Appendix 3

	Governance Action Plan - Appendix 1						
	adline Issue		ogress To Date Owner				
Thi	This action plan addresses each and every one of the eleven recommendations in the PwC report on Sixfields.						
Pri	Priority 1 – Risk Management						
a.	Review of all policy and procedures including risk	 Review and refresh current risk policy and framework Ensuring effectiveness Apply learning from the Internal Audit Report Review and refresh all related policies and important policies Risk management training of key officer and member groups Review schedule for policies and procedures to be devised for 6 monthly/annual and bi annual reviews Refresh and cascade risk strategy and framework 	 Policy and procedures index completed Policies and procedures index published on the intranet Review of risk policy and framework underway with the assistance of specialist external support 	Borough Secretary Chief Finance Officer			
b.	Embedding of risk within the organisation through training Proper reporting of risk through the current governance process Review of current project risk processes	 Review and log all projects currently live and in the pipeline Carry out in-depth risk, review of high value/high impact projects Specialist risk management training to become mandatory for all Officers involved in projects. This to apply to current projects and future projects Specialist training, workshops arranged and delivered with external and internal resources and in consultation with the Council's internal auditors Risk reporting to be reviewed ensuring that there is an effective cascade of risk through governance arrangements Refreshed monitoring and tracking process i.e. project/service risks may also become a corporate risk 	 PwC by 25th November 2016 will have assessed the 'As Is' risk management position; undertaken a gap analysis and devising a risk management action plan Northampton Alive project summary with pipelines projects are reviewed monthly for the Northampton Alive programme board Re-provision of environmental services risk register reviewed by 25th November 2016 Improvement project summary and pipeline projects are reported monthly IT project summary with pipeline projects are reviewed bi-monthly by the IT Governance Board Audit of Northampton Alive project risk registers underway as the first stage of high value/high impact projects Specialist risk training in the process of being commissioned 	Borough Secretary Chief Finance Officer			

		•	Clarity on risk exception reporting process Corporate, service and project risks reviewed monthly Establish and embed risk management surgeries	•	Review of risk policy and framework		
Pri	iority 2 - Due Dilige	nce	(including Loans to Third Parties)				
a.	Review of current loans	•	Review existing loan agreements against lessons learnt identified by PwC	•	A summary of existing loans and key documentation has been compiled and is in one centralised place All non-committed loans held pending due diligence checks All non-committed loans to comply with checklist Mandatory requirement for legal and financial close down reports implemented	Boroug	inance Officer h Secretary
b.	Review of due diligence process and implementation of enhanced due diligence	•	Establish an extensive due diligence compliance checklist for 3 rd party loans Establish a due diligence and compliance Manual Review Treasury Management Strategy to ensure it is fit for purpose with regards to 3 rd party loans Ensure that all future 3 rd party loans are reviewed by an external advisor and that review considered in all decisions before loan is granted	•	3 rd party loans checklist has been developed and reviewed by the Council's banker Barclays Treasury Management Strategy was updated to reflect 3 rd party loans in Feb 2014 and has been refreshed annually.		inance Officer h Secretary
Pri	iority 3 - Project an	d P	rogramme Support				
a.	Transfer of programme and project capacity from LGSS to NBC	•	Transfer to be completed on 1st January 2017	•	Consultation underway Expedite transfer back through TUPE/secondment Reallocation of priorities to due diligence and compliance		h Secretary
b.	Review of Corporate Governance for Programme and Project	•	Develop and implement enhanced Corporate Project and Programme Management framework and arrangements. To include a Corporate Governance & Support Officer Programme Board; Northampton Alive	•	An enhanced Corporate and Programme management structure has been developed with expert external input Structure implemented with immediate effect	Boroug	h Secretary

	Governance	 Officer Programme Board and an Efficiency/MTFS Officer Programme Board Increase officer capacity in programme/project governance Mandatory gateway training for Officers involved in Programmes and Projects All relevant projects will go through a "gateway" process: Categorise and apply rigorous but proportionate methodologies and documentation Requirement for a Project Initiation Document (PID), minuted project /programme meetings and a full risk assessment Programmes/projects will be required to be maintained on central paper records, with clear documented minutes of meetings and professional advice received Each project/programme will require the completion of a declaration of interests form by each participant (member or officer or advisor) Mandatory training programme on the Council's constitution, including contract procedure rules and financial procedure rules for all managers in the authority 	 JD and Person Specification for the role of Governance and Risk Manager in the process of being prepared Input to be provided by PwC Increased project support capacity agreed and currently being provided by a temporary staff member Increased focus of Internal Audit activity on Programme and Project management, currently in the Regeneration area and this to continue for a minimum 3 years Temporary Recruitment of project staff completed and operational Transfer back of LGSS project staff currently underway 	
Pr		commendation Action Plan		
a.	Delivery of ISA260 Action Plan	Implementation Action Plan agreed by Audit Committee on 14 th November 2016	 Progress was reported to Audit Committee at its meeting on 14th November 2016 Further iterations prepared since 14th November 2016 and further action completed Audit Committee agreed to receive update reports at future meetings 	Finance Officer

Priority 5 – Internal Audit Recommendations						
a.	Review internal audit recommendations	 Review all internal audit recommendate since June 2013 Assess delivery of all internal audit recommendations since June 2013 when not already delivered. 	were notified to Audit Committee at its meeting on 14th November 2016	Chief Finance Officer		
b.	Improve reporting of internal audit recommendations	 Improve internal audit reporting to Aud Committee Report progress on delivery of internal recommendations to Audit Committee Implement PwC audit recommendation tracking software, TrAction Regular reporting / monitoring to and be management board/audit committee 	At Audit Committee on 14 th November 2016 reports were presented by both internal audit providers, PwC and LGSS demonstrating enhanced reporting Regular meetings between PwC, LGSS and Finance have been taking place to	Chief Finance Officer		
Pri	ority 6 - Effective D	ecisions – Cabinet Clearance Process				
a. b.	Call over process Outline of process	 Revise and cascade changes to the casover process Evaluation period and process for the parrangements Deliver training on standards requirements Deliver training on Equality Impact Assessments 	 Two stage Call Over Process implemented with Management Board oversight of standards and content of reports 	Chief Executive		
C.	Report writing guide	 Provide better Cabinet clearance reporguidance Requirement for "frontloading" of full information at the Cabinet clearance st 	developed and issuedMore comprehensive guide addressing			

			Focus on compliance	
d.	Cabinet clearance	 Review process for formal clearance Review and refresh clearance process Basic guidelines on Cabinet process circulated Clearance subject to compliance with final Council business case Reports to contain adequate and evidenced information to support decision needed Requirement for regularly reporting back to cabinet on significant projects Relevant decisions to have mandatary and financial business models produced by the Council 	 Cabinet report writing guide published and implemented to include issues raised in 6 d and e. Recommendations in the PwC report on Sixfields, implemented and enforced immediately by statutory officers 	Borough Secretary Chief Finance Officer
e.	Report compliance	 Monitoring of Cabinet decisions, implementation and compliance, including delegated decisions. To include regular reporting to the Leader and Audit Committee. 	•	
Pri	ority 7 - Governanc	е		
a.	Corporate Governance review	 Carry out fundamental review of all current NBC governance arrangements against the CIPFA/SOLACE 2016 standard Full gap analysis and action plan to address any identified weaknesses Update the local code with annual reporting against the Code to Audit Committee 	 Initial advice given by external expert Review to be undertaken as a defined project Scope, timelines and identification of resources for the review in the process of being prepared 	Borough Secretary Management Board
b.	CIPFA/Solace External Validation	 External validation support of progress against the standard 	Accreditation assurance options being actively considered	Chief Executive
Pri	ority 8 - Financial C			
a.	Improve Purchase Order Process	 Communicate importance of raising purchase orders with budget managers Enhance reporting of non-compliant 	Finance team have communicated with all managers the benefits to financial governance and management of purchase	Chief Finance Officer

		purchase orders to Management Board, Directorate Management Teams and Service Management Teams by improving dashboard Write to suppliers to inform them they must request an order number for any NBC work Review system controls and implement improvements	 order, including training on the process through monthly meeting with budget managers. Monthly reporting of non-compliant purchase order is now part of the financial dashboard reported at management teams throughout the Council. A letter to suppliers has been drafted. 	
b.	Review and improve reserves drawdown process	 Review the reserves drawdown process Improve compliance Improve reporting 	 Reserves drawdown form has been updated to include enhanced signed off All reserve drawdowns are reported to Management Board as part of monthly financial dashboard Quarterly Finance reports to Cabinet include a list of reserves drawdowns 	Chief Finance Officer
C.	Review and improve supplementary estimate process	Review the supplementary processImprove complianceImprove reporting	 Supplementary estimate process has been reviewed A new supplementary estimate form has been introduced 	Chief Finance Officer
d.	Review and improve virement process	Review virement processImprove complianceImprove reporting	Virement process is currently under review reviewed	Chief Finance Officer
e.	Improve management of capital programme	Establish a gateway process for progressing schemes through each stage of their capital programme lifecycle	 Gateway approach in process of development as part of budget planning work for 2017/18 	Chief Finance Officer
f.	Raise financial awareness	 Mandatory training covering all aspects of financial management Tailored training for specific staff depending upon requirements of role (budget management, business cases/plans, financial administration) Establish approach to validate/evidence learning 	Training material in process of being developed.	Chief Finance Officer
Pri	ority 9 - Miscellaned			
a.	Whistleblowing	Effective Whistleblowing arrangements	 The current Whistleblowing Policy has been reviewed and uploaded on the 	Borough Secretary

			 intranet. Consideration being given to provide external whistleblowing reporting Consideration being given to increase the profile of Whistleblowing 	
b.	Officer & Member hospitality	 Review policy and guidance Publish guidance 	 Review of guidance currently underway Compliance audit to be undertaken as part of the next internal Audit Plan Regular Reporting to Standards Committee Training on register currently being delivered to members Training planned for Council Officers Written guidance on registering interests being prepared for Officers and members 	Borough Secretary
C.	Cabinet process	 Review Cabinet clearance process Identify risks from lack of compliance Report writing Guide and compliance standards 	 Standards in place and adhered to Financial clearing process in place Timely reporting meeting legal requirement 	Chief Executive