

# **Annual Governance Statement**

# Responsibility

Eastbourne Borough Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards. It also needs to ensure that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively.

In discharging this overall responsibility, the council is required to put in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, which includes arrangements for the management of risk.

# What is governance?

Governance is about how the Council ensures that they are doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner. It comprises the systems, processes, cultures and values by which the council is directed and controlled and through which they account to, engage with and, where appropriate, lead their communities.

Eastbourne Borough Council has approved and adopted a Local Code of Corporate Governance, which is consistent with the principles of the CIPFA/SOLACE *Delivering Good Governance in Local Government Framework 2016*. A copy of the code is available on the website (<u>www.lewes-eastbourne.gov.uk/access-to-information/financial-information/corporate-governance</u>) and contains a table which demonstrates how the council meets the core principles.

The principles of good governance are given in the CIPFA/SOLACE *Delivering Good Governance in Local Government Framework* 2016 from which the following diagram is taken.



Achieving the Intended Outcomes

Source: CIPFA 2016

# The purpose of the governance framework

The governance framework comprises the systems and processes, and culture and values, by which the authority is directed and controlled and its activities through which it is accountable to, engages with, and leads its communities. It enables the authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate services and value for money.

The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the Council's policies, aims and objectives, to evaluate the likelihood and potential impact of those risks being realised, and to manage them efficiently, effectively and economically.

The production of this Annual Governance Statement forms part of the governance framework by providing a review of the governance arrangements in operation during the financial year.

# The Governance framework

The diagram on the next page shows how the political structure of the Council works and interacts.

# How it Works...

# The Modernised Political Structure



# **Roles and Responsibilities**

#### Head of Internal Audit

The head of internal audit (Chief Internal Auditor) provides an independent opinion on the control environment. This is based on the work of the internal audit team in delivering a risk-based audit plan of a breadth sufficient for the head of internal audit to place reliance on it to base their opinion on.

#### **Monitoring Officer**

The Assistant Director – People and Governance is the designated Monitoring Officer. The Monitoring Officer has the duty to ensure that the Council, its officers and its elected Councillors, maintain high standards of conduct.

#### Chief Finance Officer – S. 151 Officer

The Director of Finance and Performance (Chief Finance Officer – S151 Officer) is designated the responsible officer for the administration of the financial affairs of the Council under S151 of the Local Government Act 1972. This includes ensuring the lawfulness and financial prudence of decision making, providing advice, particularly on financial impropriety, publicity, and budget issues and providing financial information. The Section 151 Officer is specifically responsible for the proper discharge of financial arrangements and must advise the Council where any proposal might be unlawful or where expenditure is likely to exceed resources, and to ensure that financial management arrangements conform to the governance requirements as set out in the Chartered Institute of Public Finance and Accountancy statement on the role of the Chief Financial Officer.

# **Scrutiny and Review**

Scrutiny and review are provided by the following:

#### Audit and Governance Committee

The committee provides assurance by carrying out independent scrutiny of areas such as audit, risk management, counter fraud and financial accountability. It does this by way of reviewing reports provided to its quarterly meetings.

For more information see: <u>https://democracy.lewes-eastbourne.gov.uk/mgCommitteeDetails.aspx?ID=124</u>

#### **Scrutiny Committee**

The committee reviews the delivery of services and performance and supports the work of the Cabinet and Council. It allows Councillors outside the Cabinet, and members of the public, to have a greater say in council matters by investigating issues of local concern. For more information see: <u>https://democracy.lewes-eastbourne.gov.uk/mgCommitteeDetails.aspx?ID=128</u>

#### Cabinet

The Cabinet is responsible for most day-to-day decisions of the council. Each member is assigned a portfolio identifying areas of responsibility for which they provide a political lead at Cabinet meetings and for working in consultation with officers. For more information see: <u>https://democracy.lewes-eastbourne.gov.uk/mgCommitteeDetails.aspx?ID=125</u>

#### **Corporate Management Team**

The team provides strategic management and planning. The team also considers the annual Internal Audit plan, Strategic Risk Register and Annual Governance Statement.

#### **External Audit**

The external auditors audit the financial statements and provide an opinion on these. They produce an Annual Audit Letter which assesses how the council manages its resources and delivers value for money.

# **Review of Effectiveness**

The council has responsibility for conducting, at least annually, a review of the effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the senior managers within the authority who have responsibility for the development and maintenance of the governance environment, the head of Internal Audit's annual report, and also by comments made by the external auditors and other review agencies and inspectorates. A quarterly meeting is also held to discuss governance matters.

The governance framework, as laid out in the Corporate Code of Governance, has been in place at the council for the year ended 31 March 2025.

One element used to gain assurance is information gathered from Managers' Assurance Statements. These statements contain questions based on the core principles of good governance as well as other areas such as safeguarding, the Bribery Act and the Regulation of Investigatory Powers Act. These are completed by senior managers and any issues raised are considered.

#### Companies

The Council is also expected to report on separate bodies set up by the council and to give a full picture of the relationship with those bodies. The following table gives the details and, where appropriate, it includes a link to where information can be found in respect of information such as reports and accounts.

Name and incorporation date (where appropriate)	Current Status and summary purpose	Categorisation (Company number and nature where appropriate)	Governance and Board make up	Council shareholder interest where appropriate	Notes
Aspiration Homes LLP (Limited Liability Partnership)	Company Active Incorporated on 30 June 2017. To ensure the councils have the overall capacity to maximise housing investment and funding opportunities. To act as the asset holding vehicle for affordable housing properties that cannot, for financial accounting or other reasons be held in EBC or LDC respective Housing Revenue Accounts.	Limited Liability Partnership LDC and EBC Company number: OC41800	Governed by LLP Agreement and an Executive Committee of 6 - made up of 3 elected members from each authority.	Eastbourne Borough Council Ownership of voting rights - More than 25% but not more than 50% Right to surplus assets - More than 25% but not more than 50% Lewes District Council Ownership of voting rights - More than 25% but not more than 50% Right to surplus assets - More than 25% but not more than 50%	Aspiration Homes will act as the asset holding vehicle for affordable housing properties developed through the EHICL and LHICL commercial development programmes. Support has included a £10 million loan to be funded from borrowing by LDC to Aspiration Homes LLP. www.lewes-eastbourne.gov.uk/about-the- councils/wholly-owned-companies-and-other- incorporated-entities
Eastbourne Housing Investment Company Ltd (EHICL)	Company Active Incorporated on 1 <sup>st</sup> May 2015 To undertake more commercial development, place shaping activities and hold associated	Company EBC only. Company number: 09571387	Governed by Articles of Association and a Board of 5 directors made up of senior staff and Elected Members from Eastbourne Borough	Eastbourne Borough Council. Ownership of shares – 75% or more Ownership of voting rights - 75% or more	To enable the council to undertake non HRA development and use associated forms of tenancies.

Name and incorporation date (where appropriate)	Current Status and summary purpose	Categorisation (Company number and nature where appropriate)	Governance and Board make up	Council shareholder interest where appropriate	Notes
	respective assets, in a way which meets legal and regulatory requirements and ensures that the council has distinct control over such assets.		Council plus one Independent.	Right to appoint and remove directors.	www.lewes-eastbourne.gov.uk/about-the- councils/wholly-owned-companies-and-other- incorporated-entities
Eastbourne Homes Limited	Company active Incorporated on 24 <sup>th</sup> January 2005 The Group's principal activities were to manage, maintain and improve the housing stock on behalf of Eastbourne Borough Council.	Company Company number: 05340097	Governed by Articles of Association and a Board of 2 directors, 1 independent and 1 Elected Member from Eastbourne Borough Council	Private company limited by guarantee without share capital.	Eastbourne Homes Limited is controlled by Eastbourne Borough Council. The Parent Company was established as an Arm's Length Management Organisation (ALMO) in accordance with a Government policy initiative for local authority housing management. As of September 2024 this company is no longer responsible for the management of the Council's housing stock. www.lewes-eastbourne.gov.uk/about-the- councils/eastbourne-homes-limited-governance
Eastbourne Downs Water Company (this company changed its name to Eastbourne Theatres)	Company active until 18 <sup>th</sup> March 2024 Incorporated on 24 <sup>th</sup> August 2016 To enable water to be supplied to farms on the downs in Eastbourne.	Company EBC only Company number: 10343551 (see below)	Governed by their Articles of Association and a Board of 3 directors – made up of EBC/LDC senior staff.	Private company limited by guarantee without share capital This company is currently dormant.	www.lewes-eastbourne.gov.uk/about-the- councils/wholly-owned-companies-and-other- incorporated-entities

Name and incorporation date (where appropriate)	Current Status and summary purpose	Categorisation (Company number and nature where appropriate)	Governance and Board make up	Council shareholder interest where appropriate	Notes
Eastbourne Theatres Ltd (see also Eastbourne Downs Water)	Company active from 18 <sup>th</sup> March 2024 To provide a theatre service to the town.	Company EBC only Company number: 10343551 (see above)	Governed by their Articles of Association and a Board of 2 directors	Private company limited by guarantee without share capital This company is currently dormant.	www.lewes-eastbourne.gov.uk/about-the- councils/wholly-owned-companies-and-other- incorporated-entities
Investment Company Eastbourne Limited	Company active. Incorporated on 26 <sup>th</sup> March 2018 The Council has established this wholly owned company for the purpose of providing a Guarantee to an institutional investor (Infrastructure Investments Ltd) relating to a property asset in Leicester.	Company Company number: 11276378	Governed by their Articles of Association and a Board of 3 Directors – made up of EBC/LDC senior staff.	Private company limited by shares. The 2 shares are wholly owned by Eastbourne Borough council.	www.lewes-eastbourne.gov.uk/about-the- councils/wholly-owned-companies-and-other- incorporated-entities
South East Environmental Services Ltd	Company active. Incorporated on 31 <sup>st</sup> August 2018 To undertake domestic waste and recycling collection and street cleansing services in Eastbourne from 1 <sup>st</sup> July 2019 and to develop related services in the medium term thereafter.	Company Company number: 11545729	Governed by their Articles of Association and a Board of 5 Directors – made up of EBC senior staff and Elected Members.	Private company limited by shares. wholly owned by Eastbourne Borough council.	www.lewes-eastbourne.gov.uk/about-the- councils/wholly-owned-companies-and-other- incorporated-entities

Name and incorporation date (where appropriate)	Current Status and summary purpose	Categorisation (Company number and nature where appropriate)	Governance and Board make up	Council shareholder interest where appropriate	Notes
Cloud ConnX Limited	Company active Incorporated on 19 <sup>th</sup> January 2011 To provide competitive internet services to Eastbourne, Wealden and East Sussex based businesses on network communication technologies providing high speed broad band circuit provision etc.	Company Company number: 07497266		Eastbourne Borough Council owns 45% of shares and represented on the board.	Broadband provision.
SEILL (South East Independent Living Limited)	Company active (Company Dormant but not dissolved so shows as active on Companies House) Incorporated on 30 <sup>th</sup> September 2013 Company set up by Eastbourne Homes Ltd (see above) To deliver a short-term housing floating support service for people of 65 and over who live in Eastbourne, Lewes and Wealden Districts. Navigator service for support for people 18 or over with long term physical health condition.	Company Company number: 08710235	Governed by their Articles of Association and Directors from Eastbourne Homes Limited including a Corporate Director	Wholly owned subsidiary of Eastbourne Homes Ltd. 1 Ordinary share owned by Eastbourne Homes Ltd. This company is currently dormant,	Subsidiary of Eastbourne Homes Limited, established for the purposes of delivery of the STEPS contract and possibly bidding for similar future contracts. www.lewes-eastbourne.gov.uk/about-the- councils/south-east-independent-living- limited

#### Companies in which the council has an interest

#### Eastbourne Homes Ltd

Governance arrangements at Eastbourne Homes Ltd (EHL) are also considered. As of September 2024, this company is no longer responsible for the management of the Council's housing stock.

#### Investment Company Eastbourne (ICE) Limited

In May 2018, the council's wholly owned company Investment Company Eastbourne Limited (ICE) entered into a deal with a private company in respect of a property in Leicester. ICE is acting as the principal guarantor of a £48m refinancing loan to a private company, with Eastbourne Borough Council being the ultimate guarantor. In return for providing this guarantee, ICE received an initial guarantee fee and will continue to receive an annual guarantee fee.

All relevant activities have been predetermined under the Development and Asset Management Agreement (DAMA) and will be consolidated into the council's financial statements. The DAMA entitles ICE to a degree of control over the activities of Infrastructure Investments Limited (IIL) and exposes it to a portion of the returns from those activities. IIL is a property company that holds and lets out the property. The activities of IIL are to manage the property and the tenancies and ensure maximisation of rental income and eventually sell the property.

The operations of IIL are run by its board of directors that are appointed by a majority of the shareholders as per Article 18.1 of IIL's Articles of Association. ICE does not currently have a majority of the shareholding in IIL, but has the ability to acquire 49.5% of the ordinary shares by virtue of its Option unless a default event occurs. Clause 1.1 of the DAMA sets out a requirement for the management of IIL to run IIL in accordance with the 'Business plan' and any changes to the 'Business plan' require approval by the ICE Board of Directors.

#### **Oversight of Companies' Governance**

During the financial year, updates of assurance on the financial and governance arrangements of companies is given to the Audit and Governance Committee. It has been arranged for the Boards of the companies to add an agenda item to their quarterly meetings to consider the financial and governance arrangements to make a statement on compliance. These statements are collated and reported to the committee quarterly.

#### Managing the Risk of Fraud and Corruption

The CIPFA Code of Practice on Managing the Risk of Fraud and Corruption and guidance suggests it is good practice to make a statement on the adequacy of an authority's counter fraud arrangements in the annual governance statement.

This code contains five principles:

- Acknowledge responsibility
- Identify risks

- Develop a strategy
- Provide resources
- Take action

The Chief Internal Auditor is satisfied that the Council meets these principles by having a Counter-Fraud and Audit team who review risks across the authority and direct their work as appropriate. It is therefore considered that the organisation has adopted a response that is appropriate for its fraud and corruption risks and commits to maintain its vigilance to tackle fraud and uphold its zero tolerance.

#### **Financial Management Code**

With local authorities across the UK facing the challenges of reduced funding and increased demand for services, the need for robust financial management has never been more important. The CIPFA Financial Management Code (FM Code) sets out the principles by which authorities should be guided in managing their finances and the specific standards that they should seek to achieve. The self-regulation approach is also to prevent local authorities 'failing' and avoid any need for any external control or reductions in current powers. It is up to each authority to determine the extent to which it complies with the FM Code and to identify what action it may wish to take to better meet the standards that the FM Code sets out.

In 2024/25 the Director of Finance and Performance (Chief Finance Officer – S151 Officer) has taken account of the requirements of the CIPFA Financial Management Code and has acknowledged the approaches to Value for Money and the Council's financial resilience. A significant amount of the Code activities continues to be implemented by various teams across the Council including – the Finance Service, Internal Audit, other service departments, etc.

The Director of Finance and Performance (Chief Finance Officer – S151 Officer) has agreed that the key risks regarding future compliance with the Code will be assessed through a combination of: the budget setting process; the Medium-Term Financial Strategy; regular reviews of the Council's capital programme; Treasury Management Strategy and the provision of clear and regular financial updates/training to Members. The Council has a satisfactory record of financial management and so, analysing the council's structures, processes, and procedures against the FM Code's Financial Management Standards, shows a reasonable level of compliance with these principles. However, there are areas where further actions/consideration needs to be given to ensure full compliance with every aspect of the FM Code.

#### Local Government Finance Review – CIPFA/Department for Levelling Up, Housing and Communities

Eastbourne Borough Council's request for exceptional financial support during the COVID-19 pandemic has been referenced in previous Annual Governance Statements, as has the Council's request for further support in February 2024 in response to the

extraordinary increases in homelessness and temporary accommodation placements and the associated costs of making those placements within the borough. The department approved this further round of support subject to an additional external review led by the Chartered Institute of Public Finance and Accountancy (CIPFA) which was undertaken during the summer of 2024. The full report, published on 13 March 2025 can be found on the GOV.UK website <u>Eastbourne Borough Council: External assurance</u> review, 2024-25 - GOV.UK. A report is due to be taken to Cabinet in June 2025 which presents the final report and our response to the recommendations.

Acting on the recommendations made in previous Rapid Finance Review Report published in August 2023 the Council appointed an Independent Panel in May 2024 to oversee and drive progress towards implementing the recommendations from CIPFA's Rapid Review. An interim report from the Independent Panel was submitted to the Ministry of Housing, Communities and Local Government (MHCLG) on 17 February 2025, and it is the Independent Panel's intention to submit a final report to the MHCLG later in the 25/26 financial year.

Actions taken since the Rapid Finance Review Report published in August 2023 has resulted in Eastbourne Borough Council making substantial progress in mitigating the financial impact of increases in homelessness and temporary accommodation placements including undertaking a Fundamental Budget Review over a four-week period between September and October 2024. However despite this action and homelessness and temporary accommodation placements stabilising somewhat during the financial year, costs continue to be high and of concern. The Council therefore wrote again to MHCLG on 23 January 2025 requesting a further round of Exceptional Financial Support totalling £2m in 2025/26 and £1m in 2026/27. Support for 2025/26 was approved in principle by MHCLG on 20 February 2025.

#### **Strategic Finance Programme**

Eastbourne Borough Council continues to tackle unprecedented levels of homelessness and temporary accommodation placements. This ongoing cost pressure is compounded by high interest rates, reduction in business rates income and inflationary pressures. The Council's response to these financial challenges has been the creation of the Strategic Finance Programme which has focused on the delivery of transformational changes, savings and efficiencies whilst also making tough decisions regarding some of its non-statutory services. There have been three parts to the programme in 2024/25.

#### 1. Going Further Savings

A savings programme designed to make changes to a number of the Council's non-statutory services including:

• The transfer of subsidised discretionary services to third-party organisations

- The introduction of the Eastbourne Community Toilet Scheme to complement the Council's own provision and ensure the service remains financially viable
- The introduction of a revised car parking scheme
- Changes to the Council's heritage service and facilities

#### 2. Fundamental Budget Review

Every service area within the Council has been subject to a fundamental budget review to ensure budgets are correctly aligned and that all expenditure is tightly managed. This process has also allowed for reviews of income generation, with a new fees and charges policy being introduced.

#### 3. Assurance Review

Following the CIPFA Assurance Review undertaken in the summer of 2025 the Council has taken the opportunity to act on several areas where improvements have been suggested by CIPFA, including:

- The establishment of the Strategic Finance Board to drive forward the Council's savings and improvement activities
- A review of the Council's approach to risk management which will be provided to members in the form of a new policy in a forthcoming report to the Audit and Governance Committee
- Developing a new Economic Development Strategy for Eastbourne
- Regular peer review of the internal audit function
- More granular scrutiny and profiling of the capital programme through the officer Capital Programme Overview Board
- Stringent monitoring of the cost of borrowing relative to net expenditure
- Wider use of benchmarking and comparative analysis, which will inform future performance target setting
- A fundamental review of the Council's procurement function and alongside this the production of a new Procurement Strategy

The Strategic Finance Programme is monitored and overseen by a cross-party member Board and is also supported by an independent panel of local government experts providing a 'critical friend' role within the Board.

#### **External Audit Action Plan**

The Council is responsible for putting in place proper arrangements to secure economy, efficiency, and effectiveness in its use of resources. This includes taking properly informed decisions and managing key operational and financial risks, so the Council can deliver against its objectives and safeguard public money. The Council must report on its arrangements and their effectiveness as part of the Annual Governance Statement.

Appendix1 - External Auditor Action Plan details the key recommendations and improvement recommendations made as part of the external auditor's annual report to ensure compliance with the Council's systems of internal controls and identify areas of improvement in areas of governance, value for money and financial stability, all of which forms the External Audit Action Plan. Delivery of the action plan will be monitored through CMT and regular updates to the Audit and Governance Committee.

#### Strategic Risk Register

The Council maintains a strategic risk register which is reviewed quarterly by the Corporate Management team and changes are reported to the Audit and Governance Committee. The review considers the internal controls, to ensure early prevention and/or mitigation of risks and governance concerns, and the risk scores.

#### Quarterly meetings to discuss governance

Quarterly meetings are held to discuss any governance issues. The members of the meeting are the Chief Internal Auditor, Director of Finance and Performance (Chief Finance Officer – S. 151 Officer), Assistant Director – People and Governance (Monitoring Officer), Head of Legal Services and the Governance & Compliance Lead & Group Company Secretary. No significant issues were raised during the year.

#### Local Government Reorganisation

During the financial year 2024/25, Eastbourne Borough Council continued to actively engage with the ongoing discussions and preparations for potential Local Government Reorganisation (LGR) in East Sussex. While the specific form and timeline of any reorganisation remained subject to government decisions and further consultation, the Council proactively assessed the potential impacts on its governance arrangements, service delivery, and financial sustainability. Recognising the significant implications of LGR, the Council prioritised maintaining robust internal controls and effective decision-making processes to ensure business continuity and safeguard public funds throughout this period of potential change. The Council remains committed to advocating for the best outcomes for its residents and stakeholders in any future LGR framework.

#### **Managers' Assurance Statements**

One of the sources of assurance for the Annual Governance Statement should come from Senior Managers responsible for the operation, management and monitoring of controls within their area of responsibility. The Managers' Assurance Statement is intended to collect this assurance by covering operational, project and partnership responsibilities as well as the Bribery Act, Safeguarding, and the Regulation of Investigatory Powers Act. The form allows a senior manager to highlight concerns and the necessary actions required to improve governance. Assurance statements are sent out to Directors, Assistant Directors and Heads of Service. Once completed their contents are used to inform the governance statement.

Responses from the completed statements were grouped by subject and number/level of concerns raised. This summarised list was taken to the Corporate Management Team for consideration. The following was noted:

As last year, it was noted that many of the comments/subjects have their root cause in the current economic environment and its financial impact on the Council. This has led to the Council delivering services within tight budgets and reduced capacity. Whilst this is acknowledged, it is not felt that this has caused any significant governance issue and all the issues raised in the returned statements are being managed.

The other areas/subjects were also discussed. It was felt that there were no significant issues raised and Corporate Management Team considered that all issues raised are known and are being managed or addressed.

The Corporate Management team are therefore of the opinion that there are no significant governance issues to report.

#### Statement by Assistant Director – People and Governance (and Monitoring Officer):

As Assistant Director – People and Governance (and Monitoring Officer), I am not aware of any major governance issues in my area or elsewhere in the organisation.

The updated scheme of delegations to officers has greatly improved clarity. Work on reviewing and updating other sections of the council's constitution will continue where appropriate, however this would need to be measured against governance work in relation to local government reorganisation, arising from the English Devolution White Paper.

The Code of Conduct for Members is also kept under general review by the Monitoring Officer, although it should be stated that there is nothing inherently inadequate or defective with the existing code or the council's arrangements for dealing with complaints about councillor conduct (in so far as legislation allows). It should be flagged that the government undertook a consultation, seeking

views on proposals to introduce measures to strengthen the standards and conduct regime for local authorities in England. Feedback from that consultation is currently being analysed. Any changes arising from the consultation would need to be reflected in our standards arrangements.

#### **Opinion of the Chief Internal Auditor**

The Chief Internal Auditor is required to give an opinion of the overall adequacy and effectiveness of the control environment. The control environment is considered in three ways: the production of the Annual Governance Statement, the effectiveness of Internal Audit, and the results of the work of Internal Audit.

Effectiveness of Internal Audit: a self-assessment against the mandatory Public Sector Internal Audit Standards has been carried out and shows that the work of the Internal Audit team is carried out in accordance with the standards. The Public Sector Internal Audit Standards require an external review to be carried out at least every five years. Wealden, Rother and Chichester District Councils, along with Eastbourne and Lewes, agreed to carry out reciprocal external assessments in 2023/24. The external review of Eastbourne and Lewes was carried out in the summer of 2024 and reported to the Audit and Governance Committee in November 2024. This review supported the results of the self-assessment, in that the Internal Audit function generally conforms with the Standards. This is the last year that the work of the team is assessed against these standards as the new Global Internal Audit Standards in the UK Public Sector came into effect on 1<sup>st</sup> April 2025 for the year ending 31<sup>st</sup> March 2026.

The work of Internal Audit: audit reviews carried out by the Internal Audit team and reported to and considered by the Audit and Governance Committee quarterly. Follow ups have traditionally not been carried out on annual audits as they are repeated every year. However, it has been noted that there were some recommendations being repeated. These are now being reported monthly to the Finance Departmental Managers team meetings, and quarterly to the Audit and Governance Committee.

While the governance framework is in place and working and Internal Audit are carrying out their work in accordance with the Public Sector Internal Audit Standards, the opinion on the control environment has to be caveated by the repeated recommendations on annual audit reviews.

As reported last year, the Chief Internal Auditor has some concerns about risk management at the departmental/operational level. A review was carried out in the financial year which showed that risk management was not embedded. Since this report was issued, work has been ongoing to update the Risk Management Policy and to arrange training. However, the caveat to the overall control environment must remain in place until risk management is embedded across the Council.

#### **UPDATE ON SIGNIFICANT GOVERNANCE ISSUES 2023/24**

No significant issues were reported in 2023/24.

#### SIGNIFICANT GOVERNANCE ISSUES 2024/2025

There are no significant governance issues to report.

#### STATEMENT

We have been advised on the implications of the result of the review of effectiveness of the governance framework by the Audit and Governance Committee and that, subject to the actions identified above, the arrangements continue to be regarded as fit for purpose in accordance with the governance framework.

Signed on behalf of Eastbourne Borough Council:

The Hot.

Leading Member:

Date: 2/07/2025

Chief Executive:

Date: 27/06/2025

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D1	Quality of draft financial statements	The following matters remain key and need improvements: • Inconsistencies between notes and primary statements; • Insufficient documentation of disclosure notes; • Timeliness of preparation of group figures (which have not been included in published draft accounts), with suitable review of the consolidation; • Differences noted during our call and cast process; • Misstatements in the underlying accounting for transactions.	The Corporate Finance Team have developed and implemented a model to assess and review the output from the system trial balance and identify any key inconsistencies with the financial data presented. The team have also developed and implemented a new method of transferring information from the model directly to the draft financial statement document. This has significantly reduced the risk of inconsistencies between notes and primary statements and reduces error caused by incorrectly keying in data. We have improved the format of the notes and provided advice to the finance colleagues who prepare notes to ensure that they are complete and accurate. Since the publication of the 2021/22 statements the Council has strengthened the resilience of the commercial team and together with the Corporate Finance Team have agreed a timetable for the production of draft commercial accounts to enable them to be incorporated into the Group Accounts ahead of the publication deadline.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D2	Quality of draft financial statements	<ul> <li>Areas to keep in view through these changes for improvement include:</li> <li>preparation of a skeleton draft of the financial statements ahead of year-end, reviewed against the Code for any changes in the year and for the disclosure requirements for any new or changed activities of the Council;</li> <li>maintenance of clear audit trail of accounts mapping and documented rational of adjustments in accounts preparation;</li> <li>documentation and quantification of judgments in respect of materiality of disclosure requirements in preparing the accounts;</li> <li>documented and reviewed use of CIPFA disclosure checklists;</li> <li>documented and reviewed internal checks of arithmetic accuracy and internal consistency;</li> <li>documented and reviewed audit trail of consolidation adjustments and support;</li> <li>maintenance of a clear, documented and reviewed audit trail of consolidation adjustments;</li> <li>documented and reviewed internal the back and referencing of the draft financial statements to supporting working papers.</li> </ul>	Statements are now prepared at the transactional level rather than from "Top Down" documentation that enables the corporate finance time to have clear understanding of how the accounts are mapped. We have reviewed the CIPFA disclosure checklist in advance of the accounts completion rather than retrospectively in recent years due to resourcing issues. The Council has also taken steps to increase resourcing and resilience within the Corporate Finance Team and have also put in place arrangements to ensure that progress on completion of 24/25 draft financial statements is routinely assessed with action taken where necessary to reduce the risk of late publication of draft financial statements	Deputy Chief Finance Officer	Director of Finance & Performance (S151)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D3	Preparation for IFRS 16	We recommend early consideration following the impact analysis of actions required to embed IFRS 16 accounting in the Council's underlying accounting systems.	Over the past twelve months we have undertaken work to understand the impact of IFRS16 including meeting with regional chief accountants to ensure that our approach is consistent and correct. 2024/25 is the first year that we will full implement IFRS16.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
D4	Information technology	Our IT specialists raised the following insights with regards to the Council's systems: • Lack of a cyber security strategy; • Lack of a formal classification over the sensitivity of data at the council. Whilst these matters had no impact on our audit approach, they are areas in which the Council could make improvements to the functionality of their systems and to reduce risks.	The Head of ICT has confirmed that a Cyber Security Strategy in place, and that the Council is PSN compliant, and is currently going through the Cyber Essentials. It was also confirmed that ICT do not classify the councils data, but this is something that ICT are looking to do in the near future.	Head of ICT	Chief Executive
D5	Journal authorisation	Higher level reviews provide a mitigating control, however embedding the authorisation policy would improve the control environment. (We note that Internal Audit have raised related control findings in their Main Accounts System review).	The corporate finance team continue to support other finance colleagues to ensure that journal authorisations are completed using the correct authorisation requirements. Guidance is also available within the Final Accounts Manual The existing financial system does not allow journal authorisation to be based on the seniority of officers. To mitigate this high value journals must be approved by a senior officer. Members of the corporate finance team also review every journal to ensure that the appropriate approval is in place and provide advise where journals have not been processed correctly.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D6	Valuation of properties	We recommend that a paper should be prepared and set out the review of key assumptions, and officer's view on why the revaluation assumptions are appropriate.	As a result of the external auditor findings the Head of Corporate Finance forwarded a copy of the external auditors findings to the councils valuers Wilkes Head & Eve in January 2023. The	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
D7	Valuation of properties	There should be a documented internal control relating to the review by officers of the valuation report received from Wilks Head Eve	Head of Corporate Finance has also met with WHE representatives to agree the relevant approaches to valuations which takes account of the recommendations made within this report.		
D8	Improvements to the valuation exercise	It is recommended that, if the valuer is undertaking valuations without having specifically inspected the asset, that they are provided with all information from the client in relation to the asset and its specification and condition at the valuation date			
D9	Improvements to the valuation exercise	It is recommended that the valuer consider adopting a market standard net yield approach as this would assist with accuracy and transparency of the valuations			
D10	Improvements to the valuation exercise	The narrative in the valuation report should specifically address the circumstances of the valuation (e.g. that Eastbourne value all their assets every four years) rather than general descriptions to ensure clarity			
D11	Improvements to the valuation exercise	It is recommended that in future valuations; the valuer confirms that they have considered potential alternative use values.			

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D12	Improvements	It is recommended that in future valuations;			
	to the	the valuer confirms that they have assessed			
	valuation	the validity of this assumption in relation to			
	exercise	the properties which were inspected.			
D13	Improvements	It is recommended that the valuer achieves			
	to the	confirmation of EPC scores for each of the			
	valuation	assets they value for future valuations to			
	exercise	ensure that the full impact of the EPC ratings			
		are reflected in the valuations;			
D14	Improvements	To ensure that the valuation of the actual			
	to the	asset is prepared on a comparable basis to			
	valuation	the transactional evidence the valuer should			
	exercise	deduct Stamp Duty Land Tax (SDLT) costs,			
		agents and legal fees (purchaser's costs). The			
		impact of not deducting these costs varies as			
		SDLT is a progressive tax and is calculated on			
		the gross value			
D15	Improvements	The Council should ensure that an Annual			
	to the	revaluation review of the Heritage assets			
	valuation	should be performed as per the Council's			
	exercise	policy.			

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D16	Management assessment of estimates - Accounting Papers Not Prepared, Reviewed and Challenged for each area of Accounting Estimate	<ul> <li>We recommend formalising an approach for future years of:</li> <li>preparing papers for any key accounting judgements or issues arising.</li> <li>presenting accounting papers are presented to the same meeting of the Panel at which the draft statement of accounts are approved (if not earlier) for scrutiny and to inform the panel's approval of the draft statement of accounts.</li> </ul>	This action relates to the disclosure of major changes to accounting practice and their financial implications and key accounting judgements made by officers. Officers are reviewing options to improve the presentation of such information to members including the approval of draft financial statements once the financial accounts backlog has been removed.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
D17	Payroll review - Net Pay Variance Report not signed off once completed	We recommend that an independent check is done to ensure that the payroll report is reviewed by a person independent of the preparer to ensure that any exceptions or unusual items are investigated appropriately and that the Payroll Manager evidences their review by dating and signing the working papers.	The Payroll Manager has confirmed that all items received for the payroll are actioned by a member of the payroll team and then checked independently by another member of the team for accuracy before filing. Upon processing the payrolls the Payroll Officer produces a series of reports, which are checked and then reviewed by the Payroll Team Leader. This payroll run checking is documented and signed off on a Payroll run check list.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D18	Value for Money	The Council reassesses the capability and capacity in the finance function, including the capability and capacity to deliver a high- quality statement of accounts and supporting work papers before the deadline for the audit. This should include ensuring that there is sufficient capacity and capability to respond to audit queries during the audit period, as well as to ensure reliable in year reporting and operation of effective accounting control processes	All members of the Corporate Finance Team (both permanent and temporary) hold a relevant professional accountancy qualification and between have over 150 years of post-qualification experience. The council's ability to produce high quality financial accounts has been compromised over recent years both by increased complexity in external audit requirements, historic turnover of staff and the impact of COVID-19. The council has responded to the requirement to publish draft financial statements covering multiple year over a 12-18 month period by increasing the resources through the appointment of two interim principal accountants, increasing the working hours and contract period of one temporary employee and extending the contract. The Corporate Finance Team has also undergone a restructure to ensure resources can be deployed more effectively to support the completion and publication of financial statements. Between April 2024 & March 2025 the Corporate Finance Team have published eight sets of financial statements for both Councils and will be required to publish a further three set before 30 June 2025.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
D19	Value for Money	The Audit and Governance Committee strengthens its oversight of corrective action taken in response to previous external audit recommendations in respect of financial reporting.	Will be considered as part of a report to Audit and Governance in June, addressing these points.	Committee Team Manager	Head of Democratic Services (and Monitoring Officer)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D20	Internal Controls	The Council should undertake a detailed review of the capability and capacity in the finance function, including the capability and capacity to deliver a high-quality statement of accounts and supporting work papers before the deadline for the audit, and sufficient capacity and capability to respond to audit queries during the audit period. This should include provision of training of staff in the finance function, and other functions that input to the financial reporting process, on the adequacy of information prepared and retained to support the accounting entries, a detailed review of the control framework for financial reporting which includes implementation of internal and external recommendations, and review and implementation of improved quality control arrangements over the preparation of the statement of accounts and supporting work papers.	In addition to the comments made in relation to capability and capacity above senior officer have also facilitated a series of training events throughout 2024/25 to both finance and non- finance officers, delivered by Chartered Institute of Public Finance & Accountancy (CIPFA). Courses included: Introduction to Local Government Finance & Financial Planning Introduction to Capital Finance Budget Manager Training Business Partner Training Introduction to Local Authority Closedown and Financial Reporting Principles In addition finance staff have attended briefing sessions delivered by the Councils new External Auditor, its Treasury Management Advisors and VAT Advisors.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
	Internal Controls	<ul> <li>We recommend the Council review the year- end reporting and close process, including:</li> <li>preparation of a skeleton draft of the financial statements ahead of year-end, reviewed against the Code for any changes in the year and for the disclosure requirements for any new or changed activities of the Council;</li> <li>maintenance of clear audit trail of accounts mapping and documented rationale of adjustments in accounts preparation;</li> <li>documentation and quantification of judgments in respect of materiality of disclosure requirements in preparing the accounts;</li> <li>documented and reviewed use of CIPFA disclosure checklists;</li> <li>documented and reviewed internal checks of arithmetic accuracy and internal consistency;</li> <li>documented and reviewed audit trail of consolidation adjustments and support;</li> <li>maintenance of a clear, documented and reviewed audit trail for adjustments;</li> <li>documented and reviewed internal the back and referencing of the draft financial statements to supporting working papers</li> </ul>	Statements are now prepared at the transactional level rather than from "Top Down" documentation that enables the corporate finance time to have clear understanding of how the accounts are mapped. We have reviewed the CIPFA disclosure checklist in advance of the accounts completion rather than retrospectively in recent years due to resourcing issues. The Council has also taken steps to increase resourcing and resilience within the Corporate Finance Team and have also put in place arrangements to ensure that progress on completion of 24/25 draft financial statements is routinely assessed with action taken where necessary to reduce the risk of late publication of draft financial statements	Deputy Chief Finance Officer	Director of Finance & Performance (S151)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D22	Internal Controls	Completion of the CIPFA Disclosure Checklist and resolution of any issues arising for this	Officers have undertaken a review of the CIPFA disclosure checklist in April 2025 as part of the 2024/25 year end process.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
D23	Internal Controls	Consistency check of the figures included in the narrative report to the financial statements	The Corporate Finance Team have developed and implemented a model to assess and review the output from the system trial balance and identify any key inconsistencies with the financial data presented. The team have also developed and implemented a new method of transferring information from the model directly to the draft financial statement document. This has significantly reduced the risk of inconsistencies between notes and primary statements and reduces error caused by incorrectly keying in data.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
D24	Internal Controls	Documented analytic review of movements in balances, with a clear and meaningful explanation for variances.	We have asked the financial planning team to undertake an analytical review and provide meaningful commentary and explanation of major year to year variances.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
D25	Internal Controls	Documented internal "call and cast" of internal consistency and arithmetic accuracy	We have asked the financial planning team to undertake an analytical review and provide meaningful commentary and explanation of major year to year variances.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
D26	Internal Controls	Documented review of consolidation schedules and elimination adjustments supporting group accounts	We have amended our methodology and processes to ensure that the elimination and adjustments supporting group accounts are transparent.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
D27	Internal Controls	Documented check the figures agree to underlying supporting working papers, which have been appropriately completed and reviewed, with appropriate review of a documented audit trail of any adjustments between the general ledger and the statement of accounts	We have improved the format of the notes and provided advice to the finance colleagues who prepare the notes to ensure that they are complete and accurate.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
KR1	Financial Stability	<ul> <li>The Council should ensure that:</li> <li>It continues to manage demand for temporary accommodations</li> <li>The transformation work delivers expected outcomes</li> <li>It makes further applications for EFS as appropriate</li> <li>it considers and prepares contingency plans for different outcomes</li> </ul>	Manages demand · By January, the council managed 245 placements, which is a vast improvement from the 2023/24 outturn position of 308 and 264 at the end of Q1 2024/25. The council continues to improve on its prevention and allocation measures to continue to downward manage the numbers. Alongside, Cabinet will consider this month (12th February) a proposal to increase its own supply of temporary accommodation to reduce the reliance and cost of nightly paid emergency accommodation on the business.	Housing Options & Wellbeing Lead	Deputy Chief Executive & Director of Regeneration and Planning
	Financial Stability		Further applications for EFS. The Council has made a request to MHCLG for a further EFS of £2m in 2025/26 and £1m in 2026/27. In addition, the Council has put in place a number of steps, including the creation of a £1.4m contingency in the 25/26 budget along with a small range of earmarked reserves, recognising the scale of the savings identified.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
KR2	Governance	<ul> <li>The Council should improve its arrangements to ensure risk management is fully embedded across the organisation by:</li> <li>Reviewing the strategic risk register, to ensure it accurately reflects the key risks</li> <li>Reporting to Cabinet at least annually and Audit and Governance Committee quarterly</li> <li>Updating the Risk Management Policy, articulating the Council's risk appetite and describing the RAG methodology to be used in risk registers</li> <li>Establishing departmental risk registers with an approach that allows appropriate risks to be escalated to the strategic risk register</li> </ul>	The Council has recently commissioned an internal review of the Council's approach to risk management which will be provided to Members in the form of a new policy in a forthcoming Cabinet report. The refreshed process and new training programme were rolled out the to the Senior Managers' Forum (and those in key, risk- related roles) commenced w/c 5 May.	Assistant Director - Neighbourhood and Transformation	Deputy Chief Executive & Director of Regeneration and Planning
KR3	Governance	The Council should ensure that management action Internal Audit recommendations promptly and by agreed target dates. The Audit Committee should establish an escalation policy to hold management to account for any overdue audit recommendations.	As many of the outstanding recommendations refer to main financial systems, the management fully endorse this recommendation. Recent follow-ups of outstanding recommendations have resulted in target dates being revisited and revised. The Council has therefore commissioned an internal review of the departments' approach to Internal Audit reviews and associated recommendations aimed at monitoring the pace of progress made by services and help to address any delays promptly. The next round of reporting to Audit & Governance Committee will take place in June, and the updated, improved position will be included	Chief Internal Auditor	Deputy Chief Executive & Director of Regeneration and Planning

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
KR4	Governance	The Council should prepare its draft 2024/25 financial statements by the statutory deadline (30 June 2025), supported by a full suite of working papers agreed with the auditor in order to support good financial governance and public accountability.	The Council are actively taking steps to ensure that it is able to produce its 24/25 draft statements in line with the statutory requirements. This includes looking at options to expand and strengthen capacity and reduce single points of failure within the Corporate Finance Team.	Deputy Chief Finance Officer	Director of Finance & Performance (S151)
KR5	Governance	<ul> <li>The Council should improve its governance arrangements for its commercial companies by agreeing:</li> <li>The role of the shareholder and the mechanism to set and monitor strategic direction and manage performance, such as a shareholder committee or board</li> <li>Business plans for all its commercial companies</li> <li>the role of Officers and Councillors as directors, considering the advantages and disadvantages of the Leader of the Council and Cabinet Portfolio Holders holding Directorships</li> <li>how conflicts of interest could be managed and minimised, by introducing a conflicts of interest policy</li> <li>the role of scrutiny</li> </ul>	<ul> <li>The company is now non trading, EHL transitioned at the end of September 2024 and all contracts were novated by the 31st March 2025.</li> <li>EHICL – portfolio is under review in terms of potential purchase. Avison Young are leading.</li> <li>AHLLP – Local Partnerships (LGA) Review is currently underway. They are undertaking a piece of work with a view to making some recommendations in terms of the viability of the company going forward. There is an initial feedback meeting due Mid-May</li> <li>SEESL – a Business Plan has been drafted and will be presented to the June Board. It is currently with the Head of Environment First and Head of Commercial Finance. Cllr Murray is now Chair and has replaced the Portfolio Holder, Cllr Swansborough.</li> <li>ICEL – Report to CMT presented with the recommendations of reporting annually to Cabinet and quarterly to CMT.</li> <li>CCX - Report to CMT and the recommendations</li> </ul>	Assistant Director Property & Development	Deputy Chief Executive & Director of Regeneration and Planning

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
			of reporting annually to Cabinet and quarterly to CMT.		
KR6	Improving economy, efficiency and effectiveness	<ul> <li>The Council should assess the effectiveness of contract management arrangements for all its significant contracts by:</li> <li>Reviewing and identifying corrective action where appropriate</li> <li>Continuing to enhance the management of its Grounds Maintenance Contract</li> <li>Evaluating the training needs and guidance tools provided to its contract managers to support them in their role</li> </ul>	The Procurement Strategy is due to go to Cabinet in July. Within the strategy there is a section and action plan to support improved Contract Management, including training. We will shortly be tendering for a new Grounds Maintenance Contract, which will have improved terms and conditions to aid better service delivery.	Strategic Procurement Manager	Director of Finance & Performance (S151)
IR1	Financial sustainability	The Council should report progress to Members on the achievement of all savings on a quarterly basis, including the amount expected and delivered for each financial year	The savings relating to Stability and Growth have been routinely incorporated into the budget and reported to committees (Cabinet & Scrutiny) on a quarterly basis. The Stability and Growth Board has now transitioned into the Strategic Finance Board. All savings and improvement activity now takes place under the control of this board. The Strategic Finance Implementation Team responsible for maintaining and monitoring savings has recently created a single analysis of savings plans that have been developed over recent months to establish a single record containing agreed control totals. In addition, twice weekly meetings of the Strategic Finance Implementation Team have been in place since December 2024, meeting with managers	Deputy Chief Finance Officer	Director of Finance & Performance (S151)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
			responsible for delivering specific savings targets to ensure that agreed savings are delivered. The outcome of these meetings will be reported to relevant committees as part of the regular monitoring reporting cycle on a quarterly basis.		
IR2	Financial sustainability	The Council should develop a workforce strategy and ensure it links to the Council's objectives and MTFS	Workforce planning has been intrinsic within resource workstream of recent transformation programme. The development of a Workforce Strategy will need to reflect LGR requirements once these are understood.	Head of Human Resources	Head of Democratic Services (and Monitoring Officer)
IR3	Governance	The Council's Whistleblowing Policy (Raising Your Concerns) was last reviewed in February 2024 and is due to be revised in February 2025. However, the policy has not been updated to reflect the change in the Council's external Auditors	Addressed	Head of Internal Audit	Director of Finance & Performance (S151)
IR4	Governance	The Council should ensure it clearly minutes its decisions	The Council minutes are reviewed by senior officers prior to approval of the Chair of the relevant committee before publication. Minutes are signed off as an accurate representation of the meeting at the following meeting by elected members. All public facing committee meetings are webcast, increasing our transparency.	Committee Team Manager	Head of Democratic Services (and Monitoring Officer)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
IR5	Governance	<ul> <li>The Council should consider whether the effectiveness of the Audit and Governance Committee could be enhanced by:</li> <li>Monitoring the committee's effectiveness through undertaking a self-assessment and taking action based on the outcome of the self-assessment</li> <li>Appointing a second co-opted member to provide appropriate technical expertise, which complements existing membership</li> </ul>	Officers will work with the Chair of the A&G committee to consider the committee's effectiveness and take steps to ensure members are able to fully discharge their roles and responsibilities. This will be considered as part of a report addressing these points that will be presented to the Audit & Governance Committee in June 2025.	Committee Team Manager	Head of Democratic Services (and Monitoring Officer)
IR6	Governance	The Council should ensure it maintains a register of officer interests; it should include all pecuniary and other interests and be updated on a yearly basis	A register of officers' interests is held and maintained, however it is recognised that the format and detail require improvement.	Committee Team Manager	Head of Democratic Services (and Monitoring Officer)
IR7	Governance	The Council should update the Members Code of Conduct to ensure it includes guidelines on gifts and hospitalities.	NOT AGREED We write out to Cllrs annually with the requirements for gifts and hospitality declarations and forms on the Cllr SharePoint site also provide guidance. The current Code does state (iii) the interests of any person from whom you have received a gift or hospitality with an estimated value of at least £50. The Monitoring Officer has confirmed that existing controls are sufficient to ensure that existing controls are sufficient to ensure that Members are aware of their responsibilities with respects to gifts and hospitality.	Committee Team Manager	Head of Democratic Services (and Monitoring Officer)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
IR8	Improving economy, efficiency and effectiveness	The Council should improve performance monitoring by: • ensuring the KPIs included within its corporate performance reports are based on the strategic objectives within its Corporate Plan 20242028 and cover all relevant areas • reporting annually on the Corporate Plan • using benchmarking to compare and set KPI targets • ensuring all KPIs have an assigned priority, regardless of whether they have a target or not.	We have reviewed our performance management framework and are revising our KPls to ensure alignment with the corporate plans at both councils. This includes the setting of targets wherever possible and making greater use of benchmarking to compare performance over time and with others. We will report annually on our progress against the corporate plans. This was not done last year due to the plans having been very recently adopted, but we will now return to this being an annual activity, reported each June.	Head of Business Planning and Performance	Director of Finance & Performance (S151)
IR9	Improving economy, efficiency and effectiveness	The Council should define its strategic partners and establish a register outlining who they are and how they support the Council's strategic objectives	NOT AGREED When officers are required to engage with businesses, community groups and other stakeholders they are directed to "Quick Guide to Engagement" that is held on the Councils SharePoint site. This guide provides advice on the best ways to communicate, consult or engage and is supported by our Communications Team. The guide covers: • Reasons for engagement • Who to engage - including stakeholder mapping • How to engage • Communication tips • Evaluating results Partnerships are clearly referenced when relevant reports are considered (neighbouring authorities, ESCC, Community Safety Partnership, CAG). The	Committee Team Manager	Head of Democratic Services (and Monitoring Officer)

Action	Theme	Recommendation	Progress	Responsible Officer	Executive Lead
			Council's view is that the existing process is sufficient to ensuring that relevant partners are identified and understands how these partnerships contribute to the Council's strategic objectives.		
IR10	Improving economy, efficiency and effectiveness	The Council should have a formal agreement supporting the partnership with Lewes District Council, such as a Service Level Agreement	A joint document "Lewes District Council and Eastbourne Borough Council Shared Services - Principles and process" has been drafted. The document is designed to summarise the key principles underpinning the shared services arrangements between Lewes District Council (LDC) and Eastbourne Borough Council (EBC). It also sets out the key processes by which the shared services arrangements operate at a strategic level, including managing any changes.	Head of Legal Services & Deputy Monitoring Officer	Chief Executive
IR11	Improving economy, efficiency and effectiveness	<ul> <li>The Council should improve its procurement arrangements by:</li> <li>developing a Procurement Strategy</li> <li>ensuring it is prepared for the Procurement Act 2023; such as, by developing a project/action plan</li> <li>reporting a complete and accurate record of all waivers raised and approved, to either the Cabinet or Audit and Governance Committee.</li> </ul>	The Procurement Strategy is due to go to Cabinet in July. Within the strategy, the is an action to report on waivers to the Procurement Oversight Group. The Procurement Act is now live, and we are amending the current Contract Procedure Rules to reflect the changes, which we aim to submit to cabinet in June. Once approved we will provide training sessions to the departments, so they are aware of the changes.	Strategic Procurement Manager	Director of Finance & Performance (S151)