AUDIT COMMITTEE 25 MARCH 2025

SUBJECT: CIPFA FINANCIAL MANAGEMENT CODE

DIRECTORATE: CHIEF EXECUTIVE AND TOWN CLERK

REPORT AUTHOR: JACLYN GIBSON, CHIEF FINANCE OFFICER

### 1. Purpose of Report

1.1 To report to the Audit Committee the Council's assessment for 2024/25 against the Standards contained within the CIFPA Financial Management Code and the associated actions arising to ensure compliance.

#### 2. Background

- 2.1 Local government finance in the UK has been governed by primary legislation, regulation and professional standards as supported by regulation. The general financial management of a local authority, however, was not previously supported by a professional code.
- 2.2 This situation changed when, in December 2019, the Chartered Institute of Public Finance and Accountancy (CIPFA) published its Financial Management code (FM Code) to provide guidance for good and sustainable financial management in local authorities. The FM Code was introduced as part of a package of measures in response to concerns around the financial resilience of Councils. These measures were driven by the exceptional financial circumstances faced by local authorities (even prior to the impact of Covid19 and the current economic factors), having revealed concerns about fundamental weaknesses in financial management. In particular there had been, and continue to be, a small number of high-profile failures across local government which threaten stakeholders confidence in the sector as a whole.
- 2.3 The FM Code is designed to support good practice in financial management and to assist local authorities in demonstrating their financial sustainability through a set of standards of financial management.
- 2.4 The standards have different practical applications according to the size and different circumstances of individual authorities and their use locally should reflect this. The principle of proportionality applies to the FM Code and reflects a non-prescriptive approach to how each standard is met.
- 2.5 The code complies with other legislation and associated CIPFA codes and is evidence of compliance with statutory and professional frameworks. Demonstrating compliance with the CIPFA FM Code is a collective responsibility of the Elected Members, Corporate Leadership Team and the Chief Finance Officer.

### 3. The Financial Management Code

- 3.1 The Code focuses on value for money, governance and financial management styles, financial resilience and financial sustainability. The Code identifies the risks to financial sustainability and introduces an overarching framework of assurance which builds on existing financial management good practice. The Code has been designed on a principles-based approach which will assist in determining whether, in applying standards of financial management, a local authority is financially sustainable. The six principles of good financial management are:
  - Organisational Leadership Demonstrating a clear strategic direction based on a vision in which financial management is embedded into organisational culture.
  - Accountability Based on medium term financial planning, driving the annual budget process, supported by effective risk management, quality supporting data and whole life costs.
  - Transparency At the core of financial management, using consistent, meaningful and understandable data, reported frequently, with evidence of periodic officer action and elected member decision making.
  - Professional Standards Promoted by the leadership team, with adherence evidenced.
  - Assurance Recognised as an effective tool, mainstreamed into financial management, including political scrutiny and the results of both external audit, internal audit and inspection.
  - Long-Term Sustainability At the heart of all local services' financial management processes, evidenced by the prudent use of public resources.
- 3.2 In turn the Code is structured around 7 areas of focus:
  - The Responsibilities of the Chief finance officer and Leadership Team
  - Governance and Financial Management Style
  - Long to Medium Term Financial Management
  - The Annual Budget
  - Stakeholder Engagement and Business Plans
  - Monitoring Financial Performance
  - External Financial Reporting

Each of these areas is supported by a set of guidance standards against which Councils should be assessed. CIPFA's expectation is that authorities will have to comply with all the financial management standards if they are to demonstrate compliance with the FM Code and to meet its statutory responsibility for sound financial administration and fiduciary duties to taxpayers, customers and lenders.

- 3.3 Although the FM Code does not have legislative backing, it applies to all local authorities, including police, fire, combined and other authorities. The Code recognises that some organisations have different structures and legislative frameworks. Where compliance with this code is not possible adherence to the principles is appropriate.
- 3.4 The Council's external auditors have regard to the FM Code in their value for money assessment. Furthermore, CIPFA guidance states that the Council's Annual Governance Statement should include the overall conclusion of the assessment of the organisation's compliance with the principles of the FM Code. Where there are outstanding matters or areas for improvement, these should be included in the action plan. The Council's Annual Governance Statement is prepared on this basis.
- 3.5 Each local authority must demonstrate that the requirements of the FM Code are being satisfied. However, the FM Code is not expected to be considered in isolation and accompanying tools will form part of the collective suite of evidence to demonstrate sound decision making and a holistic view is taken.
- 3.6 Demonstrating this compliance with the FM Code is a collective responsibility of Elected Members, the Chief Finance Officer and the Corporate Leadership Team. It is for all the senior management team to work with Elected Members in ensuring compliance with the FM Code and so demonstrate the standard of financial management to be expected of a local authority. In doing this the statutory role of the Section 151 Officer will not just be recognised but also supported to achieve the combination of leadership roles essential for good financial management.

#### 2023/24 Assessment

3.7 A self-assessment against the standards set out in FM Code was prepared in March 2024. This assessment sets out what is expected within each standard and records evidence of areas of compliance and documents any further actions required to meet and/or improve current processes in place. An update against the actions identified in March 2024 is provided below:

Action Required	Timescale	Progress
To update VFM Statement and incorporate with new Productivity Plan requirements.	Jul-24	COMPLETE – VFM Statement updated and reviewed by CLT in Mar- 25
To continue to support professional development	Ongoing	ONGOING - where required officers have achieved relevant CPD requirements of professional bodies.
To recruit to remaining Finance role to ensure fully resourced.	Apr-24	COMPLETE - new Principal Finance Business Partner now in post.

To revise Contract Procedure Rules	Dec-24	COMPLETE – new Contract Procedure Rules approved by Full Council in Mar-25
Review Finance Business Partnering Action Plan	Mar-25	IN PROGRESS – progress slower than planned due to capacity and recruitment challenges with Financial Services Team.
Consider options for an independent financial resilience assessment	Dec-25	NOT PROGRESSED – pending direction of potential local government re- organisation
Further development of engagement approach for budget/strategic plan consultation	Nov-24	IN PROGRESS – Vision 2030/budget engagement undertaken but further work to refresh Consultation and Communication Strategies to be undertaken

# 2024/25 Assessment

3.8 The 2024/25 assessment has now been updated for the actions completed and in progress as above, and in light of other developments during 2024/25. This has resulted in an updated self-assessment, as attached at Appendix A. The assessment includes a RAG rating against each of the standards against the following definitions:

Assessment	Description		
	Substantial compliance		
	Reasonable compliance/Some areas for improvement		
	Minimum compliance/significant areas for improvement		

In summary the 17 standards have been assessed as follows, with actions included as required:

Ref	Standard/Description	RAG	Action Required/By When
A	The leadership team is able to demonstrate that the services provided by the authority provide value for money.		
В	The authority complies with the CIPFA Statement on the Role of the Chief Finance Officer in Local Government.		To continue to support professional development – ongoing.

		To recruit to remaining Finance role to ensure fully resourced – Apr 25
С	The leadership Team demonstrates in its actions and behaviours responsibility for governance and internal control.	Review of Code of Corporate Governance against CIPFA/Solace Addendum for 2025/26 – Mar 26
D	The authority applies the CIPFA/SOLACE Delivering Good Governance in Local Government: Framework (2016).	Implementation of Action Plan to ensure compliance with new Global Internal Audit Standards (GIAS) for 2025/26 – Jul 26  Assessment of Internal Audit Manager against CIPFA Code and GIAS – Mar 26
E	The financial management style of the authority supports financial sustainability.	Further implementation of business partnering approach – as capacity allows
F	The authority has carried out a credible and transparent financial resilience assessment.	Consider options for independent financial resilience assessment – Mar 26
G	The authority understands its prospects for financial sustainability in the longer term and has reported this clearly to members.	None
Н	The authority complies with the CIPFA Prudential Code for Capital Finance in Local Authorities.	None
I	The authority has a rolling multi-year medium-term financial plan consistent with sustainable service plans.	None
J	The authority complies with its statutory obligations in respect of the budget setting process.	None
К	The budget report includes a statement by the chief finance officer on the robustness of the estimates and a statement on the adequacy of the proposed financial reserves.	None

L	The authority has engaged where appropriate with key stakeholders in developing its long-term financial strategy, medium term financial plan and annual budget.	To revise the Communication and Consultation Strategies – Mar 26
M	The authority uses an appropriate documented option appraisal methodology to demonstrate the value for money of its decisions.	None
N	The leadership team takes action using reports enabling it to identify and correct emerging risks to its budget strategy and financial.	None
0	The leadership team monitors the elements of its balance sheet that pose a significant risk to its financial sustainability.	None
P	The chief finance officer has personal and statutory responsibility for ensuring that the statement of accounts produced by the local authority complies with the reporting requirements of the Code of Practice on Local Authority Accounting in the United Kingdom.	None
Q	The presentation of the final outturn figures and variations from budget allows the leadership team to make strategic financial decisions.	None

This demonstrates an overall substantial level of compliance (76%) with the underlying principles of the FM Code, this an increase from the 2023/24 assessment which was a 65% compliance rate. There are areas for improvement in 4 (24%) of the standards, the actions for which are set out in the table above. It is not expected that there will be full compliance across all standards, continual improvement, the routine revision of policies and procedures and assessment against best practice is likely to result in there being actions to be implemented following each annual assessment. The Council can be assured that it has achieved this level of substantial and reasonable assurance and that there are no areas of minimum compliance and no significant areas for improvement.

3.9 As set out above these areas for improvement will be included in the Annual Governance Statement and progress monitored through the Audit Committee.

## 4. Strategic Priorities

4.1 Compliance with the FM Code will contribute to sound decision making. This will support the Medium Term Financial Strategy, enabling Members to monitor progress against Vision 2030 in a timely manner to ensure resources are allocated in line with the strategic priorities of the Council.

#### 5. Organisational Impacts

#### 5.1 Finance

The Chief Financial Officer (Section 151 Officer) has the Statutory Responsibility (supported by the Corporate Leadership Team and Elected Members) for ensuring compliance with the FM Code.

### 5.2 Legal Implications including Procurement Rules

CIPFA's intention is that the FM Code will have the same scope as the Prudential Code for Capital Finance in Local Authorities, so although the FM Code does not have legislative backing, it applies to all local authorities. In addition to its alignment with the Prudential Code the FM Code also has links to the Treasury Management in the Public Sector Code of Practice and Cross Sectoral Guidance Note and the annual Code of Practice on Local Authority Accounting in the United Kingdom. In this way the FM Code support authorities by re-iterating in one place the key elements of these statutory requirements.

## 5.3 Equality, Diversity and Human Rights

The Public Sector Equality Duty means that the Council must consider all individuals when carrying out their day-to-day work, in shaping policy, delivering services and in relation to their own employees.

It requires that public bodies have due regard to the need to:

- Eliminate discrimination
- Advance equality of opportunity
- Foster good relations between different people when carrying out their activities

Due to the nature of the report, no specific Equality Impact Analysis is required.

## 6. Risk Implications

### 6.1 (i) Options Explored

There are no alternative options available.

### 6.2 (ii) Key risks associated with the preferred approach

If compliance with the CIPFA Financial Management Code is not demonstrated, the Council's financial sustainability could be brought into question which in turn could result in a negative impact on its reputation with stakeholders.

#### 7. Recommendation

**Lead Officer:** 

### 7.1 Audit Committee are asked to:

- a) Review the progress of the actions arising from the 2023/24 self-assessment
- b) Review and comment upon the 2024/25 self-assessment, as attached at Appendix A, and the resulting actions required.

Jaclyn Gibson, Chief Finance Officer jaclyn.gibson@lincoln.gov.uk

Is this a key decision?

Do the exempt information categories apply?

No Does Rule 15 of the Scrutiny Procedure Rules (call-in and urgency) apply?

How many appendices does the report contain?

List of Background Papers:

No No No Procedure Rules (call-in and urgency) apply?

Ref	Description	Pages of Code	Detail	CFO assessment and actions required	RAG
Res A	The leadership team is able to demonstrate that the services provided by the authority provide value for money	ance Offic 17/18	The authority has a clear and consistent understanding of what value for money means to it and its leadership team.  There are suitable mechanisms in place to promote value for money at a corporate level and at the level of	The Council has clear accountability and arrangements to deliver value for money. The Council has a Value for Money Statement that was last refreshed in March 2025. This sets out why VFM is important and what the Council's approach to ensure delivery of VFM is, this includes:	
			individual services.  The authority is able to demonstrate the action that is has taken to promote value for money and what it has achieved.	<ul> <li>VFM is a key part of any business case submitted and all decision-making groups take decisions with a focus on VFM.</li> <li>Performance Scrutiny Committee reviews service and financial performance (against cost, performance, and satisfaction) on a quarterly basis and uses its remit to periodically review key (off target) services.</li> <li>Policy Scrutiny ensures that any changes to policy with financial aspects delivers VFM as part of the proposal – e.g. restructures, retention of discretionary services etc.</li> <li>The Annual Governance Statement focuses on all aspects of governance, including processes around VFM in service provision.</li> <li>Lincoln Project Management Model – this compulsory method of managing projects within the council contains key</li> </ul>	

	templates for financial assessments and risk management  The MTFS delivers a robust financial plan through a rigorous budget setting process. One of the key objectives of the MTFS is to provide cost effective services which demonstrate value for money.  The performance framework includes, regular monitoring of Vision 2025 (and will do for Vision 2030) projects to ensure that the key aims of the council are progressed to budget, timescales, and outcomes.  The performance framework includes regular service monitoring of detailed performance trends covering:  Performance measures – e.g. throughput, time taken and outstanding work  Volumetric measures to add contextual background data  Customer satisfaction - feedback through satisfaction monitoring and complaints and compliments monitoring  Quarterly Dashboard summarising all aspects of performance within the VFM chain  Unit cost benchmarking of service areas based on budget and actuals is undertaken and will be used to inform development of future strands of the savings and transformation
	programmes.

- Communication of VFM to customers and staff through a variety of channels.
- Delivering excellent customer service which is a key component of VFM.

In addition to the Value for Money Statement, the Council has also published it's Productivity Plan which sets out:

- How services have been designed, delivered or transformed to make better use of resources
- How the Council plans to use technology and make better use of data to improve decision making, service design and use of resources
- Plans to reduce waste, be efficient and spend effectively.
- Assurances on governance, financial approach and performance.

The Council has a strong record of identifying and delivering efficiency savings with clarity about any impacts on services. Annual savings of c£10.5m have been delivered over the past decade and a half.

External Audit provide a VFM assessment, the Auditors Annual Report 2023/24 stated, "Our opinion is that the Council have appropriate arrangements place. We identified no significant weaknesses in respect of arrangements to secure economy, efficiency, and effectiveness in the use of resources".

The last Peer Challenge review conducted by LGA, including a review of financial processes. The initial review led to a glowing report, with

				minimal suggested improvements. Monitoring of all aspects, to ensure standards are maintained is undertaken. An annual assurance discussion between the LGA and three statutory officers took place in March 2025. Consideration of a future Peer Challenge is currently pending in light of potential local government reorganisation.  ACTION REQUIRED – NONE	
В	The authority complies with the CIPFA Statement on the Role of the Chief Finance Officer in Local Government.	18/19	In summary this Statement requires that the CFO:  Is a key member of the leadership team, helping it to develop and implement strategy and to resource and deliver the organisation's strategic objectives sustainably and in the public interest.  Must be actively involved in, and able to bring influence to bear on, all material business decisions  Must lead the promotion and delivery by the whole organisation of good financial management so that public money is safeguarded at all times and used appropriately, economically, efficiently and effectively.  Must lead and direct a finance function that is	The Chief Finance Officer post is a key member of the Corporate Leadership Team, reporting to the Chief Executive.  She is actively involved in, and has influence over, all material business decisions.  The CFO personally leads on the MTFS and ensures that all risks are considered and detailed as part of the MTFS, in conjunction with the other members of the senior leadership team (Executive Members and Corporate Leadership Team).  She is ACCA qualified with significant experience of local government finance. Continuing professional development is undertaken as required by her accounting body.  There are contracts in place for specialist financial advice (technical accounting, treasury management, financial management & planning and taxation)	

			resourced to be fit for purpose.  • Must be professionally qualified and suitably experienced.	The CFO through the Finance team provides the financial reporting and monitoring to the Corporate Management Team and Members, with the Treasury Management reporting going through Audit Committee and Council as prescribed in the CIPFA Prudential Code and the CIPFA Treasury Management Code.  The Finance Team is suitably resourced with appropriately qualified staff, and is fit for purpose. This team includes 2 qualified accountants, 1 part qualified accountant and 9 qualified accounting technicians and 2 part qualified accounting technicians. All officers undertake continuing professional development as required by their accounting bodies. There is currently 1 vacant qualified accountant role, which is actively being recruited to, with interim support in place.  ACTION REQUIRED  1. TO CONTINUE TO SUPPORT PROFESSIONAL DEVELOPMENT AND THE ACHIEVEMENT OF PROFESSIONAL ACCOUNTACY QUALIFICATIONS – ONGOING (CFO/FINANCIAL SERVICES MANAGER)  2. TO RECRUIT TO REMAINING FINANCE ROLES TO ENSURE TEAM IS FULLY RESOURCED – APR 25 (FINANCIAL SERVICES MANAGER)	
Gov	ernance and Financial Mar The leadership Team	nagement 21	The leadership team espouses the	The leadership exhibit the Nolan principles of	
	demonstrates in its actions and behaviours	<b>~</b> 1	Nolan principles.	public life.	

responsibility for governance and internal control.

The authority has a clear framework for governance and internal control.

The leadership team has established effective arrangements for assurance, internal audit and internal accountability.

The leadership team espouses high standards of governance and internal control.

The leadership team nurtures a culture of effective governance and robust internal control across the authority.

The Chief Executive, Monitoring Officer and CFO have reviewed the CIPFA/SOLACE/LLG Code of Practice on Good Governance for Statutory Officers and exhibit the seven principles of the Golden Triangle.

There are Financial Procedure Rules which are subject to a full review on a 3-yearly basis, these have been reviewed during the last year. with consideration by Audit Committee and then approval by Full Council in January 2023. There are also separate Contract Procedure Rules, also subject to Audit Committee and Full Council approval. Both documents are clear about the respective authorisation limits for authorisation of contracts and the subsequent commitment/incurrence of expenditure. Following implementation of the Procurement Act 2023, in February 2025, Contract Procedure Rules have been fundamentally updated and were approved by Full Council in March 2025.

The Council's Audit Committee has two independent members as well as Councillor representation. The committee considers all aspects of audit activity and the regulatory framework including corporate governance, as part of it's Terms of Reference. The Committee's Terms of Reference and Work Programme reflects CIPFA's Position Statement on Audit Committees and it's additional guidance for local authority audit committees.

All Committees have separate Terms of Reference.

There is a Code of Conduct for Members which is overseen by the Ethics and Engagement Committee and was last updated in January 2021, with regular reviews undertaken as part of the Constitution as a whole, and was updated internally in 2024. Training for Members on the Code was provided in 2023, and new members are trained on the code every year on induction. In addition, there is a Code of Conduct for Officers.

The authority has in place a clear framework for governance and internal controls through it's Code of Corporate Governance. The Council's Code of Corporate Governance was comprehensively reviewed in July 2021 and is refreshed annually. The last review took place in February 2025. CIPFA and Solace have recently consulted on an Addendum to the guidance for application for 2025/26 Annual Governance Statements. A comprehensive review of the Code will be undertaken during 2025/26.

There are effective arrangements for assurance, internal audit and internal accountability. Any areas of concern raised through those arrangements are managed robustly and transparently.

The leadership team espouses high standards of governance and internal control and communicates these clearly to all staff.

There is a culture of effective governance and robust internal control. Internal audit is used to

				bring focus to any areas of concern and to ensure that standards remain high.  ACTION REQUIRED: TO REVIEW CODE OF CORPORATE GOVERNANCE AGAINST ADENDUM TO CIPFA/SOLACE GUIDANCE – MARCH 2026 (BUSINESS MANAGER – POLICY AND SERVICE IMPROVEMENT)	
D	The authority applies the CIPFA/SOLACE Delivering Good Governance in Local Government: Framework (2016).	22	The authority of aware of the provisions of the CIPFA Delivering Good Governance Framework.  The authority has sought to apply the principles, behaviour and actions set out in the Framework to its own governance arrangements.  The authority has in place a suitable code of governance.	There is a strong internal audit function which produces reporting and recommendations across all functions. This is subject to external review every 5 years, with the latest review undertaken in 2022. This concluded that the service fully conformed to the requirements of the Public Sector Internal Audit Standards and the CIPFA Local Government Application Note.  The authority has in place a clear framework for governance and internal controls through it's Code of Corporate Governance. The Council's Code of Corporate Governance was comprehensively reviewed in July 2021 and is refreshed annually. The last review took place in February 2025. CIPFA and Solace have recently consulted on an Addendum to the guidance for application for 2025/26 Annual Governance Statements. A comprehensive review of the Code will be undertaken during 2025/26.  The Framework recommends that a local code of governance is developed and reported against annually. The Council's Annual Governance Statement details how the Council has complied with its own Code of Corporate Governance over the preceding year and	

meets the statutory requirements with areas of concern reported and monitored. Internal Audit have previously assessed their compliance against the Public Sector Internal Audit Standards on a bi-annual basis. This was last undertaken and reported to the Audit Committee December 2023. In light of the introduction of the new Global Internal Audit Standards, and Application Note in the UK Public Sector, from April 2025, Internal Audit have undertaken an assessment and identified a range of actions to be implemented to ensure compliance by July 2026 (as the point the HIA Annual Report is completed). The Internal Audit Manager has undertaken an assessment against the CIPFA document "The Role of the Head of Internal Audit 2019". There is a good level of compliance overall and where improvements are required actions have been included within the QAIP which is monitored by the Audit Committee. From 2025/26 with the introduction of the new GIAS and CIPFA Code of Practice on the Governance of Internal Audit in Local Government, a revised assessment will be required, with any actions being included in the QAIP. **ACTION REQUIRED:** IMPLEMENTATION OF ACTION PLAN TO **ENSURE COMPLIANCE WITH NEW GIAS -JULY 2026 (INTERNAL AUDIT MANAGER)** 

				ASSESSMENT OF HIA AGAINST NEW CIPFA CODE AND GIAS - MARCH 2026 (INTERNAL AUDIT MANAGER)
E	The financial management style of the authority supports financial sustainability	22/23	Strong financial management is assessed against a hierarchy of  1. delivering accountability, 2. supporting performance 3. enabling transformation.  Need to perform well at each level before moving to the next. This is broadly linked to economy, efficiency and effectiveness.	Achieving stage 1 of the hierarchy. The Council has an effective framework of financial accountability through:  • Member delegations which include financial responsibilities; • Officer delegations which include financial responsibilities; • Financial Procedure Rules which set out financial responsibilities for Directors, Assistant Directors Budget Managers and all employees of the Council and all Members.  Achieving stage 2 of the hierarchy. The Council has an effective performance management framework in place including, performance measures, volumetric measures, customer satisfaction, monitoring of key strategic projects, quarterly performance reporting, quarterly dashboard across all aspects of performance within the VFM chain.  The Finance Team have implemented a Finance Business Partnering approach, equivalent to stage 2. Although, work towards stage 3 of the hierarchy has been progressed, with many examples of financial management supporting transformation specifically in relation to key strategic projects, further work is required towards fully acting as enablers.  While there is an intention to further progress this work, staff capacity and recruitment

				challenges have meant this has not yet been possible.  ACTION REQUIRED: FURTHER IMPLEMENTATION OF BUSINESS PARTNERING APPROACH – ONGOING AS CAPACITY ALLOWS (FINANCIAL SERVICES MANAGER)	
	g to Medium Term Financi				
F	The authority has carried out a credible and transparent financial resilience assessment	26	The authority has undertaken a financial resilience assessment.  That assessment tested the resilience of the authority's financial plans to a broad range of alternative scenarios.  The authority has taken appropriate action to address any risks identified as part of the assessment	The Council has reviewed the CIPFA Financial Resilience index and MHCLG financial metrics (previously produced by OFLOG) and assessed whether it is comfortable with the areas that the index/metrics flags as more concerning. Reference is made to this in the MTFS, with application of the local context, and clear explanations for the Council's position in comparison to others is provided.  The External Auditor's Annual Audit Report 2023/24 stated "based on the procedures performed, we have not identified any significant weaknesses in relation to the Council's arrangements to maintain financial sustainability".  There has not been an independent assessment of the local authority's financial resilience other than the CIPFA index, MHCLG metrics and the annual external audit. In light of the potential for local government reorganisation the timing of undertaking a financial resilience assessment is being assessed (as this will be a key element of any business plan for the formation of new councils) and will be considered further post	

				submission of LGR proposals in November 2025.  The level of prudent minimum balances in the MTFS is based on a financial risk assessment of the key variables in the budget and the probability of variations (the MTFS also contains a full risk register with details of mitigations in place and to be undertaken). This is then further expanded over the period of the MTFS to produce various scenarios as to assess the impact of key assumptions in the budget. This is documented in the MTFS. In addition, the pre-cursor report to the main MTFS sets out more detail on the key variables and the impact of changes in the underlying budget assumptions.  This financial planning and risk assessment, over a 5-year period, allows the Council to identify potential funding gaps and ensure action is taken in advance, e.g. through it's TFS Programme.  ACTION REQUIRED – CONSIDER OPTIONS FOR AN INDEPENDENT FINANCIAL RESILIENCE ASSESSMENT – MARCH 2026 (CFO)	
G	The authority understands its prospects for financial sustainability in the longer term and has reported this clearly to members.	26	The authority has a sufficiently robust understanding of the risks to its financial sustainability.  The authority has a strategic plan and long-term financial strategy that addresses adequately those risks.	The Council produces a 5-year MTFS and a 30-year Housing Business Plan incorporating revenue and capital models using a range of assumptions for economic factors and service-related factors. The was fundamentally updated in November 2023 and consisted of a number of Member engagement exercises.	

The authority reports effectively to the leadership team and to members its prospects for long-term financial sustainability, the associated risks and the impact of these for shortand medium-term decision making.

The current high levels of uncertainty around future funding for local government and the current economic factors make producing a meaningful long term plan very challenging. This risk to financial planning is clearly set out in the MTFS and has been communicated to the Leadership Team and Members, including full Member workshops and specific briefings to individual political groups as required.

The MTFS also includes a risk assessment of the key financial risks the Council faces over the 5-year period. The risks modelled include the level of inflation, the council tax base, the business rates base, pay inflation, interest rates, national funding reforms, new statutory requirements, as well as service income, housing rents/voids, and a range of capital implications e.g. cost overruns.

The pre-cursor report to the main MTFS sets out in more detail changes in key variables since the development of the previous Strategy and the impact of these on the budget and likely budget gap. Further, more, detailed reports are provided to the Corporate Management Team as part of the budget development.

The Council has a robust approach to risk management with Strategic and Directorate Risk Registers, with clear lines of escalation, supported by specific project and programme risk registers.

The Council's new Vision 2030 contains a range of projects and programmes, not all of

				which are financially resourced. The MTFS is very clear on this and specifically in relation to the larger scale capital investments emphasises the need to seek external partner contributions or grant support. In addition, the MTFS includes a specific earmarked reserve to support the roll out of some of the projects.  ACTION REQUIRED - NONE	
H	The authority complies with the CIPFA Prudential Code for Capital Finance in Local Authorities.	26/27	The authority is aware of its obligations under the Prudential Code.  The authority has prepared a suitable capital strategy.  The authority has a set of prudential indicators in line with the Prudential Code.  The authority has suitable mechanisms for monitoring its performance against the prudential indicators that it has set.	The Council is aware of its obligations under the Prudential Code and has assessed itself as compliant with those obligations. Like the Financial Management Code, there are many areas of compliance where the guidance allows for the Council to decide what an appropriate fit is; and there is not a single way to be compliant.  The latest Prudential Code was published in December 2021 and introduced revised reporting requirements, including changes to the capital strategy, prudential indicators and investment reporting. The Council's Treasury Management Strategy and Capital Strategy are prepared in accordance with the revised reporting requirements and have been benchmarked to ensure they demonstrate best practice, with further changes incorporated for the 2024/25 financial year.  Previous commercial investments were undertaken in line with the Council's Commercial Property Investment Strategy and funded through prudential borrowing. In line with updated requirements the Council has no plans for further debt for yield schemes.	

The Council's Minimum Revenue Payment (MRP) Policy is in accordance with MHCLG requirements to set aside MRP on all borrowing.

The Council has a 5- year Capital Strategy (The Code suggests up to 20 but the authority has judged that 5 years is a reasonable period over which to have meaningful plans) and within that prudential indicators are set in line with the Code. The Capital Strategy sets out the high-level plans, with individual decisions made about investments or capital schemes through separate reports to members.

The Council also has a 30-year Housing Business Plan which includes a 30-year capital investment programme. This plan was fundamentally reviewed during 2023/24 and published in November 2023.

Individual financial modelling of capital schemes covers a longer-term frame, typically over the asset life and is factored into investment decisions.

There are effective mechanisms in place to monitor performance against the code, with quarterly reporting to the Performance Scrutiny Committee and the Executive on the performance against the prudential indicators which the Council has set for itself through the strategy.

**ACTION REQUIRED - NONE** 

The MTFS is the best assessmer Directorate of what their demand be.  Although the plan is set on a rolling basis, there is the opportunity and	The authority has in place an agreed medium term financial plan.  The medium-term financial plan consistent with and integrated into relevant service plans and its capital strategy.  The medium-term financial plan has been prepared on the basis of a robust assessment of the relevant drivers of cost and demand.  The medium-term financial plan has been tested for resilience against realistic potential variations in key drivers of cost and demand.  The authority has in place an agreed 5-year MTFS. This plan is consistent with the capital strategy and refreshed annually to reflect relevant strategic priorities, commitments, underlying assumptions and emergent issues and to agree future savings targets. This ensures that the Council always has a 5-year balanced budget, allowing for sufficient time to time to plan and deliver any required savings.  The development of service budgets is Directorate led. Cost drivers and demand are considered within each directorate and used to form the basis of pressures identified and mitigations/savings put forward. The detail of the analysis of cost drivers is not contained specifically in the MTFS but forms part of the internal budget setting process, though reference is made to particularly large changes in the narrative and in the financial planning report seen as the pre-cursor to the main MTFS.	
	The MTFS is the best assessment of each Directorate of what their demand pressures will be.  Although the plan is set on a rolling 5-year basis, there is the opportunity annually to	
there have been material change assumptions, as demonstrated in The Council undertakes an annual process at an Assistant Director I	revisit plans where the latest data indicates that there have been material changes to assumptions, as demonstrated in recent years.  The Council undertakes an annual service plan process at an Assistant Director level. These service plans are driven by to both the	

The	Annual Budget			and the MTFS in terms of the delivery of key projects but also into the MTFS in relation to specific savings programme required to be delivered.  ACTION REQUIRED - NONE	
J	Annual Budget The authority complies	29	The authority is aware of its statutory	The Council understands its obligation in	
J	with its statutory obligations in respect of the budget setting process	29	obligations in respect of the budget-setting process.  The authority has set a balanced budget for the current year.  The authority is likely to be able to set a balanced budget for the forthcoming year.  The authority is aware of the circumstances under which it should issue a Section 114 notice and how it would go about doing so.	respect of the budget-setting process and has set a balanced budget for the current year, and the four following years. The Council's MTFS process is designed to deliver a full five- year balanced budget each year.  The authority is aware of the circumstances under which it should issue a section 114 notice and how it would go about doing so. In addition, the authority is aware of the Exceptional Financial Support (EFS) and Capitalisation Directives that are available through MHCLG.  ACTION REQUIRED - NONE	
К	The budget report includes a statement by the chief finance officer on the robustness of the estimates and a statement on the adequacy of the proposed financial reserves.	29/30	The authority's most recent budget report includes a statement by the CFO on the robustness of the estimates and a statement of the adequacy of the proposed financial reserves.  The report accurately identifies and considers the most significant estimates used to prepare the budget, the potential for these	The most recent budget report includes a statement by the Chief Finance Officer on the robustness of the estimates and a statement of the adequacy of the proposed financial reserves, under Section 25 of the Local Government Act.  The Chief Finance Officer has taken into consideration the recent briefing from CIPFA on Approaching the Section 25 Statement.	

			estimates to be incorrect and the impact should this be the case.  The authority has sufficient reserves to ensure its financial sustainability for the foreseeable future.  The report sets out the current level of the authority's reserves, whether these are sufficient to ensure the authority's ongoing financial sustainability and the action that the authority is taking to address any shortfall.	The budget report sets out the detail of estimates in terms of key estimates e.g. business rates, council tax grants, housing rents, specific grans, fees and charges etc. It does not set out specific service assumption details and the impact of variations in those.  The Council has assessed that it currently has sufficient reserves, which ensures its sustainability for the foreseeable future. This position has though been impacted by current economic factors, demand pressures and level of Government funding, requiring the use of reserves (earmarked and general balances) during the MTFS period while a savings programme is delivered. These reserves include general balances as well as specific earmarked reserves. The authority has a prudent approach to what is needed to manage risks.  The report sets out the current level of the authority's reserves, the sufficiency of them and the plans for the use of reserves in the future and a requirement to ensure reserves are replenished over the period of the MTFS through achievement of the savings programme.  ACTION REQUIRED - NONE	
Stak	eholder Engagement and				
L	The authority has engaged where	31	The authority knows who its key stakeholders are.	The Council is aware of who its key stakeholders are.	
	appropriate with key		Stakenoluers are.	StakeHolders are.	
	stakeholders in		The authority has sought to engage	The Council's view is that widespread	
	developing its long-term		with key stakeholders in developing	engagement with the public on council	

different ways that make it easy for them to share their views on services they receive and

financial strategy. its long-term financial strategy, its spending is still hard for residents to engage medium term financial medium term financial plan and its with in a meaningful way and is not entirely effective in influencing the budget plans. The plan and annual budget. annual budget. Council does though engage with it's The authority has assessed the stakeholders on its medium term financial effectiveness of this engagement. strategy, annual budget and strategic plan. This is undertaken through an online survey covering; the Council's priorities, key projects The authority has a plan to in Vision 2030, savings programme proposals, improvement its engagement with key stakeholders. Council Tax proposals and overall VFM. This survey is specifically sent to the Citizens Panel and is also available to all on the Council's website and is actively promoted through social media. The Council has also, in the last two years, undertaken further engagement exercises comprising of facilitated workshops with individual residents, who maybe under represented or 'hard to reach' along with representative agencies, charities or organisations supporting those with lived experience. These workshops have focused on both the budget and Vision 2030 priorities. In addition, engagement with residents/service users is conducted in line with individual service changes proposed within the budget, as part of the development and delivery of those proposals. This allows the engagement to be more targeted to affected groups and ensures that the engagement is meaningful. The Council continues to explore ways to engage with local residents and stakeholders in

				the way the Council operates. During 2025/26 the Council plans to revise both its communication and consultation strategies and toolkits which will support enhanced engagement with local communities.  ACTION REQUIRED – REVISE COMMUNICATION AND CONSULTATION STRATEGIES – MARCH 26 (AD – T&SD)	
M	The authority uses an appropriate documented option appraisal methodology to demonstrate the value for money of its decisions.	31/32	The authority has a documented option appraisal methodology that is consistent with the guidance set out in IFAC/PAIB publication 'Project and Investment Appraisal for Sustainable Value Creation: Principles in Project and Investment Appraisal'.  The authority offers guidance to officers as to when an option appraisal should be undertaken.  The authority's approach to option appraisal includes appropriate techniques for the qualitative and quantitative assessment of options.  The authority's approach to option appraisal includes suitable mechanisms to address risk and uncertainty.  The authority reports the results of option appraisals in a clear, robust and informative manner that gives clear recommendations and outlines	The Council does not currently have a consistent process for undertaking and documenting option appraisals. These are undertaken on a case-by-case basis, influenced by the scale of investment and also the requirements of external funders, e.g. green book requirements. For all projects these cover as a minimum the 5-year MTFS period and for larger scale investment these are usually based on a whole life cycle basis.  In considering a number of development projects the Council also undertakes a development appraisal from a commercial developer perspective to assess overall scheme viability, as well as financial modelling from a LA perspective, this is demonstrated in the approach to the delivery of Western Growth Corridor.  Senior members of the Finance Team are involved in the preparation of all financial modelling with key input from the service area leading on delivery. Property Services and the Major Developments Team also play a key role in the development of scheme viability	

			the risk associated with any preferred option(s).	assessments and external support is also commissioned as required.  The Council's project management framework is clear that that there are no major investments or service changes without developing a business case including an options appraisal and project initiation documents. These are reviewed and managed through DMTs and project/ programme/ visions boards, and ultimately inform decision making reports to members.  These contain both quantitative evaluation of costs and benefits and qualitative evaluation of fit to service objectives and outcomes for residents/service users.  The project documentation includes an evaluation of risk and uncertainty and the extent that this can be mitigated for given options.  Reports for decision set out the outcomes of these business case/option appraisals with clear recommendations and risk. Risks from agreed options are then managed through the corporate risk management approach.  ACTION REQUIRED – NONE	
	itoring Financial Performa		I = 1		
N	The leadership team takes action using reports enabling it to identify and correct emerging risks to its	33	The authority provides the leadership team with an appropriate suite of reports that allow it to identify and to correct emerging risks to its budget strategy and financial sustainability.	Quarterly financial monitoring reports are provided to Directorate Management Teams, Corporate Management Team, Performance Scrutiny and the Executive, which identify significant variances and corrective actions	

budget strategy and financial

The reports cover both forward- and backward looking information in respect of financial and operational performance.

There are mechanisms in place to report the performance of the authority's significant delivery partnerships.

The reports are provided to the leadership team in a timely manner and in a suitable format.

The leadership team is happy with the reports that it receives and with its ability to use these reports to take appropriate action being taken. The reports cover the position to date and the forecast for the remainder of the financial year. It also includes progress against savings targets and planned use of/contributions to earmarked reserves.

Quarterly reporting is also provided in respect of the Council's basket of key operational performance indicators.

Reporting to officers is periodically 1-month after the quarter end with reporting to Members in the following two weeks, which creates a time lag. Financial information, forecasts are available on a more regular basis and accessible by budget managers, this would highlight significant variances earlier. Services will compile performance information on a more regular basis and where relevant highlight the impacts of these.

There are mechanisms established to report the performance of the authority's significant delivery Partnerships. Annual assurance assessments for the Council's significant partners are now undertaken and reported to the Audit Committee.

The leadership team are happy with the reports it receives and with its ability to use these reports to take appropriate action, this has been particularly evident in recent years and the significant number of budget variances due to external factors.

#### **ACTION REQUIRED - NONE**

0	The leadership team monitors the elements of its balance sheet that pose a significant risk to its financial sustainability.	33	The authority has identified the elements of its balance sheet that are most critical to its financial sustainability.  The authority has put in place suitable mechanisms to monitor the risk associated with these critical elements of its balance sheet.  The authority is taking action to mitigate the risk identified.  The authority reports unplanned use of its reserves to the leadership team in a timely manner.  The monitoring of balance sheet risks is integrated into the authority's management accounts reporting processes.	The Council has historically considered its reserves position, investments and borrowing, and debt levels as most critical and therefore regular reporting is currently only made on these elements of the balance sheet.  Forecast use/contribution of/to reserves is reported on a quarterly basis to the Corporate Management Team, Performance Scrutiny and the Executive. This highlights any changes to planned use/contribution to balances as well as movements in budgeted contributions to/from earmarked reserves. This then feeds into any MTFS refresh, along with intelligence about key risks.  The quarterly financial report also provides details of usable capital resources, e.g. unapplied capital receipts, 1-4-1 receipts etc.  Borrowing and investments are reported to Performance Scrutiny Committee and the Executive on a quarterly basis as part of the Treasury Management reporting.  The level of arrears for Council Tax, Business Pates, Housing Report Covernments and	
				Performance Scrutiny Committee and the Executive on a quarterly basis as part of the Treasury Management reporting.	

				Collection Fund Surplus/Deficits are reported to Executive on an annual basis, further reporting of key collection fund areas will be incorporated in future quarterly financial performance reports.  Other assets and liabilities are only included in the Annual Statement of Accounts report to Audit Committee, Executive and Full Council.  Officers have reviewed other major balance sheet items and assessed that those items critical to it's financial sustainability are adequately reported.  ACTION REQUIRED – NONE	
P	rnal Financial Reporting The chief finance officer	35	The authority's leadership team is	The authority's leadership team and the CFO	
	has personal and statutory responsibility for ensuring that the statement of accounts		aware of the CFO's responsibilities in terms of the preparation of the annual financial statements.	are aware of the CFO's responsibilities in terms of the preparation of the annual financial statements.	
	produced by the local authority complies with the reporting		The authority's CFO is aware of their responsibilities in terms of the preparation of the annual financial	These responsibilities form part of the CFO's role description and personal objectives.	
	requirements of the Code of Practice on Local		statements.	The authority's financial statements have been prepared on time and in accordance with the	
	Authority Accounting in the United Kingdom		These responsibilities are included in the CFO's role description, personal objectives and other relevant	requirements of the Code of Practice on Local Authority Accounting in the United Kingdom, and have been consistently given an	
			performance management mechanisms.	unqualified opinion by external auditors – the latest opinion being based on the 2023/24 Statement of Accounts.	
			The authority's financial statements have hitherto been prepared on time and in accordance with the	ACTION REQUIRED - NONE	

		requirements of the Code of Practice on Local Authority Accounting in the United Kingdom.		
Q	The presentation of the final outturn figures and variations from budget allows the leadership team to make strategic financial decisions	The authority's leadership team is provided with a suitable suite of reports on the authority's financial outturn and on significant variations from budget.  The information in these reports is presented effectively.  These reports are focused on information that is of interest and relevance to the leadership team.  The leadership team feels that the reports support it in making strategic financial decisions.	The presentation of the final outturn position to the Corporate Management Team and Executive compares the outturn to the revised budget and explains the reasons for any key variances from budget. The report sets out the impact of these variances on general balances and earmarked reserves and makes proposals for further contributions to/or from these.  The report also sets out the impact of key variances on the MTFS/future years budgets and any mitigating action being taken.  These reports focus on material issues, which require action or awareness from the leadership team and therefore are appropriately focused.  The leadership team agreed that the reports support it in making strategic financial decisions.  ACTION REQUIRED – NONE	