

Norwich City Council Annual Governance Statement 2024-25

Introduction by the Leader and Chief Executive

Good governance is important and at the heart of what we do. It is the responsibility of all at Norwich City Council – whether councillors or officers, or those making decisions or scrutinising them, to ensure they are doing the right things in the right ways.

Our Annual Governance Statement is an opportunity for us to reflect on how we operate, the practices we have put in place and how we have worked to strengthen our governance systems. The Annual Governance Statement focuses upon four fundamental areas:

- 1) How we work to comply with good practice
- 2) How we have strengthened our governance systems over the past year
- 3) How we obtain assurance to know our systems are operating effectively
- 4) Those areas we have identified that require further development.

In this report, we identify some of the key developments which have occurred over the past year and up to the date when the statement of accounts is signed. This includes the creation of a new corporate plan, developed in consultation with our partners and the people we serve to inform our priorities for the future.

The statement is prepared drawing upon a range of evidence, including the work of the Council's external and internal auditors; assurance statements prepared by our services; decisions, strategies and plans produced by the Council in the past year, other inspections or reports relevant to the Council during the year and looking ahead for emerging developments impacting on the sector.

It is recognised that there are areas that we can develop, which is key to being an organisation that is focused upon improvement, but nonetheless we believe that when combined with the Council's broader code of corporate governance, this statement demonstrates that the governance arrangements for Norwich City Council are fit for purpose and working effectively.

Each year, across the country there are examples where failings in governance have contributed to Councils failing to provide services to those they serve in the way they should. We hope that you find this a useful position statement to understand the governance framework that the Council has in place to ensure that we are working to serve the people of Norwich well.

Signed:

MIKE STONARD

Mike Stonard
Leader of the Council
Date: 19th March 2026

LOUISE RAWSTHORNE

Louise Rawsthorne
Chief Executive
Date: 19th March 2026

Background and Oversight of the Governance Framework

We understand that all at Norwich City Council are responsible for good governance.

The Chartered Institute for Public Finance and Accountancy (CIPFA) provides guidance to Councils on good governance, particularly through their publication of the Delivering Good Governance in Local Government Framework. The Council has developed a local Code of Corporate Governance which is aligned to this framework, the council's evaluation of how it meets the principles set out in the code (a copy of the Council's code can be found [here](#)). This establishes the overall arrangements the Council has in place to ensure good governance.

The council and its members are responsible for ensuring that there is good sound governance in place which incorporates standards of internal control. The Governance is underpinned by 7 principles as set out in the CIPFA/SOLACE publication "Delivering Good governance in local government Framework 2016". The principles are: -

A – behaving with integrity and in accordance with our core values;

B – being open and ensuring effective engagement takes place;

C – working together to achieve our intended outcomes;

D – setting goals for economic, social, and environmental benefits and achieving them;

E – growing our capacity – including our leadership and the people who work with us;

F – managing risks and performance through robust internal control and strong financial management; and

G – implementing good practice in transparency, reporting and audit – delivering effective accountability.

Governance Assurance Map

The meetings of all Councillors and Cabinet are the most significant decision-making bodies in the authority. As such, it is important that they uphold, and are seen to uphold good governance principles. Ways in which this is demonstrated include:

- Council approving the budget, which has been subject to public consultation and is accompanied by a statement from the Council's Chief Finance Officer confirming the robustness of the proposed budget estimates and the adequacy of reserves;
- Council receiving reports from the Scrutiny and Audit Committees on how they have performed during the year to fulfil the responsibilities that Council places on them;
- Council adopting changes to improve the Constitution following recommendations from the Constitution Working Party
- Cabinet reviewing quarterly assurance reports which identify how the Council is performing against its financial and non-financial targets;
- Cabinet receiving updates on significant projects and programmes such as Towns Fund and the Housing Compliance programme;

- Shareholder panels overseeing company performance.
- Agreeing forward plans for all committees and making these publicly available.
- All committee reports including independent comments from the Chief Finance Officer and the Monitoring Officer on the financial and legal implications of the decisions being taken.

This Annual Governance Statement fundamentally provides an opportunity to evaluate the effectiveness of corporate governance arrangements over the past year. It has been drawn together through:

- Reviewing decisions and actions taken by the Council in the past year
- Reviewing the outcomes of audits and other inspections and incorporation of their opinions
- Feedback and review of services by the Council’s officers, whether via risk management, budget management, performance management, service reviews or audit recommendations.
- Review by the Council’s Executive Leadership Team.

A summary of Key Governance Sources

Source	What it covered in 2024–25	Overall view
Internal Audit	Risk-based Audit plan; Audit Reports and annual opinion.	Annual Opinion: Reasonable; No Limited: Lion Homes; Several Substantial Assurance Audits.
External Audit	2023/24 approved (Feb 2025); 2024/25 underway to Feb 2026	Return to annual audit cycle following national backlog; work to statutory backstop timetable
Cabinet	Quarterly integrated reports; including Performance, Budget Monitoring and Corporate Risks	Performance “remained steady”. Implementation of new Risk Strategy.
Audit Committee	Regular IA/EA updates; risk reviews; learning from sector failures; independent member appointed	Strengthened Audit and independence.
Scrutiny Committee	Regular review of decisions made by Cabinet and the issuing of Scrutiny topics	Strengthened scrutiny and independence
Statutory Officers	Monthly governance review and escalation	Ongoing oversight and commissioning of remedial actions
Assurance Board	ELT/SLT. Monthly performance reports and metrics; Budget Monitoring, Corporate and Directorate Risks, Internal Audit plan and In-Progress recommendation tracking.	New risk strategy roll out/much improved closure of Audit recommendations.

1) How we work to comply with good practice

The CIPFA framework sets out the core principles that all Councils should seek to follow. The Council has a code of corporate governance which sets out in detail each of the core principles and how the Council complies with these. In this annual governance statement, we set out examples of the steps we have taken over the past year to develop our compliance with each principle, as follows,

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

The Council is responsible for approving the budget, developing key policies and ensuring that constitutional decisions are adhered to. The Council elects one third of its members three years out of four.

The Council's constitution continues to be reviewed and updated. The Financial Regulations have been revised and approved by Full Council in February 2025. The new regulations reflect best practice, drawing upon the example of other local authorities and the development of practice and procedure in recent years reflective of lessons learnt from those local authorities that have encountered governance failings and financial management challenges. The chief executive officer alongside the work of audit, scrutiny and the standards committee support and ensure that high standards are maintained and promoted amongst members.

Several policies and codes of practice have been reviewed and updated during 2024-25, including but not limited to the following,

- Anti-Money Laundering Policy
- Whistleblowing Policy
- Anti-Fraud & Corruption Policy
- Code of Corporate Governance

Success: Updated Financial Regulations, Policies and the Code of Corporate Governance reflecting best practice,

Weakness: Outdated Regulations/Policies that don't reflect best practice .

Corrective action: Implement version control and review anniversaries; Identify specific responsible officers. Include review in Audit Committee workplan.

B) Ensuring openness and comprehensive stakeholder engagement

One way this has been taken forward is through our community conversations workstream, which continues to progress as a partnership project alongside The Shoebox CIC, one of our VCSE partners. This sees six community connectors employed by The Shoebox, working alongside the council's three conversation officers and our wider community enabling team. Through conversation and building community connection in three of the more deprived parts of the city, they seek to understand what is important to residents and support the growth of community assets in direct response to local need.

The council currently consults widely on projects, policies and strategies ranging from play area redevelopments to budget consultations to EDI policies. It uses [Get Talking Norwich](#), its engagement and consultation platform, as its primary means of engagement and

where resources allow, it undertakes to do face-to-face consultation events and engagement. The council is continuing to improve its consultation and is currently undertaking a piece of work to develop organisation wide principles of consultation. These will be focused on open, honest, and accessible consultations giving clarity over which decisions stakeholders can influence and a pathway for how these voices can affect change.

The council recognises that while consultation is effectual, it is part of a broader engagement framework. Its community conversations programme has seen it work in three of the more deprived areas of the city since 2022. In these areas, officers have open conversations and can feedback what is important to residents, what the assets are in neighbourhoods and what issues residents face. Its community conversations insights hub collates these trends and both internal services and external partners can see them and request further data. This information can be used to formulate projects, services and policies in the pre-consultation stage ensuring that services are well targeted to the communities they serve.

Specific examples of stakeholder engagement include the following:

Livestock Market - A consultation ran from 18 July 2024 to 26 August 2024, resulting in 354 responses. This was part of an extensive consultation and engagement strategy to raise awareness about the livestock market and our plans to seek legal permission to be able to relocate it outside of the city's boundaries.

Future of City Hall - A survey ran from 6 February 2025 to 2 March 2025, receiving 1,673 responses to inform the development of the strategic vision.

Budget 2025-26 – a citywide conversation - A survey ran from 12 December 2024 to 12 January 2025 in relation to key questions about the future budget for Norwich City Council, receiving 2,176 responses which was a significant increase in relation to the previous year.

Success: Extensive consultations (Budget 2025–26; City Hall vision; Livestock Market) and development of organisation wide consultation principles.

Weakness: Feedback not always integrated systematically into early-stage governance (options appraisal and gateway decisions).

Corrective action: Embed consultation principles in project governance.

C) Defining outcomes in terms of sustainable economic, social, and environmental benefits

As an outcome-focussed community-led plan, 'We are Norwich' entails a different way of working for the council, with a strategic focus on delivering the outcomes the council and Norwich communities want to achieve. Work has been undertaken to develop outcome based measures in some areas, meaning that we are moving towards a hybrid performance approach with some Outcome based indicators; full adoption of an outcome based approach would not be deliverable within the time available before Local Government Reorganisation changes are made, but the work we have done will act as a useful test of the model for any future organisation.

Going forwards, the council will use the feedback and intelligence from its extensive corporate plan engagement programme to develop a robust business planning process and to completely review its corporate performance framework, ensuring its priorities, plans and measures of success reflect what the city wants from its council.

Using the iterative approach to consultation mentioned above, it will engage all areas of the council, and stakeholders across the local community, to define the outputs needed to deliver the plan's outcomes, and it will seek to reshape the organisation aligning resources and priorities through its business plan, so enabling it to be in the best possible shape to deliver for Norwich.

Success: Launch of We Are Norwich (2024–2029) and work to align corporate performance and business planning to outcomes.

Weakness: Nutrient Neutrality continues to constrain development and income; reliance on external credits supply.

Corrective action: Participation in Norfolk Environmental Credits Ltd joint venture; ongoing monitoring of credits pipeline and financial implications.

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

In 2024-2025, information across corporate performance, finance and risk elements was presented to Cabinet as three quarterly reports, and an annual report for 2024-2025.

The new priorities in 'We are Norwich – A community-led plan 2024-2029' that was approved by Cabinet in February 2024 are as follows:

- An open and modern council
- A prosperous Norwich
- A fairer Norwich
- A climate responsive Norwich
- A future-proof Norwich

Reporting for 2024-25 sets out progress for year one of the 'We Are Norwich – A community-led' and includes achievements, some of which relate to the 'We are Norwich Business Plan'.

Corporate Performance is reported to Cabinet quarterly. The Quarter 4 2024-25 performance was reported to Cabinet in July and a copy of the report can be found here. Appendix A to the report provides a full summary of all KPIs, including their definitions and the explanation of the RAG rating methodology.

Overall performance for 2024-2025 remained steady. There were 22 KPIs that were reported quarterly, and six KPIs that were reported annually. A breakdown of the 28 indicators is shown below:

KPIs against targets		Totals for 2023-2024		Totals for 2024-2025	
Green	Performance is on or above target	14	58%	14	58%
Amber	Early warning that performance is not on target and action may be required.	5	21%	6	25%
Red	Performance has reached a level where we will intervene and agree what action is required to bring it back on target.	5	21%	4	17%
Total		24		24	
	Data is being monitored	4		3	
	Data is not currently recorded	1		1	

Further work is planned in 2025-26 to map budgets onto the intended outcomes to ensure and support financial planning and investment in line with priorities.

Success: Quarterly integrated performance/finance/risk reports to Cabinet; improved budget monitoring.

Weakness: Council's risk appetite was not embedded previously.

Corrective action: Roll out risk appetite training, templates, and reporting in 2025–26 to standardise decision making.

E) Developing the entity's capacity, including the capability of its leadership and the people within it

There has been a concerted recruitment process to secure capacity and capability at the Executive Leadership Team and the Senior Leadership Team levels, which has been successful in providing both energy and experience to support the delivery of the council's objectives. During 2024-25 there has been a focus on staff development and training across the organisation, alongside ensuring regular supervision meetings and annual performance discussions underpin the delivery of services on a day to day basis.

Success: ERP implementation (including payroll in house) with Substantial/Reasonable assurance; successful recruitment to key roles reducing interim reliance.

Weakness: Interim/agency use had been high, requiring stronger value for money oversight via the Vacancy Management Panel.

Corrective action: Vacancy Management Panel and workforce plans to sustain capability and reduce temporary staffing cost.

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

The council has continued to produce quarterly assurance reports, to provide senior management and cabinet with oversight of the financial and non-financial performance of the organisation.

Risk Management has continued to be managed in a structured manner, with quarterly reviews of both departmental and the corporate risk registers. Further development of the

organisations understanding and management of risk, including understanding its appetite for risk, will be implemented in 2025.

In June 2025 Audit Committee received a report setting out details of a review undertaken by GGI of the councils risk management strategy and policy. The revised strategy and policy is robust and adds value to the council's existing practices. In particular, it proposes the council adopts a risk appetite statement which reflects the level of risk that an organisation is prepared to accept, after balancing the potential opportunities and threats a situation presents. It takes into account the potential benefits of innovation and the threats that change inevitably brings and consequently helps to support effective decision making.

The proposed risk appetite statement sets out for each of the five main types of risk facing public sector organisations;

- Quality of service;
- Financial;
- Regulatory;
- Workforce;
- Reputational / relationship risks,

Budget monitoring is reported monthly to directorate management teams and the assurance board. Quarterly budget monitoring is reported to cabinet including a provisional outturn report following the financial year-end.

The provisional outturn was a £0.769m underspend on the General Fund revenue Account and a windfall surplus of £8.300m arising from a change in national guidance around the use of retained capital receipts on the Housing Revenue Account (HRA).

Additionally, the capital provisional outturn was a £7.348m underspend against the General Fund and £5.921m underspend against the HRA programmes. A copy of the provisional outturn report to Cabinet can be found here [2024-2025 Provisional Outturn](#)

Treasury Management Committee receives quarterly reports detailing treasury activity for each quarter as well as the annual Treasury Management Strategy. Treasury Management reporting is also presented to Cabinet and Council.

The Council's annual budget and Medium Term Financial Strategy (MTFS) are prepared annually. For 2025/26 the council was able to set a balanced budget without the need to drawdown from reserves. As part of the monthly monitoring and budget preparation process the council was able to identify and correct incorrect data used in the modelling of car park income.

During 2024-25 the council implemented a new corporate debt strategy. The council's vision is to have a best-in-class debt recovery team and processes to ensure the council maximises income, collecting debt promptly and effectively while ensuring fair and equitable treatment of our customers.

Developing a high-level debt recovery strategy for Norwich City Council across all service areas involves balancing effective recovery practices with fairness, transparency, and support for vulnerable residents. The strategy is underpinned by the council's new

Corporate Debt Policy and Vulnerability Framework. Both these documents outline the key objectives and guiding principles to ensure consistent and effective debt management across all council services. The strategy will be in place for a period of 3 years and reviewed annually.

Internal Audit undertook further work to develop an assurance map review of Norwich City Services Ltd's (NCSL) governance arrangements, utilising a three lines of assurance model developed by the Institute of Internal Auditors. This followed up on work undertaken by officers from the council and NCSL to develop and enhance the governance arrangements for the company. The outcome was reported to and discussed by the Audit Committee in September 2024 and noted.

In 2024, in accordance with good practice, Norwich City Council in its role as sole shareholder initiated a review of the Lion Home's business plan. The CIPFA Local Authority Owned Companies: A Good Practice Guide states,

"It is good practice for the local authority to review its companies on a regular basis. Over time circumstances change, strategic direction may alter and there will be different financial imperatives. Assurance around the approach being taken to the company portfolio should serve to ensure that risks are managed effectively and that public funding is used efficiently." [page 69]

The review was scoped to reflect the following,

"The objective of the review is to assess the level of financial risk the Council is exposed to through LH especially given the current economic climate and pressure on local government budgets; to assess alignment of NCC's corporate objectives with the purpose of the company; and to consider opportunities for the company to diversify to minimise risk.

The review was concluded in the final quarter of 2024 – 2025, however by that time further changes in circumstances had arisen including the confirmation of the local government reorganisation timetable and some relevant economic circumstances. As a consequence, further advice was commissioned to support the decision making about the future of the company, which was finally concluded by a Cabinet decision in July 2025 to complete a Members Voluntary Liquidation.

The decision was a reflection of the due consideration of all relevant information established by the external review and the additional expert advice received by the Shareholder Panel, the company Board of Directors and the Cabinet, reflective of the spectrum of options available and their implications for both the company and Norwich City Council.

Information across the 'We are Norwich – A community-led plan 2024-2029' including corporate performance, finance and risk elements were presented to Cabinet as three quarterly reports, and an annual report for 2024-2025.

Audit Committee receive regular cyber security updates. During 2024-25 the council maintained its Public Services Network (PSN) Compliance and Payment Card Industry Data Security Standard (PCIDSS) compliance.

In October 2024, the Ministry of Housing, Communities and Local Government (MHCLG) Local Digital team launched the voluntary Cyber Assessment Framework (CAF) for local government to set a clear cyber security standard for the sector.

The CAF for local government has been adapted from the National Cyber Security Centre's CAF to meet the sector's specific needs. The Government Security website was launched in October 2024 and is designed to bring together government security policies, standards and guidance into one place to become the go to website for government security professionals. By introducing the CAF for local government, the aim is it will be the 'go to' resource for local government cyber security information. The Council is signed up to CAF and has been participating in the CAF programme since its launch in October 2024, and has already completed the Get CAF Ready programme.

In addition, the Council has been accepted onto Local Digital's CAF Support programme, for help with implementing priority actions.

During 2024-25 the council purchased the Anglia Square site. This is a significant purchase using grant funding from Homes England. The council has worked with Homes England to complete extensive due diligence in order to access the grant funding, and additional grant funding, to demolish the site. The partnership working with Homes England enabled the council to mitigate the risks associated with developing the Anglia Square site, which had otherwise been unable to find a solution that was commercially viable. Further funding was subsequently awarded by Homes England that has supported the progression of the regeneration, linked to the development of an investment partnership to manage the demolition of the site in preparation for future redevelopment.

Houses in multiple occupation (HMO) - the private sector housing service has continued to implement an improvement plan following on from a peer review in an earlier year, this includes a project designed to bring all relevant data together in a single digital system, which will aid the development of service delivery and efficiency. Additionally, interim expert senior leadership support has been engaged to help drive further improvements in this service.

An internal audit of the business processes relating to the undertaking of DBS checks during 2024-2025 resulted in a no assurance finding. This matter was considered and discussed at a meeting of the Audit Committee, with remedial actions being undertaken to rectify the circumstances. This is part of a wider action plan arising from a review of Human Resources designed to raise standards and practice across the service and the organisation.

The council collects 22 tenant satisfaction measures each year with the latest data from year ending March 2025. Details of the measures and our performance are published on our website and also reported annually to Cabinet (in September each year as part of a wider report of the council's compliance against the Housing Ombudsman Code of Practice). The annual satisfaction measures are reported here: [Tenant Satisfaction Measures \(TSM\) | Norwich City Council](#) and include an illustration of performance against the previous year. Performance is tracked quarterly by staff and the Cabinet Member for Housing and benchmarked against other councils using Housemark.

The Halls is a Grade 1 Listed, Scheduled Ancient Monument. In 2020, The Halls secured £3.6 million of Town Deal Capital funding to enable a series of improvements to access,

audio visual and lighting, and to food and drink capacity. Alongside this funding, the council has committed further capital for urgent structural repairs and maintenance.

The council explored a number of operating models to identify how The Halls could realise higher income and become sustainable. It was recognised that a third party/ external operator could bring industry expertise into running the Halls. In particular, an operator could promote The Halls commercially, bring sector experience in sourcing and programming events and artists, and knowledge of front of house and bar procedures.

A tender for an operator for The Halls was undertaken in 2024 however following an internal review, it was decided not to proceed with this procurement as procedural inconsistencies were identified in the invitation to tender and the evaluation criteria.

In February 2025, a second tender process was initiated. However, upon receiving notification that one of the tenderers intended to challenge the outcome, the procurement was subsequently abandoned in September 2025. The Council has now decided to maintain the operation of the Halls as an in-house function. A lessons learnt review of both procurement processes is currently underway.

Success: Revised Risk Strategy & Policy (Audit Committee approval June 2025); improved tracking and closure of audit recommendations.

Weakness: The Halls procurement governance.

Corrective action: Halls procurement lessons learned review.

G) Implementing good practice in transparency, reporting and audit to deliver effective accountability.

Our new community-led corporate plan 2024-2029 'We are Norwich' launched in April this year, and we are now developing a new business planning process and performance framework that will enable the council to realise the plan and monitor its progress.

The new Corporate Performance Framework specifies a range of performance measures, baselines, and targets, allowing the council to evaluate and monitor how well it is working towards delivery of the successes (outcomes) set out in the plan.

Through this process and framework, the council identifies and mobilises the appropriate infrastructure and resources to effectively become an evidence-based decision-making organisation that consistently monitors and evaluates its activities (outputs) and impacts (outcomes). It allows the council to realise opportunities to change culture and behaviours and incorporate the new guiding principles.

As part of the continued drive for best practice good governance the council will undertake a review of its AGS in 2025-26 to include the following:

- Develop a key risk/summary table for risks and actions.
- Strengthen year-on-year risk continuity tracking.
- Develop governance lessons from BAU and projects.

Success: Return to an annual external audit cycle and Audit/Scrutiny Committee's work programme.

Weakness: Narrative in prior AGS drafts insufficient.

Corrective action: This AGS includes explicit evaluations and prioritised issues; future reporting will continue to emphasise candid governance judgements.

1) How we have strengthened our governance systems over the past year

Tracking of Outstanding Audit Recommendations

The process of monitoring the implementation of audit recommendations has continued to be improved during 2024-25. This has produced significant improvement in outcomes and supported enhanced engagement and reporting upon delivery all the way from service delivery through to reporting progress to Members.

Enhancement of digital capacity through an Enterprise Resource Planning (ERP) system and Asset Management System.

In February 2024 the council implemented the Unit4 ERP system, which brought together Human Resources and Finance information in a joined-up manner within a single system database, to support better decision making and internal control going forwards, whether in terms of day-to-day management and administration of staffing issues such as staff transferring between positions or the oversight of pay awards, through to strategic planning of resources to support the delivery of the We Are Norwich plan and the associated financial planning.

During 2024-25 Internal Audit conducted three audits of the Unit4 ERP system. Two audits were in respect of the systems controls surrounding key financial processes across accounts payable, accounts receivable, income and accountancy services. The audits received substantial and reasonable assurance opinions on the controls. The third audit was in relation to the overall controls for the ERP system itself and received a substantial assurance audit opinion. The internal audit work also complimented the additional audit work undertaken by the council's external auditors on the ERP system as part of the 2023-24 audit of the statement of accounts.

Phase Two of the Unit4 ERP implementation was to utilise the payroll module and bring the council's payroll service back in house. This programme of work was completed in December 2024 with the first payroll run made for staff and Councillors on 23rd December.

Phase Three will see further exploration of opportunities to deliver additional efficiencies and joined up working, whether via automation of business processes or for example, by incorporating additional elements of procurement management within the ERP core services.

During 2024-25 as part of the improvements to internal governance arrangements, the council set up an Assurance Board including the Executive Leadership team and the Senior Leadership team. Assurance Board meets on a monthly basis and receives budget monitoring and corporate performance reporting as standing agenda items in addition to ad-hoc reporting items.

Election

By-elections - The Council elects one third of its Members three years out of four. In May 2024 the local elections took place alongside the Police and Crime Commissioner elections in Norwich, with a General Election also taking place in July 2024.

In May 2025 three city council and one county by-elections took place following resignations from councillors in the Bowthorpe ward, Sewell ward, Mancroft ward and Mancroft division. The scheduled county council elections were deferred by government order due to Norfolk being part of the priority programme for devolution and local government reorganisation.

An increased level of postal votes is being seen, and together with the implementation of voter ID this has increased the workload of the election team considerably.

The council's returning officer has placed adequate resources to ensure the successful, safe, effective, and efficient delivery of elections with clear leadership and personnel in place.

Statutory changes to the Procurement Act

The Procurement Act 2023, which came into force from February 2025, has significantly changed the way local authorities procure goods and services. The Act has placed tighter legislative controls and prescribed level of required transparency across the whole procurement process including: -

- The codification of the National Procurement Policy Statement (NPPS) which allows the government to set wider policy objectives to which it expects public procurement to contribute.
- Mandatory publishing of contract details including the performance of the contract through a set of Key Performance Indicators (KPIs) for larger contracts.

The council, through its procurement team, will deliver bespoke training courses alongside a clear and consistent framework for delivery.

In parallel with the implementation of the Procurement Act 2023, the Contract Procedure Rules were fully revised and updated, receiving approval from Full Council in February 2025. This went hand in hand with a full revision of the council's financial regulations also approved by Full Council in February 2025.

Risk Management

Risk Management has continued to be managed in a structured manner, with quarterly reviews of both departmental and the corporate risk registers. Further development of the organisations understanding and management of risk, including understanding its appetite for risk, will be implemented in 2025.

2) How we obtain assurance to know our systems are operating effectively

Internal Audit

Internal audits are undertaken according to an annual risk-based plan throughout the year by an independent internal audit service, Eastern Internal Audit Services (EIAS), a consortium hosted by South Norfolk Council which provides an internal audit service to Councils in Norwich and Norfolk and provides our Head of Internal Audit role. The Head of Internal Audit reports on progress and issues arising to the Audit Committee. In addition to which the Head of Internal Audit also provides an annual report, containing their annual opinion on the adequacy and effectiveness of governance, risk management and internal control at the Council, which reflects upon the year completed and highlights any issues

or concerns arising from the audit activities over the previous year. The Internal Audit Opinion for 2024/25 was Reasonable Assurance in relation to the framework of risk management, governance of the Council and internal control. However, there was Limited Assurance in relation to the governance of Lion Homes. A copy of the full internal Audit Opinion report can be found on the Council's website in the Audit Committee Agenda item 6 at its meeting on 21st October 2025 [here](#).

In 2024/25 the Head of Internal Audit has reported one no assurance report relating to HR DBS checks and one limited report, relating to Democratic Services (Member Expenses). Four Audits relating to Unit4 (ERP) Controls, Non-Housing Commercial Property, Housing Benefits and Council Tax Reduction and Key Controls were all given the highest possible assurance level of 'Substantial'.

The Head of Internal Audit has supported the Council in its response to the Lion Homes company governance Limited Assurance opinion. The support is across four key areas as follows:

- Company Viability
- Whistleblowing
- Council and Company Oversight
- Lion Homes Statement of Accounts

On the 20th January 2026 Audit Committee received a confidential briefing on these matters to provide assurance that the Governance issues identified would be addressed as part of a lessons learned report.

During 2024/25 the council made significant improvements to the tracking and implementation of internal audit recommendations. The Executive Leadership Team and Senior Leadership Team receive monthly reporting on progress which has resulted in over 180 recommendations being closed.

In addition, the annual report and opinion is actively used to improve the performance and governance of services moving forward.

Senior leaders have had greater involvement in the preparation of the 2025/26 internal audit plan, which has been aligned to items in the corporate risk register and the council's corporate priorities.

External Audit

The Council's external auditors are responsible for reviewing the Council's statement of accounts and providing a value for money opinion on the Council and the Council's Housing Benefit Subsidy Claim. The external auditors operate to an agreed work programme that is reviewed by the Council's Audit Committee.

The external auditors have concluded their outstanding work on the 2021/22 and 2022/23 accounts. The statement of accounts for 2021/22 and 2022/23 were approved on 13th December 2024 in-line with the Government regulations to address the audit backlog.

The 2023/24 statement of accounts were approved on 28th February 2025 in-line with the Government 'back-stop' date set out in regulations to address the audit backlog.

The 2024/25 audit including value for money is underway and will report their opinion in February 2026 in-line with the Government 'backstop' date.

The changes to the auditing process and the inclusion of 'backstop' dates will see a return to the practice of annual audits and opinions. This had been on hold in recent years because of a national market failure that has been the subject of intensive discussions and planning by the Government in conjunction with professional and sector stakeholders including the Local Government Association (LGA) and Financial Reporting Council (FRC) and the Chartered Institute of Public Finance & Accountancy (CIPFA) and National Audit Office (NAO) amongst others.

The External Auditor has shared their draft 2024-25 Audit Results Report (ARR). The ARR includes two Value for Money risks of significant weaknesses and the findings and recommendation have been included in the AGS for completeness as follows:

1) Finding: Arrangements over the solely owned subsidiary company – Lion Homes Limited.

Recommendation: The Council should update its constitution to make provision for effective governance and management of any companies in which it has an interest, to provide comprehensive oversight of governance guidelines for all subsidiaries and explicitly reference where these policies can be found.

Council Response: On the 20th January 2026 Audit Committee received a confidential briefing on these matters to provide assurance that the Governance issues identified would be addressed as part of a lessons learned report.

2) Finding: Timely financial reporting

Recommendation: To meet its objectives and the requirements of the Audit and Accounts Regulations the Council needs to:

- continue to re-assess roles, responsibilities and resource requirements for financial reporting; and
- take action to ensure that sufficient and appropriate audit evidence is available in relation to transactions in the financial statements.

Council Response: The Council has worked closely with EY throughout the 2024-25 audit. Where improvements have been identified with closedown processes, the Finance Team will continue to work with the auditor as required.

Audit Committee

The Audit Committee is tasked by the Council to scrutinise the Council's arrangements for governance and audit matters. Examples of the work undertaken by the Committee during the year to support delivery of its role include:

- Annual Report of the Audit Committee – this allows the committee to review and report upon its work during the previous year, linked to best practice approaches identified by the Chartered Institute of Public Finance & Accountancy (CIPFA).

- Learning lessons from failings in other authorities – a report outlining how the Council learns from the experiences of others, and particularly what can be learnt to avoid the failings of other Councils.
- Regular review of risk registers.
- Regular review of internal audit activity
- Review of Cyber Assurance.
- The appointment of an independent member of the committee with experience and expertise in matters relating to the Audit Committee's terms of reference. Work is also progressing with the recruitment of an additional independent member for the audit committee.

Advisory work

Phase Two of the Unit4 ERP implementation was to utilise the payroll module and bring the council's payroll service back in house. As part of the 2024-25 Internal Audit Plan a specific piece of advisory work was commissioned from the council's Head of Internal Audit to:

- Facilitate improved governance, risk management and control in relation to the implementation of the new payroll system.
- Review the processes that were put in place and offer advice and guidance on the controls for the new system and in-house function.

Overall, the audit found that the new in-house payroll function had been successfully established from scratch, that the core processes had been embedded across the HR and Payroll departments and that the monthly payroll has been consistently processed without disruption or negative impact to the wider staff and employees at Norwich City Council.

Some minor improvement points were identified, and management implemented the improvements following completion of the final report. A further assurance audit of the payroll function is scheduled for Quarter 4 of the 2025/26 Internal Audit Plan.

Reporting to HMRC forms a critical component of our Payroll Service Governance Framework. Ensuring compliance with statutory tax obligations and promoting transparency in financial disclosures is a key requirement for the council. Through robust internal controls and proactive risk management, we maintain accurate and timely submissions, aligned with HMRC expectations and corporate accountability standards.

External Regulators

The council continues to ensure that its accreditation to collect electronic card payments in a secure way is maintained in accordance with the relevant standards. The Payment Card Industry Data Security Standard (PCI DSS) is an information security standard designed to reduce payment card fraud by increasing security controls. Public Services Network (PSN) is the standard to allow the council to share Government data (e.g. Department for Work and Pensions (DWP)). Compliance is overseen by the council's data controller and in March 2025 they reported that accreditation had been maintained with no significant data breaches in the previous (Q4 2025) quarter.

Statutory Officers

The Council's statutory officers have specific personal duties to raise concerns about activities within the Council or report failings in governance. This includes the Chief

Executive, the Monitoring Officer, and the Chief Finance Officer. This group meets monthly to consider and review any issues of concern relating to governance and will commission additional work, investigations, and remedial action wherever necessary or appropriate.

Operational & Strategic Boards

Officers have established several boards to support the delivery of operational and strategic outcomes during 2024-25, both in recognition of best practice and because of feedback from audit activities. These include the Capital Board, the Assets & Development Board, specific project boards and steering groups, each responsible for ensuring that risks, delivery, resources, and outcomes are managed, monitored, and controlled appropriately.

The work of partners and in partnership with others

Recognising the strategic importance of partnership working, a review of the Norwich 2040 City Vision partnership has commenced and is progressing at pace, in close consultation with key strategic partners and stakeholders.

A broader review of the council's strategic partnerships is also underway with a view to extending leadership of place to a wider cohort of senior managers and officers. The aims of the review include ensuring:

- Each partnership is identified as either strategic or operational.
- There is a business need for the council's involvement with clear links to its corporate priorities and the City Vision.
- The council's level of involvement and any responsibilities are clearly understood, including across decision making and commissioning.
- Each partnership has two identified owners, one being a member of SLT and another appropriate designated lead officer to ensure consistent representation.
- Partnership owners have a defined role and set of responsibilities.

As Levelling Up funded (LUF) projects progress through the delivery phase, monitoring is a key aspect to ensure MHCLG can effectively track progress, and that projects are being delivered in accordance with their agreed deliverables and outcomes. The Government has created a robust process of monitoring, whilst minimising the burden on local authorities. Norwich City Council is expected to submit quarterly monitoring returns covering Project Expenditure, Project Progress & Changes, and Risks. In addition to this, Norwich City Council is required to report every 6 months on their Outputs and Outcomes to MHCLG.

Peer Review

Following on from the LGA Peer Review in the previous year, progress was reviewed, and a report published in March 2024, which reflected progress against each of the recommendations within the original Peer Review. [Corporate Peer Challenge Progress Review Report March 2024](#).

3) Information Governance

This section of the AGS provides an outline of Norwich City Council's Information Governance (IG) compliance. IG is the framework within which the Council's accountability, standards, policies, and procedures are developed, implemented, and maintained to ensure that data information processed by, or on behalf of the Council, is done so lawfully, appropriately, and securely. This includes data protection and privacy, statutory information requests, and records management.

In line with our Information Risk Management Policy, this statement will be provided annually, and it is logical that a summary appears in the AGS.

To ensure executive oversight of data protection and wider information risk management the Council designates a Senior Information Risk Owner (SIRO). In May 2024, the Executive Leadership Team (ELT) designated a new SIRO, Emily Yule – the Executive Director of Resources.

The Council has in place policies that outline the roles, responsibilities and requirements of employees, councillors, and stakeholders when processing data and information. This includes our Data Protection Statement, Information Risk Policy, IT User Security Policy, Records Management Policy, and our Appropriate Policy Document.

These policies are supplemented by a suite of procedures and guidance providing further detail on processes and expectations. This includes our Information Security Incident Response Plan, Information Request procedures, Clear Desk Guidance, Confidential Waste Guidance, and Information Storage Guidance.

As set out in our Information Risk Policy, the Council requires all officers to undertake Information Governance training at least once every two years. The last full training review was completed in October 2023 and we will deliver an updated version of this online learning for all staff in October 2025.

As part of the Council's member development programme, newly elected members are invited to attend 'An Introduction to Information Governance' session delivered by the Data Protection Officer via Teams. These sessions are recorded, then the recording and the slide deck used are made available to members on e-councillor. The last session held was on 12 August 2024.

To bolster the e-learning, the Information Governance Team provide additional training sessions to service areas upon request. Additionally, sessions may be scheduled at the direction of the Data Protection Officer to mitigate against any emerging concerns or changes to high-risk data processing.

The Council has in place an Information Security Incident Plan for the internal reporting and management of potential personal data breaches. Internal breach reporting procedures are made known to all officers and elected members through training and the Council's Intranet.

Incidents Logged

The below figures include incidents arising from the Council's own processing of personal data, and any third-party incidents made by any joint-controller processing or processing undertaken on our behalf by data processors or sub-processors.

In the financial year 2024-25, 151 instances were referred to the Information Governance Team for investigation. Of these, 34 were identified as not an incident.

This figure is comparable to:

- 117 incidents referred in 2023-24; of which 6 were not an incident; and Not all personal data breaches need to be reported to the Information Commissioner's Office (ICO) as per the regulator's guidance, only those resulting in a 'high risk' to a data subject require a data controller to self-report.

In the financial year 2024-25, the Council has self-reported once to the ICO.

- IC-318925-W7F6. The Council believed that personal data in the form of an officer's notebook had been lost in a public place. Given the content, this was reported to the ICO, however, the notebook was later found. It had not been accessed by any unauthorised persons; therefore, this was not a breach.

Data Protection and Subject Access Request Performance

In the financial year 2024-25, the Council received 189 valid requests. Of these, 40 (21%) were received from Shelter seeking copies of a person's housing file.

All requests have been responded to; 181 (99.8%) received an on-time response. This exceeds the internal target of 95%.

ICO Complaints

One Freedom of Information (FOI)/Environmental Information Regulations (EIR) process has resulted in an ICO process being opened.

- IC-340134-L3R7. Relates to correspondence sent under Civica process 9877060; in which the requester sought an Internal Review under the Freedom of Information Act 2000(FOIA) following a response they received under a Councillor Enquiry. It was the view of the Council that this request should not be considered under the FOIA. The ICO recognised the processes for Councillor Enquiries but deemed that "from the Commissioner's perspective there are not relevant to the question of compliance with the FOIA." The Council also sought to apply an exemption for future publication. The ICO recommended the Council consider disclosing the withheld information to the complainant or otherwise reiterate our intention to exempt the information as for future publication. In response we released the data to the complainant, whilst confirming that the information remains in draft and is intended for future publication. The complainant confirmed that the information was satisfactory, after which the ICO confirmed that the case was closed with no further action necessary.

Individual Right Requests

In addition to the right of access, data subjects have data rights as set out in Articles 16-22 of the UK General Data Protection Regulation. In the financial year 2024-25 the Council received 14 requests, 2 for 'rectification', 10 for 'data erasure', 2 for 'restriction', all requests received an on-time response.

Freedom of Information & Environmental Information Regulations

Any person has the right to seek information from a public authority; requests relating to environmental matters are processed under the Environmental Information Regulations 2004 (EIR), most other requests are processed under the Freedom of Information Act 2000 (FOIA). Such legislation does not cover the disclosure of personal data, such requests instead fall under the UK GDPR please see the 'Data Protection Requests' section above.

The KPI for FOI/EIRs to be sent within 20 working-days has remained the same this year at 95%, having been increased from 90% in October 2024. This increase ensured that the Council's own target reflects the standards expected by the regulator and was supported by the CEO, SIOR and SLT.

In the financial year 2024-25, the Council received 868 valid requests. Of these, the Council provided an on-time response to 832 requests (95.9%). To date, 4 requests remain open/unanswered. Along with the four open requests, 32 other requests were responded to after the deadline.

Tribunal Decisions

The Council has had zero cases this year of FOI or EIR matters being heard by the First-Tier Tribunal.

Investigatory Powers

As a local authority with enforcement powers, the Council can consider seek to have authorised the use of covert surveillance or covert human intelligence sources in line with the Regulation of Investigatory Powers Act 2000 (RIPA).

In January 2025, the Council's Senior Leadership Team (SLT) approved minor revisions to the RIPA Policy, these included:

- updating the Council's Senior Responsible Officer (SRO) for RIPA to be Emily Yule - the Executive Director for Resources;
- updating the Council's RIPA Coordinator to be the position of Information Governance Manager (rather than a named officer).

In the financial year 2024-25, the Council has not considered any requests for the use of covert surveillance or covert human intelligence sources.

There were also zero non-RIPA requests in relation to test purchases.

Compliance

During 2025 the Council will undertake an internal audit to establish the condition of our compliance of the Local Government Transparency Code 2015. The outcome of this audit will be shared within the Annual Governance Statement for 2025-26.

4) Those areas we have identified that require further development.

The table below highlights four key areas requiring focused action in 2025–26.

Risk	2024–25 position	Direction	Commentary
Company Governance (NCSL / Lion Homes)	Limited Assurance for Lion Homes; MVL decision in 2025	→ (static)	Continue to monitor NCSL performance and assurance mapping. Support for LHL through MVL process/Lessons Learned report
Procurement Governance (The Halls)	Two procurements in 2024–25	→ (static)	Lesson Learned report underway
HR Compliance – DBS	No Assurance internal audit report in 2024–25	↗ (improving control)	Statutory safeguarding risk; corrective programme in progress. On target to be completed in 2025-26.
Risk Appetite	Not embedded during 2024–25	↗ (improving control)	Strategy approved June 2025; Roll out complete. 1st reporting Q3 2025-26

The following action plan sets out progress against all previously agreed actions from 2023 and earlier Annual Governance Statements and incorporates additional areas relating to the current year under review where further work is considered necessary to improve the governance of the council or address specific concerns.

2023 -2024 Action Plan Outstanding Matters – Updates

Issues & challenges identified	Lead Officer	Target implementation date	Update
(CORP number refers to Corporate risk register item)			
Updates on Issues from previous Annual Governance Statement Action Plan			
<p>Scheme of Delegation Undertake a review of the Council’s scheme of delegation to ensure there is clarity on levels and authorities in decision making</p>	Monitoring Officer	The results of the review will be subject of a report to Cabinet and Full Council during 2024.	<p>Completed.</p> <p>The Financial Regulations have been reviewed, revised and approved by Full Council. The Contract Procedures have also been updated in line with the changes arising from the Procurement Act 2023, which will have a material impact upon the regulations applicable to public sector procurement.</p>
<p>Corporate Performance Measures Following the adoption of the new Community-led Plan, undertake a review of the Council’s key performance measures to ensure these are aligned to the corporate plan</p>	Executive Leadership Team	December 2024	<p>Completed.</p> <p>The new community-led plan 2024-2029 entitled ‘We are Norwich’ launched in April this year; it replaces the previous corporate plan 2022-26. The council is now developing a new business planning process and performance framework that will enable it to realise the new plan and</p>

Issues & challenges identified	Lead Officer	Target implementation date	Update
			<p>monitor its progress.</p> <p>A new Corporate Performance Framework has been developed as part of this; it will specify a range of performance measures, baselines, and targets, allowing the council to evaluate and monitor how well it is working towards delivery of the outcomes set out in its new plan. This will be translated into an annual Corporate Business Plan.</p> <p>New target implementation date is February 2025, albeit some elements will be piloted ahead of this date.</p>

<p>Financial Procedure Review Accompanying the constitution, the Council has a set of detailed financial procedures outlining how transactions should be undertaken. This document has not been reviewed for some time.</p>	<p>Interim Chief Finance Officer</p>	<p>31 July 2023</p> <p>Revised target December 2024</p>	<p>Completed Following on from the review of the Financial Regulations, the review and update of the Financial Procedures is now complete.</p>
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<p>Commercial Debt Policy The Council's approach to collection of commercial debt has not been reviewed for some time. It is intended to undertake this review during the year.</p>	Interim Chief Finance Officer	2024	Completed
<p>Counter-fraud, whistleblowing, and money laundering policies. The suite of policies the Council uses to support its approach to reducing the risk and incidence of fraud in the organisation, including whistleblowing and money laundering, will be subject to review during the year</p>	Interim Chief Finance Officer	31 March 2024	Completed

2024-2025 New Action Plan

Issues & challenges identified (CORP number refers to Corporate risk register item)	Lead Officer	Target implementation date	Update
<p>Anti-fraud and corruption, whistleblowing, and anti-money laundering policies. The suite of policies the Council uses to support its approach to reducing the risk and incidence of fraud in the organisation, including whistleblowing and</p>	Interim Chief Finance Officer	30th June 2025	Completed

Issues & challenges identified	Lead Officer	Target implementation date	Update
(CORP number refers to Corporate risk register item)			
money laundering, will be subject to review during the year			
<p>Company Governance (CORP25). In April 2023, following a request for a cashflow advance and indication of a deterioration in financial and other performance measures, a review of NCSL, the Councils wholly owned company, was instigated.</p>	<p>CEO/ MD and Board of NCSL</p>	<p>Improvement Plan September 2023</p> <p>Business Plan December 2023</p>	<p>Completed. Additional board members were appointed with relevant skills (Financial/ housing repairs)</p> <p>An independent review was undertaken of the company and its performance. A governance review was undertaken by Local Partnerships and reported to the Shareholder Panel</p> <p>A permanent MD was appointed along with an enhanced management team (Finance Director/ Operations Managers)</p> <p>An improvement plan was received as requested and considered by the company Board and Shareholder Panel.</p> <p>The Business Plan was evaluated by Shareholder Panel, comments made and is due to be considered by Scrutiny and Cabinet in July 2024.</p>

Issues & challenges identified (CORP number refers to Corporate risk register item)	Lead Officer	Target implementation date	Update
			<p>Financial performance for 2024/25 has improved as have other performance metrics.</p> <p>Audit Committee received the internal audit assurance map in September 2024.</p>
<p>Company Trading Environment (CORP34). With the current economic climate and the on-going potential challenges for Local Government the Council needs to establish the level of financial risk it is exposed to. The Council therefore concluded that it needed to review how effectively it is delivering housing developments via Lion Homes to ensure that it is adopting the optimum solution whilst minimising risks.</p>	CEO/ Major Projects Director	July 2024	<p>Completed</p> <p>The review was completed within 2024 – 2025 however changes in circumstances at the beginning of 2025 resulted in further review of the options, culminating in the Cabinet decision in July 2025 to implement a Members Voluntary Liquidation.</p>
<p>Regulatory Services (CORP17) The Council is a regulatory authority for Houses in Multiple Occupation and their licensing under the Housing Act 2004. During 2023/24 management became</p>	Executive Director Development and City Services	December 2024	<p>Complete</p> <p>Business processes continue to be reviewed to support more efficient and effective working, including the implementation of an information system</p>

Issues & challenges identified	Lead Officer	Target implementation date	Update
(CORP number refers to Corporate risk register item)			
aware of non-compliance in their HMO Licensing activities. These issues were immediately addressed.			that will digitise all records and bring them into a single location.

<p>Cyber Threats (CORP07) All democratic governments during election years should expect increased interference from hostile nation states.</p> <p>Artificial intelligence (AI) will almost certainly make cyber-attacks against the UK more impactful because threat actors will be able to analyse exfiltrated data faster and more effectively and use it to train AI models. AI will almost certainly increase the volume and heighten the impact of cyber-attacks over the next two years.</p> <p>AI lowers the barrier for novice cyber criminals, hackers-for-hire, and hacktivists to carry out effective access and information gathering operations. This enhanced access will likely contribute to the global ransomware threat over the next two years.</p>	<p>Head of Customers IT and Digital</p> <p>Infrastructure Security and Support Manager.</p> <p>Information Governance Manager</p>	<p>Ongoing due to the need to continually update measures taken and resilience.</p>	<p>In progress, further planned actions include the following,</p> <p>Move towards a position where we "assume compromise" of devices and architect solutions to make it as difficult as possible for threat actors to exfiltrate data and move laterally across network.</p> <p>Research expansion of Indicator of Compromise detection with distributed honeypots, ransomware canaries; host-based firewalls on devices to reduce opportunity for lateral movement; enhancing System Event Monitoring based on emerging threats.</p> <p>Make it difficult for threat actors to remain undetected, focussing on detection.</p> <p>Isolate vulnerable devices to reduce the impact of an incident. Assess the Cyber Assessment Framework (CAF) which provides guidance for government bodies responsible for vitally important services to enhance our services.</p>
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<p>Oversight of the cost of interim and agency staff (CORP31)</p> <p>The cost of temporary staffing arrangements has been identified as an area where more focussed oversight is required.</p> <p>The council has in place interims for valid reasons including the need for specialist support to projects and to cover key posts where recruitment has been unsuccessful; however, the cost of those temporary arrangements and their length of tenure indicates that the council may not be achieving value for money.</p>	<p>Chief Executive</p>	<p>December 2024</p>	<p>Completed</p> <p>The successful recruitment to several key posts is allowing interim staff to leave the organisation following a suitable handover period.</p> <p>Regular oversight at the most senior level in the organisation is also leading to further challenge on the need for temporary staff. Clear exit strategies are being developed to reduce the number and therefore the overall cost of those temporary arrangements over the course of the year.</p> <p>The issues leading to the need for temporary staffing are also being explored to understand the need for additional recruitment and retention measures.</p> <p>A vacancy management panel has been established and meets bi-weekly to review and challenge all requests to proceed with recruitment, regardless of whether that is undertaken on a temporary or permanent basis.</p>
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<p>Livestock Market The council is under an obligation to use its reasonable endeavours to secure an alternative site for the Livestock Market. Currently legislation requires this to be within the Norwich City boundary; however, the lack of suitable sites means that the council is seeking to amend the act through a private bill to allow it to be held outside the city's boundary. Failure to successfully achieve the change will expose the council to a range of financial and other risks in keeping the existing market maintained and needing to continue to seek alternative provisions in line with the agreement with the freeholder and according to the Act.</p>	<p>Director of Major Projects</p>	<p>July 2027</p>	<p>In progress</p> <p>Parliamentary assent has been received to change the 1988 Norwich Act and progress is being made to identify a suitable alternative site for the Livestock Market.</p>
<p>Nutrient Neutrality (NN) (CORP18) The council's ability to determine planning applications, which result in an increase in overnight accommodation, continues to be adversely impacted by NN. The Council has its own approved scheme and continues to evaluate whether it should join the Norfolk Environmental Credits</p>	<p>Executive Director Development and City Services</p>	<p>October 2024</p>	<p>Complete</p> <p>The Council has now joined the Norfolk Environmental Credits Limited joint venture partnership, but continues to monitor the issue and impact of nutrient neutrality.</p>

<p>Ltd (NEC) joint venture partnership. Stalled development presents several financial and reputational risks to the council.</p>			
<p>Anglia Square redevelopment Following the withdrawal of Weston Homes from delivery of the approved scheme the future of the site and in particular the council's desire to see wholesale redevelopment of that area is under threat. Failure to achieve redevelopment as envisaged has the potential to impact on other sites in the city and has wider issues for the council.</p>	<p>Director of Major Projects</p>	<p>March 2026</p>	<p>Complete The council purchased the site in 2024 using grant funding from Homes England.</p> <p>The council continues to work on the site with planned demolition works funded by Homes England due to commence in 2025.</p> <p>The council has established an investment partnership to redevelop the site.</p>
<p>Information Governance The Council plans to further strengthen our existing IG framework through the implementation of a 'Data and Information Strategy' and a 'Data Ethics Policy'.</p>	<p>Information Governance Manager</p> <p>SIRO – Executive Director Resources</p>	<p>March 2026</p>	<p>In progress The Data and Information Strategy document has been published.</p> <p>The Data Ethics Policy is currently being drafted for planned publication in the financial year 2025-26.</p>
<p>Construction issues with property in the City In late 2023 condition survey work picked up that a building in the City Centre which the Council had recently taken ownership of had issues with its construction which</p>	<p>Executive Director Development and City Services</p>	<p>April 2026</p>	<p>In progress Measures were undertaken in early 2024 to address immediate deficiencies and appropriate regulatory authorities are now content with the state of the building in the medium term.</p>

<p>resulted in it being contrary to building regulations.</p>			<p>Further work is ongoing on establishing and costing the full programme of works to permanently rectify all issues with the building.</p>
<p>Nutrient Neutrality (CORP18) Nutrient Neutrality has hugely impacted on planning applications and fee income</p>	<p>Executive Director of Resources</p>	<p>March 2026</p>	<p>In Progress Norfolk Environmental Credits (NEC) have a small and steady supply of credits.</p> <p>We have started to assign credits to Norwich developments.</p> <p>NEC are currently unable to meet demand for large scale development. However, they are looking at further sources of credits.</p>
<p>Devolution and Local Government Review In December 2024 the government announced its plans for devolution and local government reorganisation. In Norfolk, where there are county and city/district councils, the aim is to create single-tier unitary councils which will deliver all council services across an area.</p> <p>Work is underway across Norfolk to explore what a new model for local</p>	<p>CEO and ELT</p>	<p>September 2025</p>	<p>In Progress The City Council along with 5 other districts are working to submit a three Council option in September 2025.</p> <p>Workstreams have been set up across the council. Initial tasks have centered around data requests.</p>

government might look like.			
<p>Risk Management Strategy and Policy During 2024 and early 2025 work was undertaken to review and update the council's risk management strategy and policy, including the production of a risk appetite statement that will underpin and support decision making about the future management of risks.</p>	Interim Chief Finance Officer	January 2026	<p>In Progress The new risk strategy and policy was approved by audit committee in June 2025. <u>Risk strategy</u></p> <p>The strategy and policy will be presented to Cabinet for formal approval and adoption by the council.</p> <p>Further work will be undertaken to refresh the risk assessment templates and registers, alongside briefings for managers during 2025 – 2026++</p>
<p>HR Employee DBS checks (CORP09) To provide assurance that vulnerable adults and children at risk of harm or abuse if inappropriate staff are appointed to roles.</p> <p>Reputational damage and undermining of public confidence in the Authority caused by failure to meet statutory requirements in relation to DBS checks.</p>	Executive Director Resources	May 2025	<p>In Progress The in-progress internal audit recommendations are being followed up and progress tracked on the Audit recommendation Tracker.</p>