



Coventry City Council

# Public report

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**Report to**

Audit and Procurement Committee

30<sup>th</sup> January 2023

**Name of Cabinet Member:**

Cabinet Member for Policy and Leadership – Councillor G Duggins

**Director approving submission of the report:**

Chief Operating Officer (Section 151 Officer)

**Ward(s) affected:**

City Wide

**Title:**

Annual Governance Statement 2021-22

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**Is this a key decision?**

No

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**Executive summary:**

The purpose of this report is to provide details of the results of the annual review of effectiveness of the Council's governance arrangements and seek approval for the Annual Governance Statement, which forms part of the Statement of Accounts for 2021-22.

**Recommendations:**

Audit and Procurement Committee is recommended to:

- 1) Consider the findings of the review of effectiveness of the Council's governance arrangements and confirm its satisfaction with the level of assurance provided that arrangements are fit for purpose.
- 2) Consider and approve the Annual Governance Statement (attached at Appendix One), which will accompany the 2021-22 Statement of Accounts.

**List of Appendices included:**

Appendix One – Annual Governance Statement 2021-22

**Background papers:**

None

**Other useful documents:**

Annual Governance Statement 2020-21

<https://edemocracy.coventry.gov.uk/ieListDocuments.aspx?CId=553&MId=12572&Ver=4>

**Has it or will it be considered by scrutiny?**

No

**Has it, or will it be considered by any other council committee, advisory panel or other body?**

No

**Will this report go to Council?**

No

**Report title:**

Annual Governance Statement 2021-22

**1. Context (or background)**

- 1.1 Coventry City Council is responsible for ensuring that its business is 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. In discharging this responsibility, the City Council is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the effective exercise of its functions, including arrangements for the management of risk.
- 1.2 To demonstrate such arrangements, the City Council has adopted a Code of Corporate Governance, which is consistent with the principles reflected in the CIPFA / SOLACE framework and guidance 'Delivering Good Governance in Local Government' (2016).
- 1.3 The Annual Governance Statement ('AGS') explains how Coventry City Council has complied with the Code and in doing so, reflects the requirements of the Accounts and Audit Regulations 2015 and the Accounts and Audit (Amendment) Regulations 2022, which requires all relevant bodies to conduct a review of the effectiveness of its system of governance and prepare an Annual Governance Statement. The AGS also details key governance / control issues that the Council faces in the coming year.
- 1.4 The AGS is normally presented to Audit Committee in June / July each year to meet the deadline for publication specified in the Accounts and Audit Regulations. However, as there are delays in the completion of the audit of the 2019-20 accounts (due to technical and balance sheet valuation issues), the draft accounts for 2021-22 have not yet been published. The Council has worked closely with its auditors, Grant Thornton to resolve the outstanding matters and it is anticipated that a decision will be reached on these in the imminent future. Whilst there is a delay in the finalisation of the 2019-20 accounts, it is felt appropriate to present the AGS for 2021-22 at this time to facilitate the AGS annual review for 2022-23.

**2. Options considered and recommended proposal**

- 2.1 Whilst processes are in place to assess key elements of the governance framework through-out the year, for example through the work of Internal Audit, the Corporate Governance Steering Board and the Council's Audit and Procurement Committee, an annual review is also undertaken as part of the production of the AGS for the year. The purpose of the review is to provide assurance that arrangements continue to be fit for purpose and identify key governance issues for the forthcoming year. This annual review incorporates a number of processes with the outcomes reviewed and agreed by the Corporate Governance Steering Board and Strategic Leadership Team. For 2021-22, this has included:
  - The outputs from the Internal Audit Service, reflected in an annual report that identifies those issues, which in the opinion of the Chief Internal Auditor, should be considered when producing the Annual Governance Statement.
  - Levels of complaints and whistleblowing disclosures made.
  - Reports from external bodies during the year, including those from the Council's external auditors and other inspection agencies.

- Consideration of the Council's Corporate Risk Register and Covid-19 Risk Register.
- An annual assessment by each Director of the adequacy of governance arrangements / internal controls in relation to their service areas.
- An assessment of the Council's compliance with the principles and standards of the CIPFA Financial Management Code, which supports good practice in financial management and demonstrating financial sustainability.
- Assessment of the role of the S151 Officer against the requirements stated in the CIPFA Statement on the Role of the Chief Financial Officer in Local Government (2016.)
- An annual review against the principles and best practice set out in the Code of Corporate Governance.

2.2 Based on the outcomes of the review, the overall opinion that has been reached is that reasonable assurance can be provided that the Council's governance arrangements continue to be regarded as fit for purpose in accordance with the governance framework. The basis of this opinion includes the following key findings from the review:

- The Chief Internal Auditor's opinion that moderate assurance can be provided that there is generally an effective and adequate framework of governance, risk management and internal control in place designed to meet the Council's objectives.
- A self-assessment of the Council's compliance with the Financial Management Code which has concluded that the Council is in a relatively strong position with regards to having good and sustainable financial management.
- The 2020/21 Annual report from the Council's external auditors which concluded that overall, the Council's financial position is robust and has appropriate arrangements in place to ensure it manages risks to its financial sustainability. No significant weaknesses were found in the Council's governance arrangements or value for money arrangements for responding to the Covid-19 pandemic.
- The number of complaints to the Local Government / Social Care Ombudsman is comparable to similar local authorities / West Midlands Combined Authority.
- Assurance obtained from Directors that there are no significant concerns in relation to governance within their service areas.
- The conclusion that the role of the S151 Officer within the Council meets the principles of the CIPFA statement on the Role of the Chief Financial Officer in Local Government.

2.3 The AGS also details the key governance issues that the Council faces in the coming year. Section 5.3 of Statement, attached at Appendix One, provides details of these areas. Whilst the process of identifying the issues is co-ordinated by the Chief Internal Auditor, it incorporates the views and opinions of senior officers, the Council's Governance Steering Board and Strategic Leadership Team. The key issues come from the following processes:

- A review of progress against the actions planned to address significant issues highlighted in the Annual Governance Statement for 2020-21.
- New issues identified as part of the review of effectiveness outlined in section 2.1.

The outcomes from these processes are expanded upon below.

**2.4 Update on issues raised in the Annual Governance Statement 2020-21** – An update on the progress against planned actions in relation to the issues raised in the 2020-21 AGS is provided in section 5.1 of the Statement attached at Appendix One. A review of the 19 issues highlighted in the AGS for 2020-21 has found that these fall into two categories, namely:

**2.4.1 Issues which have now been addressed** – Five issues have been closed as they are no longer viewed as a significant governance issue facing the Council and will not be carried forward to the 2022-23 action plan:

- **Governance over relationships with partners and outside bodies:** The One Coventry Partnership was formally relaunched in January 2022 with refreshed membership to reflect its focus on driving a One Coventry approach for the city, providing leadership on key strategic issues / developments, and enabling a joined-up public sector approach to the development and delivery of strategic city-wide priorities. The Coventry and Warwickshire Anchor Alliance is fully established and is in the process of refreshing its six existing commitments and the Coventry and Warwickshire Integrated Care Partnership was set up in 2022 in response to the Health and Care Act 2022. These partnerships work closely together to ensure a system wide approach to improving the lives of local people and a Chief Partnerships Officer is in place to lead this area of work in line with One Coventry Plan priorities.
- **Review and update of the Social Value and Sustainability Policy:** The updated policy was approved by Cabinet in August 2021. Social value and sustainability is embedded as part of the procurement and planning consultation processes and the Council works closely with partners and key anchor institutions within the City to deliver long terms sustainable solutions. The revised Social Value and Sustainability policy outcomes are supported by the vision, values and priorities contained in the One Coventry Plan.
- **Implementation of the Local Government Ethical Standards best practice from the Committee on Standards in Public Life:** Coventry Municipal Holdings was set up as a Holding company for most of the wholly owned companies by the City Council. This took account of the Nolan principle of openness and publication of agendas and minutes have been taken into account and form part of the Shareholder Committee meeting which occurs twice a year. This is engrained in the Group Governance Agreement which is a legally binding document.
- **Compliance with the Financial Management Code:** The Council's compliance with the code was reviewed in 2021-22 and the results were reported to Scrutiny Board 1 in January 2022. The report considered by Scrutiny Board concluded that the Council was compliant with the code in most respects. In line with the Scrutiny Board recommendations the outstanding areas will be subject to further updates in 2022-23 both as part of the Scrutiny 1 work programme and in respect of value for money, as part of the External Auditor's planned activity.
- **Ensuring robust governance over group activities / investments:** In November 2021 the Council incorporated Coventry Municipal Holdings Limited (CMH) to manage its wholly owned companies and strengthen the governance arrangements for these investments, taking into account lessons learnt from issues encountered by other local authorities and the recommendations made in Public Interest Reports issued by Grant Thornton on such matters. A Group Governance Agreement is in place which sets out the governance

structure and training has been provided by the Council's legal advisors to those officers appointed as directors.

**2.4.2 Carry forward to the 2022-23 Action Plan** - A number of governance issues remain in the Annual Governance Statement. These are detailed in section 5.3 of the Statement attached at Appendix One, along with the actions the Council plans to take (or has taken) in 2022-23 in relation to these issues. In summary, the issues that have been carried forward to the 2022-23 Action Plan are as follows:

- Sustainable improvement in Children's Services.
- Ensuring delivery of the Council's vision and corporate objectives, in line with the Medium-Term Financial Strategy.
- Raising educational standards.
- Implementation of the Information Management Strategy.
- Management of increasing demand in relation to homelessness and the associated costs of housing families in temporary accommodation.
- Development of a corporate data access standard.
- Governance over the programme of capital projects.
- City of Culture legacy.
- Strengthening arrangements linked to the programme of health and safety audits undertaken.
- Further development of the Council's IT Disaster recovery plans and processes.
- Implementation of the Redmond Review into the oversight of local audit and the transparency of local authority financial reporting.
- To further strengthen the Council's arrangements and internal control environment around IT / Cyber Security.
- Embedding new methods of consultation and engagement.
- Refresh of the One Coventry Plan.

**2.5 New Governance Issues** – Five new issues have been identified for the Annual Governance Statement. These are also detailed in section 5.3 of the Statement attached at Appendix One, along with the actions the Council plans to take (or has taken) in 2022-23 in relation to these issues. These issues were identified as part of the review undertaken to support the production of the AGS as detailed in 2.1 and are summarised below:

- Updating the Local Code of Governance to provide a more comprehensive description of the Council's governance arrangements.
- Mandatory training for Waste Services employees returning to work.

- Raising awareness and promoting the Employees Code of Conduct.
- Approval of the Council's draft Sustainability and Climate Change Strategy.
- Improving the process for raising concerns under the Council's Whistle Blowing Policy.

### **3. Results of consultation undertaken**

3.1 None

### **4. Timetable for implementing this decision**

4.1 Timescales for specific actions which are being taken to address significant governance issues are included in the Annual Governance Statement. The action plan will be subject to quarterly monitoring by the Corporate Governance Group to ensure that issues are addressed in the timescales outlined.

### **5. Comments from the Chief Operating Officer (Section 151 Officer) and the Chief Legal Officer**

5.1 Financial Implications

There are no specific financial implications associated with this report. Internal control / governance has clear and direct effects on finance within the Council. Since these vary widely, it is not useful to attempt to summarise them here, beyond noting that all systems and controls are designed to help improve value for money obtained, the probity and propriety of financial administration, and / or the management of operational risks.

5.2 Legal implications

The City Council is required by the Accounts and Audit Regulations 2015 to approve, and subsequently publish, the Annual Governance Statement alongside the Statement of Accounts.

### **6. Other implications**

#### **6.1 How will this contribute to achievement of the One Coventry Plan?**

The governance framework comprises the systems and processes (i.e. the internal control environment), and culture and values, by which the authority is directed and controlled, and its activities through which it accounts to, engages with and leads the community. It enables the authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost effective services.

#### **6.2 How is risk being managed?**

The key risk that exists is that planned actions are not implemented. This risk is managed through the Council's governance framework which includes arrangements to provide oversight of planned actions through reporting to senior management and designated committees / boards. Defined processes also exist to gain assurance that agreed actions arising from the work of Internal Audit, External Audit or another external agency have been implemented on a timely basis.

**6.3 What is the impact on the organisation?**

None

**6.4 Equalities / EIA**

None

**6.5 Implications for (or impact on) climate change and the environment**

None

**6.6 Implications for partner organisations?**

None

**Report author(s):**

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**Service:**

Finance and Corporate Services

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Lara Knight	Governance Services Co-ordinator	Law and Governance	12/1/2023	17/1/2023
Paul Jennings	Finance Manager Corporate Finance	Finance	12/1/2023	20/1/2023
<b>Names of approvers: (officers and members)</b>				
Barry Hastie	Chief Operating Officer (Section 151 Officer)		12/1/2023	19/1/2023
Julie Newman	Director of Law and Governance (Chief Legal Officer)		12/1/2023	13/1/2023
Councillor G Duggins	Cabinet Member for Policy and Leadership		12/1/2023	18/1/2023

This report is published on the council's website:



## Appendix One – Annual Governance Statement 2021-22

### 1. Scope of responsibility

- 1.1 Coventry City Council is responsible for ensuring that its business is 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. Coventry City Council also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency, and effectiveness.
- 1.2 In discharging this overall responsibility, Coventry City Council is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the effective exercise of its functions, which includes arrangements for the management of risk.
- 1.3 Coventry City Council has an approved Code of Corporate Governance, which is consistent with the principles reflected in the CIPFA / SOLACE framework and guidance *Delivering Good Governance in Local Government (2016)*. A copy of the Code is available on our website at:  
[http://www.coventry.gov.uk/downloads/file/3639/code\\_of\\_corporate\\_governance\\_2017](http://www.coventry.gov.uk/downloads/file/3639/code_of_corporate_governance_2017)  
or can be obtained from Governance Services.
- 1.4 The Annual Governance Statement explains how Coventry City Council has complied with the Code and also meets the requirements of Regulation 6(1) (b) of The Accounts and Audit Regulations 2015 which requires all relevant bodies to prepare an Annual Governance Statement and the Accounts and Audit (Amendment) Regulations 2022.

### 2. The purpose of the governance framework

- 2.1 The governance framework comprises the systems and processes, culture, and values by which the Authority is directed and controlled and its activities through which it accounts to, engages with, and leads the community. It enables the authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate services and value for money.
- 2.2 The system of internal control is a significant part of the framework and is designed to manage risk to a reasonable level. It 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 system of internal control is based on an on-going process designed to identify and prioritise the risks to the achievement of Coventry City Council policies, aims and objectives, to evaluate the likelihood and potential impact of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively, and economically.
- 2.3 The governance framework has been in place at Coventry City Council for the year ended 31<sup>st</sup> March 2022 and up to the date of approval of the Statement of Accounts.

### 3. The governance framework

The key principles, approach and review processes that comprise the authority's governance arrangements are set out in the City Council's Code of Corporate Governance. Key elements include the following:

- 3.1 There is a governance / internal control environment that supports the Council in establishing, implementing, and monitoring its policies and objectives. The Council's overarching objectives are contained in published policy documents including the One Coventry Plan. These high-level plans are supported by a range of thematic policies, strategies and delivery plans, service plans, and detailed work programmes.
- 3.2 The existing Council Plan which sets out the Council's long-term vision and priorities for the city is being refreshed and is now called the One Coventry Plan. The plan takes into account lessons learnt from COVID-19 pandemic and the impact this has had on our communities and the way we work. To deliver the Council's long-term vision of working together to improve the city and the lives of those who live, work and study in Coventry, the One Coventry Plan sets out the priorities of increasing the economic prosperity of the city and region, improving outcomes, and tackling inequalities within our communities and tackling the causes and consequences of climate change, through continued financial sustainability and the Council's role as a partner, enabler, and leader. The delivery of the One Coventry Plan is supported by a range of policies and strategies and a performance management framework. A copy of the draft One Coventry Plan is available on our website at:  
[www.coventry.gov.uk/strategies-plans-policies/draft-one-coventry-plan/9](http://www.coventry.gov.uk/strategies-plans-policies/draft-one-coventry-plan/9)  
and the performance management framework is at:  
[http://www.coventry.gov.uk/downloads/download/5245/performance\\_management\\_framework](http://www.coventry.gov.uk/downloads/download/5245/performance_management_framework)
- 3.3 Throughout this process, clear channels of communication exist with all sections of the community and other stakeholders, to ensure the Council considers local needs and communicates both expected and actual outcomes for citizens and service users. This is evidenced through the Council's formal decision-making and performance management processes.
- 3.4 In October 2015, Coventry City Council agreed to join the proposed West Midlands Combined Authority, which is a model of governance for local authorities to act together to drive economic prosperity for the area. A Combined Authority is a statutory body in its own right supported by a devolution agreement with the Government and a constitution which sets out the terms of their funding and powers.
- 3.5 In December 2017, it was announced that Coventry had been named the UK City of Culture for 2021. The aim of this programme was to encourage the use of culture and creativity as a catalyst for change, to promote the development of new partnerships and to encourage ambition, innovation, and inspiration in cultural and creative activity. This activity will make significant contributions to the delivery of the One Coventry Plan and corporate priorities. Coventry City of Culture Trust was set up to organise and deliver this activity and was formally incorporated and received charitable status. Financial responsibility for the Trust's activities lies with the Chair and Trustees, with an independent Audit Committee providing scrutiny and oversight. As accountable body and guarantor for delivery of the UK City of Culture 2021 programme, Coventry City Council is a principal partner in supporting the work of the Trust and ensuring that there is good governance around the Trust meeting the City of Culture programme delivery and legacy ambitions.

- 3.6 The control environment to ensure delivery of the Council's objectives is laid down in the Council's Constitution and performance management framework. The Constitution sets out how the Council operates, including:
- Roles and responsibilities of both Councillors and officers, including the Head of Paid Services, Monitoring Officer, and Chief Financial Officer.
  - How decisions are made and the procedures in place to ensure that these are efficient, transparent, and accountable to local citizens. The Constitution includes the Council's senior management structure and a scheme of delegation which sets out the principles for decision making and responsibility for functions. The Council facilitates policy and decision making via a Cabinet structure with Cabinet Member portfolios. There are scrutiny boards covering all portfolios and an overarching Scrutiny Co-ordination Committee. The Member decision making, advisory and scrutiny bodies are shown at <http://www.coventry.gov.uk/howthecouncilworks>
- 3.7 Coventry City Council has developed a comprehensive set of policies and procedures, including those relating to the standards expected of Members and officers. These are subject to regular review to ensure the Council continues to enhance and strengthen its internal control environment. Systems exist to ensure compliance with policies and procedures, including statute and regulations. Internal Audit, through its annual risk-based plan assesses compliance with key procedures and policies.
- 3.8 The Council has an Equality, Diversity and Inclusion Commitment which is available on our website at: [equality, diversity and inclusion commitment](#). This sets out the Council's commitment to meeting all areas of the public sector equality duty and to ensure equality of opportunity, both as a provider and commissioner of services and as a large employer. The commitment is implemented through setting equality objectives linked to the One Coventry Plan. In 2022, a new set of equality objectives were approved and are available on our website at: [Equality Objectives | Equality and Diversity | Coventry City Council](#). Progress is monitored and reported to the Cabinet Member (Policing & Equalities) and an annual report of completed Equality Impact Assessments is available at: [Equality and diversity – Coventry City Council](#)
- 3.9 The Council's Risk Management Policy and Strategy defines processes for identifying, assessing, managing, and monitoring financial and operational risks. The Strategy recognises the need for risk registers at service, directorate and corporate level which are updated and reviewed regularly. The Corporate Risk Register is reviewed quarterly by the Strategic Leadership Team and is reported to the Audit and Procurement Committee.
- 3.10 The Council, through its Whistleblowing and Complaints Procedures, has documented processes in place to deal with concerns raised by both employees and members of the public. These policies have been widely communicated and are subject to regular review to ensure they are working effectively. In addition, the Council's Fraud and Corruption Strategy reinforces the Council's commitment to creating an anti-fraud culture, whilst having effective arrangements in place in responding to allegations of fraud and corruption.
- 3.11 An Audit and Procurement Committee provides independent assurance to the Council on various issues, including risk management and control and the effectiveness of the arrangements the Council has for these matters. The Committee's terms of reference were developed in conjunction with CIPFA guidance, and the Committee carries out a

periodic self-assessment to measure its effectiveness, based on recommended CIPFA practice.

3.12 For the financial year 2021-22, the Chief Operating Officer was the nominated Section 151 Officer, with the delegated responsibility for ensuring there are arrangements in place for proper administration of financial affairs. The Council last carried out an assessment of the role of the Section 151 Officer against the requirements stated in the CIPFA Statement on the Role of the Chief Financial Officer in Local Government (2016) in August 2022. This assessment concluded that the Authority meets the five principles laid out in the CIPFA statement, namely:

- The Chief Financial Officer (CFO) in a local authority is a key member of the Leadership Team, helping it to develop and implement strategy and to resource and deliver the authority's strategic objectives sustainably and in the public interest.
- The CFO in a local authority must be actively involved in, and able to bring influence to bear on, all material business decisions to ensure immediate and longer-term implications, opportunities and risks are fully considered, and alignment with the authority's overall financial strategy.
- The CFO in a local authority must lead the promotion and delivery by the whole authority of good financial management so that public money is safeguarded at all times and used appropriately, economically, efficiently, and effectively.
- The CFO in a local authority must lead and direct a finance function that is resourced to be fit for purpose.
- The CFO in a local authority must be professionally qualified and suitably experienced.

The Chief Operating Officer (Section 151 Officer) is a key member of the Council's Strategic Leadership Team with a critical role in strategic planning for the organisation. The Team also includes the Chief Executive and Monitoring Officer, who, along with the Chief Operating Officer, collectively have leadership responsibility for good governance as principal statutory officers. The Chief Operating Officer is also part of the Council's One Coventry Leadership Team which consists of all of the Directors of the Council.

3.13 The Annual Governance Statement also includes a review of the effectiveness of the system of internal control within group activities, where the Council is in a relationship with another entity to undertake significant activities. The following describes the group activities for the year ended 31<sup>st</sup> March 2022:

- In November 2021 the Council incorporated Coventry Municipal Holdings Limited (CMH) to manage most of its wholly owned companies and strengthen the governance arrangements for these investments. In setting up these arrangements, the Council took account of lessons learnt from issues encountered by other local authorities and the recommendations made in Public Interest Reports issued by Grant Thornton on such matters. A Group Governance Agreement is in place which sets out the governance structure and training has been provided by the Council's legal advisors to those officers appointed as directors. The CMH group comprises of the following subsidiaries:

- Tom White Waste Limited (and its subsidiaries A & M Metals Limited and Tom White Waste (LACO) Limited)
- Coombe Abbey Park Limited (and its subsidiaries No Ordinary Hospitality Management Limited and Coombe Abbey Park (LACO) Limited)
- No Ordinary Hotels Limited (dormant)
- Coventry Technical Resources Limited
- Coventry Regeneration Limited

In accordance with the Group Governance Agreement, the subsidiaries are required to produce annual business plans and in addition, CMH produce an annual performance report covering all of group's performance. A Shareholder Committee is in place which oversees the group's performance.

- The Coventry and Solihull Waste Disposal Company Limited was incorporated on 24<sup>th</sup> February 1992 is owned jointly by Coventry City Council, Solihull Metropolitan Borough Council, Warwickshire County Council and Leicestershire County Council.
- The UK Battery Industrialisation Centre Limited was incorporated on 27<sup>th</sup> February 2018 and the Council is currently the sole shareholder with 1 share which has a nominal value of £1. The purpose of the company is to run the proposed National Battery Development Facility.
- The Friargate Joint Venture Project limited Ltd was incorporated on 17<sup>th</sup> December 2018. This is a 50/50 joint venture with Friargate Holdings 2 Limited, established to develop new buildings within the Friargate district of the city.
- Sherbourne Recycling Limited (SRL) was incorporated on the 25<sup>th</sup> February 2021 and Coventry City Council along with seven other local authorities acquired shares in the company on the 1<sup>st</sup> April 2021. The purpose of the company is to manage the construction of a material recycling facility (MRF) and then operate the facility, which will sort the dry mixed recyclable waste received from the eight local authorities and other commercial customers. Sherbourne Recycling Trading Limited is a trading subsidiary of Sherbourne Recycling Limited who own 100% of the shares in this entity. All commercial contracts will be secured through this entity with the waste being processed by SRL on an arm's length transaction.

#### **4. Review of effectiveness**

- 4.1 Processes are in place to assess key elements of the governance framework throughout the year, for example, through the work of Internal Audit and the Council's Audit and Procurement Committee. A review of the effectiveness of the governance framework is also undertaken annually as part of the production of the Annual Governance Statement. This is informed by the work of senior managers within the authority, who have responsibility for the development and maintenance of the governance environment, the Chief Internal Auditor's opinion on the overall adequacy and effectiveness of Coventry City Council's risk management, internal control, and governance arrangements, and also by comments made by the external auditors and other review agencies and inspectorates.

4.2 Arrangements to assess the effectiveness of the governance framework include:

- Regular and detailed monitoring of the Council's performance, by both Strategic Leadership Team and Members against targets and objectives set out in the One Coventry Plan.
- Regular meetings of the Council's Governance Steering Board to consider on-going and emerging governance issues and co-ordinate actions required. Updates on this work are provided to Strategic Leadership Team.
- Consideration of ethical governance matters by the Ethics Committee, including reflecting on national governance failings to identify if there are any lessons learnt for the Council to take forward.
- On-going reviews of the Council's Constitution, overseen by the Constitution Advisory Panel and subject to approval by Full Council. These reviews include areas such as standing orders, financial procedures, and the scheme of delegation.
- Regular reviews of the Council's strategies and procedures to ensure they continue to reflect the needs of the Council.

4.3 The review of effectiveness has also been informed by:

- Reports from the external auditors and other inspection agencies.
- The Council's Corporate Risk Register and Covid-19 Risk Register.
- Directors' Statements of Assurance. An annual assessment of the adequacy of governance arrangements / internal controls in relation to their service areas by each Director.
- An assessment of the Council's compliance with the principles and standards of the CIPFA Financial Management Code, which supports good practice in financial management and demonstrating financial sustainability. Whilst 2021-22 is the first full year of compliance, CIPFA have recognised the additional burdens placed on local authorities as a result of the pandemic and have allowed for further flexibility in progressing plans for implementation during 2021-22. Overall, the Council has satisfied CIPFA's requirement to demonstrate a direction of travel towards full compliance with the Code in 2021-22.
- The work of the Internal Audit Service during 2021-22. The Service works to a risk-based audit plan, which is approved annually by the Council's Audit and Procurement Committee. An annual report is also produced and presented to the Committee. The report identifies those issues, which in the opinion of the Chief Internal Auditor, should be considered when producing the Annual Governance Statement.

4.4 We have been advised on the implications of the result of the review of the effectiveness of the governance framework by the Audit and Procurement Committee and can provide reasonable assurance that the Council's governance arrangements continue to be regarded as fit for purpose in accordance with the governance framework and that a plan to address weaknesses and ensure continuous improvement of the system is in place.

## 5. Significant governance issues

5.1 Table one below provides an update on the governance issues that were raised in the 2020-21 Annual Governance Statement.

**Table one**

No	Governance issues identified in 2020-21	2021-22 update
1	Sustainable improvement in Children's Services	<p>Quality Assurance visits and service performance reviews were completed. Feedback from the frontline was received but not in the form of an innovation and improvement forum. This is still to be developed.</p> <p>The Continuous Improvement plan for 2021-22 was delivered.</p> <p>The Workforce Plan for 2021-22 was delivered.</p> <p>An Ofsted inspection undertaken in June 2022 rated Children's Services as "Good".</p>
2	Ensuring delivery of the Council's vision and corporate objectives, in line with the Medium-Term Financial Strategy	<p>The Council's 2021-22 budgetary control position has been balanced at year-end with the estimated unbudgeted impacts of Covid managed through the use of various Covid grants provided by Government.</p> <p>A balanced budget has been set for 2022-23 without the need for further service cuts to be identified. At this stage, One Coventry Plan transformation programmes have not been progressed to the point that they have informed the Council's financial position for this period.</p>
3	Raising educational standards	<p>The co-created Education Partnership and School Improvement annual actions and key principles for the 2021-22 academic year were:</p> <ul style="list-style-type: none"> <li>• Further develop the Coventry Education Partnership to enable successful and effective: <ul style="list-style-type: none"> <li>➢ induction and support for new headteachers</li> <li>➢ succession planning</li> <li>➢ school-to-school support that impacts positively on school improvement</li> </ul> </li> <li>• Using a range of attendance strategies ensure all pupils are motivated to achieve high levels of school attendance so that educational inequalities are reduced.</li> <li>• Ensure that early years' practitioners working with children and professionals supporting families are resilient well trained, knowledgeable, and confident to deliver high quality services.</li> <li>• Develop children and young people's mental and physical health and wellbeing so that they develop confidence, resilience, and independence.</li> </ul>

		<ul style="list-style-type: none"> <li>• Develop and embed a broad, equitable and well-planned curriculum that enables pupils to take advantage of opportunities, responsibilities, and experiences of later life.</li> <li>• Ensure that curriculum planning: <ul style="list-style-type: none"> <li>➢ accounts for delays and gaps in learning as a result of Covid-19</li> <li>➢ is sequenced so that new knowledge and skills build on what has been taught before and towards its clearly defined end points</li> <li>➢ allows reading to be prioritised so that pupils are able to access the full curriculum offer</li> </ul> </li> <li>• Be ambitious for children and young people with SEND and effective in the provision that we make for them so that their educational outcomes improve across all key stages, including in the early years.</li> <li>• Develop an environment in which pupils feel safe, and in which bullying, discrimination, sexual harassment, sexual abuse, and sexual violence – online or offline – are not accepted and are dealt with quickly, consistently, and effectively whenever they occur.</li> </ul> <p>Schools have continued to focus on education recovery following the COVID pandemic and responding to the return of OFSTED graded inspections.</p>
4	Implementation of the Information Management Strategy	<p>Review of online Data Protection training was delayed due to a wider review of corporate and mandatory training. A new online option is being reviewed and review of the training strategy is scheduled on the Information Management Strategy Group work programme for 2022-23</p> <p>An approach has been agreed for progressing the outcomes of the risk management audit which has just started in Law and Governance but needs progressing. This is a standing item on the Information Management Strategy Group agenda.</p>
5	Management of increasing demand in relation to homelessness and the associated costs of housing families in temporary accommodation	<p>The Service secured a £2million underspend during 2021-22. A number of mitigations were put in place over the previous 3 years that have resulted in this improved position and will continue to have a positive impact moving forward.</p> <p>As a demand led service, we anticipated a significant increase in homeless households approaching the council in 2021-22. Although we have seen an increase in customers the financial impact was managed. The following actions were completed in 2021-22:</p> <ul style="list-style-type: none"> <li>• HMO accommodation purchased and project closed.</li> <li>• Let's Rent Coventry and other initiatives resulted in more families permanently accommodated in the private sector.</li> <li>• 1149 homeless preventions and reliefs.</li> <li>• A new supported housing project for single people leaving Temporary Accommodation opened by Spring Housing.</li> </ul>



		<ul style="list-style-type: none"> <li>• Rent accounting system due to go live in July 2022.</li> <li>• 90% occupancy achieved on all family temporary accommodation.</li> <li>• Cabinet approval secured to purchase up to 50 family temporary accommodation houses.</li> </ul>
6	Development of a corporate data access standard	This has been delayed to due to vacancies in the Team and other pressures.
7	Governance over relationships with partners and outside bodies	<p>The One Coventry Partnership was relaunched formally in January 2022 with refreshed membership to reflect its focus on driving a One Coventry approach for the city, providing leadership on key strategic issues/developments, and enabling a joined-up public sector approach to the development and delivery of strategic city-wide priorities.</p> <p>The Partnership is committed to working together to develop a One Coventry culture for how the public sector behaves and relates to communities and the voluntary and community sectors.</p> <p>The Coventry and Warwickshire Anchor Alliance is fully established and currently in the process of refreshing and reframing it's six existing commitments, with current priorities relating to Coventry and Warwickshire Pound and Employment Opportunities.</p> <p>The Coventry and Warwickshire Integrated Care Partnership was set up in response to the Health and Care Act 2022 through a series of Integrated Care Systems (ICSs) to cover England. The ICSs for each relevant area include an Integrated Care Board (ICB), with commissioning responsibilities currently undertaken by clinical commissioning groups (CCGs). In addition, an Integrated Care Partnership (ICP) has been established; a committee of the ICB, giving a voice to the wider health and care community and with a focus on health, public health, and social care. The Integrated Care Board (ICB) and local authority are statutory members of the ICP so are directly involved in developing the integrated care strategy. This work is at its early stages following formal establishment of the ICB July 2022.</p> <p>The ICS, Anchor Alliance, and One Coventry Partnership work closely together to ensure a system wide approach to improving the lives of local people.</p> <p>A Chief Partnerships Officer is in place to lead this area of work in line with One Coventry Plan priorities. Partnerships established and governance arrangements in place where required, focus agreed in line with risks previously identified. As a result, this issue will not be carried forward to the 2022-23 action plan.</p>
8	Governance over the programme of capital	Governance arrangements continue to be in place and embedded, including the City of Culture Readiness Board and

	projects	the Council's Programme Delivery Board which meet regularly.
9	City of Culture legacy	<p>The £44m public realm programme secured on the back of the City of Culture title successfully concluded, transforming key parts of the city centre through close collaboration with artists.</p> <p>The £50m Cultural Capital programme saw the completion of key projects supporting City of Culture delivery and legacy, across production spaces, performance venues and heritage assets (e.g., Coventry Cathedral, Drapers Hall, Herbert Art Gallery &amp; Museum and St. Mary's Guildhall.)</p> <p>As the City of Culture year entered its final months, the City of Culture Trust confirmed its Principles, Strategic Objectives and Green Futures Theory of Change for the Legacy period to March 2024.</p> <p>Destination Coventry, a two-year proof-of-concept collaboration between Coventry City Council and Coventry &amp; Warwickshire Chamber of Commerce, launched as the city's new pilot Destination Management Organisation. Destination Coventry's membership programme set out a range of membership benefits, alongside a suite of marketing and advertising opportunities to suit different stakeholder needs and budgets.</p> <p>Culture Change Coventry commenced work to refresh the City's Cultural Strategy, working in close consultation with the Coventry City of Culture Trust and a wide range of stakeholders through both a workshop day and online consultation.</p>
10	Strengthening arrangements linked to the programme of health and safety audits undertaken	<p>The Audit Inspection and Monitoring (AIM) Programme was updated for 2022-2023 and shared at Health and Safety Strategy Group and the Joint Health and Safety Forum.</p> <p>The AIM Programme is risk and resource based. Resource analysis has ensured the programme targets can be met in the time scales given.</p> <p>The team have been allocated their audit monitoring and assessment programmes for the year and this is being monitored at one to ones and team meetings.</p>
11	Further development of the Council's IT disaster recovery plans and processes	<p>Significant improvements have been made to the technical components of our ICT &amp; Digital disaster recovery position. This includes completing a wholesale move to a new secondary data centre facility, which through the process of doing so, allowed us to reconfigure and test how some of our infrastructure is connected and architected. We have changed how we manage our internet connections, building in more resilience and we have also implemented a new storage area network (SAN) for how files and data are stored. All of this improves our disaster recovery position from a technical point of view.</p> <p>Alongside this, work has been continuing, led by the Coventry, Solihull, and Warwickshire Resilience Team in working with services regarding their business continuity plans, especially in light of the new ways of working. This work is on-going, and we will continue to work with colleagues throughout 2022/23 to support with this wider business continuity plan activity.</p>
12	Review and update of the Social Value and Sustainability	The Social Value and Sustainability Policy was approved by Cabinet in August 2021.

	Policy	<p>The new policy document is available publicly on our website and the council is performing well in terms of addressing the contents.</p> <p>Social value and sustainability is embedded as part of the procurement and planning consultation processes and the Council works closely with partners and key anchor institutions within the City to deliver long terms sustainable solutions. The revised Social Value and Sustainability policy outcomes are supported by the vision, values and priorities contained in the One Coventry Plan. Outcomes are being delivered and monitored as detailed below:</p> <ul style="list-style-type: none"> <li>• Procurement – social value and sustainability commitments are being included in our tenders where relevant and proportionate.</li> <li>• Planning – all major development sites in Coventry are completing a social value action plan as part of their construction activity in the city. This is monitored and measured during the lifespan of the project to ensure targets set by developers are being achieved.</li> <li>• Council partners – the Council will work with Partners within the City on specific initiatives that align with both the Council's and the Partner's individual Social Value and Sustainability outcomes.</li> </ul> <p>As a result, this issue will not be carried forward to the 2022-23 action plan.</p>
13	Implementation of the Local Government Ethical Standards Best Practice from the Committee on Standards in Public Life	<p>Coventry Municipal Holdings was set up as a Holding company for most of the wholly owned companies by the City Council. This took account of the Nolan principle of openness and publication of agendas and minutes have been taken into account and form part of the Shareholder Committee meeting which occur twice a year. This is engrained in the Group Governance Agreement which is a legally binding document. As a result, this issue will not be carried forward to the 2022-23 action plan.</p>
14	Implementation of the Redmond Review into the oversight of local audit and the transparency of local authority financial reporting	<p>The Council has signed up to the national procurement arrangements for appointing the next round of external auditors for councils via the body, Public Sector Auditor Appointments (PSAA). Legislation or further instruction is awaited on the need to have at least one independent member on audit committees, the need for external auditors to take an annual report to Full Council and the format of a simplified statement of service information and costs to be compiled alongside the Statement of Accounts.</p>
15	To further strengthen the Council's arrangements and internal control environment around IT / Cyber Security	<p>A business case for investment to increase the organisations ICT assurance position was made during 2021-22. This was approved and included in budget setting for financial year 2022-23. Having received the budget in April 2022 implementation activity has started on several components including technical solutions and staffing. Cyber Security forms a fundamental part of the ICT &amp; Digital Service plan for 2022-23 with significant progress being planned.</p>

16	Compliance with the Financial Management Code	<p>The Council's compliance with the code was reviewed in 2021-22 and the results were reported to Scrutiny Board 1 in January 2022.</p> <p>The report considered by Scrutiny Board concluded that the Council was compliant with the code in most respects.</p> <p>In line with the Scrutiny Board recommendations the outstanding areas will be subject to further updates in 2022-23 both as part of the Scrutiny 1 work programme and in respect of value for money, as part of the External Auditor's planned activity.</p> <p>As a result, this issue will not be carried forward to the 2022-23 action plan.</p>
17	Ensuring robust governance over group activities / investments	<p>In November 2021 the Council incorporated Coventry Municipal Holdings Limited (CMH) to manage most of its wholly owned companies and strengthen the governance arrangements for these investments. A Group Governance Agreement is in place which sets out the governance structure. This includes:</p> <ul style="list-style-type: none"> <li>• Financial information will be obtained and reviewed by officers on a quarterly basis with any issues reported onwards to Shareholder Committee on an exception basis.</li> <li>• There are two representatives from CMH on each subsidiary Board so collectively CMH has visibility of the subsidiary companies' performance on a monthly basis at each Board meeting.</li> <li>• Financial reporting will form part of the agenda for Shareholder Committee, the meetings for which are already established in the municipal calendar.</li> <li>• It is proposed that Audit and Procurement Committee will receive a consolidated financial performance report following the Shareholder Committee September meeting.</li> <li>• It is proposed that Scrutiny Board includes on its work programme an item to consider a review of company business plans following consideration by Shareholder Committee in March each year.</li> </ul> <p>In addition, officers appointed as directors have received training from the Council's legal advisors.</p> <p>Therefore, robust overarching governance is now in place with the introduction of Coventry Municipal Holdings. As a result, this issue will not be carried forward to the 2022-23 action plan.</p>
18	Embedding new methods of consultation and engagement	<p>The Let's Talk Coventry platform has been active for over three years and has been used to support a range of consultation and engagement activity. We are currently evaluating the platform with respect to effectiveness and also looking at how Let's Talk can be used in conjunction with Gov Delivery and Firmstep to improve reach and response. This work is part of the wider Coventry Connects Programme to improve two-way</p>

		<p>engagement with residents.</p> <p>Community messenger's group was established in July 2020. This is a group of over 300 voluntary and community sector representatives who have supported the COVID response by helping to develop and share messages to support isolation, testing, vaccination etc, particularly with residents who found it most difficult to comply with guidance. As part of our COVID legacy, the group are keen to work on other issues around access to health and care and support the better understanding and improved access to services.</p>
19	Refresh of the One Coventry Plan	<p>Work to refresh the Council Plan commenced in 2021.</p> <p>Considerable engagement was undertaken with Elected Members throughout 2021-22 to develop the proposed strategic priorities and Performance Indicators for the refreshed One Coventry Plan.</p> <p>Extensive work was also undertaken to prepare for the engagement period. Workforce engagement commenced in February 2022.</p>

5.2 The Council is seeking to continuously enhance its management arrangements to improve service delivery, efficiency, and value for money, whilst achieving its objectives. The review of effectiveness has informed identification of the following key challenges for 2022-23 (table two), along with the actions planned to address these matters to further enhance our governance arrangements.

**Table Two**

Ref	Governance issue	Planned actions 2022-23	Responsible officer	Timescale
1	Sustainable improvement in Children's Services	<p>The following actions are planned in 2022-23:</p> <ul style="list-style-type: none"> <li>• Develop a confident and competent, experienced, and stable workforce.</li> <li>• Deliver this year's workforce plan.</li> <li>• Strengthen further feedback from the front line in the form of an innovation and improvement forum.</li> <li>• Develop and implement the response to the Ofsted 2022 inspection.</li> </ul>	Director of Children's Services	March 2022
2	Ensuring delivery of the Council's vision and corporate objectives, in line with the	The 2022-23 budgetary control position will be closely monitored to ensure that the key financial pressures being experienced by the Council can be mitigated and/or managed.	Chief Operating Officer	July 2022 to January 2023

	Medium-Term Financial Strategy	<p>Work has begun to assess the range of financial scenarios facing the Council for the period from 2023-24. This will continue to be undertaken with little information about the future local government funding.</p> <p>The Council's One Coventry Plan will be refreshed and approved during the year and there will be a need to make sure that the Council's financial plans are aligned to the revised objectives of the new Plan. These proposals will be formalised through the 2023-24 Pre-Budget Report.</p>		
3	Raising educational standards	<p>We will refresh the school improvement principles for the 2022-23 academic year and agree with the Coventry Education Partnership. The majority of the principles will remain, but there will be an enhanced focus on continued education recovery, addressing behavioural and attendance issues.</p> <p>We will also need to consider the impact and response to the Schools' Bill changes, and Coventry position as an Education Investment Area.</p>	Head of Education Improvement & Standards	2022-23 academic year
4	Implementation of the Information Management Strategy	<p>A review of Data Protection training and delivery will take place to provide up to date, user friendly Data Protection training and delivery to suit various roles. Following this the new training strategy will be finalised and approved.</p> <p>Action will be taken to drive the embedding of information risk management across the organisation, including implementing the agreed actions from the Internal Audit review and implementing an appropriate information asset management solution</p>	Head of Information Governance / Information Management Strategy Group / Senior Information Risk Owner	March 2023
5	Management of increasing demand in relation to homelessness and the associated costs of housing families in	<p>The homelessness service is demand led and it is anticipated that there will be a significant increase in demand during 2022-23. The mitigations that have been put in place ensures that the service is in a good position to deal with any increase however this will be dependent on wider Covid-19</p>	<p>Director of Adult Social Care &amp; Housing</p> <p>Head of Housing &amp; Homelessness</p>	March 2023

	temporary accommodation	<p>impacts. The following actions are planned for 2022-23:</p> <ul style="list-style-type: none"> <li>• Continue to purchase 3-bed and larger temporary accommodation for families.</li> <li>• Seek to increase the number of homeless households accommodated by Let's Rent Coventry.</li> <li>• Embed new homeless prevention team (9 officers) and increase the number of homeless prevention and reliefs.</li> <li>• Embed additional officers within the temporary accommodation team to deliver increased move-ons and income recovery.</li> <li>• Undertake a Private Sector Leasing procurement to commence in the 3<sup>rd</sup> Quarter of 2022-23.</li> <li>• Continue to seek reductions in Temporary Accommodation costs.</li> <li>• Embed the rent accounting IT system to ensure maximisation of income.</li> <li>• Continue to minimise voids in Temporary Accommodation and meet target of 90% occupancy.</li> </ul>		
6	Development of a corporate data access standard	Development and implementation of a corporate access standard and protocol for all systems that hold personal data.	Members & Elections Team Manager	March 2023
7	Governance over the programme of capital projects	Following the end of City of Culture, the governance arrangements previously in place and embedded, namely the Council's Programme Delivery Board will be the primary forum for ensuring compliance. This Board, which meets regularly, is chaired by the Chief Executive and is attended by all directors responsible for capital project delivery.	Chief Executive	On-going
8	City of culture legacy	St. Mary's Guildhall will open to the public in Summer 2022, with a new visitor offer and new destination café/restaurant in the Undercroft. Work on Charterhouse will complete, providing a new heritage destination,	Strategic Lead / Acting Head of Service Sports, Culture,	2022-2024

		<p>complementing completed work on the Heritage Park at London Road Cemetery.</p> <p>Legacy capital projects are further planned to progress in 2022-23 - at the Albany Theatre (due to enter into the construction stage) and at the former IKEA building (through RIBA Design Stages).</p> <p>The City of Culture Trust will focus on three strands of legacy delivery – the Assembly Festival Garden (Summer 2022), Reel Store (Digital Gallery) and a new, commissioned Green Futures programme.</p> <p>A refreshed Cultural Strategy with three-year Action Plan will be launched, supported by new governance arrangements for the city's Cultural Compact.</p> <p>The two-year Destination Coventry proof-of-concept pilot will be reviewed and evaluated, leading to decisions on future sustainable Destination Management arrangements for the city.</p>	Destination	
<b>9</b>	Strengthening arrangements linked to the programme of health and safety audits undertaken.	Internal Audit will carry out a formal follow up review of recommendations made in their review of health and safety audit arrangements.	Chief Internal Auditor / Occupational Health, Safety & Wellbeing Services Manager / Health & Safety Team Leader	September 2022
<b>10</b>	Further development of the Council's IT disaster recovery plans and processes	Support the work of the business continuity planning across the organisation, ensuring that ICT disaster recovery processes are enhanced, with supporting documents formalised and testing arrangements agreed.	Head of ICT & Digital	March 2023
<b>11</b>	Implementation of the Redmond Review into the oversight of local audit and the transparency of local authority financial	The Council will implement the required measures set out in the Redmond Review once these have been legislated for and defined.	Director of Law and Governance	March 2023



	reporting			
<b>12</b>	To further strengthen the Council's arrangements and internal control environment around IT / Cyber Security	<p>Implementation of the cyber security activities listed in the ICT &amp; Digital Service Plan.</p> <p>The activity that will be most visible for all users is the implementation of Multi-Factor Authentication for all users – this will take place during 2022-23.</p> <p>Progression towards Cyber Essentials Accreditation.</p>	Head of ICT and Digital.	March 2023
<b>13</b>	Embedding new methods of consultation and engagement	<p>The following actions are planned in 2022-23:</p> <ul style="list-style-type: none"> <li>• Evaluation of Let's Talk Platform and integration of engagement tools and routes through Coventry Connects Programme.</li> <li>• Work with emerging Integrated Care Strategy to support the mandated requirement to engage better with communities and ensure alignment between council and NHS work in this area.</li> <li>• Joint Strategic Needs Assessment (JSNA) is due to be updated in 22/23 and 23/24. Our previous JSNA included engagement data and we are currently reviewing the success of this approach and how we can link insight coming from across the council and partners to populate JSNA going forward.</li> </ul>	Consultant - Public Health (Insight)	2022-2024
<b>14</b>	Refresh of the One Coventry Plan	<p>We are now in a period of extensive workforce and public engagement. The findings from this engagement will be used to further inform the development of the One Coventry Plan.</p> <p>The updated draft Plan will then be presented for political approval. This is expected to take place by the end of 2022/23.</p>	Chief Executive	March 2023
<b>15</b>	Update of the Local Code of Governance	The Local Code of Governance will be updated during 2022-23 to provide a more comprehensive description of the Council's governance arrangements and strengthen arrangements for the annual review of effectiveness.	Director of Law and Governance	March 2023

<b>16</b>	Mandatory training for Waste Services employees returning to work	Employees in Waste Services who have taken industrial action will receive full mandatory training prior to their return to work to ensure that their knowledge is up to date. This will include training on the Employee Code of Conduct and other areas relevant to the principles of good governance.	Director of Streetscene and Regulatory Services	October 2022
<b>17</b>	Employees Code of Conduct	To raise awareness and promote the Employees Code of Conduct.	Director of Law and Governance / Director of HR	March 2023
<b>18</b>	Sustainability and Climate Change Strategy	To finalise the Council's draft Sustainability and Climate Change Strategy (a green future for Coventry.)	Director of Business, Investment and Culture / Head of Climate Change and Sustainability	Report to Cabinet December 2022 Out to public consultation January to March 2023  Final approval from Cabinet 2023
<b>19</b>	Whistleblowing procedure	To standardise and improve the process for raising concerns under the Council's Whistle Blowing Policy.	Director of Law and Governance / Chief Internal Auditor	March 2023

5.3 We are satisfied that these steps will address the need for improvements that were identified in our review, and we will monitor their implementation and operation, as part of our next annual review.

**Cllr George Duggins**  
Leader of Coventry City Council

**Martin Reeves**  
Chief Executive of Coventry City Council