

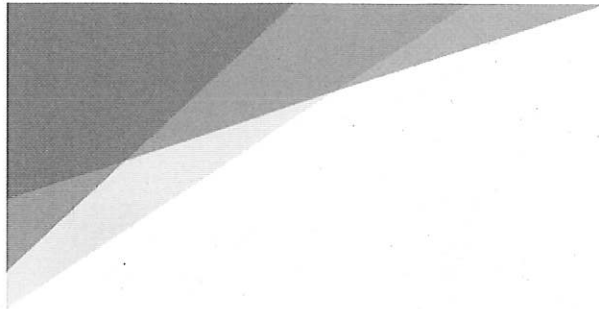


Nottingham
City Council

Nottingham City Council

ANNUAL GOVERNANCE STATEMENT

2024/25



1. Introduction

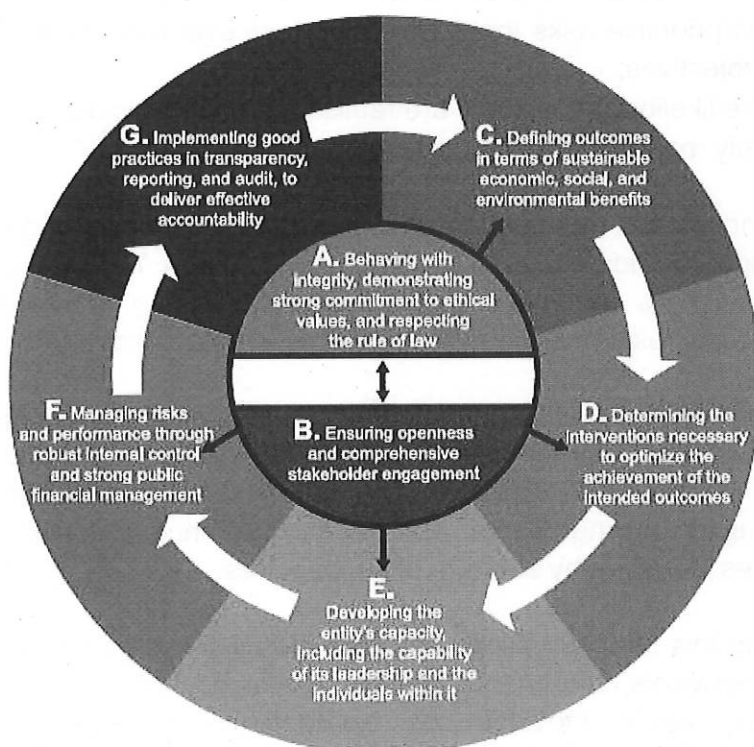
- 1.1 Each year the city council produces a governance statement that explains how it makes decisions, manages its resources and promotes values and high standards of conduct and behaviour. This statement complies with regulation 6(2) of the Accounts and Audit Regulations 2015.
- 1.2 Nottingham City Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards, that public money is safeguarded, correctly accounted for and used economically, efficiently and effectively to deliver quality services to the community it serves.
- 1.3 The city council is committed to embedding and achieving a robust set of corporate governance arrangements. The city council is managed within a robust framework as set out in the city council constitution, which clearly outlines how the city council operates, how decisions are made and what procedures need to be followed to ensure the city council is efficient, transparent and accountable to its residents and stakeholders.
- 1.4 The Annual Governance Statement (AGS) reports on:
 - i. how the city council complies with its own governance arrangements;
 - ii. how the city council monitors the effectiveness of the governance arrangements and;
 - iii. what improvements or changes in governance arrangements are proposed during the forthcoming year.
- 1.5 The governance framework is under continuous review and to bring the compilation of this year's AGS into line with the guidance for 2024/25, a collaborative approach between the Monitoring Officer, the S151 officer and Internal Audit was adopted to ensure Internal Audit and Statutory officers have considerable input to the work. The Monitoring Officer and Chief Finance Officer remain members of the Council's Corporate Leadership Team (CLT) and are fully involved in the breadth of the city council activity and decision making.
- 1.6 The footnotes provided are internet links which will take you to the specific supporting documents and appropriate web pages.

2. Scope and Responsibilities

- 2.1 Nottingham City Council is responsible for ensuring that its services are provided and conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. The Local Government Act 1999 also places a duty on all councils to secure continuous improvement and to demonstrate economy, efficiency and effectiveness.
- 2.2 In discharging this overall responsibility, the city council is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, and arrangements for the management of risk.
- 2.3 The Chartered Institute of Public Finance and Accountancy (CIPFA) and the International Federation of Accountants (IFAC) identified seven key principles relating to governance in their document International Framework: Good Governance in the Public Sector (CIPFA/IFAC, 2016). A summary of the Seven Principles of Good Governance in the public sector and how they relate to each other is shown in Figure 1 below.

Achieving the intended outcomes while always acting in the Public Interest

Figure 1 - The International Framework: Good Governance in the Public Sector (CIPFA/IFAC, 2016)



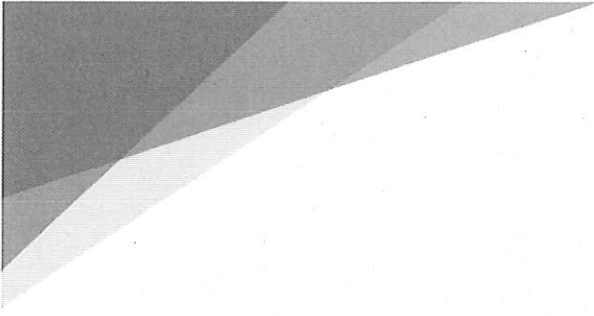


The Purpose of the Governance Framework

- 2.4 The Governance Framework comprises the systems and processes, culture and values by which Nottingham City Council is directed and controlled. This, together with its activities and leadership, enables it to monitor and manage its performance for delivering cost effective services.
- 2.5 Effective performance and risk management allows the city council to have increased confidence in achieving its objectives and allows the citizens of Nottingham to have increased assurance in the city council's governance arrangements and its ability to deliver.
- 2.6 The system of internal control is a significant part of the governance framework and is designed to manage risk to an acceptable level. Risk cannot be eliminated and therefore controls can only provide reasonable and not absolute assurance of effectiveness.

Internal control is based on a process to:

- Identify and prioritise risks that prevent the achievement of the city council aims and objectives;
 - Evaluate the likelihood that risks are realised and their impact;
 - Appropriately manage identified risks.
- 2.7 The city council has a number of committees that challenge and review the options considered and actions taken by the city council. The aim is to ensure that robust decisions are made that focus on achieving the best strategic outcomes for local residents within the available level of resources.
- 2.8 The city council has an Audit Committee, which, has as part of its function the responsibility of considering the effectiveness of the city council's risk management arrangements, the control environment and associated anti-fraud and anti-corruption arrangements, and seeks assurance that action is being taken on issues identified by auditors and inspectors.
- 2.9 In discharging this function, the Audit Committee will ensure compliance with such codes, protocols, statements and policies as are necessary to meet its responsibilities, which includes the appropriate arrangements for the management of risk.

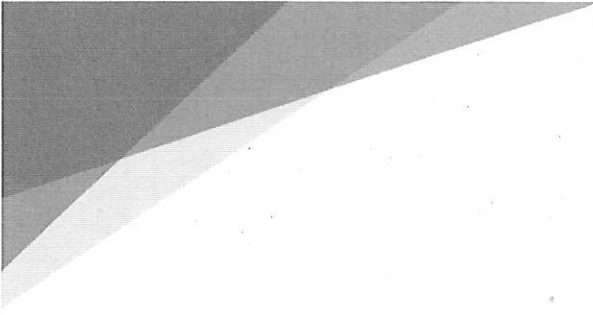


3. The 2024/25 Governance Framework

- 3.1 The CIPFA/IFAC framework (Good Governance in the Public Sector), provides advice and indicators to good governance which affords the city council the opportunity to review and test its governance and structures in delivering best practice.
- 3.2 The CIPFA/IFAC framework identifies the seven core principles of good governance as:
1. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.
 2. Ensuring openness and comprehensive stakeholder engagement.
 3. Defining outcomes in terms of sustainable economic, social, and environmental benefits.
 4. Determining the interventions necessary to optimize the achievement of the intended outcomes.
 5. Developing the entity's capacity, including the capability of its leadership and the individuals within it.
 6. Managing risks and performance through robust internal control and strong public financial management.
 7. Implementing good practices in transparency, reporting, and audit to deliver effective accountability.
- 3.3 The governance framework covered by this statement has been in place at Nottingham City Council for the year ended 31 March 2025 and is considered up to May 2025. An assessment of the city council's governance arrangements against each core principle is attached at Appendix 1.

4. Financial Intervention

- 4.1 In November 2023, a Section 114 (part 3) report was issued to Councillors due to the financial sustainability of the Council in line with the Local Government Finance Act 1988. The report was for the then Section 151 Officer to formally notify the Council that, in his professional opinion, the Council was unable to meet its statutory requirement to deliver a balanced budget for 2024/25.

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- 4.2 As a result, a legal prohibition period came into force from 29 November 2023 and was in place until day after the City Council meeting on 18 December 2023, when a Spend Control Policy and Board was approved to remain in place until 31 March 2025. That has since been extended indefinitely till the Section 151 Officer feels sufficiently comfortable with the financial management of the council and the oversight within Finance to release this provision.
- 4.3 A request for Exceptional Financial Support (EFS) for the financial year 2023/24 and 2024/25, was made to the Government Department for Levelling Up Housing and Communities and approved. This allowed the Council to set a balanced budget for 2024/25 on 4th March 2024. In practical terms this sought permission to 'capitalise' revenue expenditure so that it is treated as capital expenditure and can be met from the council's capital resources. The final amount and confirmation that the Council can capitalise is subject to a number of conditions and assurance.
- 4.4 The 2024/25 budget included £41.024m of Exceptional Financial Support (EFS) required to have a balanced budget, only £7.737m of this was required at the end of financial year 2024/25. This led to an underspend against the 2024/25 budget, supported by the EFS. The limited requirement for EFS in 2024/25 represents a positive direction of travel in the council's financial sustainability journey.

5. NCC Improvement Plan

- 5.1 As a result, of the issuance of a Section 114, the Council received Directions from the Secretary of State for Levelling Up, Housing and Communities on 22nd February 2024. These Directions included the appointment of Commissioners to oversee the next phase of the Council's improvement journey.
- 5.2 The Directions included a requirement for the Council to develop and agree an Improvement Plan to the satisfaction of the Commissioners, and to report on the delivery of the Plan at six monthly intervals or at such intervals the Commissioners may direct.
- 5.3 The Improvement Plan was developed and received political support and approval at the Council's Executive Board on 16th July 2024 and at an extraordinary meeting of City Council on 5th August 2024 where Councillors

formally approved the Plan as the Council's overarching improvement plan in response to the Commissioner-led intervention.

5.4 The Improvement Plan sets out how the Council will address the issues and challenges that have led to the current intervention and respond to the actions required by Commissioners. The improvement plan is built around three aims of enabling and supporting the Council to become:

- A council that delivers for Nottingham with a clear direction and purpose
- A council that is financially sustainable
- A council that is well-run with effective people, processes and systems.

5.5 Informed by the learning from previous experience, relevant governance and assurance arrangements were put in place to monitor and manage the delivery of the Improvement Plan. These arrangements will ensure clear accountability and responsibility. Corporate Directors were appointed as Senior Accountable Officers (SAOs) and are accountable for the delivery of the improvement programmes assigned to them.

The table below details the programmes within the three Aims:


Table 1 - NCC Improvement Programme

Aim	Programme	Senior Accountable Officer
Aim 1 - A council that delivers with clear direction and purpose	Programme 1 – Vision, Purpose and Approach	Chief Executive
	Programme 2 – Review and Develop the Transformation Programme	Chief Executive
	Programme 3 – Manage and Monitor our Delivery	Chief Executive
Aim 2 - A council that is financially sustainable	Programme 4 – Continuous Financial Sustainability	Corporate Director of Finance and Resources (S151)
	Programme 5 – Strengthen Financial Management	Corporate Director of Finance and Resources (S151)
	Programme 6 – Corporate Landlord and Asset Sales	Corporate Director for Growth and City Development



Aim	Programme	Senior Accountable Officer
	Programme 7 – Council Companies and Traded Services	Corporate Director of Finance and Resources (S151)
Aim 3 - A council that is well-run with effective people, processes and systems	Programme 8 – Improve Governance	Chief Executive
	Programme 9 – An Engaged, Effective and Empowered Workforce	Corporate Director of Finance and Resources (S151)
	Programme 10 – Strengthen Internal Control and Assurance	Corporate Director of Finance and Resources (S151)
	Programme 11 – Improve Enabling Processes and Systems	Corporate Director of Finance and Resources (S151)

- 5.6 Since the approval of the improvement plan at the extraordinary meeting of City Council on 5th August 2024, several boards (Improvement Board, Transformation Board and Finance & Resources Board) incorporating the CLT, Leadership and Commissioners have been set up to ensure accountability and delivery. These boards were established to assess progress against the Improvement Plan and evaluate the council's delivery of each programme's activities. The three boards meet monthly to scrutinise progress against milestones, completed activities, challenges identified, and solutions found plus risks and mitigations. It also reviews any material variations to the Plan's content or timings.
- 5.7 The Commissioners provide regular progress updates to the Secretary of State, the Commissioners' second report dated 21 March 2025 was published on 8 May 2025. The commissioners reported that they were pleased that the constructive and cooperative working interaction with the Council has continued and that the Commissioners have had no occasion to formally use their powers and have instead developed mechanisms and relationships whereby their contribution is sought at the earliest opportunity in respect of issues and is efficiently structured into programmes of improvement activity. This has enabled the Commissioners to assist Members and officers most effectively in their development and delivery of the Council's policies and plans.



5.8 Furthermore, the commissioners reported that over the past year, there has been much positive progress on developing plans, strategies, and programmes for improvement such as the Council Plan, Medium Term Financial Plan, and Improvement Plan along with securing and organising the necessary capacity to deliver. The Commissioners also advised that over the coming year; the Council will need to move into the implementation phase for these plans to have the required impact.

6 Review of Effectiveness

6.1 A review of the city council's governance arrangements draws on several sources including:

- Service updates from individual service managers
- Reviews of partnership governance arrangements
- External inspections by government agencies
- Internal Audit reviews which consider and report upon compliance with corporate policies and procedures
- External audit reports


6.2 The Audit Committee plays a key role in the city council's review of the effectiveness of its governance framework. It seeks assurance on the adequacy of the city council's risk management, control and governance arrangements.

6.3 The Audit Committee receives regular training to ensure it has the appropriate knowledge and skills. The Audit Committee undertook the core knowledge and skills questionnaire from CIPFA guidance with the results being built into training plans for the Committee. The Committee also completes a self-assessment against updated CIPFA guidance.

7. Internal Audit and Review


7.1 The city council has an internal audit function and a positive working relationship with the Council's external auditors (Grant Thornton). The arrangements for the provision of internal audit are contained within the city council's Financial Regulations which are included within the Constitution.

7.2 The Corporate Director of Finance & Resources, as Section 151 Officer is responsible for ensuring that there is an adequate and effective system of



internal audit of the city council's accounting and other systems of internal control, as required by the Accounts and Audit Regulations 2015.

- 7.3 In 2024, CIPFA published revised Public Sector Internal Audit Standards to promote further improvement in the professionalism, quality, consistency and effectiveness of internal audit across the public sector. The city council has adopted these standards, and internal audit has carried out self-assessments with areas for improvement being addressed.
- 7.4 The Internal Audit's three -year Plan (2025/26 – 2027/28) is prioritised by a combination of key and operational systems' assessments and reviews on the basis of risk, and the city council's corporate governance arrangements. The work incorporates reviews of the main financial systems, other systems identified as high risk, grant certification work and the continued development of continuous auditing and proactive anti-fraud work. The plans are discussed and reviewed by management, the corporate leadership team, Finance and Resources board and approved by the Audit Committee.
- 7.5 All system reports include an assessment of the adequacy of the internal controls and their operations. Any areas for improvement are included in a prioritised action plan which is agreed with relevant directors and actions taken reported through CLT and Audit Committee.
- 7.6 The Head of Internal audit produces an annual report summarising the work carried out and giving an overall opinion on the level of assurance that can be provided for the system of internal control within the Council, based on the work carried out.
- 7.7 Due to limited resources and various management changes within the function in 2024/25 there were fewer reviews undertaken in 2024/25. In order to provide an opinion based on sufficient coverage the reviews completed in 2023/24 and 2024/25 were taken into consideration. The overall opinion for 2024/25 is **Limited** assurance.
- 7.8 Whilst a Limited opinion on the control environment as a whole is not adequate, there are signs of improving control environment in more recent reviews and the implementation of the various improvement plans.
- 8. External Audit and Review**

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- 8.1 Grant Thornton LLP were appointed by the Public Sector Auditor Appointments (PSAA2) as the city council's external auditor in 2020/21.
 - 8.2 Their annual work programme is set in accordance with the Code of Audit Practice issued by the National Audit Office and includes nationally prescribed and locally determined activities.
 - 8.3 City council officers work closely with external audit to provide information and assurance in support of those conclusions and acts on any recommendations made as a result.
 - 8.4 They have regularly reported on progress and made interim conclusions to the Audit Committee.
 - 8.5 The external audit of the 2024/25 is taking place at present, whilst the previous year 2023/24 was concluded in March 2025. It is important to note that the 2023/24 Accounts were disclaimed as the auditors were unable by the backstop date to gain the requisite level of assurance on the Accounts. However, they were able to complete the Value for Money Audit. This was reported to the Audit Committee in March 2025.

9. Internal Review


- 9.1 This year the AGS process is enhanced with the introduction of a questionnaire approach which included senior officers in order to assess the levels of assurance that senior officers felt they were provided through 14 aspects of governance. The responses from the senior officers are summarised below.

Financial Management

- 9.2 All senior officers that participated felt they were involved in setting their budgets, they were able to monitor expenditure and had clear mitigating plans in the event of exceeding their budgets.

There were comments that finance business partnering could be improved, and staffing changes had an impact on budgeting and management but there had been improvements over previous years.

Risk Management

- 
- 9.3 All responded that their service risk registers were up to date and were reviewed monthly or quarterly.

The main risks being managed were reported as relating to attracting and retaining staff, external assessments, transformation and access to external funding/resources.

Some emerging risks were noted but were stated as able to mitigate providing sufficient resources were available.

Legislation and Regulation

- 9.4 Whilst all respondents understood their legislation relating to their services there were some concerns in being able to fully meet them, mainly due to inadequate resources or funding.

There are some gaps in the service policies, but these are being addressed as part of the regular reviews.

Governance and Decision making


- 9.5 All respondents understood their powers under the scheme of delegation and how to get approvals outside of them. There was a comment that the financial authority levels could be reviewed. This will be picked up with the Section 151 officer in 2025/26.

Health and Safety

- 9.6 Most Mandatory training is up to date and all significant Health and Safety (H&S) risks within services areas have been identified. Risk assessments are being carried out and action taken where required, along with staff involvement where applicable.

Procurement & Contract Management

- 9.7 All respondents were aware of how to procure within law and council procedures, knew which contracts they were responsible for and were managing them actively.
Most knew when their contracts were ending and had a process for renewal.



Some concerns were expressed over existing contracts, but these are to be addressed in renewal or in managing them.

Internal Controls

- 9.8 Most were aware of the audits and inspections undertaken in their area last year and what is scheduled, and didn't highlight any other areas for review. All were on track to complete recommendations becoming due in future, although some were being included in improvement plans and other reviews.

Business Continuity

- 9.9 All stated that they had reviewed their service Business Continuity Plan within the last 12 Months. There were comments that external providers had to be considered as part of some plans and that there were increased risks as records were moved to a new system from Liquid Logic to the Cloud.

Information Security

- 9.10 All stated that their teams were up to date with Information Security Training. Where applicable they understood and had arrangements for sharing data, however, there was a comment that the process was overcomplicated but is being reviewed.


Complaints

- 9.11 All were up to date with any complaints and feedback any learning to the service.

Data Protection & FOI

- 9.12 Most teams are up to date with the General Data Protection Regulation (GDPR) and Freedom of Information (FOI) training, and they are clear about what data and systems they are responsible for and that it is up to date. Data is kept up to date through frequent use, regular reviews, reminders, and systems. Data retention policies are in place and known along with protocols for data sharing.

Human Resources



9.13 There were a number of responses where some employees hadn't completed their Individual Performance Review (IPR). Delays in the provision of establishment budget was raised as a challenge to provide compliance assurance, but this is being picked up as part of the Finance Improvement Programme.

There appeared to be appropriate controls over Time off in Lieu (TOIL) and staff training.

Conflicts

9.14 All declaration of interests were up to date

10. External Inspections and Services Assurances

10.1 Children's Services

Following the Inadequate judgement of Nottingham Children's Services in 2022/23 there have been six further monitoring visits Including April, July, November 2024.

Each of which have demonstrated overall improvements with further work to do to ensure that we are consistently supporting children and young people in Nottingham City.


Nottingham is provided with sector led improvement partners due to the Inadequate Ofsted inspection and the DfE Intervention notice.

An Improvement Plan and Transformation Programme have been developed in 2025 to ensure improvement work continues at pace as informed by Peer Reviews, sector led improvement support and national drivers for change as detailed within the Children's Wellbeing and Schools Bill 2025.

A Children's Partnership Improvement Board chaired by the DfE independent advisor was established in May 2020 to support our improvement and continues to oversee progress.

April 2024 report

Showed improvements in the delivery of services to children and families.



Working within the context of significant financial challenges and wider pressures on the council, senior leaders have successfully secured funding for a more balanced base budget for children's services.

The service secured very much needed permanent additional management and staffing posts in the children in care service to support the oversight of plans and reduce caseloads.

There are signs of a stabilising workforce and a reduction in staff turnover in some parts of children's services.

Senior leaders have continued to invest in and strengthen quality assurance processes. Findings from individual audits are routinely translating into whole-service learning.

The work undertaken by senior leaders within children's services to secure service improvements and developments in other service areas has inspired confidence in the children in care workforce. Social workers are optimistic about working for Nottingham City Council and believe that things are getting better and will continue to improve

July 2024 Report


Elected members and senior leaders in Nottingham City Council remain committed to improving children's services despite ongoing financial challenges and changes in the senior leadership team.

Senior leaders have a good oversight of children's services and are aware of the strengths and areas for development. They have strengthened many of the areas highlighted on previous inspection visits relating to front door services for children.

The multi-agency safeguarding hub (MASH) processes and partnerships have matured and are now increasingly more responsive to requests from families and professional agencies for support.

Quality assurance processes in children's services have been strengthened, and a refreshed audit framework is now more firmly embedded in practice. Leaders have commissioned peer reviews to further challenge themselves on the quality of practice, and on ensuring their focus remains on things positively influencing outcomes for children.

November 2024 report



Since the last inspection visit, Nottingham City Council has continued to make strides in its children's services improvement journey. Progress has been sustained against the backdrop of severe financial pressures, changes in leadership and continuous external scrutiny of the council. Children's services now have a new permanent director of children's services (DCS), with leadership no longer spread across children's and adult services.

While the progress made to support children in care planning and achieving permanence in some areas has been slow, it is evident that plans which have previously stalled are now accelerating.

The quality and impact of assessments for children in care remains too variable. Some provide a fair overview of children's needs, but others are based on too limited interactions with the child to understand their individual needs or the impact of their earlier life experiences.

The workforce in the children in care and fieldwork services continues to stabilise, and children are now experiencing fewer changes in social workers. Social workers' caseloads continue to reduce, allowing workers time to embed improved practice standards and expectations.

10.2 Electoral Services

In 2024/25 Nottingham City Council were the lead authority for the first Combined County Authority Mayoral election in May 2024.


MHCLG and the Electoral Commission oversaw our delivery of this election, which was light touch through a series of Teams meeting to ensure the required resources were available (due to the Section 114).

We were able to provide them with assurances that we were able to meet our statutory responsibilities whilst conducting this election.

There was a General Election on 4 July 2024. The Council delivered this election in accordance with its statutory duties and responsibilities and in accordance with all relevant legislation and regulations.

10.3 Housing Services

Extracts from Regulatory Judgement 15 January 2025



“C3 -Our judgement is that there are serious failings in the landlord delivering the outcomes of the consumer standards and significant improvement is needed.

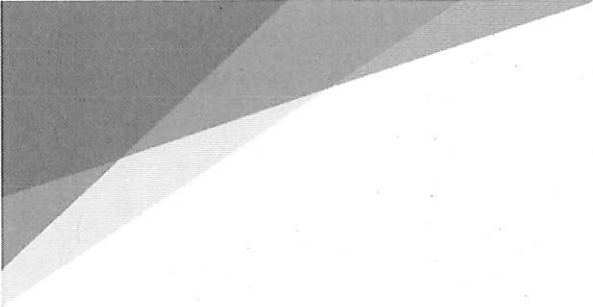
From the evidence and assurance gained during the inspection, we have concluded that there are serious failings in Nottingham CC delivering the outcomes of the consumer standards and significant improvement is needed, specifically in relation to the outcomes in our Safety and Quality Standard and Transparency, Influence and Accountability Standard. Based on this assessment, we have concluded a C3 grade for Nottingham CC

The inspection has found serious failings in how Nottingham CC is delivering the outcomes of the consumer standards and evidence that this has had a significant impact on service outcomes for tenants. Our judgement is based on the scale and breadth of the issues identified during the inspection. The issues include a high proportion of homes without a recent stock condition survey and a lack of confidence in the information Nottingham CC holds about its homes, as well as poor repairs performance with issues around data integrity, and poor outcomes for tenants from the adaptations service. We found no evidence that tenants' views are considered in decision making about landlord services, limited evidence that performance information is provided to tenants and weaknesses in how the information Nottingham CC holds about its tenants is used to ensure equitable outcomes.

The Safety and Quality Standard requires landlords to have an accurate record at an individual property level of the condition of their homes based on a physical assessment of all homes and ensure that homes meet the requirements of the Decent Homes Standard. We have limited assurance that Nottingham CC has an accurate, up-to-date, and evidenced understanding of its stock quality and decency as it has not surveyed almost 40% of its homes for more than ten years. We also found limited oversight by Nottingham CC of the quality of its homes. This is a serious failing for Nottingham CC.

Nottingham CC has recently commissioned a stock condition survey to address these failings and then intends to undertake a five-year rolling programme. We saw Nottingham CC has plans to use the information to inform its programme of improvements to its homes. We will continue to engage with Nottingham CC as it takes action to improve the quality of its homes.

Nottingham CC could not provide assurance that it delivers an effective, efficient and timely repairs service required by the Safety and Quality Standard, which is



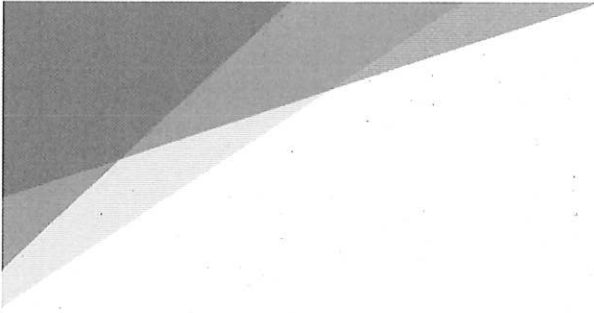
a serious failing. Nottingham CC is unable to accurately report average repair times due to system failures and is using a manual process to cleanse its repairs data. It does not have confidence in the integrity of its data and does not provide this information to tenants or senior leaders. Evidence indicated repairs is an area of concern for tenants and a significant driver of complaints. Nottingham CC also told us it has almost 1,000 live disrepair cases. It told us that procuring a new system is a priority and we have seen evidence of plans to clear the disrepair backlog. We will continue to engage with Nottingham CC as it seeks to deliver an improved repairs service for tenants.

Nottingham CC is engaging constructively with us and has a plan to rectify these failings. These include gaining a better understanding of the condition of its homes, new systems and processes for its repairs service, strengthening its tenant engagement strategy to ensure transparency, influence and accountability in the provision of services, and delivering an adaptations service which meets tenants'. We have some assurance Nottingham CC is meeting the requirements of the Transparency, Influence and Accountability Standard. This standard sets out the outcomes landlords must deliver about being open with tenants and treating them with fairness and respect so that tenants can access services, raise complaints, influence decision making and hold their landlord to account to deliver fair and equitable outcomes for tenants. During the inspection we observed a respectful approach to tenants, but evidence from surveys, an external report and complaints feedback indicates this is not the experience for every tenant.

Nottingham CC has provided evidence that it understands the diverse needs of its tenants and keeps this information up to date. It was unable to provide evidence of how its services deliver fair and equitable outcomes for tenants as it does not monitor or report on these. Nottingham CC has identified this as an area for improvement, and it is included within its improvement plan.

We are engaging with Nottingham CC as it continues to address the issues set out in this judgement. Our engagement will be intensive, and we will seek evidence which gives us assurance that Nottingham CC is making sufficient change and progress, including ongoing monitoring of how it delivers its improvement programme. Our priority will be that risks to tenants are adequately managed and mitigated. We are not proposing to use our enforcement powers at this stage but will keep this under review as Nottingham CC seeks to resolve these issues."

The Council fully accepts the Regulators findings and is self-aware of the need to improve its services following Housing Services being brought back in house



from an Arm's Length Management Organisation (ALMO). The council has an agreed improvement plan which is fully funded and resourced, with progress being monitored at joint monthly meetings with the Regulator of Social Housing. Meetings to date have demonstrated substantial and sustained improvement in services, Key Performance Indicators (KPIs), and Tenants Satisfaction Measures (TSMs) to the satisfaction of the Regulator.

11. Key Improvement areas

11.1 Strategic Council Plan

The new strategic plan covers the years 2025-2029 with a vision to make Nottingham a flourishing, inclusive, and sustainable city where residents thrive. A renewed council where Nottingham strengthens its core and becomes a national leader in financial stewardship, innovation, and community health and wellbeing.

Our commitment is to foster a safe, resilient, and connected Nottingham, where opportunity and prosperity are accessible to all. A council that delivers for local people, leading Nottingham forward. By empowering our neighbourhoods, supporting business and driving economic growth across the region, and championing social equity, we aim to create a dynamic city that celebrates its unique heritage while embracing possibilities through partnership

A renewed council


- a) Fostering Governance Transparency and Innovation
- b) Financial Stewardship
- c) Adopting a 'One Council' approach

Delivering for local people

- a) Empowering Safe Communities
- b) Providing Safe, Affordable Housing
- c) Healthy and Safe Residents
- d) Enhancing Education and Skill

Leading Nottingham forward

- a) Revitalising the Economy
- b) Celebrating Cultural Heritage

- 
- c) Improving Infrastructure and Connectivity
 - d) Championing Sustainability

12. Significant Governance Issues

- 12.1 In 2024/25 no further significant governance issues were identified other than those included in this statement. All findings of regulatory inspections received during the period covered by this statement are being addressed and progress will be reported at regular intervals through the appropriate committee.
- 12.2 The Improvement plans are being implemented and are being reported and monitored monthly at CLT and at Improvement board.
- 12.3 As noted earlier, the relatively low use of EFS (£7.7m out of £41m required to balance the budget) represents a positive direction of travel. Tight expenditure controls remain in place and are being monitored via spend control and Procurement. Forecast positions are available much earlier in the month but forecasts are not always of sufficient reliability to support timely management decision making. Nonetheless, there is increasing evidence of budget accountability.
The council is on a journey and integrity of the ledger and tight financial management are at the heart of the improvements required by Commissioners and the Section 151 officer.

13. Declaration by City Council

- 13.1 We have been advised on the results of the review of the effectiveness of the governance framework by the Audit and Standards Committee. The city council continues to develop plans to ensure continuous improvement of the arrangements are in place and these will continue to be enhanced.
- 13.2 Over the coming year, we will continue to strengthen the city council's governance arrangements and will monitor the implementation of recommendations to improve and enhance the arrangements as part of our next annual review.



Signed:

N. [Signature] Leader of the Council: Councillor:

Date: 27/3/26

[Signature], 30/3/26 Chief Executive:

Date:

[Signature] Section 151 Officer:

Date: 27/3/26

NHCR ^{Deputy} Monitoring Officer:

Date 30/3/26

Appendix 1

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

Ref	How we can demonstrate that the city council meets this principle	Evidence
PA1	<p>The city council promotes high standards of ethical behaviour by developing, maintaining and monitoring a Code of Conduct for Members of the city council. The Code of Conduct clearly sets out the standards expected for elected Councillors to ensure they operate in a clear, transparent manner and treat each other, and members of the public, with respect and courtesy. The Code and the city council's policies and procedures are communicated via corporate induction sessions and are available on the city council's internet and intranet site.</p>	<p><u>Members Code of Conduct & Staff Code of Conduct</u> are included in the city council's Constitution.</p>
PA.2	<p>The Codes of Conduct for Members and city council employees include the requirement to disclose interests (including statutory Disclosable Pecuniary Interests) and to declare gifts and hospitality. The Members Gifts and Hospitality Register is available on the city council's website on the Transparency pages</p>	<p>Councillors' Register of Interests</p>
PA.3	<p>Comprising of nine councillors, allocated on the basis of the political composition of the council, the city council's Audit Committee is responsible for helping Members to adhere to the Members Code of Conduct and promoting other elements of sound ethical behaviour.</p>	<p>Audit Committee</p> <p><u>Committee details - Audit Committee - Nottingham City Council</u></p>
PA.4	<p>The council has adopted a combined Commercial and Procurement Strategy for 2025 - 2029.</p> <p>The Strategy which supports Procurement and Commercial Services sets out the approach the council is taking to achieve best value through the use of professional and</p>	<p><u>Commercial & Procurement Strategy</u></p>

Ref	How we can demonstrate that the city council meets this principle	Evidence
	"commercially confident" resources as well as the use of technology, innovation, best practice and procedures. There is a professional Shareholder Unit that provides support to Council Owned Entities.	
PA.5	The city council has an established corporate compliments, comments and complaints process. In the event that the procedure is exhausted, the Ombudsman is the appropriate body to consider and the Council's response.	<u>Compliments, Comments and Complaints Policy</u>
PA6	The city council has a Counter-Fraud Strategy as well as a Confidential Reporting (Whistleblowing) Procedure to ensure that members and employees of the authority are not influenced by prejudice, bias or conflicts of interest in dealing with different stakeholders. The Audit Committee receives regular update reports outlining progress in implementing key anti-fraud actions to protect the city council's interests.	<u>NCC Counter Fraud Strategy</u> <u>Confidential Reporting (Whistleblowing) Procedure</u>

Principle B – Ensuring openness and comprehensive stakeholder engagement

Ref	How we can demonstrate that the city council meets this principle	Evidence
PB.1	The city council publishes decisions on its website; on this page you can find a record of executive and non-executive decisions made under the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations	<u>Notice of Decision</u>

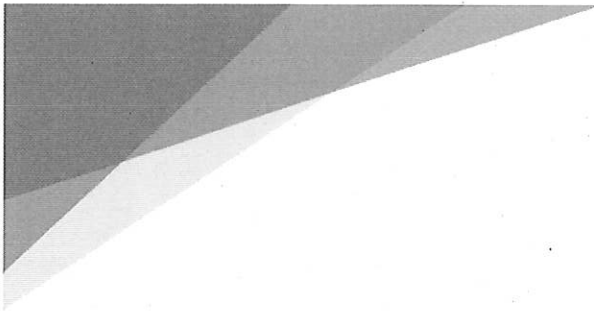
Ref	How we can demonstrate that the city council meets this principle	Evidence
PB.2	The city council is committed to openness and transparency. Meeting items are only discussed in private if they absolutely cannot be discussed in any other way and a relevant exemption is applied.	Executive & City Council Meetings <u>Council Meetings & Decisions - Nottingham City Council</u>
PB.3	The city council places communications at the centre of all that it does. The communications strategy which is underpinned by the city council's vision sets out an approach which aims to improve communications with local people as well as a number of key stakeholders across the city through a series of pre-agreed campaigns. This approach proactively supports engaging local people and stakeholders in democracy and city council services in a number of ways across a number of digital and more traditional channels.	Corporate Communication Strategies <u>communications-strategy.pdf</u> Quarterly Priorities are agreed with Executive Board Leads, the City Director and Directors (internal only)
PB.4	<p>The City Council is committed to using customer insight as a mechanism for improving service delivery. Recent work has been undertaken to improve the complaints process, delivering a strengthened framework to ensure compliance with the Local Government and Social Care Ombudsman's new Complaint Handling Code issued in February 24, with an expectation that councils adopt the code into working practices by April 2026, requiring Councils to view complaints as an opportunity to learn and improve.</p> <p>For 23/24 the Council received 5869 complaints, 52 complaints (0.9%) progressed to stage 2 demonstrating overwhelming majority of complaints resolved at early stages. The Council performs well with a low number of investigations to be reviewed by the</p>	<p><u>Digital, Data and Customer Access Strategy.pdf</u></p> <p>https://www.lgo.org.uk/your-councils-performance/nottingham-city-council/statistics</p> <p>https://www.ncchousing.org.uk/media/jnibuiis/annual-complaints-report-2023-24.pdf</p> <p>https://www.nottinghamcity.gov.uk/media/pofdezn3/have-your-say-policy-and-procedure.pdf</p> <p><u>Nottingham City Council Housing Services - Nottingham City Council</u></p>



Ref	How we can demonstrate that the city council meets this principle	Evidence
	<p>Ombudsman and has continued to achieve 100% satisfactory compliance with their recommendations. There was an increase in the number of detailed LGO investigations, 10 in comparison to 2022/23 and the number of upheld complaints has increased by 2 from the previous year to 100%, reflecting 3 upheld complaints per 100000 residents and less than 0.002% of total complaints received.</p> <p>The 2024/25 report will be produced in due course</p> <p>Engagement and Consultation</p> <p>This function is managed by a dedicated resource, the Research, Engagement and Consultation Team. Consultation processes adhere to the Gunning Principles and meet Equalities Act and GDPR requirements and are designed to be accessible to both digital and non-digital audiences. Consultation on MTFP and budget proposals is carried out annually in line with our statutory duty, and findings used to inform final decision making. Corporate-wide and service level consultations are shared publicly via our Engage Hub portal.</p> <p>As part of Improvement Plan instruction 1.4 an enhanced programme of citizen feedback initiatives is being put in place. This includes a perception tracker tool for customer service users; development of the Citizens' Panel initiative; a resident and stakeholder engagement programme for elected members and senior officers; and a refreshed framework for engagement and consultation for both internal and external users.</p>	<p>https://www.nottinghamcity.gov.uk/media/kuqpvlcz/8-customer-charter-1-1.pdf</p> <p>https://www.nottinghamcity.gov.uk/engage-nottingham-hub/research-engagement-consultation-framework/</p>



Ref	How we can demonstrate that the city council meets this principle	Evidence
	<p>The council supports several specialist forums for citizen feedback and co-design work, including those for children and young people (such as Primary Parliament, the Voices of Care group and various bespoke Child Friendly Nottingham forums) and for disabled citizens (the Disability Involvement Group).</p> <p>The council is strengthening its relationship with research institutions to enable greater research engagement partnership working. We are a partner in the Universities for Nottingham Co(l)aboratory community PhD programme and Nottingham Trent University MARKETs project and we are developing protocols and capacity to enhance the council's research capabilities and improve evidence-based decision making and organisational learning.</p>	
PB.5	<p>The City Council Operating Plan for 2024/2025 was reported to the Executive Board in May 2024 on the delivery of the priorities and objectives.</p> <p>The Nottingham City Council Plan 2025-29 was presented to the Executive Board in February 2025.</p>	<p>Strategic Plan</p> <p><u>Nottingham City Council Strategic Council Plan 2023-27</u></p> <p><u>Our Council Plan 2025-29.</u></p>
PB.6	<p>The city council communicates through its website regarding the city council's vision, achievements, financial position and performance. The website has recently been redeveloped to provide the public with easier access to information and services. Various parts of the organisation use a variety of social media, including Twitter, Facebook, YouTube, google+, Pinterest and Flickr to engage and inform communities and stakeholders. The</p>	<p><u>Homepage - Nottingham City Council</u></p>



Ref	How we can demonstrate that the city council meets this principle	Evidence
PC.1	<p>The new Council plan covers the years 2025-2029 with a vision to make Nottingham a flourishing, inclusive, and sustainable city where residents thrive. A renewed council where Nottingham strengthens its core and becomes a national leader in financial stewardship, innovation, and community health and wellbeing</p> <p>The Improvement Plan was developed in close liaison with Commissioners and agreed with them on 8th July 2024. The Plan also received political support and approval at the Council's Executive Board on 16th July 2024. At an Extraordinary Meeting of City Council on 5th August 2024, Councillors formally approved the Plan as the Council's overarching improvement plan in response to the Commissioner-led intervention.</p>	<p>Strategic Plan</p> <p><u>Our Council Plan 2025-29.</u></p> <p><u>NCC Improvement Plan</u></p>
PC.2	<p>The Improvement Plan sets out how the Council will address the issues and challenges that have led to the current intervention and respond to the actions required by Commissioners. It is built around three aims of enabling and supporting the Council to become:</p> <ul style="list-style-type: none"> • A council that delivers with clear direction and purpose • A council that is financially sustainable • A council that is well-run with effective people, processes and systems 	<p><u>NCC Improvement Plan</u></p>
PC.3	<p>The city council has adopted in full CIPFA's Prudential Code for Capital Finance in Local Authorities and their Treasury Management Code of Practice.</p>	<p><u>Nottingham City Council Capital Strategy - 2022/23-2026/27</u></p>

Ref	How we can demonstrate that the city council meets this principle	Evidence
	<p>The city council receives support on all aspects of borrowing, lending and investments from a specialist provider of local government treasury and capital financing advice.</p> <p>Reserves strategy and forecasts are clearly set out in the Medium Term Financial Strategy and are monitored through the quarterly Finance updates.</p> <p>Opportunities for strengthening the reserves position are routinely considered as part of the account closure exercise. The revenue budget is set and is reviewed on a regular basis. As part of 2024/25 year end, all General Fund reserves that have no earmarked purposes were moved into the General Fund Unallocated Balances.</p>	<p><u>Capital Financial Strategy 2025/2026</u></p> <p><u>Capital Investment Programme Funding 2025/2026</u></p> <p><u>Medium Term Financial Strategy and Council Tax Setting 2025/26</u></p>
PC.4	<p>The annual report on the Treasury Management Strategy for 2024/25, incorporating the Minimum Revenue Provision Policy Statement, Investment Strategy and Prudential and Treasury Indicators required under Part 1 of the Local Government Act 2003 was approved by city council in March 2024 (having been considered by the Audit Committee). Member awareness and engagement on Treasury Management issues is progressed through development events and regular updates.</p>	<p><u>Treasury Management Strategy 2025/26</u></p>
PC.5	<p>The council has an Asset Management Plan which sets out the continuing work of Asset Maximisation and bring together the priorities for delivery for operational property, the accommodation strategies and plans and how the decisions taken to drive these also provide a greater level of</p>	<p><u>Asset Management Plan</u></p>



Ref	How we can demonstrate that the city council meets this principle	Evidence
	opportunity for physical regeneration within the City. The Corporate Asset Management Strategy is currently under development with the view to have it approved by summer 2025.	

Principle D – Determining the interventions necessary to optimise the achievement of the intended outcomes.

Ref	How we can demonstrate that the city council meets this principle	Evidence
PD.1	<p>Financial and non-financial performance reports are presented on a monthly basis at Council Corporate Leadership Team Meetings (CLT) and taken to Executive Board each quarter. The content of the reports demonstrates the city council's progress in achieving against the performance measures and budgets across city council activities and are used to highlight examples of excellence in service delivery, as well as monitoring areas requiring improvement. Reports are also provided to Overview and Scrutiny Committees for each respective service area</p>	<p><u>Budget Monitoring Reports</u></p>
PD.2	<p>Progress in implementing the Improvement plan and the service plans are reported monthly to the Improvement Board, Transformation Board, F&R Board, and regularly to the Audit Committee and Council.</p> <p>The Council's improvement plan progress update is also reported to the secretary of state on a regular basis by the commissioners. There have been two published letters since the Improvement Plan was established.</p>	<p><u>Nottingham City Council: Commissioners' first report</u></p> <p><u>Nottingham City Council: Commissioners' second report - GOV.UK</u></p>
PD.3	<p>A Housing Strategy has been created to enhance Nottingham's housing offer so that the most vulnerable people at all stages of life can live in a safe homes and quality environment. Following a review of the complains procedure, a housing ombudsman complaint handling code has been developed (which is now cited as</p>	<p><u>Housing Strategy</u></p> <p>Asset Management Strategy</p> <p><u>Tenants Charter and Service Standards</u></p>



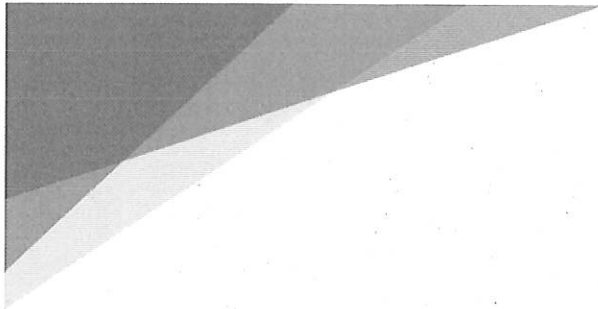
Ref	How we can demonstrate that the city council meets this principle	Evidence
	best practice in the industry). A tenant's Charter and Service Standards has also been put into place in close liaison with our tenants input. The Corporate Asset Management Plan is currently under review as part of the Council's Improvement Plan with a target completion date of October 2025.	
PD.4	To make Nottingham a flourishing, inclusive, and sustainable city where residents thrive. A renewed council where Nottingham strengthens its core and becomes a national leader in financial stewardship, innovation, and community health and wellbeing. Our commitment is to foster a safe, resilient, and connected Nottingham, where opportunity and prosperity are accessible to all. A council that delivers for local people, leading Nottingham forward. By empowering our neighbourhoods, supporting business and driving economic growth across the region, and championing social equity, we aim to create a dynamic city that celebrates its unique heritage while embracing possibilities through partnership.	<u>Our Council Plan 2025-29</u>
PD.5	The council is committed to Equality and Diversity	<u>Equality and Diversity Strategy</u>

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

Ref	How we can demonstrate that the city council meets this principle	Evidence
PE.1	The city council participates in multiple benchmarking exercises and uses the information for financial and service quality comparisons. Learning from other entities enables the city council to achieve value for money and best practice service delivery	Benchmarking Corporate Peer Review CIPFA External Assurance Review
PE.2		Statutory / Mandatory Post within current structure



Ref	How we can demonstrate that the city council meets this principle	Evidence	
	<p>The city council has three statutory governance officers posts with responsibility for governance</p>	Head of Paid Services	Chief Executive Officer
		Chief Financial Officer and s151 Officer	Corporate Director of Finance & Resources
		Monitoring Officer	Director of Legal and Governance
PE.3	<p>The Constitution sets out a Scheme of Delegation, Financial Regulations and Contract Procedure Rules.</p> <p>The Scheme of Delegation gives officers authority to act within the policies and objectives defined by the executive and the city council as a whole</p> <p>The Financial Regulations underpin the effective management of the city council's financial arrangements, and the Contract Procedure Rules govern the making of contracts for and on behalf of the city council.</p> <p>The city council's Constitution sets out the framework for decision making and the formal reporting of those decisions. Decision making is underpinned by a framework of policies, plans and strategies.</p> <p>The Constitution is kept under review by the Director of Legal and Governance, (the city council's Monitoring Officer). These documents are comprehensively reviewed on a regular basis with amendments being approved by full city council.</p>	<p><u>Constitution</u></p> <p><u>Schedule of delegated authority</u></p> <p><u>Financial Regulations</u></p>	



Ref	How we can demonstrate that the city council meets this principle	Evidence
PE.4	<p>To support our elected Members, the City Council develops an annual Learning and Development Plan, accompanied by a calendar of training events and workshops. Each offering is aligned with the relevant 'Political Skill' areas as defined by the Local Government Association, enabling Members to easily identify opportunities that match their individual development priorities.</p>	<p>Councillor's induction plan and Councillor Development Steering Group,</p>
PE.5	<p>In compliance with the data transparency code, the city council has published its senior management structure and pay structure.</p> <p>The city council publishes an annual pay policy, last approved by city council in March 2025. The pay policy is currently under review</p> <p>Information is also provided about member's remuneration.</p>	<p><u>Pay policy</u></p> <p><u>Members Allowance</u></p>
PE.6	<p>The city council recognises that its employees are central to its success.</p> <p>Development offer is based on addressing generic skills, including leadership development, and professional development.</p> <p>The employee performance framework exists to promote performance and identify development needs, linking to behavioural expectations of all staff.</p> <p>Staff also undertake a range of compulsory e-learning on topics such as health and safety and data protection.</p>	<p>E-learning Programme</p>

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

Ref	Evidence	Evidence
PF.1	<p>The Risk Policy sets out the city council's strategy for ensuring that effective risk management is embedded within all areas of the city council's operations.</p> <p>A refreshed Council's Risk Management Strategy was signed off at CLT, F&R Board in June 2025 and it is to be presented at July Executive Board.</p> <p>It also requires that all managers and Councillors address the issue of associated risk whilst making any and all policy decisions.</p> <p>The Audit Committee reviews the Strategic Risk Register regularly.</p> <p>The system of internal control is designed to identify and prioritise the risks to the achievement of the city council's policies, aims and objectives and to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically</p>	<p><u>Risk Management Strategy.pdf</u></p> <p>Strategic Risk Register</p>
PF.2	<p>The city council's Financial Management arrangements conform to the governance requirements of the CIPFA statement on the role of the Chief Financial Officer in Local Government (2016). Information on the financial performance of the city council provided to budget managers and senior officers is well presented, timely, complete and accurate. Real time desk top budget information is available to</p>	<p><u>Statement of Accounts 2023/24</u></p> <p><u>Treasury Management Annual Report 2024/25</u></p>

Ref	Evidence	Evidence
	budget holders across the city council via Oracle Fusion.	
PF.3	<p>The city council's policies and staff training programme promote compliance with information legislation. To support this, data protection e-learning courses have been further updated, Training for senior managers is complete and relevant policies are in place in line with current legislation.</p> <p>We comply with standards for public sector data handling and security and have achieved Public Services Network certification every year since its launch. The city council has met the standards required by the new NHS Data Security and Protection Toolkit.</p>	<p>Data Protection Policy (Internal only)</p> <p>Data Sharing Policy (Internal only)</p> <p>Information Governance Policy (Internal only)</p>
PF.4	<p>The city council's review of the effectiveness of the system of internal control is informed by:</p> <ul style="list-style-type: none"> • Head of Internal Audit based on management information, performance information, officer assurance statements and Scrutiny reports • The work undertaken by Internal Audit during the year. • The work undertaken by the External Auditor reported in their annual audit and inspection letter. 	<p><u>Internal Audit Plan 2025-2028</u></p> <p><u>Internal Audit Annual Report</u></p>
PF.5	<p>The city council has a Corporate Strategy for the prevention and detection of fraud and corruption. A key area of work continues to be Council Tax and Housing fraud. Results of fraud investigations are publicised on the internet using the city council's social media presence The city council participates in the National Fraud Initiative (NFI), this is a biennial data</p>	<p><u>NCC Counter Fraud Strategy</u></p> <p>National Faud Initiative</p>

Ref	Evidence	Evidence
	matching exercises led by the Executive Board Office that matches electronic data within and between public and private sector bodies to prevent and detect fraud. Regular updates on these exercises are provided to the Audit Committee.	

Principle G – Implementing good practices in transparency, reporting, and audit, to deliver effective accountability.

Ref	How we can demonstrate that the city council meets this principle	Evidence
PG.1	<p>In line with the Local Government Transparency Code 2015, the city council is required to publish certain types of information for transparency purposes, this information can be found on the city council's website along with monthly Transparency Reports.</p> <p>A record of executive decisions made under the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 are published on the city council's website. Information is also provided about member's remuneration.</p>	<p>Transparency Report</p> <p><u>Members Allowance</u></p> <p><u>Notice of Decision</u></p>
PG.2	<p>The city council operates five number of Overview and Scrutiny Committees that consist of Elected Members who undertake annual work programmes. Their two main functions are to hold decision makers to account and to also develop and review policy.</p>	<p><u>Overview & Scrutiny</u></p>
PG.3	<p>The Statement of Accounts is published and produced in compliance with the Accounts and Audit Regulations 2015 presenting a</p>	<p><u>Published Accounts 2022/23</u> <u>Published Accounts 2023/24</u></p>



Ref	How we can demonstrate that the city council meets this principle	Evidence
	<p>true and fair view of the financial performance of the city council in the delivery of services to the citizens of Nottingham.</p> <p>The accounts are subject to independent external audit and are made available via the city council's website. This is seen as an essential feature of public accountability and stewardship as it provides an annual report on how the city council has used the public funds for which it is responsible.</p>	<p><u>Accounting Policies</u></p>
PG.4	<p>The Audit Committee has responsibility for conducting an annual review of the effectiveness of the governance framework, including the system of internal control. The review of effectiveness will be informed by:</p> <ul style="list-style-type: none"> • City council officers, responsible for the development and maintenance of the governance environment • The Strategic Manager, Audit and Fraud's annual report • Comments and observations made by external auditors and external review agencies and inspectors. <p>The Committee also report on their activities to full council</p>	<p><u>Roles and Responsibilities</u></p> <p><u>Audit Committee Terms of Reference.</u></p> <p>Audit Committee Annual report</p>
PG.5	<p>The city council's assurance arrangements conform to the governance requirements of the CIPFA Statement on the role of the Head of Internal Audit (2020). The Internal Audit Charter is currently</p>	<p><u>Internal Audit Charter</u></p> <p><u>Internal Audit Strategy and Plan</u></p> <p>Annual Audit Committee Plan</p>



Ref	How we can demonstrate that the city council meets this principle	Evidence
	<p>under review as part of the Internal Control and Assurance programme.</p> <p>Information on the work of Internal Audit is provided to managers and senior officers and is well presented, complete and accurate. Summary reports are provided to the Audit Committee on a quarterly basis.</p> <p>The annual report of the Head of Internal Audit summarises the audit work undertaken during 2024/2025.</p> <p>Where recommendations have been made to improve processes, these are being addressed by appropriate officers. From the work undertaken in 2023/2024 by Internal Audit, the Strategic Manager, Audit and Fraud was able to give the following assurance:</p> <p>“From the work carried out by Internal Audit during 2023/24 and 2024/25, it has been concluded that the level of assurance on the adequacy and effectiveness of the city council’s control environment is Limited”</p>	<p><u>Internal Audit Annual Report</u></p>

