## Level of Compliance with the CIPFA Financial Management Code Financial Year 2021/22

Ref	Description	FM Code	Detail	RAG Assessment	Compliance Assessment & Commentary
		Ref			Key Actions, Owners & Deadlines
Res		-	eam and Chief Financial officer (CF		
A	The leadership team is able to demonstrate that the services provided by the authority provide value for money (VFM).	17-18	Legislative requirement for Authorities to deliver VFM. Delivery of VFM depends on decisions of Elected Members. Shared responsibility across the Leadership Team to communicate and understand the risks involved.	AMBER	<ul> <li>Value for Money is assessed as part of the external audit process and although not yet formally concluded no issues have been raised by the External Auditor in relation to 2020/21, or previous years.</li> <li>The Council's Medium Term Financial Strategy (MTFS) and General Fund and Housing Revenue Budgets were agreed in February 2021. The MTFS delivers a financial plan through a rigorous budget setting process.</li> <li>One of the key objectives of the MTFS is to provide cost effective services which demonstrate value for money.</li> <li>Business cases for spending plans are reviewed by the Executive Team before passing through to Members for discussion and challenge prior to formal consideration by Cabinet and recommendation to Council for formal approval, in line with the Constitution.</li> <li>Regular meetings take place between Cabinet, Executive and statutory officers at which budget issues are discussed, including the continuing impact of COVID-19 on the Council's finances, to ensure that any proposals for additional spend show value of money.</li> <li>Budget &amp; Performance Panel reviews service and financial performance (against cost and performance) on a quarterly basis and uses its remit to periodically review key (off target) services.</li> </ul>

					The Annual Governance Statement focuses on all aspects of governance, but critically on processes around VFM in service provision
					The Council's Project Management Model which is the compulsory method of managing projects within the council contains key templates for financial assessments and risk management
					Assessment: Amber
					Actions Required
					Increased use of benchmarking data and peer review for inclusion in
					business case and as part of Outcomes Based Resourcing (OBR) to focus on VfM aspects.
					Ownership
					Executive Team
					Deadline
					February 2023 - To be incorporated as part of 2023/24 budget
	The second second second lines	40.40	la summer di la Otata mant		process)
В	The authority complies with the CIPFA	18-19	In summary this Statement requires that the CFO:	AMBER	Neither the Chief Finance Officer or Monitoring Officer posts are members of the Councils Executive Team and attend meetings on
	Statement on the Role		• Is a key member of the		invitation only. Although able to bring influence on the various
	of the Chief Finance Officer in Local		leadership team, helping it to develop and implement		business decisions this is often at the later stages of the process.
	Government		strategy and to resource and		The CFO personally leads on the Budget process and MTFS and
			deliver the organisation's		ensures that all risks are considered and detailed as part of the
			strategic objectives sustainably and in the public		MTFS, in conjunction with the other members of the Leadership Team (Cabinet and Executive).
			interest.		The CFO is CIPFA qualified with significant experience of local
			<ul> <li>Must be actively involved in, and able to bring influence to</li> </ul>		government finance. Continuing professional development is undertaken as required by their accounting body.

			<ul> <li>bear on, all material business decisions</li> <li>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.</li> <li>Must lead and direct a finance function that is resourced to be fit for purpose.</li> <li>Must be professionally qualified and suitably experienced.</li> </ul>		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 Financial Services function consists of 23 FTE's and delivers financial, exchequer and procurement support to services. The finance team includes 4 qualified accountants and a number of accounting technicians. There has been a significant reduction in capacity with key vacancies held pending a director led service review. There are contracts in place for specialist financial advice such as technical accounting, treasury management and taxation. Assessment: AMBER Actions Recruitment to address the capacity issues within finance function Owners Director of Corporate Services & CFO Deadline August 2022		
Gov	Governance and Financial Management Style						
С	The Leadership team demonstrates in its actions and behaviours responsibility for	21	The leadership team espouses the Nolan principles. The authority has a clear framework for governance and internal control.	RED	There is a Code of Conduct for Members which is overseen by the Standards Committee. In addition, there is a Code of Conduct for Officers.		

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.	Although the Council has in place a framework for governance and internal controls through its Code of Corporate Governance, following the ending of the shared arrangement for the provision of a Head of Internal and subsequent staff resignations the Council was without an Internal Audit service until the appointment of Mersey Internal Audit Agency (MIAA) in October 2021. Both the CFO and Head of Internal Audit (HoIA) have judged that sufficient audit work and coverage of key risks will be undertaken by July 2022 to provide assurance over the effectiveness of the Governance of the Council, and the system of Internal Control. This will enable the HoIA to provide their annual assessment to assist in the production of the Annual Governance Statement for 2021/22. The Financial Procedure Rules where last subject to a full review and approval by Audit Committee on 2014. Contract Procedure Rules, were reviewed and approved November 2020. Both documents are clear about the respective authorisation limits for authorisation of contracts and the subsequent commitment/ incurrence of expenditure. The Council's Audit Committee has no independent membership and is limited Councillor representation. The Committee considers all aspects of audit activity and the regulatory framework including corporate governance, as part of its Terms of Reference. Within the Council's Constitution all Committees have separate Terms of Reference.
		Assessment Red Actions
		Ensure that Internal Audit deliver sufficient audit work and coverage to support the annual HoIA Opinion and AGS Review of Financial procedure rules

					Ownership Chief Finance Officer Deadline July 2022
D	The authority applies the CIPFA/SOLA CE Delivering Good Governance in Local Government: Framework (2016)	22	This framework recommends that the review of the effectiveness of the system of internal control is reported in an annual governance statement	RED	As noted above the Council was without an internal audit function for approximately 6 months until the appointment MIAA in October 2021 The Council's Local Code of Corporate Governance, has not been comprehensively reviewed for a number of years with planned review in 2019 delayed due to the COVID-19 pandemic. A more comprehensive review will be undertaken in 2022 to take account of any potential longer-term changes arising from the impact of COVID- 19 and presented to Audit Committee November 2022 The Council prepares an Annual Governance Statement (AGS) in line with the framework within CIPFA's Local Code of Corporate Governance. The draft AGS is provided to the Audit Committee for review and approval in advance of its inclusion signing by the CEO and Leader of the Council and in the Statement of Accounts. Assessment Red Actions Undertake a comprehensive review of the local code of Corporate Governance

					Deadline November 2022
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.	GREEN	<ul> <li>The Council Plan together with the MTFS and annual budgets set the strategic framework for the work and financial plans of the Council and recognise the agreed corporate priorities and objectives.</li> <li><u>Stage 1.</u></li> <li>The Council has an effective framework of financial accountability through:         <ul> <li>Member delegations which include financial responsibilities.</li> <li>Officer delegations which include financial responsibilities.</li> <li>Financial Procedure Rules which set out financial responsibilities for Directors, Heads of Service and Budget Holders</li> </ul> </li> <li><u>Stage 2.</u></li> <li>The Council has an effective performance management framework in place including, performance measures, customer satisfaction, monitoring of key strategic projects and quarterly performance reporting to Cabinet and Budget and Performance Committee. The Finance Team have attempted to implement a Finance Business Partnering approach, although this has been restricted pending the capacity issues and forthcoming service review.</li> <li><u>Stage 3.</u></li> <li>There are many examples of financial management supporting Transformation specifically in relation to key strategic projects, but further work required towards acting as an enabler.</li> <li>Assessment Green</li> </ul>

					Actions Further work to develop business partnering model
Lon	g to Medium Term Finan	cial Man	agomont		
F	The authority has carried out a credible and transparent financial resilience assessment.		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	AMBER	The Council has reviewed the CIPFA Financial Resilience index and considers the findings to show the Council to be financially resilient with no areas of pressing concern. However, the index is based on data published in 2020 and has not yet been refreshed. The Local Government Association (LGA) undertook an independent assessment of the Council's financial resilience 2021/22. A number of outlying areas where highlighted for a detailed review and consideration against performance against outcomes. A more through piece of worth is planned for as part of the Council's Outcomes Based Resourcing approach to budgeting from 2023/24. In the MTFS there are some illustrative scenario's about how changes in key assumptions about Business Rates, Council Tax etc would impact on the budget, but these do not cover all key variables, or the longer-term impact. The Service and financial planning process provided information on cost and demand drivers to enable robust and informed financial planning in each service area. The Council has recognised the underlying structural deficit within its budget and although some OBR principles were applied as part of the 2021/22 and 2022/23 budget processes it is a core priority for all Officers in the coming financial year, and it will be expected to deliver significant inroads into the deficit. It will be further considered by the Financial Resilience Group alongside ongoing work to embed the Council's new priorities and outcomes during 2022/23.

					Actions Although the Council delivered a balanced budget for 2022/23 without a call on reserves, further work will be undertaken during the year to utilise OBR principles as it works to address the structural deficit as part of the 2023/24 budget process. Ownership CFO, Executive Team and Cabinet Deadline December 2022 – As part of the 2023/24 budget process
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 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 short- and medium-term decision making	AMBER	In consultation with Cabinet the Council produces a 4-year MTFS and a 30-year Housing Business Plan incorporating revenue and capital models using a range of assumptions for economic and service- related factors. The MTFS is refreshed annually considered by the Executive and Cabinet before being recommended to Full Council. The current high levels of uncertainty around future funding for local government, and the legacy impacts of COVID-19, as well as local factors such as the decommissioning of the Heysham Nuclear Power Stations and the growing structural deficit make producing a meaningful long-term plan very challenging. The risks around financial planning are clearly set out in the Council's MTFS and has been communicated to the Executive and Members. Although there is significant work to be completed to fully embed risk management throughout the Council, it is recognised that a considerable amount of work is undertaken to manage the Council's financial risks. The Council needs to continue to develop its overall approach in particularly around the key drivers underpinning the structural deficit.

					The Council retains prudent levels of resources to manage risks over the short term as outlined in the budget and MTFS papers.
					Assessment Amber Actions Although the Council delivered a balanced budget for 2022/23 without a call on reserves, further work will be undertaken during the year to utilise OBR principles as it works to address the structural deficit as part of the 2023/24 budget process.
					Ownership CFO, Executive Team and Cabinet Deadline December 2022 – As part of the 2023/24 budget process
Η	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	GREEN	<ul> <li>The Council is aware of its obligations under the Prudential Code and has assessed itself as compliant with those obligations.</li> <li>The Council has a 5-year General Fund Capital Programme and supporting Capital Strategy in line with the Prudential Code. Although the Code suggests this could be extended the Council has judged that this is a reasonable period over which to have meaningful plans and assumptions.</li> <li>The Capital Programme sets out the high-level capital investment plans proposals but in addition contains a limited "development pool" for projects the Council wish to explore but where the supporting business case is not fully developed. Decisions made about schemes within the development pool are through consideration of robust</li> </ul>

			performance against the prudential indicators that it has set.		business cases and separate reports to Cabinet. The Council also has a 30-year Housing Business Plan which includes a 30-year capital investment programme. The Councils prudential indicators are set in line with the Code and reflect current and forecast levels of investment and borrowing. There are effective mechanisms in place to monitor performance against the Code, with bi-annual reporting to the Cabinet, Budget & Performance Panel and Council. The Councils commercial investments ceased following the revisions to the Code in November 2020 and the Council has no plans for further debt for yield schemes. Previous commercial investments were undertaken in line with the Council's Commercial Property Investment Strategy. Assessment: Green Actions Assess the implications arising from any proposed changes to the Prudential Code. Owner CFO Deadline On going
I	The authority has a rolling, multi-year medium-term financial plan consistent with sustainable service plans.	27	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.	AMBER	The Council has in place an agreed 4-year MTFS. The strategy is consistent with the capital programme and is refreshed annually to reflect relevant strategic priorities, commitments, underlying assumptions as well as emergent local, or national issues. The development of service budgets is Directorate led. Cost drivers and demand are considered within each directorate and used to form

The medium-term financial plan has been prepared on the basis of a robust assessment of the relevan drivers of cost and demand.	in the MTFS but forms part of the internal budget setting process
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Ann	<u> </u>							
J	The authority complies	29	The authority is aware of its	GREEN	The Council understands its obligation in respect of the budget-			
	with its statutory		statutory obligations in respect of		setting process and has set a balanced budget for the current year.			
	obligations in respect of		the budget-setting process.					
	the budget setting		31		The 2021/22 revenue budget was approved at Full Council 24			
	process.		The authority has set a balanced		February 2022 and required a contribution of £2.267M from the			
	process.		-					
			budget for the current year.		Council's reserves in order to balance the budget.			
			The authority is likely to be able to		Through a review of a number of areas including the capital			
			set a balanced budget for the		programme and income generating opportunities the Council			
			forthcoming year.		balanced its 2022/23 budget without a call on reserves. Although a			
			, et al. e et al. e g y e en t		structural deficit remains for 2023/24 with drawings on reserves			
			The authority is aware of the		forecast. The overall level of reserves remains sustainable in the			
			2					
			circumstances under which it		short-term pending the outcomes of OBR			
			should issue a Section 114 notice					
			and how it would go about doing so.					

					The Council is aware of the circumstances under which it should issue a section 114 notice and how it would go about doing so. This includes latest guidance issued by CIPFA in light of COVID-19. Assessment: Green Actions 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 estimates to be incorrect and the impact should this be the case. 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 authority has sufficient reserves to ensure its financial sustainability for the foreseeable future.	AMBER	Both the General Fund and HRA budget reports include a statement by the Chief Finance Officer on the robustness of the estimates and a statement of the adequacy of the proposed financial reserves The budget reports set out the detail of key estimates e.g., business rates, council tax, housing rents, specific grants, fees and charges etc. It does not set out specific service assumption details and the impact of variations in those. The report sets out the current level of the Council's reserves, the sufficiency of them and the plans for the use of reserves in the future. Based on current information the Council has sufficient reserves to meet the expected deficits, which ensures its sustainability for the short-term pending the outcome of the Council's Outcomes Based Resources review. Assessment: Amber Actions Required A process is already underway to seek an in-year reduction in the use of reserves to deliver a balanced budget for 2023/24 and beyond Owner CFO, Executive Team and Cabinet Deadline

					December 2022 – As part of the 2023/24 budget process
Sta	keholder Engagement and	Busin	ess Plans		
L	The authority has engaged, where appropriate, with key stakeholders in developing its long-term financial strategy, medium term financial plan and annual budget.	31	The authority knows who its key stakeholders are. The authority has sought to engage with key stakeholders in developing its long-term financial strategy, its medium-term financial plan and its annual budget. The authority has assessed the effectiveness of this engagement. The authority has a plan to improvement its engagement with key stakeholders.	AMBER	The Council is aware of who its key stakeholders are. Currently it only undertakes limited formal engagement and consultation with residents and interested parties on its medium-term financial strategy and annual budget through the Budget & Performance Panel meeting in January each year. 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, rather than detailed engagement on the whole budget. Whilst recognising that engagement with the public on Council spending is hard for residents to engage with in a meaningful way progress is being made via its Community Connectors and Peoples Jury and it is hoped an increased use of on-line tools. Engagement is therefore focussed on development of the Council Plan and Priorities through consultation with residents, businesses, and other organisations with a stake in the district Assessment: Amber Actions Required Review and consideration of the most effective methods of stakeholder engagement on financial matters. Owner Executive Team and Cabinet Deadline February 2023 – As part of the 2023/24 budget process

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 Council recently established a Projects Team overseen by a Programme Manager as well as refreshing its project management methodology and supporting documentation, which is consistent with other government and other leading methodologies. 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 although this not yet fully embedded and is inconsistently applied across the Council Delivering our Priorities (DoP) quarterly reports are presented to Cabinet and Budget & Performance Panel. The DoP reports contains
			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 risk associated with any preferred option(s).	Cabinet and Budget & Performance Panel. The DoP reports contains not only financial and project reporting but performance against the Council's key performance indicators (KPI's) External specialism is engaged when required and members of the Finance Team and are involved in the review and challenge of all financial modelling along with key input from other key support services and the service area leading on delivery. Business cases contain both quantitative evaluation of costs and benefits and qualitative evaluation of fit to Council Priorities 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 Capital schemes within the development pool are reviewed by the Capital Strategy Group which includes the chairs of Budget and Performance and Overview and Scrutiny Committees prior to submission to Cabinet, or Full Council if applicable for consideration and approval. Assessment: Amber

					Action Further work is required to fully embed project management and the accompanying disciplines throughout the Council and ensure that is consistently applied. Owner Executive Team and Programme Manager Deadline December 2022 – As part of the 2023/24 budget process
Monit	oring Financial Performa	ance			
N 1	The Leadership team takes action using reports enabling it to identify and correct emerging risks to its budget strategy and financial sustainability.	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. 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	GREEN	<ul> <li>Quarterly financial and non-financial DoP reports are provided to Executive, Cabinet and Budget &amp; Performance Panel. The reports identify significant variances and provides some commentary on any corrective actions being taken. The reports cover the position to date and the forecast for the remainder of the financial year. It also includes of the various capital schemes and planned use of reserves.</li> <li>DoP reporting also provides information in respect of the Council's basket of key operational performance indicators and projects.</li> <li>Reporting to officers is usually 1-month after the quarter end with reporting to Members in the following two weeks, dependent upon committee cycles, which creates a time lag. As a result of COVID-19 Financial information, forecasts are available on a more regular basis and accessible by budget holders this highlights significant variances earlier.</li> <li>Assessment: Green</li> <li>Action</li> </ul>

			its ability to use these reports to take appropriate action		More work is required to ensure timely distribution of financial information, reporting of corrective action as well as refinements to various aspects Owner CFO Deadline 2022/23 Quarter 1 Delivering our Priorities report
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.	GREEN	The Council has historically considered its reserves position, investments and borrowing, and debt levels as most critical and therefore reporting is currently only made on these elements of the balance sheet. Forecast use of reserves is reported on a quarterly basis to the Cabinet, Budget and Performance and 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, or revised budget process, along with intelligence about key risks. Borrowing and investments are reported to Cabinet, Budget and Performance and Council on a bi-annual basis as part of the Treasury Management reporting. Prudential Code requirements are adhered too to provide the risk management of treasury activity. Additional reporting on areas including collection rates, arrears and write offs now incorporated Assessment: Green Action Required Continued review and refinement of the presentation of financial information

					Ownership CFO Deadline On going
Exte	rnal Financial Reporting				
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.	35	<ul> <li>The authority's leadership team is aware of the CFO's responsibilities in terms of the preparation of the annual financial statements.</li> <li>The authority's CFO is aware of their responsibilities in terms of the preparation of the annual financial statements.</li> <li>These responsibilities are included in the CFO's role description, personal objectives and other relevant performance management mechanisms.</li> <li>The authority's financial statements have hitherto been prepared on time and in accordance with the requirements of the Code of Practice on Local Authority Accounting in the United Kingdom.</li> </ul>	GREEN	Both the Council's leadership team and CFO are aware of the CFO's responsibilities in terms of the preparation of the annual financial statements. These responsibilities form part of the CFO's role description and personal objectives. The Council's Statement of Accounts are prepared on time and in accordance with the requirements of the Code of Practice on Local Authority Accounting in the United Kingdom. A declaration to this effect is made within the accounts and signed by the S151 Officer. Assessment: Green Actions Required: None
Q	The presentation of the final outturn figures and variations from budget	35	The authority's leadership team is provided with a suitable suite of reports on the authority's financial	GREEN	The presentation of the final outturn position to the Cabinet and Executive compares the outturn to budget and explains the reasons

allows the Leadership	outturn and on significant variations	for any key variances from budget in line with the in-year quarterly
team to make strategic	from budget.	budget monitoring process.
financial decisions.	The information in these non-orts is	The nement esta suit the immediat of these veriences on menoral
	The information in these reports is presented effectively.	The report sets out the impact of these variances on general balances and earmarked reserves and makes proposals for further
	presented enectively.	contributions to/ or from these.
	These reports are focused on	
	information that is of interest and	These reports focus on material issues, which require action or
	relevance to the leadership team.	awareness from the leadership team and therefore are appropriately
		focused
	The leadership team feels that the	
	reports support it in making strategic financial decisions.	In addition, the narrative report that accompanies the Statement of Accounts provides a link to achievement of outcomes and
	strategic illiaricial decisions.	performance. The Leadership Team understand variances from
		budget and how they have been managed.
		Assessment: Green
		Actions Required: None