighbourhoods. <p>The strategic plan details some of the key programmes which will deliver these missions. The 2023/24 budget enables the delivery of the priorities set out in the Islington Together 2030 Plan, by including growth to support manifesto commitments and continued transformation funding to put strategic priorities into practice.</p> <p>Sustainable economic, social, and environmental benefits</p> <p>The council considers and balances the combined economic, social, and environmental implications of policies and plans in all key decisions, and this is documented on the council’s website. The Medium Term Financial Strategy 2023/24 to 2025/26 demonstrates how the council takes a longer-term view in its decision making, balancing plans for sustainable outcomes with short term financial constraints.</p> <p>Fairness is at the heart of Islington Council’s strategic vision. The council’s Challenging Inequality Programme sets out the council’s long-term ambition for challenging inequality and promoting inclusion, through its role as a strategic leader, employer, service provider and commissioner. The Challenging Inequality Strategy, published on the council’s website, presents the specific actions and the outcomes that will be monitored to ensure this vision translates into tangible change for residents and staff. In a commitment to openness and accountability, the governance and monitoring of this programme is covered by a wide range of structures including the Challenging Inequality Programme Board (made up of council directors and service leads), staff networks, the Race Equality Working Group for elected</p>

Appendix A – Summary of Islington Council’s Governance Framework – CIPFA/SOLACE Principles

Core Principles of the CIPFA/SOLACE framework	Examples of the governance arrangements the council has in place
	<p>Members, the Challenging Inequality Coalition of community groups, and the Challenging Inequalities Partners Working Group of a variety of organisations and institutions. Progress will be reported publicly and refreshed via an annual stocktake.</p> <p>The council declared a Climate Emergency in June 2019, recognising the need to drastically reduce carbon emissions in the borough. A pledge has been made to work towards being a net zero borough by 2030, and the Vision 2030: Building a Net Zero Carbon Islington by 2030 strategy was adopted in November 2020.</p> <p>The Affordable Energy Board has been replaced by a Net Zero Carbon Executive Board with a wider remit. This board is developing strong interfaces with other council officer/member boards to manage strategic risks. This area has also been included in the council’s Principal Risk Report to ensure that the risk cause, consequence, and mitigating actions are tracked and monitored.</p>
<p>Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes</p>	<p>Determining Interventions</p> <p>Decision makers receive objective and rigorous analysis of a variety of options when making decisions, indicating how intended outcomes would be achieved and the associated risks, for instance in the challenge and review process that underpins the setting of the annual budget and savings plans.</p> <p>All key decisions include details of the financial, legal, environmental and equality implications, to allow Members and officers to make informed decisions.</p> <p>The council recognises that an evidence-based approach is essential to keeping residents’ experiences at the centre of what it does. Active stakeholder engagement played a significant role in the development in the Islington Together 2030 strategic plan. The council designed a tiered engagement strategy, aspiring for a mix of mass engagement (large-</p>

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	<p>scale, light-touch methods to reach as many local people as possible), and targeted approaches to engage with different communities across socio-economic status, ethnicities, sexualities, genders, ages, faiths, and disabilities.</p> <p>Planning Interventions</p> <p>The council’s strategic priorities are fully aligned to the annual budget and medium-term financial strategy. The council has considered long term pressures on funding streams, such as council tax, business rates and the government funding settlement.</p> <p>The council works in partnership with a wide range of organisations from the statutory sector, third sector and business sector to deliver services for local people and drive forward improvements in Islington. Partnership working includes different types of relationships – from contractual arrangements between the council and other organisations to deliver services or projects through to strategic forums (some of which are required by statute, others voluntary) which bring partners together around the table to agree how best to tackle key challenges and shared priorities. Some have funding to allocate and targets to meet, others provide a steer to inform individual partners’ priorities and commissioning.</p> <p>Governance arrangements vary depending on the nature of partnership working but are designed to ensure that the partnership remains appropriate, effective, and fit for purpose. In addition, the council’s Financial Regulations provide guidance on best practice in managing partnership arrangements.</p> <p>Where the relationship is a contractual one i.e., funding to deliver an agreed service, the contract or service level agreement will set out requirements around use of funding, what is to be delivered, targets, measurable outputs and how the contract is to be monitored, reviewed and evaluated. Contracts and budgets are managed by the relevant department with the Corporate Director having overall responsibility. Where the relationship is a strategic one, for</p>

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	<p>instance membership of a partnership such as the Safer Islington Partnership, the Terms of Reference will set out governance and accountability arrangements.</p> <p>Where a partnership is a mandatory requirement, e.g. the Safer Islington Partnership and Children’s Trust Boards, there will be an expectation set out in legislation on named partners to attend. Even in the case of non-mandatory partnerships such as the Children and Families Board or the Islington Partnership Board, partners may agree ‘mandatory’ membership from key organisations.</p> <p>Over the past decade, the council has worked closely with its partners through the Islington Partnership Board (IPB). The IPB discusses priorities for the borough, shares information about key issues affecting individual organisations and agrees joint working arrangement for cross cutting challenges such as youth unemployment and welfare benefit reforms.</p> <p>Where the partnership involves sharing data then either a contract or an Information Sharing Agreement will be in place.</p> <p>The Health and Wellbeing Board, which includes membership from the council, the Islington Integrated Care Board and Healthwatch Islington provides the mechanism for leadership of the local health and wellbeing system, maintaining an overview of account for improvement in health and wellbeing outcomes, and ensuring effective coordination and integration of commissioning plans to secure best use of resources and population health outcomes.</p> <p>Optimising the Achievement of Intended Outcomes</p> <p>The council has in place a robust Performance Management Framework to ensure effective delivery of services and priorities. Elements are:</p>

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	<ul style="list-style-type: none"> • Corporate Performance Indicators – performance measures covering the impact of key services and priorities; • Internal monitoring and challenge around performance and delivery through Departmental Management Teams and CMB; • Public reporting and scrutiny through quarterly reports to scrutiny committees, including more in-depth scrutiny of specific topics; and • Overall monitoring of corporate performance through the Policy and Performance Scrutiny Committee. <p>Performance reports are submitted to the council’s five scrutiny committees on a quarterly basis. The reports are published in the papers for the relevant meetings on the council’s website.</p> <p>Capital Programme</p> <p>The council’s Corporate Asset Strategy, introduced in March 2020, ensures investment is directly linked to core council ambitions around fairness and community wealth building. It is designed to deliver a strategic, long-term approach to managing and enhancing the council’s community asset base. Alongside the formal three-year capital programme, the approved 2023/24 budget report included latest indicative capital expenditure estimates over the next 10 years.</p> <p>Oversight and governance of the capital programme is supported by a framework of advisory boards with member and officer involvement:</p>

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	<ul style="list-style-type: none"> • The Corporate Asset Delivery Board, comprised of officers and Members, is accountable for the overall delivery of the corporate asset strategy, with oversight of all material asset and capital related decisions. It reviews the 10-year capital strategy and supporting annual programmes, subject to formal budget approval. • The Major Projects Board, comprised of officers, is accountable for initiating and monitoring delivery of significant mixed-use developments including those led by development partners, as well as smaller but complex schemes cutting across different directorates and/or with complex stakeholder management issues. • The Housing Delivery Board, comprised of officers and Members, integrates governance of new homes delivery and major works across the council’s existing stock. • The Borough Investment Panel, comprised of officers and Members, is accountable for recommending approval of all CIL/s106 investment decisions and spend oversight. • A series of Directorate level programme delivery boards, comprised of officers, are accountable for all other asset development and capital programme activity and linked to wider Directorate governance arrangements.
<p>Principle E: Developing the entity’s capacity, including the capability of its</p>	<p>The council is committed to the ongoing professional development of Members and officers, to ensure everyone has the knowledge and skills they need to carry out their role effectively.</p> <p>After the local elections in May 2022, a significant induction programme for new Members was delivered. An ongoing programme of training and development is being provided to Members on both a group and individual basis, with several dates scheduled for planned training each year. This programme of work is overseen by a Member Training and Development Steering Group, whose membership includes the Leader of the Council and the Chief Executive. Training includes appropriate skills and specific knowledge. Members have also attended various conferences and</p>

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<p>leadership and the individuals within it</p>	<p>away days in 2022/23 to update their knowledge. Details of all training provided to Members is reported to the Audit Committee annually and was last reported in November 2022.</p> <p>In March 2023 the council made a formal commitment to work towards achieving the Local Government Association’s Member Development Charter Status over the next three years.</p> <p>In 2022/23 the council used a Quality Conversations approach to employee performance management. This approach ensured that meaningful conversations took place between managers and employees as regularly as required to manage and improve personal and organisational performance, ensuring that the council’s employees possessed the right skills and behaviours to help achieve success. A Policy and Performance Scrutiny Committee Working Group focused on improvements to performance development during 2022, resulting in a new approach to performance development being introduced from April 2023. All managers have participated in mandatory training as part of its implementation.</p> <p>New employees attend the council’s corporate induction programme, in addition to which directorate and role specific training is provided where needed. The council introduced a new learning management system (MyLearning) in 2022 which is now the central place for e-learning and course bookings. Information on staff training, development programmes and courses available are regularly publicised on the council’s intranet website, IC Bulletin and News Roundup. There is compulsory training for staff on key issues such as equality, data protection and cyber security and health and safety.</p> <p>The council continues to add to the existing wellbeing support available to staff. This includes providing support and resources on a range of topics including mental health and work/life balance. The council has several Mental Health Ambassadors who are available to listen and offer support to all staff in a confidential capacity. Staff participated in a Wellbeing Conversation - a focused check-in between managers and their teams on health and wellbeing and were</p>

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	<p>encouraged to develop a personal wellbeing plan to be followed-up throughout 2023. The council is also investing in a range of initiatives to improve the safety of the workplace, such as carbon dioxide monitors.</p>
<p>Principle F: Managing risks and performance through robust internal control and strong public financial management</p>	<p>Managing Risk</p> <p>The council’s Principal Risk Report is revised annually and presented to the Audit Committee. The process is led by the council’s Risk Manager and Head of Internal Audit, in consultation with risk owners, Directorate Managements Teams (DMTs) and CMB. Risk Management updates are also included as applicable on the Audit Committee’s agenda.</p> <p>The council reviewed and updated its risk management framework in 2022. It continues to make efforts to improve the organisation’s risk maturity and move towards a more risk aware culture by embedding risk management into all decision making and business-as-usual practices. In the council’s Quarter 3 Corporate Performance Update to CMB, performance against the council’s key performance indicators (which are aligned to strategic priorities) was cross-checked with Strategic Risk Management to ensure that issues of strategic significance were consistent across the two areas and there were no important gaps.</p> <p>Robust internal control</p> <p>The council’s Internal Audit annual plan sets out a programme of work designed to provide assurance that the council complies with relevant laws, regulations, internal policies and procedures and has taken action to mitigate the risks identified in the council’s Principal Risks Report. The plan is drafted from a number of sources including the council’s Principal Risks Report, an Internal Audit risk assessment, audit plans of other local authorities, intelligence from</p>

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	<p>previous audits/fraud investigations, and CIPFA good governance guidelines. The 2022/23 Internal Audit plan was approved by the Audit Committee in March 2022. The Audit Committee receives Internal Audit reports on progress and outcomes against the plan bi-annually. Internal Audit updates are also included as a standing item at each Audit Committee meeting.</p> <p>A Controls Board is in place to facilitate an ongoing dialogue between Internal Audit and Directorate Management Teams around the progress of the Internal Audit plan, emerging assurance themes, monitoring of audit actions arising from internal and external audit work, proactive advisory work and escalation of areas of concern. The Director of Finance chairs the Controls Board and its members include Internal Audit and representatives from all directorates. In 2023/24, bi-annual updates on internal audit recommendations will also be presented to CMB.</p> <p>The Audit Committee reviews and approves the annual Statement of Accounts, monitors the effectiveness of the council’s corporate governance activities and promotes high standards of member conduct. The Audit Committee has independent members suitably qualified and trained to support the committee in an advisory capacity.</p> <p>The council’s Anti-Fraud Strategy promotes a zero-tolerance approach to fraud and incorporates the council’s fraud response plan. The council’s whistleblowing policy provides a mechanism for suspected fraud to be reported confidentially. The Head of Internal Audit has overall responsibility for anti-fraud related activity and reports outcomes of fraud investigations annually to the Audit Committee and whistleblowing investigations bi-annually.</p> <p>The council continued to participate in the National Fraud Initiative in 2022/23.</p> <p>Managing Data</p> <p>Through its Information Governance Strategy, the council promotes a culture of good practice around the collection, storage, use and sharing of data, and compliance with legislation. Its application will continue to be tracked in the</p>

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	<p>coming year. The council has an Information Asset Register and a Record of Processing Activity in place to ensure that it manages its information and identifies and mitigates any risks efficiently.</p> <p>A comprehensive Data and Information Management policy suite is in place to ensure staff are aware of their obligations to keep personal data secure. All staff are trained on their data protection and information governance responsibilities through mandatory e-Learning courses. This training also includes cyber security awareness training.</p> <p>Managing Performance</p> <p>The council has a suite of corporate performance indicators to help monitor delivery of the priorities in the Strategic Plan through the council’s services. Performance is reported quarterly to CMB and the Policy and Performance Scrutiny Committee, which includes a narrative update highlighting key successes, challenges and priorities going forward. Performance measurement and reporting is used to identify areas of improvement to our services for residents.</p> <p>There are five scrutiny committees within the council, which provide constructive challenge and debate on policies and objectives and hold the work of the Executive and the council to account. They can undertake more in-depth research into particular areas of policy, and request evidence from other service providers and external organisations. Each Executive Member, accompanied by the relevant Corporate Director, is required to report annually to the relevant scrutiny committee on delivery of services and priorities within their portfolio.</p> <p>The North Central London Joint Health Overview and Scrutiny Committee is formed of the Chairs and in some cases the Vice Chairs of the Health Scrutiny Committees of Barnet, Camden, Enfield, Haringey, and Islington Councils. Its role is to scrutinise strategic sector-wide issues through regular engagement with NHS North Central London. The Joint Committee works independently of both the Executive and health scrutiny committees of its parent authorities.</p>

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	<p>Accountability and effectiveness of other service providers is addressed through relevant partnership arrangements, including the Safer Islington Partnership, Children and Families Board and the Health and Wellbeing Board.</p> <p>Financial Management</p> <p>The council has a robust financial management framework in place to support both long-term achievement of outcomes and short-term financial and operational performance. The council sets and monitors an annual budget alongside a three-year MTFS. The MTFS seeks to identify required budget changes almost three years before any given budget report is agreed. This is a council-wide process involving all spending departments whereby estimates are worked up, challenged and refined as further information becomes known. It considers the most recently available budget monitoring information and the latest view on budget assumptions for the forthcoming financial year. Proposed savings are signed off as deliverable by key stakeholders across the organisation.</p> <p>The thoroughness of the overall budget setting process is considered by the Section 151 officer in their assessment of the overall robustness of the council’s budget estimates.</p> <p>In March 2023 the council approved a balanced budget for 2023/24, which included £10.995m of revenue budget savings and an increase in Council Tax by the maximum of 2.99% plus the Adult Social Care precept of 2%.</p> <p>In 2022/23, the council operated a monthly budget monitoring system, whereby financial performance, and key risks against the approved budget were monitored and reported to the CMB, the Executive and the Policy and Performance Scrutiny Committee. When an under or overspend was reported, directorates took active steps to understand and report the underlying causes and address any forecast under or overspends. This has changed to a quarterly process in 2023/24.</p>

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	<p>The Narrative Report accompanying the Statement of Accounts explains how financial performance against budget, reported to the Executive throughout the year, is consistent with the financial performance reported in the Statement of Accounts.</p> <p>CIPFA’s Financial Management Code (FM Code) provides guidance for good and sustainable financial management in local authorities. By complying with the principles and standards within the FM Code authorities can demonstrate their financial resilience in meeting foreseen demands and unexpected financial shocks. Following the essential aspects of the FM Code shows they are meeting important legislative requirements. Islington Council undertook a self-assessment against the FM Code as part of its 2022/23 and 2023/24 budget setting process. The compliance analysis is re-visited at least annually as part of the budget setting process, with any actions or recommendations implemented on an ongoing basis.</p>
<p>Principle G: Implementing good practices in transparency, reporting and audit to deliver effective accountability</p>	<p>Clear, honest, and open communication with staff and customers is one of the most essential ingredients in providing effective public service. The council’s intranet includes details of best practice and training to help staff communicate effectively in an accessible way with colleagues and service users. This includes the Microsoft Office Digital Accessibility course, the Write First Time training course, corporate templates, and a writing style guide.</p> <p>Information published on the council’s website, including in its Publication Scheme includes information on how money is spent, Members’ allowances, how decisions are made and senior officer remuneration. The council is reviewing its compliance with the Transparency Code. This is noted in section 4 of the AGS.</p> <p>The Access to Information Policy sets out the council’s commitment to Freedom of Information and Environmental Information Regulations. The council’s commitment to compliance with Individual Rights, as set out in the UK General Data Protection Regulation, is demonstrated in the council’s Individuals Rights Policy. The council publishes on its website datasets of information that are frequently requested under a Freedom of Information request. The council is</p>

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	<p>creating an Open Data Strategy to increase proactive publication. A restructure is underway (in April 2023) which will centralise the teams which deal with Freedom of Information and Subject Access Requests under the corporate Information Governance team. It is expected that this will improve response times.</p> <p>The following information is reported annually to Members and is available on the council’s website:</p> <ul style="list-style-type: none"> • Statement of Accounts and Narrative Report • Internal Audit Annual Plan • Internal Audit Annual Report • Annual External Audit Report • Annual Governance Statement <p>The Statement of Accounts and accompanying performance information in the Narrative Report is prepared in line with CIPFA’s Code of Practice requirements, allowing easy comparison with other local authorities. Recommendations made by external audit are acted upon, and this is reported to Members in external audit’s subsequent reports.</p> <p>The council has a formal two-stage process for managing complaints. The process is set out on the council’s website and copies are available from the Corporate Customer Service Team. The council’s aim is to ensure that when things go wrong, it responds quickly to put things right. It tries to learn from and improve its performance in response to customer feedback. Departmental Complaints Officers record and report on all complaints, and the service response is monitored. Customers and residents who are dissatisfied with how the council has dealt with a complaint can contact</p>

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	<p>the Local Government and Social Care Ombudsman or the Housing Ombudsman; independent, impartial, and free services. The Ombudsman has powers to independently investigate complaints about how the council has acted.</p>