

**Neath Port Talbot Council  
Annual Governance Statement  
2019-2020**



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## Introduction

The Council has adopted the 2016 Delivering Good Governance in Local Government: Framework (the Framework), developed by the Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Authority Chief Executives (SOLACE). To comply with the Framework, the Council must publish an Annual Governance Statement (AGS), which explains the processes and procedures in place to enable the Council to carry out its functions effectively. The governance framework comprises the systems, processes, cultures and values by which the Council is directed and controlled, and through which we engage with and lead the local community. The framework brings together an underlying set of legal requirements, good practice and management processes.

In preparing the AGS, the Council conducted a review on the effectiveness of its system of internal control in place for the year ending 31<sup>st</sup> March 2020 to ensure that:

- its business is conducted in accordance with all relevant laws and regulations;
- public money is safeguarded and properly accounted for;
- there is sound and inclusive decision making;
- resources are used economically, efficiently and effectively; and
- there is clear accountability for the use of those resources to achieve agreed priorities which benefit local people and communities.

***“Corporate governance is about making sure that the Council is run properly. It is about ensuring the Council does the right things, at the right time and in the right way.”***

The Council’s system of internal control are designed to manage risk to a reasonable level. The Council cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness.

## The Framework

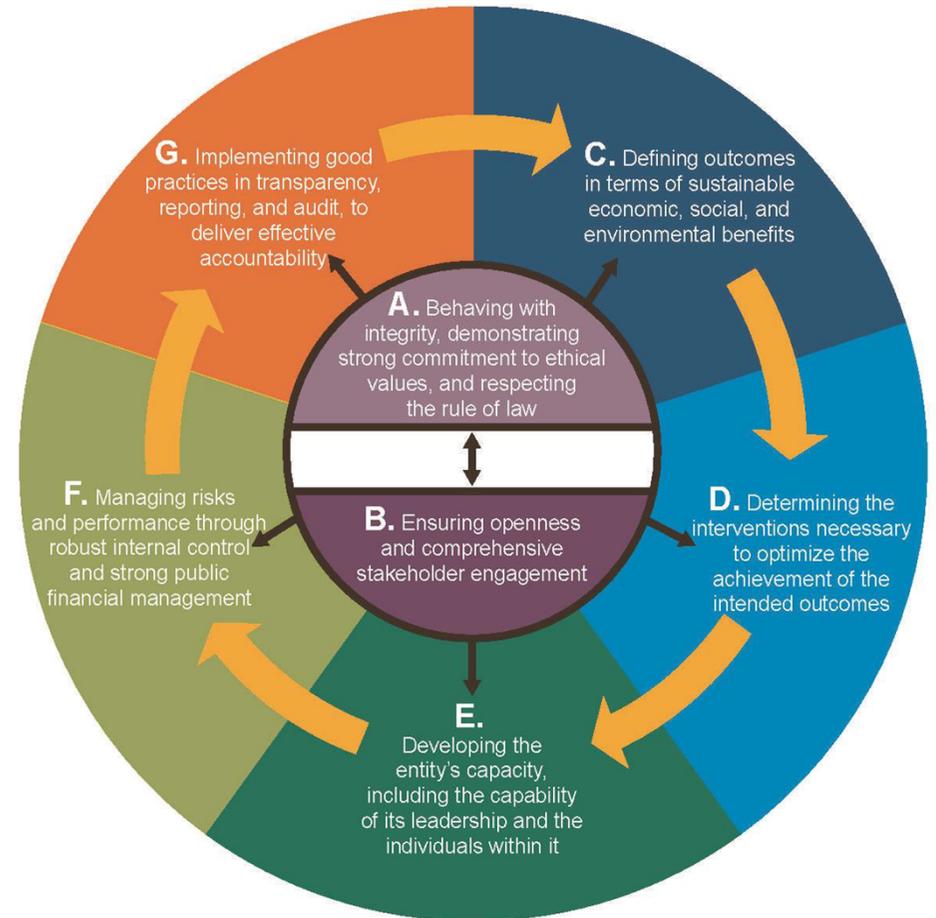
The Framework comprises two core principles and five supporting principles as illustrated in the diagram.

Principles A and B run through principles C to G but good governance is dynamic, and the Council as a whole is committed to improving governance on a continuing basis through a process of evaluation and review.

**The next section: Putting the Principles into Practice,** illustrates examples of how the Council demonstrates compliance to meet these seven principles and the assurances taken during the year on the effectiveness of our governance arrangements.

Any governance improvement areas identified from undertaking the review have been included in an action plan set out in **Table 2** on page 53. The Corporate Governance Group, will oversee the action plan and progress will be reported to Corporate Directors Group, Cabinet and Audit Committee throughout the financial year.

Progress made on improvement work identified during 2018-2019 are contained in **Table 1** on page 55.



## Putting the Principles into Practice

<b>Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
1.1 Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation	1.1.1 <a href="#">Employee Code of Conduct</a>	<p>Last reviewed in January 2020 and will be reviewed every two years to ensure it is still relevant and fit for purpose.</p> <p>The Internal Audit service review adherence to key aspects of the Code of Conduct annually and report to Senior Management.</p>	None identified
	1.1.2 <a href="#">Member Code of Conduct</a>	<p>Monitored by the <a href="#">Standards Committee</a></p> <p>On signing their Declaration of Acceptance of Office, Members are required to give an undertaking to abide by the Members' Code of Conduct.</p> <p>Members receive training on the Code of Conduct and refresher training throughout the year.</p>	A1.1.2: Head of Legal Services reports annually to the Corporate Governance Group and Standards Committee to give an assurance that the Code is fit for purpose - add to agenda for 2020-2021.
	1.1.3 An <a href="#">induction programme for Members</a> was published on the Council website in 2017.	<p>The induction programme forms part of the Authority's Strategy and Charter for Member Development and is structured for both new and returning members. The aim is to provide a supportive and structured development framework to enable Members perform their duties. Members elected through by-elections receive a tailored induction.</p>	None identified

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
	1.1.4 Staff: the Induction Checklist, (which contains information about the expected standards of behaviour) must be signed by managers and their employees.	There is reference to the Employee Code of Conduct in both the Induction Checklist and the Statement of Particulars. The corporate Induction Checklist is emailed to recruiting managers in advance of when a new starter is due to commence employment.	None identified
	1.1.5 <a href="#">Performance Appraisal Process 2016</a>	Heads of Service to report on CPMS, information in relation to performance appraisals completed. In addition to this all performance appraisals must be counter-signed by the grandparent manager. For example an Accountable Manager's performance appraisal is signed by the Head of Service and counter-signed by the Corporate Director	None identified
1.2 Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These should build on the Seven Principles of Public Life (the Nolan Principles)	1.2.1 Organisational Vision and Values are published in the <a href="#">Corporate Plan – Shaping NPT</a>	These are now incorporated into our recruitment processes (written into job descriptions and person specifications of senior posts in the organisation).	None identified
	1.2.2 The vision and priorities for staff are contained within the <a href="#">Workforce Plan 2018-2022</a>	A review of the Workforce Plan was carried out in December 2019, to look at the action taken to date and ensure future actions remain fit for purpose moving forward.	None identified

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Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
	See also 1.1.2 <a href="#">Member Code of Conduct</a> - The Standards Framework for Members (Section 1, Ethical framework)	See A1.1.2	
1.3 Leading by example and using these standard operating principles or values as a framework for decision making and other actions	1.3.1 Integrated Impact Assessment (IIA)  The tool assess the impact of proposed initiatives (e.g. policy, service, procedures, strategies, projects etc.) relating to key legislation (i.e. equality, sustainable development, the Welsh language etc.). It is applied to decisions relating to the initiative and to consider whether the initiative will have a positive, negative or neutral impact on the community.	The revised IIA tool was circulated to staff at the end of April 2019 and training has been made available to all officers.	A1.3.1: A review and evaluation will be undertaken in spring 2020 to ensure the revised IIA tool is embedded into practice (to be rolled over as improvement action).
	1.3.2 Declarations of interest	These are made by Members at the beginning of Committee meetings and recorded in the meeting minutes.	A1.3.2: Head of Legal Services reports annually to the Corporate Governance Group and Standards Committee to

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			give an assurance that the declaration process is fit for purpose - add to agenda for 2020-2021.
	1.3.3 The <a href="#">Standards Committee</a>	<p>The Committee meet on a quarterly basis (or more frequently where referrals from the Ombudsman are considered).</p> <p>Reports are regularly presented to the Standards Committee and any recommendations arising.</p> <p>The Committee also has delegated authority to discharge a number of functions.</p>	None identified
	<a href="#">1.3.4 Member and Officer Relations Protocol</a>	A protocol is in place as part of the Neath Port Talbot Constitution and Employee Code of Conduct and monitored by the <a href="#">Standards Committee</a>	A1.3.4: Copy of the protocol to be drawn to the attention of Officers and Members via publication on the Council's Intranet page. This will be undertaken by the end of March 2020.
1.4 Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively	1.4.1 The Anti-fraud, Corruption and Malpractice Strategy	This Strategy is currently under review and once approved by the relevant committee the new three year Strategy will be published.	A1.4.1: This strategy will be completed and reported to Members during 2020-2021.

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Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
		Compliance with the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA, 2014)	
	1.4.2 <a href="#">Member Interests</a> are shown by individual Members on the Council website.	Declarations of interest for Members is a standing item on all committee meeting agendas and recorded in minutes of meetings.	See A1.3.2
	1.4.3 Staff Interests	An up-to-date register is held by each service Director. Subject to internal audit review annually	
	1.4.4 Members: The <a href="#">Constitution</a>	The Council's Monitoring Officer is required by law to keep a Register of all notifications made by Members. The Register is open to public inspection during normal office hours.	A1.4.4: Head of Legal Services to update the constitution and bring a report to members in Autumn 2020 following royal assent of the Local Government and Elections (Wales) Bill.
	1.4.5 Staff Gifts & Hospitality	An up-to-date register is held by each service Director	A1.4.5: The Head of Finance reports annually to the Corporate Governance Group to give an assurance that the register of staff gifts / hospitality is up-to-date and accurate - add to agenda for 2020-2021.

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	1.4.6 Whistleblowing Policy	Policy approved by Personnel Committee: 31/08/2015. Review date: 31/08/2017	A1.4.6: Policy to be reviewed in 2020 and published on the council website.
	<a href="#">1.4.7 Corporate Comments, Compliments and Complaints Policy</a> , March 2016.	The Corporate Complaints Policy will be revised in 2020 to reflect a number of changes and improvement issues identified throughout the year (see opposite).	A1.4.7: Revise Corporate Complaints Policy in 2020 (to include: implementation of the Complaints Standards Authority for Wales (CSA) powers; recommendations from an internal audit review report which was received in November 2019; further staff guidance within the complaints process for disability related reasonable adjustments; further staff guidance in relation to covert recording and further staff guidance in relation to managing querulous/persistent complainants.
	1.4.8 <a href="#">Social Services Compliments and Complaints</a>	Statutory requirement to publish Annual Report; report presented to Cabinet (last report 31.01.2020).	None identified

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	1.4.9 Complaints and responses	Reported to Cabinet and relevant Cabinet Boards on a quarterly basis.	See A1.4.7
	See also 1.4.4 Members: The <a href="#">Constitution</a> , Part 5, Section 3 'Personal Interests' addresses this.	Member's interests are published on the NPT Council website for each committee throughout the year.	See A1.4.4
	See also 1.1.1 Officers: <a href="#">Employee Code of Conduct</a> (Section 9, 2017).	The Council's Contract Procedure Rules, Employee Code of Conduct and the Public Contract Regulations (2015) require officers and members not to have any involvement in a tender process where they have a potential conflict of interest. They should have no role whatsoever which should negate the need for any declarations of interest to be made.	
2.1 Seeking to establish, monitor and maintain the organisation's ethical standards and performance	2.1.1. The Corporate Procurement Team	This is acknowledged by the team when undertaking tender work for other sections when developing and evaluating procurement process. The team also monitor and evaluate compliance looking at what approach sections adopt.	A2.1.1: Corporate Procurement to monitor and evaluate compliance looking at what approach sections adopt. Head of Legal Services reports annually to the Corporate Governance Group - add to agenda for 2020-2021.

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		The Ethical Employment Code of Practice issued to all sections sets out processes that should be valued.	
2.2 Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation	2.2.1 Member training  See also 1.1.2 Member Code of Conduct)  See also 1.3.3 Standards Committee – special dispensation to vote	Through the year, Members receive training on the Code of Conduct (& refresher training).  Annual reports are presented to Standards Committee.  Members Declaration of Acceptance of Office – undertaken given to abide by the Members' Code of Conduct Leading in the Welsh Public Service Behaviours Framework.	A2.2.1: Future ethical awareness training commissioned to be informed by: The Seven Principles of Public Life (the Nolan Principles).
2.3 Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values	2.3.1 Recruitment and Selection Policy 2018	Training is provided to recruiting managers.	A2.2.2: In 2020 six courses are planned in relation to Recruitment and Selection and Safe Recruitment.
	2.3.2 <a href="#">Pay Policy Statement</a>	Approved by Council 27 February 2019, next review date March 2020	None identified

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	<a href="#">2.3.3 Contract Procedure Rules</a>	Training is available to staff.	A2.3.3: Head of Legal Services to provide training on implementation of Contract Procedure Rules. Training to be scheduled for Spring 2020 and bi annually thereafter.
2.4 Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with high ethical standards expected by the organisation	<a href="#">2.4.1 Ethical Employment in Supply Chain Policy 2019</a>	New – Policy introduced in 2019.	A2.4.1: Head of Legal Services reports annually to the Cabinet on the implementation and operation of the Policy - add to Cabinet forward work programme for 2020-2021.
	2.4.2 We continue to participate in a number of partnerships. Governance arrangements are in place for each for partnership which: <ul style="list-style-type: none"> <li>Clarify the roles of members both individually and collectively in relation to the partnership and to the Council;</li> </ul>	Between February and May 2020, scrutiny committees will be reviewing all partnership arrangements under their remit, to ensure they are robust and have good governance arrangements in place.	A2.4.2: To ensure that a copy of all partnership agreements are logged centrally with the Head of Legal Services. To be undertaken by the end of September 2020.

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Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
	<ul style="list-style-type: none"> <li>Clearly set out the legal status of the partnership; and</li> <li>Make clear the extent to which representatives or organisations both understand and make clear to all other partners the extent of their authority to bind their organisation to partner decisions.</li> </ul>		
<p>3.1 Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations</p>	<p>3.1.1 Cabinet and Committee Reports contain a section entitled “Legal Impacts” so that legal obligations are placed at the forefront of decision making. See also 1.4.4 The <a href="#">Constitution</a></p>	<p>Safe and Legal Decision Making Training is available for relevant officers.</p> <p>Democratic Services Officers and Legal Services monitor reports.</p>	<p>None identified</p>

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Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
3.2 Creating the conditions to ensure that statutory officers, other key post holders and members are able to fulfil their responsibilities in accordance with legislative and regulatory requirements	3.2.1 Financial management arrangements	We have a range of policies and procedures (such as financial regulations, financial procedures, contract standing orders, accounting instructions and officer delegations) that conform to the governance requirements of the CIPFA Statement of the Role of the Chief Financial Officer in Local Government (2010).	A3.2.1: To put in place an agreed procedure where Financial Regulations and Accounting instructions are reviewed to ensure they remain relevant and proportionate. A review of Accounting Instructions is currently underway and will be completed by the Autumn of 2020.
	3.2.2 Democratic Services - support function.	The Head of Democratic Services presents an annual report to Democratic Services Committee and Council, outlining the resource requirements to enable the Council, Cabinet and Committee to receive high level support and discharge of its democratic functions.	None identified
	See also 1.4.4 The Council's Constitution and the different responsibilities of Members and Officers / clear job descriptions for all staff, which highlight their roles and responsibilities.	The Monitoring Officer oversees the Council's Constitution and ensure it is kept up to date.	See A1.4.4

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Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
3.3 Striving to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders	3.3.1 Cabinet and Committee Reports contain a section entitled “Legal Impacts” so that legal obligations are placed at the forefront of decision making.	<p>Legal Enterprise Case Management Software providing audit trails of legal advice given and time spent providing legal advice on all matters.</p> <p>Transaction documentation and hard copies of Legal Advice provided are stored by the Council.</p> <p>Legal training provided to officers on regular basis to ensure they are up to date with recent legal developments and powers available.</p>	None identified
3.4 Dealing with breaches of legal and regulatory provisions effectively	3.4.1 Data Protection Breaches Panel review cases.	Reports to different professional bodies	A3.4.1: Head of Legal Services reports annually to the Corporate Governance Group to give an assurance that the current system for dealing with data protection breaches is fit for purpose - add to agenda for 2020-2021.
	3.4.2 Internal Audit Special Investigations / Disciplinary Cases  See also 3.3.1 Cabinet and Committee Reports	The Council requires that all officers who carry out disciplinary investigations have undertaken the ACAS Investigation Officers training. Also, Heads of Service who are the decision makers in disciplinary investigations	None identified

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Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
		must have attended the ACAS Decision Maker training.	
3.5 Ensuring corruption and misuse of power are dealt with effectively	<p>See 1.4.1 Anti-fraud, Corruption and Malpractice Policy</p> <p>See 1.4.6 Whistle Blowing Policy</p>	<p>Cases are monitored by the Public Services Ombudsman for Wales and the Council's Standards Committee. During the period 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2020, the Monitoring Officer was notified of a total of 3 complaints made against County Borough Councillors alleging a breach of the Code of Conduct. All 3 were dismissed by the Public Service Ombudsman for Wales as not being appropriate for investigation.</p> <p>For the civic year: 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2020, the Standards Committee received three referrals from the Public Service Ombudsman for Wales stemming from the previous civic year (2018-2019) relating to the Code of Conduct of Town and Community Councils only.</p>	<p>None identified</p> <p>See also A1.4.1 / A1.4.6</p>

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
<p>4.1 Ensuring an open culture through demonstrating, documenting and communicating the organisation’s commitment to openness</p>	<p>4.1.1 The Council produces a number of annual reports throughout the year to give assurances about our governance arrangements.</p>	<p>The reports are available to the public and the Corporate Governance Group oversee any risks identified to governance arrangements, arising from these annual reports.</p> <ol style="list-style-type: none"> <li>1. <a href="#">Corporate Plan Annual Report</a></li> <li>2. <a href="#">Strategic Equalities Plan Annual Report</a></li> <li>3. <a href="#">PSB Well-being Plan Annual Report</a></li> <li>4. <a href="#">Welsh Language Standards Annual Report</a></li> <li>5. <a href="#">Welsh Language Promotion Strategy</a></li> <li>6. <a href="#">Audit Service progress Report September 2019</a></li> <li>7. <a href="#">Complaints, Compliments and Comments Annual Report</a></li> <li>8. <a href="#">Ombudsman Annual Report,</a></li> <li>9. <a href="#">Social Services Director’s Annual Report,</a></li> <li>10. CIW Annual Performance Letter / Inspection Programme</li> <li>11. <a href="#">Annual Equalities in Employment Information Report, including the Gender Pay Gap report,</a></li> <li>12. <a href="#">The Pay Policy Statement is published annually in line with the Localism Act 2011 and to ensure transparency in the Council’s pay arrangements.</a></li> <li>13. <a href="#">Property Asset Management Plan (2016-2021) – progress report</a></li> </ol>	<p>None identified</p>

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
	<a href="#">4.1.2 FOI Policy / FOI Publication Scheme</a>	Published in March 2014	A4.1.3: Head of Legal Services to undertake a review of Publication Scheme in 2020-2021 with a report to Cabinet for approval.
	4.1.3 The Council's strategic purpose, vision and values are set out in the Corporate Plan – Shaping NPT.	One of our values is: we will conduct the work of the in an open and accessible way, ensuring we are properly accountable for the decisions we make.	None identified
	4.1.4 <a href="#">Council Meeting Cycle</a>	The Council agrees its meeting cycle at its Annual Meeting and this is published on the Council's website. Meetings are supported with forward work programmes detailing items for the next 3 meetings.	None identified
	<p>See also 4.5.1 Corporate Communications and Community Relations Strategy 2018-2020</p> <p>This includes new 'Brand' guidelines to create consistency and increase visibility and understanding about what the Council does.</p>	<p>We have improved the accessibility of information to better engage all stakeholders in the Council's work, with the intention that there will be a continuous flow of information about how the Council is delivering on its well-being objectives and to keep stakeholders up-to-date.</p> <p>Council Website (<a href="http://www.npt.gov.uk">www.npt.gov.uk</a>) performance is monitored using Google analytics to see how our website is being used. We also carry out an annual website</p>	None identified

<b>Principle B: Ensuring openness and comprehensive stakeholder engagement</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
		survey to measure our effectiveness and ensure the website is performing as expected.	
4.2 Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case the justification for the reasoning for keeping a decision confidential should be provided	4.2.1 Executive and non-executive and regulatory report guidance and report template	The guidance was developed and circulated to reporting officers in May 2019. As and when changes arise the guidance is updated and circulated to report authors/officers.  Report templates ensure the relevant information and advice is presented to substantiate recommendations.	None identified
	4.2.2 Safe and Legal Decision Making	Training is available for relevant officers.	None identified
4.3 Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear	4.3.1 Modern.gov system  See also 1.3.1 Integrated Impact Assessment (IIA)	All publically accessible reports are published on the Council website via Modern.gov system showing the decisions taken at each meeting.	None identified
4.4 Using formal and informal consultation and engagement to determine the most appropriate and effective interventions / courses of action	4.4.1 Neath Port Talbot Consultation and Engagement Strategy 2018-2020	The Council uses Snap Survey software for Corporate Consultations for both internal and external stakeholders.	None identified

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
		<p>The Planning Policy Service use Objective consultation software for the Local Development Plan.</p> <p>These arrangements are regularly reviewed to ensure they are effective and value for money when reviewing budget for forthcoming financial year.</p>	
	4.4.2 Community of Practice	First launched in September 2019, to improve the way we consult and involve our communities and partner agencies in the work we do from the outset. The aim being to get early feedback that helps shape proposals before the Council goes out to wider public consultation.	None identified
	4.4.3 Citizens Panel	Launched in January 2020 – (a demographically representative group of residents) enabling people to express their views and opinions about the Council’s work and feel that their voices are listened to. This will strengthen the Council’s approach to consultation and engagement and also help us to meet our obligations under the Wellbeing of Future Generations (Wales) Act 2015.	None identified
	4.4.4 Shaping NPT	An area on the Council’s website ‘ <a href="#">ShapingNPT</a> ’ has been designed to improve communications and engagement. The aim is to improve awareness of what the Council	None identified

<b>Principle B: Ensuring openness and comprehensive stakeholder engagement</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
		does and encourage engagement by simplifying the narrative around the Council's Corporate Plan and Annual Reports. We are using citizens' and wider stakeholders' stories to bring the Council's work to life celebrating successes and highlighting areas where more work needs to be done to achieve our objectives.	
4.5 Effectively engaging to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably	4.5.1 Corporate Communications and Community Relations Strategy 2018-2020  See also 4.4.1 Consultation and Engagement Strategy 2018-20	During 2019-2020, work continued to deliver on the requirements of the Strategy. During 2019-20 we launched a new Community of Practice for Engagement and Involvement and the NPT Citizens' Panel. The Strategy is currently being updated for the period 2020-2022	None identified
	4.5.2 Key Stakeholder List	We have a list of key stakeholders that we engage with on major policies and plans. Some of these include: Youth Council; Black Minority Ethnic Community Association; and consultee database for the Local Development Plan.	None identified

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
	4.5.3 Youth Mayor	First established in September 2019 and elected by the young people of the borough. The role will involve representing the voice of all children and young people across the borough at a number of pre-determined civic duties.	None identified
	4.5.4 Partnership working with our trade unions and teaching associations	This is a major feature of the Council's culture in relation to workforce engagement. It involves elected Members, managers, employees and trade unions developing and implementing a way of working based on mutual respect and trust, shared objectives and joint ownership of problem solving.	None identified
4.6 Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively	4.6.1 Third Sector Partnerships	The Council has a long and productive relationship with Third Sector organisations and awards grant funding to organisations so they can support our communities in a wide range of ways. The Council recognises and values the contribution the organisations make to help us deliver on some of our services (e.g. supporting the wellbeing of local people and communities). The Partnership Agreement (Compact) between the Council and the Voluntary and Community Sector in Neath Port Talbot formally recognises the contribution of voluntary work to local people and communities. It provides a framework for further developing the many years of	None identified

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
		partnership working in the county borough in pursuit of our shared interest to build strong communities where everyone has an equal chance to lead a fulfilled life. It sets out the responsibilities and expectations on both the Council and the Voluntary and Community Sector in working together.	
	4.6.2 Voluntary Sector Liaison Forum	There is a partnership agreement in place between the Council and the local Voluntary and Community Sector in Neath Port Talbot.	None identified
	4.6.3 County Borough Council / Community Councils Liaison Forum	The Council meets with the Town and Community Councils throughout the year to discuss a wide number of issues.	None identified
	4.6.4 Informal partnerships	There are a number of informal partnerships in place, e.g. Equality and Community Cohesion Group. Arrangements are regularly reviewed to ensure they are effective, where they are not alternative models of working are proposed.	None identified
	4.6.5 Public Services Board (PSB)	PSB members work together to deliver the objectives set out in the PSB Well-being Plan and monitor progress on delivery of work.	None identified

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
<p>4.7 Ensuring that partnerships are based on:</p> <ul style="list-style-type: none"> <li>• Trust</li> <li>• A shared commitment to change</li> <li>• A culture that promotes and accepts challenge among partners; and</li> <li>• that the added value of partnership working is explicit</li> </ul>	<p>See 2.4.2 and 4.5.4</p>	<p>The Council plays an active role in collaborative arrangements to ensure the best return for our citizens and other stakeholders.</p> <p>These arrangements are reviewed regularly to ensure they meet required needs of the Council and where they do not reports are brought to members highlighting various risks and concerns for the decisions to be made on future actions.</p> <p>During early 2020, the Council’s scrutiny committees will be reviewing the collaborative arrangements that fall within their purview to ensure they are robust and have good governance arrangements in place.</p>	<p>None identified</p>
	<p>4.7.1 Staff Council (Consists of: LGS Green Book Negotiating Forum, LSPG (Schools trade union partnership forum), Service Joint Consultative Groups, and the Corporate Health &amp; Safety Trade Union forum).</p>	<p>All of these groups meet regularly and are an opportunity for two-way information sharing, consultation (formal and informal) and where necessary, negotiation. As part of our approach to partnership working, trade unions have representation in other forums; so for example, trade unions sit as an integral part of the Heads of Service Workforce Planning Group.</p>	<p>None identified</p>

<b>Principle B: Ensuring openness and comprehensive stakeholder engagement</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
4.8 Engaging stakeholders effectively, including individual citizens and service users - establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes	See 1.3.1 Integrated Impact Assessment (IIA)	The IIA assesses the need for consultation with stakeholders to consider whether 'initiatives' (e.g. policy, service, procedures, strategies, projects etc.) will have a positive, negative or neutral impact on the community.	See A1.3.1
4.9 Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement	See 4.5.1 Corporate Communications and Community Relations Strategy 2018-2020	Clear strategies are in place to ensure members and officers communicate effectively in relation to community engagement.  <a href="#">See 1.1.1 Employee Code of Conduct</a>  See 1.1.2 Member Code of Conduct - monitored by the <a href="#">Standards Committee</a>	None identified
4.10 Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs	See section 4.4 and 4.5		
4.11 Implementing effective feedback mechanisms in order to demonstrate how their views have been taken into account	See section 4.5		

<b>Principle B: Ensuring openness and comprehensive stakeholder engagement</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
4.12 Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity	4.12.1 Council has a number of duties through the following legislation to ensure inclusivity of feedback from all stakeholder groups: <ul style="list-style-type: none"> <li>• Equality Act 2010</li> <li>• Welsh Language Standards (No.1) Regulations 2015,</li> <li>• Well-being of Future Generations (Wales) Act 2015</li> <li>• Environment (Wales) Act 2016)</li> </ul>	See 1.3.1	A1.3.1
4.13 Taking account of the interests of future generations of tax payers and service users	4.13.1 Well-being of Future Generations (Wales) Act 2015.	<a href="#">Corporate Plan – Shaping NPT</a> Neath Port Talbot Public Services Board (PSB) <a href="#">Well-being Assessment</a>	A4.13.1: Where relevant incorporate proposals for improvements from external regulator’s audit work into the Council’s 2020-2021 corporate planning arrangements.
	4.13.2 The Council’s three Well-being Objectives and statement are published in the <a href="#">Corporate Plan – Shaping NPT</a>	As part of preparing the Annual Report, the Council is required to consider whether the current well-being objectives remain relevant/need amending. In March 2019 the word ‘safe’ was added to the third well-being objective for the Corporate Plan 2019-2022	None identified

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

<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
		and it was not considered necessary to make any other changes.	

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvements / action
<p>5.1 Having a clear vision which is an agreed formal statement of the organisation’s purpose and intended outcomes containing appropriate performance indicators, which provides the basis for the organisation’s overall strategy, planning and other decisions</p>	<p>See 4.1.4 - The Council’s Corporate Plan. The delivery of our vision and well-being objectives is organised at three levels:</p> <ul style="list-style-type: none"> <li>• Level 1 – Improvement Priorities</li> <li>• Level 2 – Corporate Change Programme</li> <li>• Level 3 – Business Plans/Service Delivery</li> </ul>	<p>The Council’s strategic vision and priorities for the county borough are set out in the: <a href="#">Corporate Plan – Shaping NPT</a></p> <p>The Plan is reviewed each year to ensure it reflects current state of affairs / local need.</p>	<p>None identified</p>
	<p>5.1.1 Corporate Performance and Risk Management system (CPMS)</p>	<p>The system enables the integration of the Council’s strategic planning, business planning, performance management and risk management arrangements. This ensures that there is a ‘Golden Thread’ running from the three corporate well-being objectives, through to key corporate strategies and to service business plans. This enables the Council to clearly demonstrate how its services and functions contribute to the Council’s well-being objectives which in turn support the seven national well-being goals.</p>	<p>A5.1.1: We will incorporate the findings from the Wales Audit Office’s review of our performance, risk and business planning arrangements in 2020-2021.</p>
<p>5.2 Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer</p>	<p>5.2.1 Commissioning</p>	<p>The Council delivers or commissions an enormous range of services and functions that affect the day to day life of everyone who lives in the county borough.</p>	<p>None identified</p>

<b>Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvements / action</b>
		Service user questionnaires are undertaken as part of contract monitoring; contracts require processes to be in place to ensure providers actively engage with service users, informing service and feedback on proposed changes. Contract Monitoring Officers review practice, including interviewing service users.	
5.3 Delivering defined outcomes on a sustainable basis within the resources that will be available	See section 4.1	We examine the progress made in achieving our well-being objectives set out in the Corporate Plan, including the key performance indicators. On an annual basis progress is summarised in our Annual Report which includes data on key areas of performance.	None identified
5.4 Identifying and managing risks to the achievement of outcomes	5.4.1 Corporate Risk Management Policy	The Council continues to monitor its risks over the short, medium and long term in line with the Councils' Corporate Risk Management Policy which promotes an open, consistent and proactive risk management attitude. Monitoring reports are presented to both senior management and the Council's Cabinet on a regular basis. Latest copy of the report can be found <a href="#">here</a> .	See A5.1.1
	5.4.2 Senior Information Risk Owner (SIRO)	The Assistant Chief Executive and Chief Digital Officer took over the role in June 2019. The SIRO will report directly to the Corporate Directors Group on information	None identified

<b>Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvements / action</b>
		security matters. The SIRO is accountable for information risk throughout the Authority. An Information Management Strategy has been prepared to support the SIRO in her role.	
5.5 Managing service users' expectations effectively with regard to determining priorities and making the best use of the resources available	See also 1.3.1 Integrated Impact Assessment (IIA)		
5.6 Sustainable economic, social and environmental benefits - considering and balancing the combined economic, social and environmental impact of policies, plans and decisions when taking decisions about service provision	See also 4.1.4 The Council's strategic vision and priorities (set out in the <a href="#">Corporate Plan – Shaping NPT</a> )		
5.7 Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints	See also 4.3.3 Budget setting process		
	See also A1.3.1		
5.7 Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints	5.7.1 <a href="#">Welsh Government Procurement Policy</a>	Complying with the policy, by ensuring that contracts over the value of £1,000,000 include community benefits clauses and contracts split into "Lots" or smaller arrangements – allowing smaller organisations to bid for elements of contracts if they are unable to bid for larger packages.	A5.7.1: Head of Legal Services to provide ongoing training during 2020-2021 to officers on requirements and for Corporate Procurement team to advise on any compliance points.
	<a href="#">See also 2.4.1 Ethical Employment in Supply Chain Policy 2019</a>	The Council has made a commitment to actively examine where it sources its goods and services from to ensure those arrangements are ethical.	
5.8 Determining the wider public interest associated with balancing conflicting	See section 5.7 / 4.3 / 4.4		

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvements / action
interests between achieving the various economic, social, and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs			
5.9 Ensuring fair access to services	5.9 <a href="#">Strategic Equality Plan (SEP)</a>	In 2020 we will be revising the Council’s equality objectives set out in the SEP. They will be better aligned and integrated with the Council’s well-being objectives. We have also taken on board findings from the Equality and Human Rights Commission’s ‘Is Wales Fairer?’ Report. The Report focuses on six themes: Education, Health, Personal Safety, Living Standards, Employment and Participation, we have adopted these themes for our revised equality objectives.	None identified



<b>Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
about service improvements or where services are no longer required in order to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts			
6.3 Planning Interventions - establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets	<a href="#">See 4.1.4 Corporate Plan – Shaping NPT.</a> <u>The delivery of our vision and well-being objectives is organised at three levels:</u> <ul style="list-style-type: none"> <li>• <u>Level 1 – Improvement Priorities</u></li> <li>• <u>Level 2 – Corporate Change Programme</u></li> <li>• <u>Level 3 – Business Plans/Service Delivery</u></li> </ul>	<p style="text-align: center;">N/A</p> <p>See 4.3.1 - Council Cycle of Meetings</p>	See A5.1.1
6.4 Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered	<a href="#">See 4.6.4 Public Services Board (PSB)</a>  <a href="#">See also section 6.2</a>		
6.5 Considering and monitoring risks facing each partner when working collaboratively including shared risks	<p>See 2.4.2</p> <p>See also 5.4.1 Corporate Risk Management Policy</p>		

<b>Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
6.6 Ensuring arrangements are flexible and agile so that the mechanisms for delivering outputs can be adapted to changing circumstances	<p><a href="#">See 4.1.4 Corporate Plan – Shaping NPT.</a>  <u>The delivery of our vision and well-being objectives is organised at three levels:</u></p> <ul style="list-style-type: none"> <li>• <u>Level 1 – Improvement Priorities</u></li> <li>• <u>Level 2 – Corporate Change Programme</u></li> <li>• <u>Level 3 – Business Plans/Service Delivery</u></li> </ul>		
6.7 Establishing appropriate local performance indicators (as well as relevant statutory or other national performance indicators) as part of the planning process in order to identify how the performance of services and projects is to be measured	<p><a href="#">See 4.1.4 Corporate Plan – Shaping NPT.</a>  <u>The delivery of our vision and well-being objectives is organised at three levels:</u></p> <ul style="list-style-type: none"> <li>• <u>Level 1 – Improvement Priorities</u></li> <li>• <u>Level 2 – Corporate Change Programme</u></li> <li>• <u>Level 3 – Business Plans/Service Delivery</u></li> </ul>	<p>There is a clear structure in place for delivering the objectives, priorities and actions set out in this Plan, which includes a basket of key performance indicators.</p> <p>Service Business Plans also contain a number of local performance indicators.</p> <p>On a quarterly basis the Cabinet and relevant Cabinet Boards, receive a report on progress being made in relation to the well-being objectives and improvement priorities.</p>	None identified
6.8 Ensuring capacity exists to generate the information required to review service quality regularly	See also 5.1.1 Corporate Performance and Risk Management System (CPMS)	The system generates a number of performance reports to support the above quarterly reporting cycle.	See A5.1.1

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
6.9 Preparing budgets in accordance with organisational objectives, strategies and the medium-term financial plan	6.9.1 <a href="#">Budget</a> setting process	For 2019-2020 the savings identified came from professional and Cabinet Member input and were subject to an extensive programme of consultation with service users, staff and trade unions, and scrutinised by the relevant committee. The equality impact of budget proposals was also explicitly considered when developing and agreeing the proposals within the revised Forward Financial Plan. <a href="#">2019-2020 Budget.</a>	None identified
6.10 Informing medium and long-term planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy	See above 6.9.1 Budget setting process		
6.11 Optimising achievement of intended outcomes - ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints	See above 6.9.1 Budget setting process		
6.12 Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term	See above 6.9.1 Budget setting process		

<b>Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
6.13 Ensuring the medium-term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage	See above 6.9.1 Budget setting process		
6.14 Ensuring the achievement of 'social value' through service planning and commissioning. The Public Services (Social Value) Act 2012 states that this is "the additional benefit to the community....over and above the direct purchasing of goods, services and outcomes"	<a href="#">See 2.4.1 Ethical Employment in Supply Chain Policy 2019</a> See A2.4.1		

<b>Principle E: Developing the entity's capacity, including the capability of its leadership and the individuals within it</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement /action</b>

**Principle E: Developing the entity’s capacity, including the capability of its leadership and the individuals within it**

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement /action
7.1 Developing the entity’s capacity - reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness	See 1.2.2 The vision and priorities for staff are contained within the <a href="#">Workforce Plan 2018-2022</a>	<p>The Workforce Plan seeks to identify the key challenges and priorities for our employees over the 5 year period, as set out in the Corporate Plan objectives and priorities, the Medium Term Financial Plan, the Asset Management Plan and the Corporate Risk Register.</p> <p>The action plan seeks to address these challenges, and to ensure that the Council has the right number of people, with the right skills and attitudes, in the right place, at the right time, and in order to deliver its services and functions.</p>	None identified
7.2 Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how the authority’s resources are allocated so that outcomes are achieved effectively and efficiently	<p>7.2.1 There are a number of examples of research and benchmarking exercises undertaken across the Council:</p> <ul style="list-style-type: none"> <li>• We work collaboratively with three other welsh Councils in relation to our corporate performance system, to share best practice</li> <li>• We use National Performance Indicators</li> </ul>	See 6.1 above.	None identified

**Principle E: Developing the entity’s capacity, including the capability of its leadership and the individuals within it**

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement /action
	<p>for benchmarking via All Wales data.</p> <ul style="list-style-type: none"> <li>• We benchmark via The Association for Public Service Excellence (APSE) for some services</li> <li>• A Member Task &amp; Finish Group has been viewing data on other authority’s costs of webcasting to inform recommendations to Council.</li> <li>• Electoral Services officers participate in the Association of Electoral Administrators network to benchmark electoral administration.</li> <li>• Participation by Officers and Members in networks facilitated by the WLGA to benchmark and research out best</li> </ul>		

<b>Principle E: Developing the entity's capacity, including the capability of its leadership and the individuals within it</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement /action</b>
	practice across Democratic Services.		
7.3 Recognising the benefits of partnerships and collaborative working where added value can be achieved	See 2.4.2 / section 4.6 and 4.7		
7.4 Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources	7.4.1 Social Care Workforce Development Partnership (SCWDP)  See also section 7.1 Workforce Plan 2018-2022	The broad aim of the SCWDP is to improve the quality and management of social services provision through a planned approach to training and to increase the proportion of staff across the whole social care sector with the qualifications, skills and knowledge they need for the work they do and to achieve this through Social Care Development Partnerships led by local authorities.	None identified
7.5 Developing the capability of the entity's leadership and other individuals - developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained	See 1.4.4 The Council's Constitution (different responsibilities of Members and Officers / clear job descriptions for all staff).		

**Principle E: Developing the entity’s capacity, including the capability of its leadership and the individuals within it**

<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement /action</b>
7.6 Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body	7.6.1 List of officer delegation	The Constitution requires the Head of Legal Services to keep a list of all officer delegations made in accordance with the Constitution.	A7.6.1: Head of Legal Services to undertake a review in 2020-2021 of all proposals and keep a central electronic list of delegations.
7.7 Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure, whereby the chief executive leads the authority in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other’s authority	7.7.1 Cross party panel	The panel which is made up elected Members (and chaired by the Leader) undertakes the Chief Executive’s appraisal and agrees the objectives for year ahead and personal learning.	None identified
	See 1.4.4 The Council’s Constitution and the different responsibilities of Members and Officers / clear job descriptions for all staff, which highlight their roles and responsibilities.	The Monitoring Officer oversees the Council’s Constitution and ensure it is kept up to date.	See A1.4.4

**Principle E: Developing the entity’s capacity, including the capability of its leadership and the individuals within it**

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement /action
<p>7.8 Developing the capabilities of members and senior management to achieve effective shared leadership and to enable the organisation to respond successfully to changing legal policy demands as well as economic, political and environmental changes and risks by:</p> <ul style="list-style-type: none"> <li>• Ensuring members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged</li> <li>• Ensuring members and officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis</li> <li>• Ensuring personal, organisation and system-wide development through shared learning, including lessons learnt from both internal and external governance weaknesses</li> </ul>	<p>7.8.1 Member support and development.</p>	<p>Each year a schedule of Member Seminars is delivered over the Civic year. Some topics are standard items such as: Committee Procedures, Code of Conduct, Council Budget and Corporate Safeguarding. However, as the year evolves new topics are added, the following are some examples for 2019-20:</p> <ul style="list-style-type: none"> <li>• Police Update</li> <li>• Remodelling of Adult Social Care Service</li> <li>• Local Government &amp; Elections (Wales) Bill</li> </ul>	<p>None identified</p>
	<p>7.8.2 Reviewing individual member performance</p>	<p>This is done on a regular basis taking account of their attendance and considering any training or development needs.</p> <p>We also undertake an annual member survey to gather views for improvements to individuals and the team that supports members.</p>	<p>None identified</p>
	<p>7.8.3 Officer support and development</p>	<p>The training available for officers is reviewed and updated on an ongoing basis to ensure they can fulfil their roles and responsibilities (e.g. Equalities Training, Digital Leadership Programme, Violence Against Women, Domestic Abuse and Sexual Violence, Raising Awareness of Prevent (WRAP))</p>	<p>None identified</p>

**Principle E: Developing the entity’s capacity, including the capability of its leadership and the individuals within it**

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement /action
	7.8.4 Reviewing individual officer performance	See below	None identified
	See also 1.1.3 An <a href="#">induction programme for Members</a> / 1.1.4 Staff: the Induction Checklist, (which contains information about the expected standards of) / 1.1.5 <a href="#">Performance Appraisal Process 2016</a> / 1.2.2 The vision and priorities for staff are contained within the <a href="#">Workforce Plan 2018-2022</a> / 2.2.1 Member training		
7.9 Ensuring that there are structures in place to encourage public participation	See section 4.5		
7.10 Taking steps to consider the leadership’s own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections	7.10.2 External regulator inspections See 1.1.5 <a href="#">Performance Appraisal Process 2016</a>	CIW have a programme of inspections based on their annual performance evaluation (letter), e.g. Older Adults (June 2019).	There is a proposal in the Local Government & Elections (Wales) Bill for peer reviews. We await the final outcome of the Bill requirements.
7.11 Holding staff to account through regular performance reviews which take account of training or development needs	See 1.1.5 <a href="#">Performance Appraisal Process 2016</a>	The majority of employees within the Council have regular 1:1s or supervision sessions with their manager to address their performance and to discuss training and development needs.	None identified
7.12 Ensuring arrangements are in place to maintain the health and wellbeing of the	See 1.2.2 <a href="#">Workforce Plan 2018-2022</a>	The Council has signed the Time to Change Wales Employer Pledge. We have in place	None identified

**Principle E: Developing the entity’s capacity, including the capability of its leadership and the individuals within it**

<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement /action</b>
workforce and support individuals in maintaining their own physical and mental wellbeing		an action plan which contains initiatives to support employees across the Council with mental ill health. Progress on the action plan is reported annually to Personnel Committee.	

<b>Principle F: Managing risks and performance through robust internal control and strong public financial management</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
8.1 Managing risk - recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making	See 2.4.2 / 4.1.1 / 4.5.4 / 5.4.1 / 5.4.2 and section 6.5		
8.2 Implementing robust and integrated risk management arrangements and ensuring that they are working effectively			
8.3 Ensuring that responsibilities for managing individual risks are clearly allocated			
8.4 Managing Performance - monitoring service delivery effectively including planning, specification, execution and independent post-implementation review	8.4.1 Corporate Performance Management Framework  See also 5.1.1 Corporate Performance and Risk Management system (CPMS)	We have a range of performance indicators that enable the Council to measure performance of services. To support the delivery of the framework, there is a corporate performance management team as well as directorate performance management teams.	See A5.1.1:

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
8.5 Making decisions based on relevant, clear, objective analysis and advice pointing out the implications and risks inherent in the organisation’s financial, social and environmental position and outlook	<p>See also 1.4.4 The Council’s Constitution</p> <p>The Constitution sets out how the Council operates and the process for policy and decision-making. Within this framework all the decisions are taken by Council, Cabinet or Cabinet Boards. The decisions are presented in a comprehensive written format in a standard template. The Cabinet Scrutiny Committee considers any decisions directly before the Cabinet meets. This is referred to as contemporaneous scrutiny. A record of decision-making and supporting materials are published (publically accessible reports only) on the Council’s website via Modern.gov.</p>		
8.6 Ensuring an effective scrutiny or oversight function is in place which encourages constructive challenge and debate on policies and objectives before, during and after decisions are made, thereby enhancing the organisation’s performance and that of any organisation for which it is responsible	8.6.1 Scrutiny Committees	<p>The role and responsibility for scrutiny has been established and is clear. Annual forward work programme sessions are arranged to identify items for the committees to focus on in the new civic year.</p> <p>Throughout the year scrutiny Members also undertake specific training to enhance their skills (e.g. Chair and Vice Chair training). In 2019, scrutiny Officers also had training to help them better support the needs of the scrutiny committees and members.</p>	None identified
8.7 Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement	See 4.3.1 <a href="#">Council Meeting Cycle</a>	The cycle of meetings sets out a calendar of dates for submitting, publishing and distributing timely performance reports.	

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

<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
8.8 Ensuring there is consistency between specification stages (such as budgets) and post-implementation reporting (e.g. financial statements)	8.8.1 Financial standards, guidance and regulations	The Director is responsible for ensuring there are proper arrangements in place for the administration of the financial affairs of the Council. Corporate Directors are responsible for the financial management of their respective services and are supported by regular financial management information, which includes monthly financial monitoring reports.	None identified
8.9 Robust internal control - aligning the risk management strategy and policies on internal control with achieving objectives	See also 5.4.1 Corporate Risk Management Policy		
8.10 Evaluating and monitoring risk management and internal control on a regular basis	See 5.4.1 Corporate Risk Management Policy		
8.11 Ensuring effective counter fraud and anti-corruption arrangements are in place	See 1.4.1 The Anti-fraud, Corruption and Malpractice Strategy		
8.12 Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor	8.12.1 Annual Governance Statement  See also 9.9.1 Internal audit service	The Annual Governance Statement reports on the extent of the Council's compliance with its principles and practices of good governance, including how the Council has monitored the effectiveness of its governance arrangements in the year. The Annual Governance Statement is reviewed every year and updated to reflect the improvement work undertaken during the year.	None identified

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
8.13 Ensuring an audit committee or equivalent group or function which is independent of the executive and accountable to the governing body: provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment and that its recommendations are listened to and acted upon	Audit Committee (Terms of reference, Membership and Training)	Audit committee complies with best practice (Audit Committees: Practical Guidance for Local Authorities and Police (CIPFA, 2013))	None identified
8.14 Managing Data - ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data	8.14.1: Data management framework and procedures / data protection officer / policies and procedures	The Head of Legal Services is the Council's Data Protection Officer (DPO) and has responsibility for ensuring compliance with the Data Protection Act 2018. The DPO will report directly to the Corporate Directors Group on information security matters.	A8.14.1: A review of Data Processing, Data Protection and Data Sharing work will be undertaken by the Information Governance team in 2020 and central records kept of data sharing.
8.15 Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies	See 8.14.1		
8.16 Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring	See 9.9.1 Internal audit service		

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

<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
8.17 Strong public financial management - ensuring financial management supports both long-term achievement of outcomes and short-term financial and operational performance	See 3.2.1		
8.18 Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls	See 3.2.1		

<b>Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability</b>			
<b>Behaviours and actions that demonstrate good governance in practice</b>	<b>Evidence of key systems, documents and processes</b>	<b>Assurance of arrangements in place</b>	<b>Suggested improvement / action</b>
9.1 Implementing good practice in transparency - writing and communicating reports for the public and other stakeholders in an understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate	See 4.3.2 Executive and non-executive and regulatory report guidance		
9.2 Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand	See 4.1.1 The Council produces a number of annual reports throughout the year to give assurances to our governance arrangements.		
9.3 Implementing good practices in reporting - reporting at least annually on performance, value for money and the stewardship of its resources			
9.4 Ensuring members and senior management own the results	See 1.4.4 The <a href="#">Constitution</a>		
9.5 Ensuring robust arrangements for assessing the extent to which the principles contained in the framework have been applied and publishing the results on this assessment including an action plan for improvement and evidence to demonstrate good	9.5 Corporate Governance Group	The Corporate Governance Group ensure that the governance arrangements of the Council are robust and fit for purpose. The Group oversee any risks identified to governance arrangements and meet on a regular basis and have terms of reference to fulfil their role.	A9.5.1: To deliver governance awareness training across the Council.

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
governance (annual governance statement)			
9.6 Ensuring that the Framework is applied to jointly managed or shared service organisations as appropriate	See 8.12.1 Annual Governance Statement		
9.7 Ensuring the performance information that accompanies the financial statement is prepared on a consistent and timely basis and the statements allow for comparison with other similar organisations	See 8.12.1 Annual Governance Statement		
9.8 Assurance and effective accountability - ensuring that recommendations for corrective action made by external audit are acted upon	9.8 External audit / regulatory reports		
9.9 Ensuring an effective internal audit service with direct access to members is in place which provides assurance with regard to governance arrangements and recommendations are acted upon	9.9.1 Internal audit service	<p>Our internal audit service is resourced and maintained so that it delivers on its audit work programme planned for the current financial year.</p> <p>Compliance with CIPFA’s Statement on the Role of the Head of internal Audit (2010)</p> <p>Compliance with Public Sector Internal Audit Standards</p>	None identified
9.10 Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations	See 9.8		

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

Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	Assurance of arrangements in place	Suggested improvement / action
9.11 Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement	See 8.12.1 Annual Governance Statement		
9.12 Ensuring that when working in partnership, arrangements for accountability are clear and that the need for wider public accountability has been recognised and met	See 2.4.2 Governance arrangements are in place for each partnership we are involved in.		

## Review of Effectiveness

The Council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the Chief Officers and the Internal Audit Service who have responsibility for the development and maintenance of the governance environment and also by comments made by the external auditors and other review agencies and inspectorates. A Corporate Governance Group, reporting to the Corporate Directors Group ensures that improvement work is scheduled, resourced and monitored. The Council uses a number of ways to review and assess the effectiveness of its governance arrangements, the table below highlights the different mechanisms during 2019-2020:

<b>Constitution Review &amp; Monitoring (2019-2020)</b>	<b>Internal Audit Service (2019-2020)</b>	<b>Audit Committee (2019-2020)</b>	<b>Standards Committee (2019-2020)</b>	<b>External Auditors (2019-2020)</b>
<p>We started a review of the Constitution to look at ways to modernise arrangements. However, the review has been placed on hold until the final requirements of the new Local Government and Elections (Wales) Bill are known (summer 2020) and a report will be brought to Council upon publication of the final legislation.</p> <p>Reports were taken to the Council's Cabinet and Cabinet Boards in 2019-2020 seeking authority to amend the Constitution to include additional delegated powers for officers in respect of</p>	<p>The service undertook a number audit reviews throughout the year, in order to provide an opinion on the internal control, risk management and governance arrangements of the Council.</p> <p>The internal auditors' opinion was that the Council's internal control environment and systems of internal control in the areas audited were satisfactory; and that reasonable assurance can be given that there have been no major weaknesses noted in</p>	<p>In 2019-20 the Audit Committee:</p> <ul style="list-style-type: none"> <li>• Approved the Council's Statement of Accounts including the Annual Governance Statement.</li> <li>• Approved the Council's Internal Audit Plan for the year.</li> <li>• On a quarterly basis monitored Internal Audit performance against the plan.</li> <li>• Monitored External Audit Performance and received update reports from Wales Audit Office.</li> </ul>	<p>During the period 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2020, the Monitoring Officer was notified of a total of 3 complaints made against Members of Neath Port Talbot County Borough Council alleging a breach of the Code of Conduct. Each of these complaints were dismissed by the Public Service Ombudsman for Wales as not being appropriate for investigation.</p> <p>An annual report was presented to the Standards Committee on the 5<sup>th</sup> March 2020,</p>	<p>Based on the work carried out by the Wales Audit Office and other relevant regulators (such as Estyn or Care Inspectorate Wales), the Auditor General believes The Council is meeting its statutory requirements in relation to continuous improvement.</p> <p>Also in the latest Annual Audit Letter for Neath Port Talbot County Borough Council 2017-18, the Auditor General was satisfied that the Council has appropriate arrangements in place to secure economy, efficiency and effectiveness in its use of resources.</p>

<b>Constitution Review &amp; Monitoring (2019-2020)</b>	<b>Internal Audit Service (2019-2020)</b>	<b>Audit Committee (2019-2020)</b>	<b>Standards Committee (2019-2020)</b>	<b>External Auditors (2019-2020)</b>
<p>decision making of new items of legislation. Formal reports by s151 or Monitoring Officer – no reports were issued by the s151 or Monitoring Officer in 2019-2020.</p>	<p>relation to the internal control systems operating within the Authority.</p>	<ul style="list-style-type: none"> <li>• The Committee approved a revised Internal Audit Charter.</li> <li>• The Committee received Treasury Management Progress Reports in order to fulfill their obligations in relation to the Scrutiny of Treasury Management activity.</li> </ul>	<p>highlighting the work undertaken and will be presented to Full Council in Spring 2020.</p>	

## Governance Improvement Areas

The Council is committed to improving the governance arrangements in place and addressing issues identified.

**Table 1** improvement areas identified during 2018-19 and progress during 2019-20.

Improvement Area (2018-2019)		Progress (during 2019-2020)
1.	Integrated Impact Assessment (IIA) – review and evaluate the revised Integrated Impact Assessment Tool	The revised Integrated Impact Assessment tool was circulated to staff at the end of April 2019. A review and evaluation will be undertaken during 2020-2021 to ensure the revised IIA tool is embedded into practice. This work will be carried forward to 2020-2021.
2.	General Data Protection Regulation (GDPR) – monitoring of arrangements	<p>A programme of work is ongoing with the Information Governance team to consider the future work streams of the section.</p> <p>Work is presently ongoing to conclude the initial school development programme in respect of GDPR and it is estimated that this initial work will be undertaken by the end of 2019, with ongoing review in 2020.</p> <p>A work stream is presently under consideration with the team to determine how best the Council can continue to demonstrate compliance with GDPR and Data Protection principles and a work programme will commence where officers will engage with internal sections and Accountable Managers to assist in demonstrating compliance with GDPR.</p> <p>Discussions are to be had with Internal Audit as to how GDPR issues can be implemented in audit processes as well. In the interim the Records Officers are obtaining accredited qualifications in data protection compliance and data protection principles with external bodies to assist the Council in fulfilling its legal obligations.</p> <p>A report will be brought to CDG in early 2020-2021.</p>
3.	Information Management – update the Information Strategy and bring forward for approval	Responsibility for updating the Strategy sits with the SIRO. A report has been drafted and finalised by the end of 2019-20.

Improvement Area (2018-2019)		Progress (during 2019-2020)
4.	<p>Corporate Performance Management System – review system implementation:</p> <p>4.1 review system implementation / benefits maximised</p> <p>4.2 support performance scrutiny review</p>	<p>A client review took place with CAMMS (software providers) on 18th October 2019 to review implementation and post implementation of the system.</p> <p>Since the system has been in place a number of benefits have been identified (e.g. business plans in one place on a timely basis, clear links to the corporate plan wellbeing objectives (golden thread)). A Snap' survey has been undertaken to seek the views of the system users in order to determine if the system is meeting the objectives as set out in the project scope. This internal work will align with the review being undertaken by the Wales Audit Office which has now been delayed due to COVID-19.</p> <p>Discussions on contract renewal for CPMS are underway.</p> <p>A programme of briefings for elected members is being developed to establish how the system can support Members in discharging their roles in relation to performance management. This work has been delayed due to the UK Parliamentary Election in December and COVID-19 and will resume in 2020-2021.</p>
5.	<p>Review of the Council's collaborative / regional working arrangements</p>	<p>Following on from the meeting of the Chairs and Vice Chairs forum in September 2019, where the Group were presented with the Welsh Local Government Association's Compendium of Shared Services. Each Scrutiny Committee will now be reviewing the collaboration/partnership they are responsible for to ensure they are robust and have good governance arrangements in place. The reviews were due to start in February and run until May but have been delayed due to COVID-19. This work will now resume during 2020-2021 and will be built into their individual Forward Work Programme following discussions with Chairs on how they wish to develop this work within their individual Committees.</p>

**Table 2:** improvement areas identified during 2019-2020.

<b>Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law</b>		
<b>Ref (action)</b>	<b>Improvement Action to be undertaken during 2020-2021</b>	<b>Responsible Officer</b>
A1	Reassess governance arrangements as part of recovery planning and the associated governance improvement priorities.	Corporate Governance Group
A1.1.2	Report annually to the Corporate Governance Group and Standards Committee to give an assurance that the Member Code of Conduct is fit for purpose - add to agenda for 2020-2021.	Head of Legal Services
A1.3.1	Undertake a review and evaluation of the revised IIA tool in spring 2020, to see how well it is embedded into practice.	Strategic Manager Policy & Democratic Services
A1.3.2	Report annually to the Corporate Governance Group and Standards Committee to give an assurance that the declaration process is fit for purpose - add to agenda for 2020-2021.	Head of Legal Services
A1.3.4	Copy of the Member and Officer Relations Protocol to be drawn to the attention of Officers and Members via publication on the Council's Intranet page – to be undertaken by the end of March 2020.	Head of Legal Services
A1.4.1	Review of Anti-fraud, Corruption and Malpractice Strategy to be completed and reported to Members during 2020-2021.	Head of Finance
A1.4.4	Update the constitution and bring a report to members in Autumn 2020 following royal assent of the Local Government and Elections (Wales) Bill.	Head of Legal Services
A1.4.5	Report annually to the Corporate Governance Group to give an assurance that the register of staff gifts/hospitality is up-to-date and accurate - add to agenda for 2020-2021.	Head of Finance
A1.4.6	Whistle Blowing Policy to be reviewed in 2020 and published on the council website.	Head of Human Resources
A1.4.7	Revise Corporate Complaints Policy in 2020 (to include: implementation of the Complaints Standards Authority for Wales (CSA) powers; recommendations from an internal audit review report which was received in November 2019; further staff guidance within the complaints process for disability related reasonable adjustments; further staff guidance in relation to covert recording and further staff guidance in relation to managing querulous/persistent complainants).	Strategic Manager Policy & Democratic Services
A2.1.1	Report annually to the Corporate Governance Group on corporate procurement and compliance - add to agenda for 2020-2021.	Head of Legal Services

<b>Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law</b>		
<b>Ref (action)</b>	<b>Improvement Action to be undertaken during 2020-2021</b>	<b>Responsible Officer</b>
A2.2.1	Future ethical awareness training commissioned to be informed by: The Seven Principles of Public Life (the Nolan Principles).	Head of Legal Services
A2.2.2	Deliver six courses in relation to Recruitment and Selection and Safe Recruitment.	Head of Human Resources
A2.3.3	To provide training on implementation of Contract Procedure Rules - training to be scheduled for Spring 2020 and bi annually thereafter.	Head of Legal Services
A2.4.1	Report annually to the Cabinet on the implementation and operation of the Ethical Employment in Supply Chain Policy - add to Cabinet forward work programme for 2020-2021.	Head of Legal Services
A2.4.2	To ensure that a copy of all partnership agreements are logged centrally with the Head of Legal Services – by the end of March 2021.	Head of Legal Services
A3.2.1	To put in place an agreed procedure where Financial Regulations and Accounting instructions are reviewed to ensure they remain relevant and proportionate. A review of Accounting Instructions is currently underway and will be completed by the Autumn of 2020.	Head of Finance
A3.4.1	Reports annually to the Corporate Governance Group to give an assurance that the current system for dealing with data protection breaches is fit for purpose - add to agenda for 2020-2021.	Head of Legal Services

<b>Principle B: Ensuring openness and comprehensive stakeholder engagement</b>		
<b>Ref (action)</b>	<b>Improvement Action (2019-2020)</b>	<b>Responsible Officer</b>
A4.1.3	To undertake a review of FOI Publication Scheme in 2020-2021 with a report to Cabinet for approval.	Head of Legal Services
A4.13.1	Where relevant incorporate proposals for improvements from external regulators audit work into the Council's 2020-2021 corporate planning arrangements.	Strategic Manager Policy & Democratic Services
CO19/20	Review of the Council's collaborative / regional working arrangements.	Strategic Manager Policy & Democratic Services

<b>Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits</b>		
<b>Ref (action)</b>	<b>Improvement Action (2019-2020)</b>	<b>Responsible Officer</b>

A5.1.1	Incorporate the findings from the Wales Audit Office's review of our performance, risk and business planning arrangements in 2020-2021 into CPMS.	Strategic Manager Policy & Democratic Services
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**Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes**

Ref (action)	Improvement Action (2019-2020)	Responsible Officer
See A5.1.1		

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

Ref (action)	Improvement Action (2019-2020)	Responsible Officer
None identified		

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

Ref (action)	Improvement Action (2019-2020)	Responsible Officer
A8.14.1	A review of Data Processing, Data Protection and Data Sharing work will be undertaken by the Information Governance team in 2020 and central records kept of data sharing.	Head of Legal Services

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

Ref (action)	Improvement Action (2019-2020)	Responsible Officer
A9.5.1	To deliver governance awareness training across the Council in 2020-2021.	Head of Legal Services / Strategic Manager Policy & Democratic Services

**Signed:**



**Chief Executive: Steven Phillips**

**Date: 11<sup>th</sup> May 2020**

**Signed:**



**Leader of the Council: Councillor Rob Jones**

**Date: 11<sup>th</sup> May 2020**