



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

ANNUAL GOVERNANCE STATEMENT

2024/2025

Mae'r ddogfen hon hefyd ar gael yn Gymraeg

This document is also available in Welsh

www.npt.gov.uk

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Introduction

To prepare our Annual Governance Statement, the council has adopted the 2016 Delivering Good Governance in Local Government: Framework (the Framework), developed by the Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Council Chief Executives (SOLACE). We have also taken into account the Delivering Good Governance in Local Government: addendum, which was released in May 2025.

The council must publish an Annual Governance Statement (AGS) to comply with this Framework. The AGS explains the processes and procedures in place to enable the council to carry out its governance functions effectively. The governance framework comprises of the systems, processes, cultures and values by which the council is directed and controlled, and through which we engage with, and lead, the local community. The framework brings together an underlying set of legal requirements, good practice and management processes.

The AGS forms part of the council's corporate governance framework which also includes a local Code of Corporate Governance and corporate self-assessment. The council is now in its fourth year of conducting a self-assessment, meeting the requirements of the Local Government and Elections (Wales) Act 2021. The self-assessment allows us to score ourselves on the effectiveness of the council's system of internal control in place for the year ending 31st March 2025. This Annual Governance Statement contributes to the self-assessment by demonstrating:

- The council's business is conducted in accordance with all relevant laws and regulations;



- Public money is safeguarded and properly accounted for;
- There is sound and inclusive decision making;
- Resources are used economically, efficiently and effectively;
- There is clear accountability for the use of those resources to achieve agreed priorities which benefit local people and communities to ensure value for money and long term-sustainability;
- A commitment to continuous improvement.

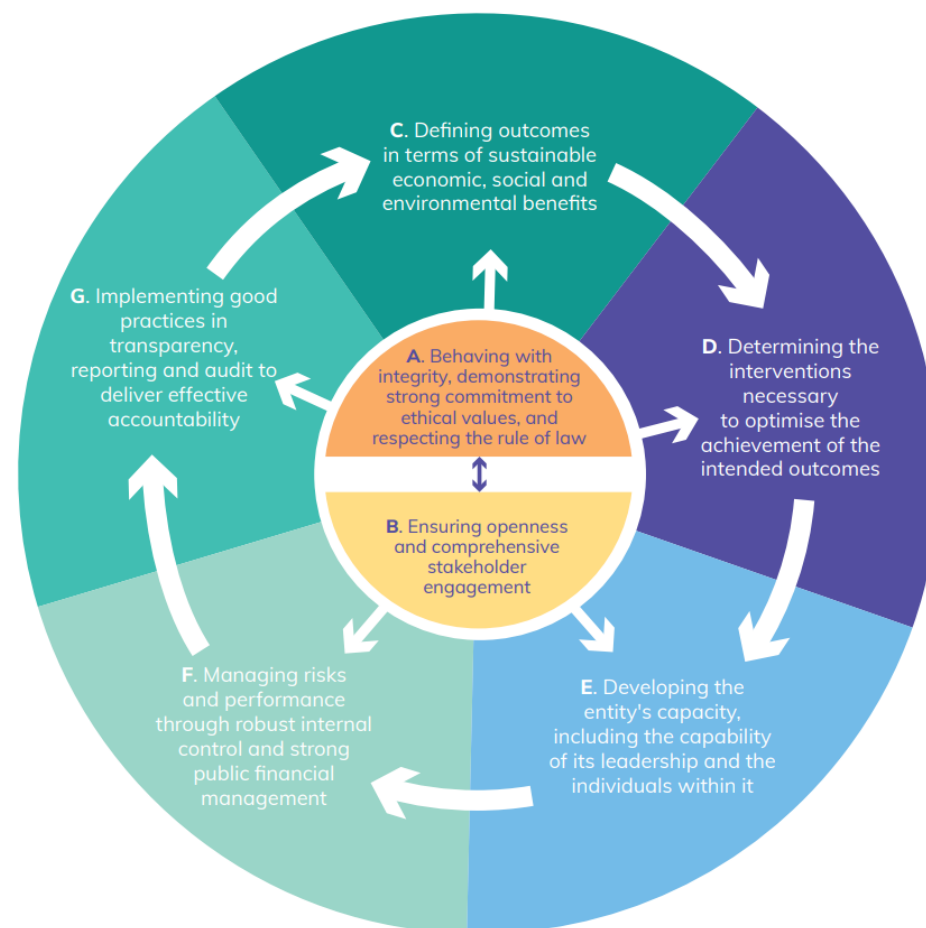
The council's systems of internal control are designed to manage risk to a reasonable level. The council cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness.

Delivering Good Governance in Local Government: Framework (The Framework) 2016

The Framework comprises of two core principles and five supporting principles as illustrated in the diagram. Principles A and B run through Principles C to G, but good governance is dynamic, and the council is committed to improving governance on a continuing basis through a process of evaluation and review as a whole.

The next section, Putting the Principles into Practice, illustrates examples of how the council demonstrates compliance to meet these seven principles. In addition, the council uses a number of ways to review and assess the effectiveness of its governance arrangements, and **Table 1 on page 68** highlights the improvements made during 2024/2025, which were identified during the 2023/2024 AGS.

Whilst preparing this Annual Governance Statement, we have reflected on any governance improvement areas which need reviewing or will be further developed in 2025/2026. These have been included in an action plan set out in **Table 2 on page 78**. The Corporate Governance Group, will oversee the action plan and progress will be reported to Strategic Leadership Team throughout the financial year and to the Governance & Audit Committee on a six monthly basis.



Putting the Principles into Practice

PRINCIPLE A: BEHAVING WITH INTEGRITY. DEMONSTRATING STRONG COMMITMENT TO ETHICAL VALUES, AND RESPECTING THE RULE OF THE LAW		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
1.1 Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation.	1.1.1 Corporate Induction	
	Assurance arrangements	The Corporate Induction Programme ensures that participants benefit from consistent, council-wide information – gaining an appreciation of our purpose and values, prompting them to consider how they can embody these on a day-to-day basis. There are contributions from HR colleagues, Health & Safety, Learning & Development and more, as well as a “welcome” from the Chief Executive. New starters still receive a “local induction” from their line managers – addressing departmental matters. Corporate Induction Programme is delivered on a quarterly basis.
	1.1.2 Employee Code of Conduct	
	Assurance arrangements	The Employee Code of Conduct sets out the principles by which all employees should act. This includes the need to make the necessary declarations regarding interests, gifts and hospitality accepted/rejected. The policy sets out how all council employees are obliged to ensure that their private interests do not conflict with their public duties and comply with the council's rules on the registration and declaration of financial and non-financial interests. The code was updated in January 2021.
	1.1.3 Member Code of Conduct	

PRINCIPLE A: BEHAVING WITH INTEGRITY. DEMONSTRATING STRONG COMMITMENT TO ETHICAL VALUES, AND RESPECTING THE RULE OF THE LAW

Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Assurance arrangements	<p>All members and officers are required to comply fully with Codes of Conduct as set out in the Constitution, which sets out the particular roles and responsibilities and provides clarity on the interfaces between these roles. This includes:</p> <ul style="list-style-type: none"> • Functions and subsections delegated to officers • Members' Code of Conduct (including social media principles) • Employees' Code of Conduct • Protocol on Member/Officer Relations <p>Members and Co-opted Members are required to register their personal interests in any business of the council, and to comply with the rules on personal interests set out in the Members' Code of Conduct. All personal interests disclosed by Members are published on the council's website within the Member's profile information.</p> <p>The Monitoring Officer (the Head of Legal and Democratic Services) has the specific duty to ensure that the council, its officers, and its elected councillors maintain the highest standards of conduct in all they do., This is based on Section 5 of the Local Government and Housing Act 1989, as amended by Schedule 5, paragraph 24 of the Local Government Act 2000.</p> <p>The Standards Committee has a responsibility to monitor and scrutinise the ethical standards of the council, its members, employees and any associated providers of council services, and to report to the council on any matters of concern. The committee is chaired by an independent person, and its role includes determining the outcome of complaints against councillors and co-opted members.</p> <p>The Local Government and Elections (Wales) Act 2021 provided an additional duty on group</p>

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		leaders to ensure members within their political group also comply with the Members Code of Conduct and ongoing support will be provided on this function via the Standards Committee.
	Update - 2024/2025	In 2024/2025, the Monitoring Officer was notified of a total of three complaints relating to Member conduct. One related to a County Borough Councillor, and two related to Community Councillors. The Public Services Ombudsman found that there was no evidence of a breach of conduct in all of these cases. The Standards Committee and Full Council considered the Committee's Annual Report 2023/24 in April 2024, and outlined the work of the Committee.
	1.1.4 Members: An induction programme for Members	
	Assurance arrangements	The induction programme forms part of the council's Strategy and Charter for Member Development, and is structured for both new and returning members. The aim is to provide a supportive and structured development framework to enable members perform their duties. Members elected through by-elections receive a tailored induction. Training takes place following local government elections, and continues to be embedded in member training. An annual survey takes place of members to identify any training and development needs. The induction programme was updated in 2023.
	1.1.5 Staff: New Starter Induction Checklist	
	Assurance arrangements	New starter induction checklist contains information about the expected standards of behaviour and must be signed by managers and their employees.
	1.1.6 Performance Appraisal Process	

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Assurance arrangements	<p>The majority of employees within the council should have regular 1:1s or supervision sessions with their manager to address their performance and to discuss training and development needs. Performance appraisal forms have been developed following feedback from managers and employees. The forms focus on:</p> <ul style="list-style-type: none"> • Discussions between managers and employees • Previous year's achievements • Recording of future objectives, goal outcomes, and • Development needs, including any personal career plans.
	Update - 2024/2025	The Learning, Training & Development Team will progress the implementation of the iTrent HR/Payroll Database. The launch of the Development module will facilitate more effective recording of the appraisal process, provide greater assurance, and allow for reporting on the number of appraisals carried out.
1.2 Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These	1.2.1 Corporate vision and values	
	Assurance arrangements	The council's vision and values are published in the council's Corporate Plan . They are also incorporated into our recruitment processes and written into all new and revised job descriptions and person specifications.
	Update - 2024/2025	The Corporate Plan was updated for 2024/2027, the vision and values remain the same as agreed in 2022.
	1.2.2 The vision and priorities for staff are contained within the council's Strategic Workforce Plan	

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
should build on the Seven Principles of Public Life (the Nolan Principles)		The Strategic Workforce Plan: The Future of Work Strategy 2022 – 2027 was agreed by the council's Personnel Committee in October 2022.
	Assurance arrangements	During 2023/2024 Audit Wales published their Springing Forward: Strategic Workforce report . The content of the report concluded that the council has a clear vision for its workforce, strengthened by its work with partners, which continues to be a strategic priority for delivering its well-being objectives. Two overall recommendations were made by Audit Wales, and accepted by the council, which are being progressed as improvements.
	Update - 2024/2025	A review of the Strategy was considered by Personnel Committee in March 2024 and again in March 2025, and the strategic priorities were confirmed as remaining fit for purpose. The Delivery Plan for 2024/2025 and 2025/2026 were approved for implementation.
1.3 Leading by example and using these standard operating principles or values as a framework for decision making and other actions		1.3.1 Integrated Impact Assessment (IIA) - The tool assesses the impact of proposed initiatives relating to key legislation. It is applied to decisions making to consider whether initiatives will have a positive, negative or neutral impact on the community.
	Assurance arrangements	The IIA tool, guidance and associated forms were updated in autumn 2023 to comply with the enforcement actions as contained in the Welsh Language Commissioner's decision notice in relation to complaint CS 114 (for further details see the Complaints section page 14).
	Update - 2024/2025	Training on the requirements of the policy making standards as they relate to consultation documents was arranged for relevant officers in October 2024. This was delivered by Ateb, who have extensive bilingual communications and compliance experience in consultation and engagement exercises across Wales. The training was attended by officers involved in developing consultation documents on policy decisions relating to reorganising education in NPT and officers

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		who hold licences for Snap Survey software, Planning Policy officers and Corporate Policy, Performance and Engagement Officers.
	1.3.2 Declarations of Interest	
	Assurance arrangements	These are made by members at the beginning of Committee meetings and recorded in the meeting minutes, with guidance and training and provided by the Monitoring Officer. The Standards Committee reviews declarations of interest and the granting of dispensations to ensure ethical decision making.
	1.3.3 Member and Officer Relations Protocol	
	Assurance arrangements	<p>A protocol is in place as part of the council's Constitution and Employee Code of Conduct. A review of the protocol was undertaken at the early stages of the member induction programme, as part of the wider review of the council's Constitution. Copies of which have been distributed to officers.</p> <p>A detailed member induction programme takes place following local government elections. This includes specified training relating to the Members' Code of Conduct, social media issues, gifts and hospitality and officer/member protocols. Training has also been provided to officer groups within the council on the nature of the relationship between officers and members, which will continue in future years.</p> <p>The protocol is monitored by the Standards Committee, who considered the protocol and its implementation recommending a few minor changes for consideration which will now be included within the Constitution going forward and circulated to officers and members.</p>

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Update - 2024/2025	As of the 31 st March 2025, 43 of the 60 elected members attended a follow up refresher session.
	See section 1.1.2 Employees Code of Conduct	
	See section 1.1.3 Members Code of Conduct	
1.4 Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively	1.4.1 The Anti-fraud, Corruption and Malpractice Strategy	
	Assurance arrangements	The council's Anti-Fraud and Corruption Strategy demonstrates the zero tolerance approach to fraud and corruption. This strategy outlines how the council delivers an effective approach to managing the risk of fraud and corruption. The council maintains a continuous overview of arrangements via the Finance Director (Section 151 Officer), the Constitution (including financial procedure rules), various codes of conduct, and its internal audit arrangements.
	Update - 2024/2025	The council's Anti-Fraud and Corruption Strategy 2022/2025 was approved by Cabinet on 25 th April 2023. The Strategy is due for review and update within 2025/2026.
	1.4.2 Member Interests	
	Assurance arrangements	Declarations of Interest for Members is a standing item on all meeting agendas, recorded in minutes of meetings, and are shown by individual members on the council website. The Standards Committee reviews declarations of interest and the granting of dispensations to ensure ethical decision making.
	1.4.3 Staff Interests	

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Assurance arrangements	An up-to-date register is held by each directorate and is subject to Internal Audit review annually.
	1.4.4 Neath Port Talbot Constitution	
	Assurance arrangements	<p>The Constitution sets out how the council operates and the process for policy and decision-making. Within this framework all the decisions are taken by Council and Cabinet. The decisions are presented in a comprehensive written format in a standard template. A record of decision-making and supporting materials are published (publicly accessible reports only) on the council's website via Modern.gov.</p> <p>In accordance with the Local Government and Housing Act, 1989, the Monitoring Officer ensures compliance with established policies, procedures, laws and regulations. After appropriate consultation, this officer will report to the full Council in respect of any proposals, decisions or omissions which could be unlawful, or which have been subject of an Ombudsman Investigation resulting in a finding of maladministration. The Monitoring Officer oversees the council's Constitution and ensures it is kept up to date. The Council's Modernisation Group continues to review constitutional provisions on a regular basis to ensure the Constitution is kept up to date.</p> <p>The Constitution is regularly updated and available for public inspection either on the website or in person.</p>
	Update - 2024/2025	The Monitoring Officer has not issued a Section 5 report in 2024/2025.
	1.4.5 Staff Gifts & Hospitality	

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Assurance arrangements	An up-to-date register is held by each directorate and is subject to Internal Audit review annually.
	1.4.6 Whistleblowing Policy	
	Assurance arrangements	The council's Whistleblowing Policy encourage workers to disclose any malpractice or misconduct of which they become aware and importantly to provide protection for workers who report allegations of such malpractice or misconduct. Any whistleblowing worker is protected against adverse employment actions (discharge, demotion, suspension, harassment, or other forms of discrimination) for raising allegations of business misconduct.
	Update - 2024/2025	The policy was reviewed by officers and Standards Committee within 2024/2025, and was discussed at the 9 th September 2024 Standards Committee. The revised Whistleblowing Policy was approved by Personnel Committee on 10 th February 2025, and is accessible on the council's intranet and internet websites.
	1.4.7 Corporate Comments, Compliments and Complaints Policy	
	Assurance arrangements	The Corporate Comments, Compliments and Complaints Policy meets the requirements set out in the Public Service Ombudsman for Wales Model Complaints Policy.
	1.4.8 Social Services Compliments and Complaints	
	Assurance arrangements	Legislation requires social services authorities to maintain a procedure for considering complaints and representations and the purpose of this report is to provide a review and statistical analysis of the complaints, comments and compliments received by Social Services during the reporting period.

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Update - 2024/2025	The latest Social Services Compliments and Complaints Annual Report 2023/2024 was prepared and reported to Social Services, Housing and Community Safety Scrutiny Committee on 1st May 2025. No systemic issues were identified.
	1.4.9 Corporate Comments, Compliments and Complaints	
	Assurance arrangements	<p>The Corporate Comments, Compliments and Complaints Annual Report is presented to Governance & Audit Committee, to enable the Committee to discharge the following functions contained in the Local Government & Elections (Wales) Act 2021:</p> <ul style="list-style-type: none"> to review and assess the council's ability to handle complaints effectively to make reports and recommendations in relation to the council's ability to handle complaints effectively. <p>The Corporate Complaints Group (made up of officers with responsibility for dealing with complaints) meet on a quarterly basis to share best practice and to identify and implement any identified improvement work.</p>
	Update - 2024/2025	The Corporate Comments, Compliments and Complaints Annual Report 2023/2024 was presented to Governance & Audit Committee on 21 st February 2025. No systemic issues were identified.
	1.4.10 – Contract Procedure Rules	
	Assurance arrangements	The council's Contract Procedure Rules, Employee Code of Conduct and the Procurement Act 2023 require officers and members not to have any involvement in a tender process where they have a potential conflict of interest. They should have no role whatsoever that should negate the need for any declarations of interest to be made.

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Update - 2024/2025	The Contract Procedure Rules and Standing Orders were updated and approved by Full Council in February 2025 to incorporate amendments to procurement legislation (Procurement Act 2023), and a training programme for officers has commenced.
2.1 Seeking to establish, monitor and maintain the organisation's ethical standards and performance	2.1.1. Corporate Procurement Team	
	Assurance arrangements	Ethical standards are acknowledged by the team when undertaking tender work for other sections and when developing and evaluating procurement processes and have been enshrined in all tendering activities. The team also monitor and evaluate compliance looking at what approach sections adopt. The Procurement Strategy issued to all sections sets out processes that should be valued.
2.2 Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation	2.2.1 Member training	
	Assurance arrangements	The induction programme forms part of the council's Strategy and Charter for Member Development, and is structured for both new and returning members. The aim is to provide a supportive and structured development framework to enable members to perform their duties. Members elected through by-elections receive a tailored induction. This training programme took place following local government elections in May 2022 and continues to be embedded in member training. An annual survey takes place of members to identify any training and development needs. Annual reports are presented to Standards Committee. Members Declaration of Acceptance of Office – undertaken to abide by the Members' Code of Conduct.
	See section 1.1.3 - Member Code of Conduct	

PRINCIPLE A: BEHAVING WITH INTEGRITY. DEMONSTRATING STRONG COMMITMENT TO ETHICAL VALUES, AND RESPECTING THE RULE OF THE LAW		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
2.3 Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values	2.3.1 Recruitment and Selection Policy 2018	
	Assurance arrangements	Training is provided to recruiting managers, and courses are undertaken in relation to Recruitment and Selection, Safe Recruitment and other Employment Policies and Procedures. Unconscious Bias training is available for managers, a review of equalities training is underway, and a matrix approach is being considered, setting out what training is mandatory for particular groups of employees, including recruiting line managers.
	Update - 2024/2025	The Recruitment Policy has been reviewed and was approved by Personnel Committee in September 2024. It will be proposed that all recruiting managers undergo unconscious bias training.
	2.3.2 Pay Policy Statement	
	Assurance arrangements	The Pay Policy Statement provides the framework for decision making on pay, and in particular, decision making on senior pay. Preparing and publishing this statement is a requirement under the Localism Act 2011. The provisions in the Act do not apply to the staff of local authority schools and therefore teaching staff are not included in the scope of this document.
	Update - 2024/2025	The 2025/2026 review has taken place and the revised Pay Policy Statement was presented to Council on 20 th March 2025.
	2.3.3 Contract Procedure Rules	
	Assurance arrangements	Training is available to staff and advice booklets are provided. Ongoing support is provided to sections in complying with procurement rules and processes. A dedicated section of the council's intranet has provided standard documents and processes for officers to follow.

PRINCIPLE A: BEHAVING WITH INTEGRITY. DEMONSTRATING STRONG COMMITMENT TO ETHICAL VALUES, AND RESPECTING THE RULE OF THE LAW		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Update - 2024/2025	The Contract Procedure Rules and Standing Orders were updated and approved by full Council in February 2025 to incorporate amendments to procurement legislation (Procurement Act 2023) and a training programme for officers has commenced.
2.4 Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with high ethical standards expected by the organisation	2.4.1 Ethical Employment in Supply Chain Policy 2019	
	Assurance arrangements	Policy introduced in 2019 and annual reports brought to Cabinet and Scrutiny setting out how the council complies with the arrangements set out in the policy.
	2.4.2 Continue to participate in a number of partnerships.	
	Assurance arrangements	<p>Governance arrangements are in place for each partnership which:</p> <ul style="list-style-type: none"> Clarify the roles of members both individually and collectively in relation to the partnership, and to the council; Clearly set out the legal status of the partnership; <p>Make clear the extent to which representatives or organisations both understand and make clear to all other partners the extent of their council to bind their organisation to partner decisions.</p> <p>Given the importance of collaboration to this council, Scrutiny committees review existing collaborations to make sure they were all on a strong footing, and are productive to enable the council's Cabinet to be confident that those arrangements are working in the best interest of citizens. It is also ensuring that there is clear and effective democratic oversight of those arrangements. The council plays an active role in collaborative arrangements to ensure the best return for our citizens and other stakeholders. These arrangements are reviewed regularly to ensure they meet the required needs of the council. In areas where they do not meet them, reports are</p>

PRINCIPLE A: BEHAVING WITH INTEGRITY. DEMONSTRATING STRONG COMMITMENT TO ETHICAL VALUES, AND RESPECTING THE RULE OF THE LAW		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		brought to members highlighting various risks and concerns for the decisions to be made on future actions.
	Update - 2024/2025	To ensure that a copy of all partnership agreements are logged centrally with the Head of Legal & Democratic Services. This work was completed in 2023/2024 and updated in 2024/2025 with a report to full Council on all Joint Committees the council participated in. The focus of this work was reviewed in 2024/2025 as part of the council's Corporate Plan work.
	2.4.3 Procurement Strategy	
	Assurance arrangements	<p>The purpose of the Procurement Strategy is to set out how we are changing procurement within the council, to enhance our contract management arrangements and set out the vision and strategic direction necessary to deliver better outcomes for our communities. The strategy also sets out how the council intends to carry out procurement in a socially responsible way, and how to meet the objectives it has set. The strategy has been developed with a full appreciation of the complex regulatory framework within which procurement operates. It also recognises that it is an area with high risks – with potentially significant impacts on service delivery, financial management and legal compliance, as well as the overall reputation of the council.</p> <p>The strategy attempts to meet the requirements of different procurement objectives such as obtaining value for money, procuring responsibly and supporting Small and Medium Enterprises (SMEs) and the Voluntary and Community sector (VCS). It recognises that these objectives can sometimes be in conflict with one another, and that achieving the best outcome will often depend on the circumstances surrounding a particular procurement exercise. SMEs play a major role in Neath Port Talbot in creating jobs and generating income and can deliver real social and economic benefits. Engagement with this sector is a core operational way of doing business, integrated into all</p>

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		directorates and departments and activities with regular reporting against targets. VCSs can help play a significant role in delivering social value.
3.1 Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations	3.1.1 Cabinet and Committee reports contain a section entitled “Legal Impacts” so that legal obligations are placed at the forefront of decision making.	
	Assurance arrangements	‘Safe and Legal Decision Making Training’ is available for relevant officers and is provided on an annual basis by the Head of Legal and Democratic Services to council officers. Democratic Services Officers and Legal Services monitor reports to ensure legal compliance.
	See section 1.4.4. The Constitution	
3.2 Creating the conditions to ensure that statutory officers, other key post holders and members are able to fulfil their responsibilities in accordance with legislative and regulatory requirements	3.2.1 Financial management arrangements	
	Assurance arrangements	We have a range of policies and procedures (such as financial regulations, financial procedures, contract standing orders, accounting instructions and officer delegations) that conform to the governance requirements of the CIPFA Statement of the Role of the Chief Financial Officer in Local Government (2010). A review of Accounting Instructions was completed during 2022/2023.
	3.2.2 Democratic Services - support function.	
	Assurance arrangements	The Head of Democratic Services presents an annual report to Democratic Services Committee and Council, outlining the resource requirements to enable the Council, Cabinet and Committee to receive high level support and discharge of its democratic functions. The Chair of the Democratic Services Committee presents an Annual Report of the Democratic Services Committee to full

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Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		Council updating Members on the work that has been undertaken by the Committee during the previous civic year.
	See section 1.4.4 - The Constitution	
3.3 Striving to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders	3.3.1 Cabinet and Committee Reports contain a section entitled “Legal Impacts” so that legal obligations are placed at the forefront of decision making.	
	Assurance arrangements	Legal Enterprise Case Management Software provide audit trails of legal advice given and time spent providing legal advice on all matters. Transaction documentation and hard copies of legal advice provided are stored by the council. Legal training is provided to officers on a regular basis to ensure they are up to date with recent legal developments and powers available.
3.4 Dealing with breaches of legal and regulatory provisions effectively	3.4.1 Data Protection Breaches Panel review cases.	
	Assurance arrangements	Head of Legal & Democratic Services and Information Risk Officers report annually to the Corporate Governance Group to give an assurance that the current system for dealing with data protection breaches is fit for purpose. The council retains a breach register, which is presented to the Corporate Governance Group on a quarterly basis.
	Update – 2024/2025	Two referrals were made to the Information Commissioner’s Office. No further action was required by the Information Commissioner’s Office.
	3.4.2 Internal Audit Special Investigations/Disciplinary Cases	

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	Assurance arrangements	The council requires that all officers who carry out disciplinary investigations have undertaken the Advisory, Conciliation and Arbitration Service (ACAS) Investigation Officers training. In addition, Heads of Service who are the decision makers in disciplinary investigations must have attended the ACAS Decision Maker training.
	See section 3.3.1 - Cabinet and Committee Reports	
3.5 Ensuring corruption and misuse of power are dealt with effectively	3.5.1 Standards Committee	
	Assurance arrangements	The Standards Committee has oversight of the complaints and any themes or patterns emerging (but only considers specific details of individual cases if a complaint is formally referred to the Standards Committee by the Monitoring Officer or the Ombudsman for Wales).
	Update – 2024/2025	The Monitoring Officer was notified of a total of three complaints relating to Member conduct one of which was a County Borough Councillor and two relating to Community Councillors. The Public Services Ombudsman has considered that in all these cases that there was no evidence of a breach of conduct.
	See section 1.4.1 - Anti-fraud, Corruption and Malpractice Strategy	
	See section 1.4.6 - Whistleblowing Policy	

Principle B: Ensuring openness and comprehensive stakeholder engagement		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
4.1 Ensuring an open culture through demonstrating, documenting and communicating the organisation's commitment to openness	4.1.1 The council produces a number of annual reports throughout the year to give assurances about our governance arrangements.	
	Assurance arrangements	<p>The following reports are available to the public and the Corporate Governance Group oversee any risks identified to governance arrangements, arising from these annual reports.</p> <ol style="list-style-type: none"> 1. Corporate Plan Annual Report 2. Corporate Self-Assessment 3. Strategic Equalities Plan Annual Report 4. PSB Well-being Plan Annual Report 5. Welsh Language Standards Annual Report 6. Welsh Language Promotion Strategy Annual Report 7. Internal Audit Report 8. Complaints, Compliments and Comments Annual Report 9. Social Services Complaints Annual Report 10. Ombudsman Annual Report 11. Pay Policy Statement 12. Annual Equalities in Employment Report 13. Gender Pay Gap Report 14. Social Partnership Annual Report 15. Director of Social Services Annual Report
	4.1.2 FOI Policy/FOI Publication Scheme	

Principle B: Ensuring openness and comprehensive stakeholder engagement		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Assurance arrangements	<p>Freedom of Information (FOI) Policy was published in March 2014. A review of the Publication Scheme took place in 2020, to consider updated advice from the Information Commissioner's Office and found only minor changes were required to consider updated legislative requirements. This was then considered and the Publication Scheme updated in Autumn 2023. Some updated amendments were made to reflect legislative changes in September 2024.</p> <p>This will be continually monitored to ensure legislative compliance. Work is also ongoing to look at ways to further promote and publish other information held by the council such as Freedom of Information Act responses with officers undertaking a programme of work to look at publication of FOI responses which will continue in 2025/2026.</p>
	4.1.3 The council's strategic purpose, vision and values are set out in the Corporate Plan	
	Assurance arrangements	The council's strategic purpose, vision and values are set out in the council's Corporate Plan 2024/2027 . The Plan is currently being updated for the period of 2025/2028.
	4.1.4 Council Meeting Cycle	
	Assurance arrangements	The council agrees its meeting cycle at its Annual Meeting, and this is published on the council's website. Meetings are supported with Forward Work Programmes detailing items for future consideration.
4.2 Making decisions that are open about	4.2.1 Executive, non-executive and regulatory report guidance and report templates	

Principle B: Ensuring openness and comprehensive stakeholder engagement		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case the justification for the reasoning for keeping a decision confidential should be provided	Assurance arrangements	The guidance was developed and circulated to reporting officers in May 2019. As and when changes arise the guidance is updated and circulated to report authors/officers. Report templates ensure the relevant information and advice is presented to substantiate recommendations. Guidance has been presented to officers throughout the year on matters such as Welsh Language considerations and other legislative updates.
	4.2.2 Safe and Legal Decision Making	
	Assurance arrangements	Training is available for relevant officers and takes place at regular intervals, delivered by the Head of Legal and Democratic Services.
4.3 Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear.	4.3.1 Modern.gov system	
	Assurance arrangements	All publicly accessible reports are published on the council website via Modern.gov system , showing the decisions taken at each meeting.
	See section also 1.3.1 Integrated Impact Assessment (IIA).	

Principle B: Ensuring openness and comprehensive stakeholder engagement		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
4.4 Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/courses of action	4.4.1 Community of Practice on Involvement and Engagement	
	Assurance arrangements	<p>The NPT Community of Practice on Involvement and Engagement, launched in 2019, has membership of 60+ council officers and representatives from partner organisations. Members regularly engage with a range of specific stakeholder groups as part of their work and the Community of Practice provides a forum for members to work more smartly and in a more collaborative way to ensure that everyone in our communities can have the opportunity to have their say on the decisions that affect them. It is intended to provide a professional and respectful forum for members to share experiences and knowledge on involvement and engagement issues in a spirit of mutual learning and peer support.</p> <p>The Community of Practice undertook a key role in supporting the consultation on the 2024/2025 budget and contributed to the development of the council's Consultation and Engagement Strategy and Toolkit which will be implemented during 2025/2026.</p>
	4.4.2 Citizens' Panel	
	Assurance arrangements	<p>Launched in January 2020, the NPT Citizens' Panel is made up of residents from across the county borough and actively involves them in decision making at a very early stage, so they help shape proposals before these go out to wider public consultation. This will strengthen the council's approach to consultation and engagement, and also help us to meet our obligations under the Wellbeing of Future Generations (Wales) Act 2015 and Local Government & Elections (Wales) Act 2021. Following a recent recruitment drive, there are currently 800 members on the Panel. Officers are currently working on bringing the management of the Panel back in-house and part of that process will involve asking existing members if they wish to remain on the panel (a requirement for GDPR purposes).</p>

Principle B: Ensuring openness and comprehensive stakeholder engagement		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	4.4.3 Public Participation Strategy	
	Assurance arrangements	<p>The Local Government and Elections (Wales) Act 2021 (“the Act”) requires local authorities to consult on, publish and regularly review a public participation strategy to encourage local people to participate in their decision making. This includes where councils make decisions in partnership with another council or in conjunction with another individual or body such as a local health board.</p> <p>The council’s Public Participation Strategy 2023/2027 was approved on 26th April 2023 by the council’s Cabinet. It outlines the council’s objectives, approach and mechanisms for encouraging and enabling public participation, together with information on how local people can influence decision-making. It also supports the priorities in the council’s Corporate Plan and reflects our values by setting out how we will encourage and enable local people and communities in Neath Port Talbot to be actively involved in decisions that affect them.</p>
4.5 Effectively engaging to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably	4.5.1 Key Stakeholder List	
	Assurance arrangements	We have a list of key stakeholders that we engage with on major policies and plans. These include: Youth Council, Black Minority Ethnic Community Association, and consultee database for the Local Development Plan.
	4.5.2 Youth Mayor	
	Assurance arrangements	This was first established in September 2019 and elected by the young people of the borough. The role involves representing the voice of all children and young people across the borough at a number of pre-determined civic duties.
	4.5.3 Partnership working with our trade unions and teaching associations	

Principle B: Ensuring openness and comprehensive stakeholder engagement		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Assurance arrangements	This is a major feature of the council's culture in relation to workforce engagement. It involves elected members, managers, employees and trade unions developing and implementing a way of working based on mutual respect and trust, shared objectives and joint ownership of problem solving. We are working together with trade unions to implement the new Social Partnership Duty.
4.6 Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively	4.6.1 Third Sector Partnerships	
	Assurance arrangements	The council has a long and productive relationship with community and voluntary sector organisations, and awards grant funding to organisations so they can support our communities in a wide range of ways. The Partnership Agreement (Compact), between the council and the community and voluntary sector in Neath Port Talbot, formally recognises and values the contribution of voluntary work to local people, communities and supports us to deliver on some of our services. It provides a framework for further developing the many years of partnership working in the county borough, in pursuit of our shared interest to build strong communities where everyone has an equal chance to lead a fulfilled life. It also sets out the partnership responsibilities and expectations on both the council and the voluntary sector.
	Update 2024/2025	A review of the Partnership Agreement is underway in collaboration with the community and voluntary sector and will be concluded by Summer 2025.
	4.6.2 Voluntary Sector Liaison Forum	
	Assurance arrangements	The Voluntary Sector Liaison Forum supports partnership working between the council and the voluntary sector.
	Update 2024/2025	During 2024/2025, the Voluntary Sector Liaison Forum met three times and were consulted on the 2024/2025 budget.

Principle B: Ensuring openness and comprehensive stakeholder engagement		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	4.6.3 County Borough Council/Community Councils Liaison Forum	
	Assurance arrangements	The County Borough Council/Community Councils Liaison Forum works together for the benefit of local communities whilst recognising our respective responsibilities as autonomous, democratically elected statutory bodies.
	Update 2024/2025	During 2024/2025, the County Borough Council/Community Councils Liaison Forum met twice to discuss issues of concern to the Town and Community Councils and the Forum was consulted on the 2024/2025 budget. Ongoing training was also provided to Town and Community Councils by the Monitoring Officer on the Member's Code of Conduct.
	4.6.4 Informal partnerships	
	Assurance arrangements	There are a number of informal partnerships in place, which are made up of both officers from across the council and representatives of external organisations.
	4.6.5 Public Services Board (PSB)	
	Assurance arrangements	PSB members work together to deliver the objectives set out in the PSB Well-being Plan and monitor progress on delivery of the work.
	Update 2024/2025	In May 2024, the PSB published its annual report setting out the progress made in delivering the priorities of the PSB to improve the well-being of Neath Port Talbot as contained in the PSB's Well-being Plan for the period 2023/2028.

Principle B: Ensuring openness and comprehensive stakeholder engagement		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
<p>4.7 Ensuring that partnerships are based on:</p> <ul style="list-style-type: none"> • Trust • A shared commitment to change • A culture that promotes and accepts challenge among partners; and • that the added value of partnership working is explicit 	<p>4.7.1 Staff Council (Consists of: LGS Green Book Negotiating Forum, LSPG (Schools trade union partnership forum), Service Joint Consultative Groups, and the Corporate Health & Safety Trade Union Forum).</p>	
	Assurance arrangements	All of these groups meet regularly and are an opportunity for two-way information sharing, consultation and where necessary, negotiation. As part of our approach to partnership working, trade unions have representation in other forums; so for example, trade unions sit as an integral part of the Future of Work Team. We are working together with trade unions to implement the new Social Partnership Duty.
	See section 2.4.2 - Continue to participate in a number of partnerships	
	See section - 4.5.4 - Youth Mayor	
4.8 Taking account of the interests of future generations of tax payers and service users	4.8.1 Well-being of Future Generations (Wales) Act 2015.	

Principle B: Ensuring openness and comprehensive stakeholder engagement		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	Assurance arrangements	The council's corporate strategy will demonstrate how the council contributes to the economic, social, environmental and cultural wellbeing of Neath Port Talbot and to the seven national wellbeing goals contained in the Wellbeing of Future Generations (Wales) Act 2015. Our aims set out under each well-being objective, detailing how we will focus our efforts in the short, medium and longer term. The contribution to the seven well-being goals is made through the way in which we work, in accordance with the sustainable development principle contained within the Act.
	Update – 2024/2025	During 2024/2025, work was initiated to refocus the council's Corporate Plan which sets out the council's purpose, vision, values and wellbeing objectives to a Corporate Strategy. The Strategy will set out an overarching 20-year vision for Neath Port Talbot and under each well-being objectives the aims we plan to achieve in the next three years. The delivery of those aims will be set out in Heads of Service Business Plans.
	4.8.2 The council's four well-being objectives and statement are published in the Corporate Plan	
	Assurance arrangements	The Corporate Plan 2024/2027 contains the council's four well-being objectives.
4.9 Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement	<p>See section 1.1.2 - Employee Code of Conduct</p> <p>See section 1.1.3 - Member Code of Conduct - monitored by the Standards Committee</p>	

Principle B: Ensuring openness and comprehensive stakeholder engagement	
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes
4.10 Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs	<p>See section 4.4.1 – Community of Practice – Involvement and Engagement</p> <p>See section 4.4.2 – Citizens Panel</p> <p>See section 4.4.3 – Public Participation Strategy 2023/2027</p>
4.11 Implementing effective feedback mechanisms in order to demonstrate how their views have been taken into account	<p>See section 4.4.3 – Citizens Panel</p>
4.12 Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity	<p>4.12.1 Council has a number of duties through the following legislation to ensure inclusivity of feedback from all stakeholder groups:</p> <ul style="list-style-type: none"> • Equality Act 2010 • Welsh Language Standards (No.1) Regulations 2015 • Well-being of Future Generations (Wales) Act 2015 • Local Government & Elections (Wales) Act 2021 • Environment (Wales) Act 2016 • Social Partnership and Public Procurement (Wales) Act 2023

Principle B: Ensuring openness and comprehensive stakeholder engagement	
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes
	See section 1.3.1 – Integrated Impact Assessment (IIA)

Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
5.1 Having a clear vision which is an agreed formal statement of the organisation's purpose and intended outcomes containing appropriate performance indicators, which provides the basis for the organisation's overall strategy, planning and other decisions	5.1.1 Corporate Performance Management Framework (CPMF)	
	Assurance arrangements	The purpose of the framework is to ensure we have effective corporate governance within the council. It builds on existing operational risk management practices and complements other systems of governance to form the council's internal systems of control. The framework aims to promote good management, performance, stewardship of public funds, and public engagement.
	Update – 2024/2025	During 2024/2025 work was initiated to further refine the council's interim Corporate Performance Management Framework (CPMF) to demonstrate how the council meets the duties contained within the Local Government & Elections (Wales) Act 2021. The revised CPMF will be implemented during 2025/2026.
5.2 Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer.	5.2.1 Commissioning	
	Assurance arrangements	<p>The council delivers or commissions an enormous range of services and functions that affect the day-to-day life of everyone who lives in the county borough.</p> <p>Service user questionnaires are undertaken as part of contract monitoring; contracts require processes to be in place to ensure providers actively engage with service users, informing service and feedback on proposed changes. Contract Monitoring Officers review practice, including interviewing service users.</p>

Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
5.3 Delivering defined outcomes on a sustainable basis within the resources that will be available	<p>See section 4.8.1 – Well-being of Future Generations Act</p> <p>See section 4.1.1– Corporate Plan Annual Report</p>	
5.4 Identifying and managing risks to the achievement of outcomes	5.4.1 Corporate Risk Management Policy	
	Assurance arrangements	The council's Risk Management Policy sets the approach to risk management and recognises risk management is an essential part of delivering good governance, and reduces the uncertainty of achieving the council's vision, purpose and priorities, as set out in the Corporate Plan . The Strategic Risk Register is reviewed at Strategic Leadership Team quarterly and presented to Cabinet and Governance & Audit Committee every six months.
	Update – 2024/2025	The council's Risk Management Policy was reviewed and approved by Cabinet in 2023. To ensure effective monitoring of the council's strategic risks, and in response to feedback from members, ongoing improvements are being made to take forward a strong and effective Strategic Risk Register. During 2024/2025 a number of improvements were made to further refine the council's approach to risk management including the development of a Risk Appetite Statement.
	5.4.2 Senior Information Risk Owner (SIRO)	
	Assurance arrangements	The Chief Digital Officer acts as the Senior Information Risk Owner (SIRO) for the council, with overall responsibility for managing information risk, ensuring that information risks are treated as a priority across all service areas.

Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		<p>They support the engagement with teams from across the council, fostering strong working relationships with colleagues and stakeholders, supporting them with the critical consideration of Risk and Information Governance in all aspects of their work.</p> <p>The SIRO reports directly to the Strategic Leadership Team and Corporate Governance Group on information security matters.</p>
5.5 Managing service users' expectations effectively with regard to determining priorities and making the best use of the resources available	5.5.1 Let's Keep Talking Campaign	
	Assurance arrangements	The priorities that are set out in the revised Corporate Plan for the period 2024/2027 were informed by an extensive engagement exercise "Let's Keep Talking".
	See 4.1.3 – Corporate Plan	
5.6 Sustainable economic, social and environmental benefits - considering and balancing the combined economic, social and environmental impact of policies, plans and decisions when taking decisions about service provision	<p>See section 1.3.1 - Integrated Impact Assessment (IIA)</p> <p>See section 4.1.3 - Corporate Plan</p>	

Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
5.7 Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints.	5.7.1 Welsh Government Procurement Policy and Procurement Strategy 2024/2028	
	Assurance arrangements	<p>Complying with the policy, by ensuring that contracts over the value of £1,000,000 include community benefits, clauses and contracts split into "Lots" or smaller arrangements – allowing smaller organisations to bid for elements of contracts if they are unable to bid for larger packages.</p> <p>The council has made a commitment to actively examine where it sources its goods and services to ensure those arrangements are ethical.</p>
	See section 2.4.1 - Ethical Employment in Supply Chain Policy 2019	
5.8 Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social, and environmental benefits, through consultation where possible, in order to	<p>See section 4.1.3 – Corporate Plan</p> <p>See section 4.4.3 – Public Participation Strategy 2023/2027</p> <p>See section 4.8.1 – Well-being of Future Generations (Wales) Act 2015</p>	

Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
ensure appropriate trade-offs		
5.9 Ensuring fair access to services	5.9.1 Strategic Equality Plan (SEP)	
	Assurance arrangements	Councils in Wales have a legal duty to develop equality objectives and produce a strategic equalities plan. The council's plan has been produced to meet this requirement, but more importantly to reflect and deliver on our determination to promote genuine equality of opportunity, tackle discrimination and create a fairer and more equitable Neath Port Talbot.
	Update – 2024/2025	The council's updated Strategic Equality Plan 2024/2028 – “Let's Be Fair” was presented to Cabinet for approval on 24 th July 2024 and Council on 4th September for formal adoption. A significant period of time had passed since the council published the previous plan, yet it was found the challenges, inequalities and injustices continue, and our communities continue to face increasing pressures due to the consequences of global conflicts. It was against this backdrop that the equality objectives contained in the previous plan were reviewed and were found to be still relevant to our communities in Neath Port Talbot.

PRINCIPLE D: DETERMINING THE INTERVENTIONS NECESSARY TO OPTIMISE THE ACHIEVEMENT OF THE INTENDED OUTCOMES		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
6.1 Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and including the risks associated with those options. Therefore ensuring best value is achieved however services are provided	6.1.1 Corporate Self-Assessment	
	Assurance arrangements	<p>The requirement to publish an annual self-assessment is contained within the Local Government and Elections (Wales) Act 2021 and is a corporate, organisational assessment rather than an assessment of individual services.</p> <p>As part of the self-assessment, the council is required to consider the extent to which it is:</p> <ul style="list-style-type: none"> • exercising its functions effectively (how well are we doing?) • using its resources economically, efficiently and effectively (how do we know?) • ensuring its governance is effective for securing the above (what and how can we do better?)
	Update – 2024/2025	During 2024/2025, consideration was given to how the process to develop the self-assessment could be further refined. The improvements that were identified have been implemented to develop the 2024/2025 assessment including the completion of a short survey by Directors and Heads of Service to inform the content and scoring contained in the assessment.
	See section 1.4.4 - The council's Constitution	
6.2 Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required in order to prioritise competing demands	<p>See section 1.3.1. – Integrated Impact Assessment (IIA)</p> <p>See section 1.4.4 - The council's Constitution</p> <p>See section 4.4.1 – Community of Practice – Involvement and Engagement</p> <p>See section 4.4.2 – Citizens Panel</p>	

PRINCIPLE D: DETERMINING THE INTERVENTIONS NECESSARY TO OPTIMISE THE ACHIEVEMENT OF THE INTENDED OUTCOMES	
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes
within limited resources available including people, skills, land and assets and bearing in mind future impacts	See section 4.4.3 – Public Participation Strategy 2023/2027 The report guidance for both Executive and Non-Executive reports requires report authors to describe all options that have been considered, not just any preferred option.
6.3 Planning Interventions - establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets	See section 5.1.1 Corporate Performance Management Framework (CPMF)
6.4 Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered	See section 1.3.1. – Integrated Impact Assessment (IIA) See section 4.4.4 – Public Participation Strategy 2023/2027 See section 4.4.2 – Community of Practice – Involvement and Engagement See section 4.4.3 – Citizens Panel
6.5 Considering and monitoring risks facing each partner when working collaboratively including shared risks	See section 2.4.2 - Continue to participate in a number of partnerships See section 5.4.1 - Corporate Risk Management Policy

PRINCIPLE D: DETERMINING THE INTERVENTIONS NECESSARY TO OPTIMISE THE ACHIEVEMENT OF THE INTENDED OUTCOMES		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
6.6 Ensuring arrangements are flexible and agile so that the mechanisms for delivering outputs can be adapted to changing circumstances	See section 4.8.1 - Well-being of Future Generations Act (Wales) 2015	
6.7 Establishing appropriate local performance indicators (as well as relevant statutory or other national performance indicators) as part of the planning process in order to identify how the performance of services and projects is to be measured	See section 5.1.1 - Corporate Performance Management Framework	
6.8 Ensuring capacity exists to generate the information required to review service quality regularly	See section 5.1.1 - Corporate Performance Management Framework	
6.9 Preparing budgets in accordance with organisational objectives, strategies and the medium-term financial plan	6.9.1 Budget setting process	
	Update 2024/2025	On 7th March 2024, Council approved the 2024/2025 budget following stakeholder consultation. The requirement to set a balanced budget was met.

PRINCIPLE D: DETERMINING THE INTERVENTIONS NECESSARY TO OPTIMISE THE ACHIEVEMENT OF THE INTENDED OUTCOMES	
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes
6.10 Informing medium and long-term planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy	See section 6.9.1 Budget setting process
6.11 Optimising achievement of intended outcomes - ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints	See section 6.9.1 Budget setting process
6.12 Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term	See section 6.9.1 Budget setting process
6.13 Ensuring the medium-term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for	See section 6.9.1 Budget setting process

PRINCIPLE D: DETERMINING THE INTERVENTIONS NECESSARY TO OPTIMISE THE ACHIEVEMENT OF THE INTENDED OUTCOMES	
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes
outcomes to be achieved while optimising resource usage	
6.14 Ensuring the achievement of 'social value' through service planning and commissioning. The Public Services (Social Value) Act 2012 states that this is "the additional benefit to the community....over and above the direct purchasing of goods, services and outcomes"	See 2.4.3 – Procurement Strategy

PRINCIPLE E: DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
7.1 Developing the entity's capacity - reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness	See section 1.2.2 – Vision and values of Strategic Workforce Plan	
7.2 Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how the council's resources are allocated so that outcomes are achieved effectively and efficiently	7.2.1 There are a number of examples of research and benchmarking exercises undertaken across the council	
	Assurance arrangements	<p>The Corporate Policy Team are members of Data Cymru's Corporate Performance Data network (CPDn). Its purpose is to inform and support the development of the self-assessment performance dataset (SAPD). The current SAPD holds data across a range of services/themes, and can be used to compare against other authorities. The link to this data has been shared with strategic officers, all service managers and performance leads.</p> <p>Benchmarking for a number of services is completed via APSE (Association for Public Service Excellence). A number of service areas also benchmark data with other services from other local authorities via benchmarking groups/networks/data platforms, some of which are provided by Data Cymru, Welsh Government and Welsh Local Government Association (WLGA).</p> <p>Examples of benchmarking groups include:</p> <ul style="list-style-type: none"> The council's Electoral Services officers participate in the Association of Electoral Administrators network to benchmark electoral administration.

PRINCIPLE E: DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		<ul style="list-style-type: none"> • Participation by officers and members in networks facilitated by the WLGA to benchmark and research out best practice across Democratic Services functions in other councils • Wales waste data flow for fly tipping • County Surveyor Society Wales benchmarking • Road Safety Benchmarking • Workforce planning benchmarking <p>Services also use other platforms for benchmarking data, such as the Welsh Government STATS Wales website and other platforms provided by Data Cymru. Benchmarking data (where available) is included in the performance reports that are provided to members as part of our performance arrangements.</p>
	See section 6.1.1 - Corporate Self-Assessment	
7.3 Recognising the benefits of partnerships and collaborative working where added value can be achieved	See section 2.4.2 - Continue to participate in a number of partnership	
7.4 Developing and maintaining an effective workforce plan to	7.4.1 Social Care Wales Workforce Development Partnership (SCWWDP)	

PRINCIPLE E: DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
enhance the strategic allocation of resources	Assurance arrangements	The broad aim of the SCWWDP is to ensure partnership working to support social care staff across all organisations, support the ambition of the health and social care workforce strategy and to build a digitally ready workforce. It also aims to deliver excellent education and learning, provide qualifying and post-qualifying social work training, and to shape and supply the workforce.
	See section 7.1 Future of Work Strategy 2022-2027	
7.5 Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body	7.5.1 List of officer delegation	
	Assurance arrangements	The Constitution requires the Head of Legal & Democratic Services to keep a list of all officer delegations made in accordance with the Constitution. The work to review all proposals and to keep a central electronic list of delegations is ongoing. Work with individual directorates to gather evidence of delegations is continuing, with the aim of a report to Corporate Governance Group on methods of record keeping.
7.6 Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure, whereby the chief executive leads the	7.6.1 Cross party panel	
	Assurance arrangements	The panel which is made up of elected Members (and chaired by the Leader) undertakes the Chief Executive's appraisal and agrees the objectives for year ahead and personal learning.

PRINCIPLE E: DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
council in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other's council.	See 1.4.4 - The Constitution	
<p>7.7 Developing the capabilities of members and senior management to achieve effective shared leadership and to enable the organisation to respond successfully to changing legal policy demands as well as economic, political and environmental changes and risks by:</p> <ul style="list-style-type: none"> Ensuring members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged 	7.7.1 Member support and development.	
	Assurance arrangements	<p>The Local Government Elections took place in May 2022, with the main focus of the first two years being their induction. Members were invited to undertake the following sessions as part of their induction:</p> <ul style="list-style-type: none"> Introduction to the Council, its role, Corporate Governance, Corporate Plan, Wellbeing Goals Code of Conduct and Ethics (including civility and respect) Health and Safety Replacement Local Development Plan Service Area Introductions Community Leadership and Casework Budget and Financial Management Treasury Management Committee Procedures and the role of Scrutiny and how to be an effective Scrutiny Member Equalities, Diversity and the Socio-Economic Duty Safe Data Management and GDPR

PRINCIPLE E: DEVELOPING THE ENTITY’S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT								
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes							
<ul style="list-style-type: none">Ensuring members and officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basisEnsuring personal, organisation and system-wide development through shared learning, including lessons learnt from both internal and external governance weaknesses		<ul style="list-style-type: none">Freedom of Information (FOIs)Welsh LanguageCorporate ParentingSocial MediaSafeguardingHousingViolence against Women, Domestic Violence and Sexual Violence (VAWDASV)Member Officer RelationsWomen’s Rights/Gender EqualityPublic Speaking and Working with the Media (Cabinet Members only)The role of members in relation to the Wellbeing of Future Generations Act. To include sustainable developmentThe role of members in relation to the Social Services and Well-Being (Wales) ActClimate Change, mitigation and decarbonisation <p>Members undertook committee specific training during 2024/2025 depending on their committee allocations, with particular mandatory training for members of the Licensing, Planning, Governance and Audit, Standards and other regulatory committees. Chairs and Members of Scrutiny also undertook targeted training by external providers.</p>						
	Update – 2024/2025	<p>Member Seminars were also presented on the following topics during 2024/2025:</p> <table><tr><td>18th July</td><td>Corporate Plan</td></tr><tr><td>10th September</td><td>Electric Arc Furnace</td></tr><tr><td>12th September</td><td>Highways Works Programme Member Surgeries</td></tr></table>		18 th July	Corporate Plan	10 th September	Electric Arc Furnace	12 th September
18 th July	Corporate Plan							
10 th September	Electric Arc Furnace							
12 th September	Highways Works Programme Member Surgeries							

PRINCIPLE E: DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT

Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes		
		<p>13th September</p> <p>16th September</p> <p>30th September</p> <p>3rd October</p> <p>24th October</p> <p>29th October</p> <p>7th November</p> <p>21st November</p> <p>28th November</p> <p>5th December</p> <p>9th December</p> <p>19th December</p> <p>9th January</p> <p>16th January</p> <p>30th January</p> <p>6th February</p> <p>13th February</p> <p>20th February</p> <p>27th February</p> <p>13th March</p> <p>26th March</p> <p>27th March</p>	<p>Associated British Ports</p> <p>Council Procedure Rules Training /Scrutiny Procedures</p> <p>Budget</p> <p>20mph Update</p> <p>Levelling Up Fund (LUF)</p> <p>Transport for Wales Bus Franchising</p> <p>RLDP Preferred Strategy</p> <p>Safeguarding</p> <p>Budget Training</p> <p>City Deal</p> <p>Welsh Local Government Association Workshop</p> <p>Community Safety Partnership</p> <p>Budget</p> <p>Corporate Parenting</p> <p>Rapid Rehousing Plan</p> <p>Code of Conduct</p> <p>Coastal Connections and Motion for the Ocean</p> <p>Budget</p> <p>Additional Learning Needs Education Tribunal Wales Act 2018</p> <p>Spotlight on the use of Artificial Intelligence in NPT and the new myNPT Resident Account</p> <p>Recommendations from the Modernisation Group on changes to the democratic arrangements</p> <p>School Based Counselling Service</p>

PRINCIPLE E: DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
	7.7.2 Reviewing individual member performance	
	Assurance arrangements	This is done on a regular basis taking, account of their attendance and considering any training or development needs. Members are encouraged annually to undertake self-appraisals and reviews.
	7.7.3 Officer support and development	
	Assurance arrangements	The training available for officers is reviewed and updated on an ongoing basis to ensure they can fulfil their roles and responsibilities.
	7.7.4 Reviewing individual officer performance: See 1.1.4 - An induction programme for Members See 1.1.5 - Staff: the Induction Checklist, (which contains information about the expected standards) See 1.1.6 - Performance Appraisal Process See 1.2.2 - The vision and priorities for staff	
7.9 Ensuring that there are structures in place to encourage public participation	See section 4.4.3 – Public Participation Strategy 2023/2027	

PRINCIPLE E: DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
7.8 Taking steps to consider the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections	7.8.1 External regulator inspections	
	Assurance arrangements	<p>National and local reports are undertaken by Audit Wales. A programme of work is noted in the Annual Summary. Both Estyn and Care Inspectorate Wales have a programme of inspections based on their annual performance evaluation.</p> <p>The Local Government & Elections (Wales) Act 2021 also contains a requirement for Panel Assessments (Peer reviews) to be undertaken once every electoral (ordinary) cycle. Ombudsman for Wales undertakes regular 'own initiative' pieces of work which investigate service provision linked to particular areas across the public sector.</p>
	7.8.2 Internal Process	
	Assurance arrangements	The Strategic Workforce Plan, The Future of Work Strategy 2022/2027 sets out actions for the development of leadership and management across the council.
	See section 6.1.1 - Self-Assessment	
7.9 Holding staff to account through regular performance reviews which take account of training or development needs	See section 1.1.6 - Performance Appraisal Process	
7.10 Ensuring arrangements are in place to maintain the health and	See section 1.2.2 - Strategic Work Force Plan: The Future of Work Strategy	

PRINCIPLE E: DEVELOPING THE ENTITY'S CAPACITY, INCLUDING THE CAPABILITY OF ITS LEADERSHIP AND THE INDIVIDUALS WITHIN IT		
Behaviours & actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing	7.10.1 Maximising Attendance at Work Procedure / Health and Safety	
	Assurance Arrangements	<p>The council has signed the Time to Change Wales Employer Pledge. We have an action plan in place which contains initiatives to support employees across the council with mental ill health. Progress on the action plan is reported annually to the Personnel Committee. As part of the Future of Work Strategy, we have set out an intention to develop a Health and Wellbeing Strategy. The council has a dedicated Occupational Health & Safety & Well-being Team, providing advice, support and expertise in relation to the health, safety and well-being of our employees.</p> <p>The council has a number of policies and procedures to support the health and well-being of employees, including the Maximising Attendance at Work Procedure and the Rehabilitation Procedure, as well as a suite of Health and Safety procedures all aiming to protect the health and safety of people in our workplaces. In 2024, the council adopted an Employee Assistance Programme delivered by Vivup, which offers a financial well-being platform accessible to all employees, further supporting employee mental health and well-being.</p>

PRINCIPLE F: MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT		
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
8.1 Managing risk - recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making	<p>See section 5.4.1 – Corporate Risk Management Policy</p> <p>See section 5.4.2 – Senior Information Risk Owner (SIRO)</p>	
8.2 Implementing robust and integrated risk management arrangements and ensuring that they are working effectively		
8.3 Ensuring that responsibilities for managing individual risks are clearly allocated		
8.4 Managing Performance - monitoring service delivery effectively, including planning, specification, execution and independent post-implementation review	8.4.1 Corporate Performance Management Framework	
	Assurance arrangements	<p>The purpose of the framework is to ensure we have effective corporate governance within the council. It builds on existing operational risk management practices and complements other systems of governance to form the council's internal systems of control. The framework aims to promote good management, performance, stewardship of public funds, and public engagement, ultimately demonstrating that the council is "Working Towards a More Prosperous, Fairer and Greener NPT".</p> <p>It is important that we have a fit for purpose Corporate/Service Planning and Performance Management Framework in place that joins up council business from</p>

PRINCIPLE F: MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT		
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		<p>employee level up to council level, and where everybody is clear where they fit, and how they contribute to achieving the council's vision, purpose, well-being objectives and strategic priorities contained in the Corporate Strategy.</p> <p>It is important that our planning, performance and governance related processes are fit for purpose. This includes corporate, strategy and policy, service, financial and workforce planning. It also involves ensuring benchmarking, associated policy and performance research are robust and interwoven into our decision making, reporting and monitoring processes. This includes risk management, self-assessment, complaints handling, engagement and scrutiny processes.</p> <p>This will enable a holistic view of performance, providing a different insight to the overall performance of the council. To support the delivery of the framework, there is a Corporate Performance Management team, and a Directorate Performance Management team.</p>
8.5 Making decisions based on relevant, clear, objective analysis and advice pointing out the implications and risks inherent in the organisation's financial, social and environmental position and outlook	See section 1.4.4 - The council's Constitution	
	8.5.1 Scrutiny Committees	
	Assurance Arrangements	The role and responsibility for scrutiny has been established and is clear. Annual forward work programme sessions are arranged to identify items for the committees to focus on in the new civic year. Throughout the year, scrutiny Members also undertake specific training to enhance their skills (e.g. Chair and Vice Chair training).

PRINCIPLE F: MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT		
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		<p>Several themes were identified by the Task & Finish group, which they considered important and were keen to see reflected in any amended model of scrutiny that they were going to bring forward. These themes included:</p> <ul style="list-style-type: none"> • Cabinet Members to be held to account • Public engagement being very important • Members need to have option to be involved in decisions at an earlier stage; • There process needs to be more accessible and transparent so it is clear to the public what is going to be scrutinised • The council need to consider a system which operates consistently both pre and post decision scrutiny • Ongoing performance monitoring is very important
	Update – 2024/2025	During 2024/2025 the council reviewed the scrutiny model and to ensure it continued to meet requirements and a report will be brought to Full Council in April 2025 to agree changes prior to the May Annual General Meeting.
8.6 Ensuring an effective scrutiny or oversight function is in place which encourages constructive challenge and debate on policies and objectives before, during and after decisions are made, thereby enhancing the organisation's performance and that of any organisation for which it is responsible	See section 8.5.1 - Scrutiny Committees	

PRINCIPLE F: MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT		
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
8.7 Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement	See section 4.1.4 Council Meeting Cycle	
8.8 Ensuring there is consistency between specification stages (such as budgets) and post-implementation reporting (e.g. financial statements)	8.8.1 Financial standards, guidance and regulations	
	Assurance arrangements	The Director of Finance is responsible for ensuring there are proper arrangements in place for the administration of the financial affairs of the council. Corporate Directors are responsible for the financial management of their respective services, and are supported by regular financial management information, which includes monthly financial monitoring reports.
8.9 Robust internal control - aligning the risk management strategy and policies on internal control with achieving objectives	See section 5.4.1 - Corporate Risk Management Policy	
8.10 Evaluating and monitoring risk management and internal control on a regular basis	See section 5.4.1 - Corporate Risk Management Policy	
8.11 Ensuring effective counter fraud and anti-corruption arrangements are in place	See section 1.4.1 - The Anti-fraud, Corruption and Malpractice Strategy	

PRINCIPLE F: MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT		
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
8.12 Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor	8.12.1 Annual Governance Statement	
	Assurance arrangements	The Annual Governance Statement reports on the extent of the council's compliance with its principles and practices of good governance, including how the council has monitored the effectiveness of its governance arrangements in the year. The Annual Governance Statement is reviewed every year and updated to reflect the improvement work undertaken during the year.
	8.12.2 – Internal Audit	
	Assurance Arrangements	<p>Internal Audit work in 2024/25 complies with the Public Sector Internal Audit Standards (PSIAS). The Internal Audit Plan, Charter and Strategy 2024/25 were approved by Governance and Audit Committee on 21st March 2024.</p> <p>The Governance and Audit Committee have received regular updates within 2024/25 of progress against the risk-based Internal Audit Plan and the outcomes of completed audit activities. The update reports highlight Internal Audit Plan changes for Committee awareness and agreement; and include an assurance rating and summary of findings for each completed activity.</p> <p>All recommendations made by Internal Audit were accepted by management. Recommendation implementation is reviewed/confirmed through the post audit review process. Post audit review outcomes are reported to Governance and Audit Committee.</p>

PRINCIPLE F: MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT		
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
8.7 Ensuring an audit committee or equivalent group or function which is independent of the executive and accountable to the governing body: provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment and that its recommendations are listened to and acted upon	8.7.1 Governance and Audit Committee (Terms of reference, Membership and Training)	
	Assurance arrangements	Governance and Audit Committee complies with best practice (Audit Committees: Practical Guidance for Local Authorities and Police (CIPFA 2022) and the Public Sector Internal Audit Standards.
8.14 Managing Data - ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data	8.14.1: Data management framework and procedures / data protection officer / policies and procedures	
	Assurance arrangements	<p>The Information Governance (IG) Team provide support to the Information Asset Owners who have local responsibility for Information Management in their area.</p> <p>The team develop, implement and maintain information management and information security policies and guidance. Providing operational support, training, expert advice, guidance on these areas.</p> <p>The Information Governance team provide additional assurance through the undertaking of information governance and information security audits and information risk assessments with Information Asset Managers and key stakeholders.</p>

PRINCIPLE F: MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT		
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
		<p>A number of actions have been completed as part of the information governance work including registers of the relevant agreements and assessments, with procedures to identify new processing and sharing best practice.</p> <p>Assurance is in place through information audits and the Information Asset Audit for the Information Asset Register.</p> <p>The Information Governance Strategy Group provides overview and scrutiny of IG arrangements. Making recommendations to both the Head of Legal & Democratic Services as the council's Data Protection Officer (DPO) with responsibility for ensuring compliance with the Data Protection Act 2018 and the Chief Digital Officer as the council's Senior Information Risk Owner with responsibility for information risk and security.</p> <p>The DPO and SIRO report directly to the Corporate Governance Group on information governance and security matters.</p>
8.15 Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies	See section 8.14.1 - Data management framework and procedures / data protection officer / policies and procedures	
8.16 Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring	See section 8.12.2 Internal Audit	

PRINCIPLE F: MANAGING RISKS AND PERFORMANCE THROUGH ROBUST INTERNAL CONTROL AND STRONG PUBLIC FINANCIAL MANAGEMENT	
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes
8.17 Strong public financial management - ensuring financial management supports both long-term achievement of outcomes and short-term financial and operational performance	<p>See section 3.2.1 – Financial Management Arrangements</p> <p>The CIPFA Financial Management Code 2019 (FM Code) was introduced during 2020/2021, to improve the financial resilience of organisations by embedding enhanced standards of financial management.</p>
8.9 Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls.	See section 3.2.1 - Financial Management Arrangements

PRINCIPLE G: IMPLEMENTING GOOD PRACTICES IN TRANSPARENCY, REPORTING, AND AUDIT TO DELIVER EFFECTIVE ACCOUNTABILITY	
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes
9.1 Implementing good practice in transparency - writing and communicating reports for the public and other stakeholders in an understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate	See section 4.3.1 - Modern.gov system
9.2 Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand	See section 4.1.1 - The council produces a number of annual reports throughout the year to give assurances to our governance arrangements.
9.3 Implementing good practices in reporting - reporting at least annually on performance, value for money and the stewardship of its resources	
9.4 Ensuring members and senior management own the results	See section 1.4.4 - The Constitution
	9.5.1 Corporate Governance Group

PRINCIPLE G: IMPLEMENTING GOOD PRACTICES IN TRANSPARENCY, REPORTING, AND AUDIT TO DELIVER EFFECTIVE ACCOUNTABILITY		
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes	
9.5 Ensuring robust arrangements for assessing the extent to which the principles contained in the framework have been applied and publishing the results on this assessment including an action plan for improvement and evidence to demonstrate good governance (annual governance statement)	Assurance arrangements	<p>The Corporate Governance Group meets quarterly to:</p> <ul style="list-style-type: none"> • Review the adequacy of the council's corporate governance arrangements and ensure that an appropriate governance framework operates. • Provide recommendations for improvements in corporate governance practices to enhance the council's performance, encourage innovation and maintain public trust.
	Update – 2024/2025	During 2024/2025 the Corporate Governance Group developed an assurance framework (Code of Corporate Governance) to monitor and review the council's key systems, documents and processes as set out in the Code of Corporate Governance.
9.6 Ensuring that the Framework is applied to jointly managed or shared service organisations as appropriate	See section 8.12.1 - Annual Governance Statement	
9.7 Ensuring the performance information that accompanies the financial statement is prepared on a consistent and timely basis and the statements allow for comparison with other similar organisations	See section 8.12.1 - Annual Governance Statement	

PRINCIPLE G: IMPLEMENTING GOOD PRACTICES IN TRANSPARENCY, REPORTING, AND AUDIT TO DELIVER EFFECTIVE ACCOUNTABILITY	
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes
9.8 Assurance and effective accountability - ensuring that recommendations for corrective action made by external audit are acted upon	See section 7.8.1 - External audit/regulatory reports
9.9 Ensuring an effective internal audit service with direct access to members is in place which provides assurance with regard to governance arrangements and recommendations are acted upon	See section 8.12.2 Internal Audit
9.10 Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations	See section 9.8.1 – External and regulatory reports
9.11 Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement	See section 8.12.1 - Annual Governance Statement

PRINCIPLE G: IMPLEMENTING GOOD PRACTICES IN TRANSPARENCY, REPORTING, AND AUDIT TO DELIVER EFFECTIVE ACCOUNTABILITY	
Behaviours and actions that demonstrate good governance in practice	Evidence of key systems, documents and processes
9.12 Ensuring that when working in partnership, arrangements for accountability are clear and that the need for wider public accountability has been recognised and met	See section 2.4.2 - Governance arrangements are in place for each partnership we are involved in.

Review of Effectiveness

The council has a 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 chief officers and the Internal Audit Service who have responsibility for the development and maintenance of the governance environment and also by comments made by the external auditors and other review agencies and inspectorates.

A Corporate Governance Group, reporting to the Strategic Leadership Team, ensures that improvement work is scheduled, resourced and monitored. The council uses a number of ways to review and assess the effectiveness of its governance arrangements, the table below highlights the different mechanisms during 2024/2025:

Governance Arrangements	Update for 2024/2025
Constitution Review & Monitoring	<p>The Constitution is reviewed on a regular basis to ensure it is up to date and that amendments are taken through the decision-making process as and when required. Reports are taken when necessary to ensure the Constitution is up to date, and when Democratic Services Committee have been tasked to work with the Monitoring Officer to review arrangements as and when necessary.</p> <p>Formal reports by Section 151 or Monitoring Officer: no reports were issued by the s151 or Monitoring Officer in 2024/2025</p> <p>During 2024/2025, the council established a Modernisation Group to review and enhance decision-making processes. The aim is to ensure that procedures are efficient, transparent, and aligned with best practices. It comprises of elected members to review the council's constitution, processes, and decision-making frameworks. The group will identify areas for improvement and develop recommendations to modernise and streamline constitutional processes to ensure it is effective, transparent, and fit for purpose in a changing local government environment. The group itself will have no decision-making powers and will report its findings and recommendations to full Council when a decision is required, and it would be proposed that the group will meet as required to achieve its objectives. Progress reports will be provided at key milestones, with reports outlining findings, recommendations, and an implementation plan at various intervals.</p>
Internal Audit Service	92.5% of the revised Internal Audit Plan 2024/2025 has been delivered to draft audit report at year end.

	<p>For the period 1st April 2024 to 31st March 2025, the Audit Manager's overall opinion is that a reasonable level of assurance can be provided in connection with Neath Port Talbot Council's governance, risk management and internal control environment.</p> <p>The findings that have contributed to the level of assurance are those that have been reported to Governance and Audit Committee during 2024/25.</p> <p>No areas of significant corporate concern were noted through Internal Audit work during the period. However, some issues, non-compliance or improvement opportunities were identified that require action and monitoring to ensure the achievement of objectives. Management have agreed all Internal Audit recommendations made in 2024/25 and are actively progressing their implementation.</p> <p>There are no qualifications to this opinion.</p>
Governance & Audit Committee	<p>The council's Internal Audit Plan was approved on 21st March 2024. It monitored Internal Audit performance against the plan. In addition, external audit performance has been monitored and update reports from Audit Wales have been received.</p> <p>The Committee received Treasury Management Progress Reports to fulfill their obligations in relation to the Scrutiny of Treasury Management activity.</p> <p>Received quarterly Programme and Timetable Updates from Audit Wales which provided the Committee with an update on the work undertaken by Audit Wales during the year. The updates included information on the following work undertaken by Audit Wales:</p> <ul style="list-style-type: none"> • Financial Audit Work • Performance Audit Work • Local Government National Studies (planned/in progress). <p>The update also included progress on the planned work of Estyn and Care Inspectorate Wales (CIW).</p>

<p>Standards Committee</p>	<p>On signing their Declaration of Acceptance of Office, Members are required to give an undertaking to abide by the Members' Code of Conduct.</p> <p>A detailed Member Induction Programme took place following local government elections in May 2022. This included specified training relating to the member code of conduct, social media issues, gifts, and hospitality and officer/member protocols. Refresher training takes place on an annual basis to enhance member's compliance with the Members Code of Conduct, and to ensure members are aware of the responsibility to act ethically and with integrity throughout the year. Advice is also provided on a variety of matters throughout year on interests and predetermination matters.</p> <p>All members and officers in the council are required to fully comply with Codes of Conduct as set out in the Constitution, which sets out the particular roles and responsibilities of Officers and Members, and provides clarity on the interfaces between these roles. These include:</p> <ul style="list-style-type: none"> • Functions and subsections delegated to Officers • Members' Code of Conduct (Including Social Media Principles) • Employees' Code of Conduct • Protocol on Member / Officer Relations <p>The Head of Legal and Democratic Services is the Monitoring Officer, and holds the specific duty of ensuring that the council, its officers, and its elected councillors maintain the highest standards of conduct in all they do based on Section 5 of the Local Government and Housing Act 1989, as amended by Schedule 5 paragraph 24 of the Local Government Act 2000.</p> <p>The Standards Committee has a responsibility to monitor and scrutinise the ethical standards of the council, its members, employees and any associated providers of council services, and to report to the council on any matters of concern. The Committee is chaired by an independent person and its role includes determining the outcome of complaints against councillors and co-opted members.</p> <p>In 2024/2025, the Monitoring Officer was notified of a total of three complaints relating to member conduct. One related to a County Borough Councillor and two related to Community Councillors. The Public Services Ombudsman considered that there was no evidence of a breach of conduct in all three cases.</p> <p>The Standards Committee and Full Council considered the Committee's Annual Report 2023/24 in April 2024 and outlined the work of the Committee.</p>
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External Auditors	In the Audit Wales Annual Audit Summary 2024 , which detailed the work completed since the council's last Annual Audit Summary, the Auditor General provided an unqualified true and fair opinion on the council's financial statements on 28th November 2024, in line with the statutory deadline.
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Table 1 – Governance Improvement Action Plan - 2024/2025

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law			
1.1.3	<ul style="list-style-type: none"> i. Ensure all members attend annual refreshers in respect of the Members Code of Conduct undertaken by the Monitoring Officer; ii. Ensure all Group Leaders make Standards and Ethics a standing item on their political group meeting agendas; iii. Ensure all members are completing their declarations of gifts and hospitality, including where such gifts and hospitality are declined; iv. Encourage Group Leaders to consider bi-annual meetings with the Monitoring Officer to 	Head of Legal & Democratic Services	<p>All 60 elected members (included those who have joined after 2022) received a detailed induction programme. The next scheduled training is February 2025.</p> <p>Advice has also been issued throughout the year to advise members on declarations of interest and the importance of not predetermining matters with a focus on current advice regarding the council's Replacement Local Development Plan.</p> <p>The Standards Committee undertook a review of the training that is provided to elected members in respect of the Code of Conduct, and whether it met all requirements. This included a review of the Code of Conduct to ensure it meets the necessary requirements. The Standards Committee has always stressed the importance of regular Member training. This is particularly important for newly-elected Councillors, following the May 2022 local elections, although long-serving Councillors should still undertake refresher training to ensure that they keep up to date with the requirements of the Code of Conduct and any changes in the law or procedures.</p> <p>The Committee has previously recommended to the council that it should be compulsory for all councillors to attend training on the Code of Conduct. The independent review of the Ethical Standards Framework in Wales, commissioned by Welsh Government and carried out by Richard Penn, recommended that the declaration of acceptance of office for all councillors should be amended to include a commitment to undertake training as well as to abide by the Code. This recommendation was fully supported and endorsed by Standards Committee.</p>

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
	<p>discuss standards and ethics and how they can work together to promote standards within their political groups;</p> <p>v. A series of guidance documents be circulated to all members in respect of key conduct matters such as declarations of interest, predetermination, conduct case studies and key information for members.</p>		<p>An audit in respect of Members ethics was undertaken in accordance with the provision made in the 2023/24 Internal Audit Plan. The ethical conduct of all elected members is of paramount importance to the Council as a whole. Not only must elected members comply with the Members' Code of Conduct (the Code) and associated protocols they must be seen to behaving with integrity to ensure that the electorate have confidence that decisions taken by them are lawful, considered and free from any personal gain. The role of officers is to ensure that members have the necessary protocols to guide them, to provide advice when required, and to take robust action when inappropriate behaviour is reported to them. Following this audit, reasonable assurance can be provided that there are appropriate internal processes in place to help ensure that members act in an ethical manner.</p> <p>Standards Committee have agreed to work with the Governance and Audit Committee in future matters to ensure both committees can work collaboratively to promote ethical behaviours and practices.</p> <p>The Planning Protocol is intended to guide the procedures by which Councillors ('Members') and Officers of the council deal with planning matters and to set standards of probity and conduct expected of them. Neath Port Talbot Council will seek to adopt best practice in its administration of the planning process. It recognises that the public expects the council to subscribe to the principles of fairness, consistency and objectivity. Members of the Standards Committee undertook a review of the protocol, making some minor suggestions which will be factored into the next iteration of that document which will be updated by the Planning Committee in 2025/2026.</p> <p>Whilst the Standards Committee strive to resolve matters proactively without having to hold a formal hearing, it is recognised that sometimes hearings will be necessary following referrals from the Public Service Ombudsman for Wales. Part 3 Local Government Act 2000 enables the Public Services Ombudsman for Wales to require</p>

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
			<p>Standards Committees to determine whether a councillor or co-opted member has breached the code of conduct, where the Ombudsman considers that the facts of the alleged breach do not warrant an immediate reference to the Adjudication Panel for Wales. The Standards Committee were pleased to review the procedures for such hearings and have also undertaken an update to modernise.</p> <p>This update was to ensure that it reflects the principles such as hearings being conducted in Welsh, should the Councillor choose, and to further expand on the possibility that a hearing could be conducted by written representations, and to enable the possibility of a hearing being conducted virtually via Microsoft Teams. Similar procedures adopted by other councils, and the procedures adopted by the Adjudication Panel for Wales, aim to set out clearly to the committee, officers, and councillors and their representatives, that the process that will be followed in the event that a disciplinary breach is referred to the committee for consideration.</p> <p>The Standards Committee considered one of the key protocols that exists within the local council, the Member Officer Protocol. The purpose of this protocol is to guide members and officers of the council in their relations with one another. The strength of the relationship between members and officers is vital in ensuring that the council practices the highest ethical standards in both its private and public dealings. This protocol also seeks to reflect the principles underlying the respective rules of conduct which apply to members and officers. The purpose of the rules and this protocol is to enhance and maintain the integrity (real and perceived) of local government, by demanding very high standards of personal conduct. The Standards Committee was content that the protocol was operating satisfactorily and that there were no ethical concerns arising.</p> <p>The Standards Committee welcomed the opportunity to consider the Local Resolution Protocol. This protocol recognises that the freedom of expression enjoyed by members is not absolute, and the exercise of the freedom incurs responsibilities</p>

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
			<p>and may be subject to restrictions, notably the protection of the reputation and other rights of other members and preventing unauthorised disclosure of information. The freedom to express their political opinions is not restricted by agreeing to this Protocol. The Standards Committee were pleased to note that there had been no occasions in the last 12 months where the protocol was required to be invoked, but would continue to publicise its requirements to elected members and ensure they consider the same, to negate any complaints to bodies such as the Public Service Ombudsman for Wales. The Standards Committee will continue to promote the use of this protocol to Group Leaders.</p> <p>The Standards Committee's terms of reference include responsibility for monitoring and overseeing the council's Whistleblowing Policy and considering any ethical issues arising from complaints made under the policy. The Committee was informed about work undertaken with management teams to raise awareness of the Whistleblowing Policy and Procedure., The information leaflets produced for employees and managers had some amendments suggested as to how the Whistleblowing Policy could be improved and clarified in some areas to provide greater ease of understanding, The Standards Committee was content that the council's whistleblowing arrangements were operating satisfactorily and that there were no ethical concerns arising.</p> <p>The Standards Committee welcomed the opportunity to review and comment on the council's Employee Code of Conduct. The Committee was informed about work undertaken to promote the Code of Conduct and identified some areas which could be improved and clarified to provide greater ease of understanding. These will now be considered by the council's Personnel Committee as part of their review.</p> <p>The Standards Committee was content that the council's Employee Code of Conduct is operating satisfactorily and that there were no ethical concerns arising and were</p>

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
			<p>pleased to note that their previous recommendations were taken on board by the council's Personnel Committee.</p> <p>In addition to the above activities the Standards Committee also:</p> <ul style="list-style-type: none"> • Received and considered the Annual Report of the Public Services Ombudsman for Wales; • Received and considered case decisions of the Adjudication Panel for Wales; • Received and considered case decisions made by other Standards Committees in Wales; • Received and considered the Code of Conduct casebook published by the Ombudsman. • Received guidance on the role of the Adjudication Panel for Wales and its remit in promoting and upholding the standards regime; • Received guidance on the role of the Public Service Ombudsman for Wales on how they approach determinations whether to investigate complaints against elected members. Members resolved here to write to the Public Service Ombudsman for Wales to express concern over the use of terminology such as "thicker skin" and whilst acknowledging it derives from case law, whether the Public Service Ombudsman for Wales could address the use of such phrases in its guidance; • Promoted the Town and Community Councils, Civility and Respect Pledge https://www.slcc.co.uk/news-publications/civility-respect-pledge/ as an initiative introduced by a partnership of organisations working on behalf of Town and Community Councils, the SLCC (Society of Local Council Clerks), NALC (National Association of Local Councils) and OVW (One Voice Wales), inviting Community Councils to sign the Pledge to publicly commit that it will treat councillors, clerks, employees, members of the public, and representatives of partner organisations and volunteers with civility and respect in their roles, with a number of specific supporting commitments.

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
			Where appropriate, the Standards Committee have identified points of learning and best practice and have taken them into account in their own decision making and included them in any training provided.
1.2.2	Progress recommendations made by Audit Wales as a result of the Springing Forward: Strategic Workforce report.	Head of People & Organisational Development	<p>Recommendation 1 update:</p> <p>75% of services now have a succession plan in place.</p> <p>Recommendation 2 update:</p> <ul style="list-style-type: none"> • We have focussed on impact in the review of the Strategic Workforce Plan, demonstrating positive impact in relation to recruitment and retention. • In March 2025, we repeated the People Impact Tool Survey in partnership with the CIPD to benchmark the HR team and people practices against a range of public sector and other organisations. • The Director of Strategy and Corporate Services is chair of the Organisational Development Board and Terms of Reference have been developed.
1.3.4	Continue with future training of officer groups in the significance of the member and officer relations protocol.	Head of Legal & Democratic Services	In the last twelve months, nine sessions of the importance of the member and officer protocol have been given to a variety of groups, including aspiring leader groups, Accountable Managers and individual service areas. The Standards Committee has also considered an updated member and officer protocol which will be considered by Council in 2025/2026.
1.4.10	The Contract Procedure Rules and Standing Orders will be updated to take into account the requirements of the Procurement Act 2023.	Head of Legal & Democratic Services	In September 2024, the council approved its procurement strategy which sets out its vision for procurement to implement the requirements of the Procurement Act 2023. February 2025 saw Full Council also approve the Contractual Standing Orders for procurement activities to implement the strategy and legislative requirements. A detailed training programme for officers is now ongoing.

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
2.1.1	Corporate Procurement to monitor and evaluate compliance looking at what approach sections adopt. Head of Legal & Democratic Services to report annually to the Corporate Governance Group.	Head of Legal & Democratic Services	<p>As part of ongoing work programmes with the implementation of the Procurement Strategy and development of new Contract Procedure Rules, the Corporate Procurement team have undertaken a detailed review of spend analysis within the council and to identify ways to ensure efficiency and financial savings for the council. Ongoing training will be delivered to ensure the principles are embedded in activities, this will be subject to regular review.</p> <p>Spot checks have been undertaken on procurement processes to ensure appropriate compliance is taken place. The council's Internal Audit Section has also undertaken an audit on the use of purchasing cards, and will be factoring further compliance checks into their future audit work programme.</p>
Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits			
5.1.1	Review the council's Corporate Performance Management Framework (CPMF)	Strategic Manager - Policy & Executive Support	<p>The review of the council's Corporate Performance Management Framework has been completed. The Framework was presented to the Strategic Leadership Team on 2nd April 2025. The purpose of this framework is to ensure we have effective corporate governance within the council. It builds on existing operational risk management practices and complements other systems of governance to form the council's internal systems of control.</p> <p>The framework aims to promote good management, performance, stewardship of public funds, and public engagement, ultimately demonstrating that the council is "Working Towards a More Prosperous, Fairer and Greener NPT". It is important that we have a fit for purpose Corporate/Service Planning and Performance Management Framework in place that joins up council business from employee level to council level, and where everybody is clear where they fit, and how they contribute to achieving the council's vision, purpose and well-being objectives contained in the Corporate Strategy. The revised Framework will be implemented during 2025/2026.</p>

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
5.4.1	Further strengthen the council's risk management arrangements.	Strategic Manager - Policy & Executive Support	<p>As part of the review of the council's approach to Strategic Risk Management, several improvements have been made to the format of the Strategic Risk Register. To enable ease of monitoring, each risk is now set out on its own page, setting out the risk description, mitigating actions, owner's comments and both the inherent and revised risk scoring. To further strengthen the risk register, the set of mitigating actions have been split into risk controls and mitigating actions.</p> <p>In addition, a Risk Appetite Statement has been developed. The council recognises that to achieve the ambitions set out in its Corporate Strategy, it will need to take risks. The Risk Appetite Statement acknowledges this fact, setting out how the council balances the risks and opportunities in pursuit of delivering the well-being objectives, strategic priorities and associated plans and strategies contained within the revised Corporate Strategy.</p> <p>The Risk Appetite Statement is a key element of the council's Code of Corporate Governance and the Strategic Risk Register has been updated to reflect the risk appetite set out in the Statement.</p> <p>Audit Wales have completed their review of the council's Risk Management arrangements and the report setting out their findings is being drafted. The outcome of which will inform any further improvements required in the council's approach to strategic risk management.</p>
Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes			
6.1.1	Further refine the council's annual self-assessment process.	Strategic Manager - Policy &	A project plan/timetable for the completion of the 2024/2025 self-assessment was completed. This enabled the self-assessment preparatory work and reporting to be better aligned with other statutory reporting requirements, e.g. the Annual

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
		Executive Support	<p>Governance Statement 2024/2025 and the Corporate Plan Annual Report 2024/2025.</p> <p>In addition, a key improvement to the development of the 2024/2025 self-assessment is the completion of a survey by Directors and Heads of Service to inform the scoring and content within the assessment. The survey asks for feedback on the following functions;</p> <ul style="list-style-type: none"> • Digital services • Our approach to procurement • Financial services • The role of the council • Risk management • Physical assets and facilities <p>The completed self-assessment will be presented to Governance & Audit Committee on 9th September 2025, and Cabinet on 29th October 2025 for approval.</p>
6.9.1	Further development of a medium term financial strategy.	Director of Finance	Work will commence on a documented medium-term financial strategy in the spring of 2025 following the Welsh Government's multi-year revenue funding announcement.
Principle F: Managing risks and performance through robust internal control and strong public financial management			
8.14.1	A review of Data Processing, Data Protection and Data Sharing work to be undertaken by the	Chief Digital Officer	<p>The review of Data Processing and Data Sharing arrangements is incorporated into the audit of council information assets and handling. This will identify higher risk items including those relating to Data Processing, Data Protection and Data Sharing in order that they are addressed.</p> <p>Due to significant resource pressures impacting the Information Governance team, progress on the Information Asset Audit has not been possible. Work has continued</p>

Ref (action)	Improvement Action undertaken during 2024/2025	Responsible Officer	Progress During 2024/2025
	Information Governance team.		as far as is possible on the identification and addressing of those higher risk items in the course of the usual work undertaken by the Information Governance team. However, this will increase the time required significantly. Exploratory work is underway to identify alternative means to complete the Information Asset Audit work.
Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability			
9.5.1	Develop an assurance framework to monitor and review the council's key systems, documents and processes as set out in the Code of Corporate Governance.	Strategic Manager – Policy & Executive Support	<p>During 2024/2025, work has been undertaken in developing the assurance framework. This work has included the collation of an up-to-date comprehensive list of the council's key systems, documents and processes which includes the date of development and date of any revisions.</p> <p>Officers are working with the Corporate Governance Group to develop a programme of review based on a risk-based approach to ensure the key systems, documents and processes remain up to date and fit for purpose.</p>

Table 2 - Governance Improvement Action Plan – 2025/2026

Ref (action)	Improvement Action to be undertaken during 2025/2026	Responsible Officer
Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law		
1.1.3 / 1.3.3	<p>The Standards Committee regularly reviews its Forward Work Programme and has identified the following priority areas for consideration:</p> <ul style="list-style-type: none"> • Code of Conduct, Member Training and Development – The Standards Committee will consider the need for any further training on the Members' Code of Conduct focussing on Town and Community Councils and facilitate training opportunities for Councillors. As part of this a survey and review of Community Council training plans so far as they relate to standards and ethical governance will be undertaken. Further engagement work will also be undertaken, to include presentations, meetings and guidance. Chairs and Vice Chairs have been invited to attend the Standards Committee to further explore this area of work. • Declarations of Interest – A review of interests will be declared in council meetings by Town and Community Councillors and County Borough Councillors. • Candidates for Council Elections – The Standards Committee will look to develop an easy read guide for proposed candidates on the ethical obligations they will be required to meet if elected, which can be placed on the council's website. • Observation of Council and Committee Meetings, including Town and Community Councils – The Standards Committee will continue to observe proceedings at Council and Committee meetings to give feedback on observations and inform its work priorities. • Annual Meeting with Group Leaders - To facilitate ongoing engagement with representatives from all political groups and discharge legal duties pursuant to the Local Government and Elections (Wales) Act 2021, and develop ways to ensure regular reporting from Group Leaders to comply with the duty under the aforementioned legislation. • Case Studies – A set of case studies and examples will be prepared by the Standards Committee to address practical scenarios for elected members to consider on ethical behaviour, declaration of interests and general conduct matters. 	Head of Legal & Democratic Services

Ref (action)	Improvement Action to be undertaken during 2025/2026	Responsible Officer
	<ul style="list-style-type: none"> • Engagement with Members – In order to dispel myths about the work of the Standards Committee, it was agreed that arranging a meeting with a sample of elected members would be beneficial for members to understand more about their work programme. • Adjudication Panel for Wales – The Standards Committee propose to seek out opportunities to attend adjudication panel meetings where opportunity presents itself, to observe and bring back evidence of good practice to the committee • Member and Officer Relationship – The Standards Committee recognise that this is the lynchpin of local government and propose to look at ways to further develop the Member Officer Protocol to ensure ethical standards remain at the forefront of the relationship. • Governance and Audit – The Standards Committee will look to develop a relationship with the Governance and Audit Committee, and to identify ways of working collaboratively. This will involve working together on matters such as enabling assurances of ethical decision making being provided and appropriate arrangements being in place. • Engagement with National Standards Regime – With proposals to changes in the Standards regime throughout Wales, the Standards Committee will continue to work and look at ways for such proposals to be implemented in Neath Port Talbot. • Social Media and Conduct – The increased use of social media means that the accountability and conduct of members is of utmost importance. The Standards Committee will continue its piece of work to look at social media training, and what more can be done to guide and support members in their use of social media platforms. It will also help to ensure conducts and behaviour are being considered in usage. • Local Resolution – The Standards Committee will look to do more to promote the Local Resolution Process and how it can incorporate Town and Community Councils. • Conflict Resolution – It is important that members can resolve conflicts or give alternative views without feeling that they are at risk of breaching their code of conduct. Accordingly, the Standards Committee will look at possible learning and development opportunities to support members in this area. • Member Intimidation and Harassment – Members will consider the outcome of the recent work programme to consider members in receipt of harassment and intimidation, and how it impacts on the standard regime. 	

Ref (action)	Improvement Action to be undertaken during 2025/2026	Responsible Officer
	<ul style="list-style-type: none"> Corporate Joint Committee - Members will continue to receive information on the development of the governance arrangements and ethical behaviours associated with the work of the South West Wales Corporate Joint Committee. 2027 Induction Programme - Members will begin the process of considering the induction programme for elected members following Local Government Elections in May 2027. 	
1.1.4	Democratic Services Committee will oversee a review of the Member Induction Programme as part of the preparation for the 2027 Local Government Elections, and to prepare for future inductions.	Head of Legal & Democratic Services
1.2.2	Progress recommendations made in Audit Wales Springing Forward: Strategic Workforce report .	Head of People & Organisational Development
1.3.4 & 1.4.4	<p>Continue with future training of officer groups in the significance of the member and officer relations protocol.</p> <p>In 2024/2025, the council established a Modernisation Group to review and enhance decision-making processes. The group will identify areas for improvement and will develop recommendations to modernise and streamline constitutional processes, ensuring it is effective, transparent, and fit for purpose in a changing local government environment. Progress reports will be provided at key milestones, with reports outlining findings, recommendations, and an implementation plan at various intervals.</p>	Head of Legal & Democratic Services
1.4.9	Progress recommendations made in the Internal Audit Complaints Review report	Strategic Manager - Policy & Executive Support
1.4.10, 2.3.3 & 2.4.1	A training programme be embarked on for officers and members to oversee the introduction of the Contract Procedure Rules, and to assist the council in implementing the legislative changes required.	Head of Legal & Democratic Services

Ref (action)	Improvement Action to be undertaken during 2025/2026	Responsible Officer
2.1.1	Corporate Procurement to monitor and evaluate compliance looking at what approach sections adopt. Head of Legal & Democratic Services to report annually to the Corporate Governance Group. An annual report to be presented to members on the implementation of the Procurement Strategy.	Head of Legal & Democratic Services
2.2.1	Democratic Services Committee will oversee a review of the Member Induction Programme as part of the preparation for the 2027 Local Government Elections and to prepare for future inductions.	Head of Legal & Democratic Services
3.3.1	The council's report template will be updated to ensure all matters that should be considered are incorporated when making a decision.	Head of Legal & Democratic Services
3.5.1	<p>The Standards Committee have identified the following as their programmes of work for 2025/2026:</p> <ul style="list-style-type: none"> • All members ensure they are completing their declarations of gifts and hospitality, including where such gifts and hospitality are declined, utilising the new online reporting tools; • Group Leaders continue to have regular meetings with the Monitoring Officer to discuss standards and ethics and how they can work together to promote standards within their political groups; • Steps be taken to promote the Member Officer Protocol to all elected members and officers of the council, with training provided as appropriate; • Consideration be given to inserting a guidance note on the website for those individuals wishing to stand for County Borough Council or Town/Community Councils highlighting the key ethical principles that if elected they will have to comply with; • A series of guidance documents be circulated to all members in respect of key conduct matters such as declarations of interest, predetermination, conduct case studies and key information for members to supplement the existing guidance available from the Public Service Ombudsman for Wales. 	Head of Legal & Democratic Services

Ref (action)	Improvement Action to be undertaken during 2025/2026	Responsible Officer
Principle B: Ensuring openness and comprehensive stakeholder engagement		
4.5.3	Embedding the Social Partnership Duty with our recognised trade unions.	Head of People & Organisational Development
4.5.4	Progress recommendations contained in the review of Corporate Communications and Marketing	Strategic Manager - Policy & Executive Support
Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits		
5.4.1	Progress recommendations contain within the Audit Wales Review of Corporate Risk Management	Strategic Manager - Policy & Executive Support
Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes		
6.7.1	Developing a set of actions in response to the outcomes of the CIPD People Impact Survey 2025, assessing the capability and effectiveness of the HR team and people practices.	Head of People & Organisational Development
6.9.1	Further development of a medium term financial strategy.	Director of Finance
Principle E: Developing the entity's capacity, including the capability of its leadership and the individuals within it		
7.6.1	An updated Delegation Document will be presented to Full Council in April 2025 following a review by the Modernisation Group of current delegations and a further work programme will be embarked to look at the officer delegation decision making process.	Head of Legal & Democratic Services

Ref (action)	Improvement Action to be undertaken during 2025/2026	Responsible Officer
7.8.1	Democratic Services Committee to undertake a review to commence in 2025/2026 to look at the member induction and learning and development needs for the local government elections in 2027 onwards.	Head of Legal & Democratic Services
7.8.2	Continue to promote the member development and performance assessment process in Democratic Services Committee	Head of Legal & Democratic Services
Principle F: Managing risks and performance through robust internal control and strong public financial management		
8.6.1	Implement updated model of scrutiny in 2025/2026 and monitor throughout year as to whether overview and scrutiny functions are being fulfilled.	Head of Legal & Democratic Services
8.14.1	A review of Data Processing, Data Protection and Data Sharing work to be undertaken by the Information Governance team.	Chief Digital Officer
8.14.1	Development of the existing Directorate Information Officer role to improve the management of information, and the addressing of identified risks with robust reporting mechanisms.	Chief Digital Officer
Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability		
9.9.1	From 1 st April 2025, PSIAS have been replaced by the Global Internal Audit Standards in the UK public sector. Within 2025/26 internal audit teams are required to work towards the new standards. The Quality Assurance Improvement Program (due for presentation to July 2025 Governance and Audit Committee) will confirm key actions needed to ensure compliance with the new standards.	Audit Manager

Handwritten signature of Frances O'Brien in black ink.

Signed:

Chief Executive: Frances O'Brien

Date: 27.08.25

Handwritten signature of Steve Hunt in black ink.

Signed:



Leader of the Council: Cllr Steve Hunt

Date: 27.08.25


Financial Management Code of Self-Assessment (FREM)



CIPFA issued a new code, The FREM, which sets out the standards of financial management for local authorities. Adoption of the Code commenced in April 2021. This appendix provides a self-assessment which has been approved by Corporate Directors Group and provides assurance that the financial management of the council are being met.

Section 1: The Responsibilities of the Director of Finance and the Strategic Leadership Team





Standard Reference & RAG Status	Financial Management	2024/2025 Update
A 	The Strategic Leadership Team can demonstrate that the services provided by the council provide value for money.	The council continues to deliver its services within the overall budget available. In terms of demonstrating value for money the council will continue to look for ways of comparing costs and income in a meaningful way. Historically the council has participated in benchmarking forums to compare costs however due to a lack of perceived benefit these have been wound down.
B 	The council complies with the CIPFA Statement on the Role of the Director of Finance in Local Government.	We comply with the requirements of the code. The Director of Finance is a CIPFA qualified accountant with over 20 years of local government experience, and sits on the Strategic Leadership Team, influencing material decisions and ensuring financial implications are provided in all reports. The Director of Finance is responsible for maintaining and resourcing an effective Internal Audit service and leads on risk management.

Section 2: Governance and Financial Management Style

Standard Reference & RAG Status	Financial Management	2024/2025 Update
C 	The leadership team demonstrates in its actions and behaviours responsibility for governance and internal control.	The council adopts the Nolan principles as can be evidenced in the Annual Governance Statement (AGS). The AGS is signed off by Audit Wales as part of the accounts audit process.



D 	The council applies CIPFA/SOLACE Delivering Good Governance in Local Government: Framework 2016	The Governance & Audit Committee reviewed the adequacy of governance arrangements of the council, reviewing the AGS and receiving risk management updates.
E 	The financial management style of the council supports financial sustainability	Audit Wales' latest Financial Sustainability review concluded that the council is financially sustainable but needs to develop a documented Medium Term Financial Plan (MTFP).

Section 3: Long to Medium-Term Financial Management



Standard Reference & RAG Status	Financial Management	2024/2025 Update
F 	The council has carried out a credible and transparent financial resilience assessment	The budget setting for 2025/2026 includes a statement relating to the robustness of the estimates used in calculating the budget requirement and indicates the budget process has been prepared in conjunction with officers. It also identifies the risk areas that will be actively managed during the financial year.
G 	The council understands its prospects for financial sustainability in the longer term and has reported this clearly to members	The council has developed a Medium Term Financial Plan (MTFP) to 2027/28 and are in the process of finalising the 2028/2029 MTFP.
H 	The council complies with the Prudential Code for Capital Finance in Local Authorities	The council complies with all elements of the Prudential Code.
I 	The council has a rolling multi-year financial plan with sustainable service plans	See note above regarding documented MTFP. Heads of Service business plans have been developed and are being monitored and updated annually

Section 4: The Annual Budget

Standard Reference & RAG Status	Financial Management	2024/2025 Update
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J 	The council complies with its statutory obligations in respect of the budget setting process	The council complies with its statutory obligations in respect of the budget setting process as set out in the Local Government Finance Act (1992). A legal and balanced budget set by the council by the statutory deadline was approved by Council on 5 th March 2025. The council is aware of the circumstances under which a Section 114 notice should be issue.
K 	The budget report includes a statement by the Director of Finance on the robustness of the estimates on the adequacy of the proposed financial reserves.	The budget setting report comments upon the robustness of the estimates included therein and a balanced affordable budget has been set. The reserves are reported within the budget setting process and monitored throughout the financial year. The council agreed a general reserves policy which states reserves should be maintained at circa 4% of the net revenue budget.

Section 5: Stakeholder Engagement and Business Plans



Standard Reference & RAG Status	Financial Management	2024/2025 Update
L 	The council has engaged with key stakeholders where appropriate in developing its long-term financial strategy, medium term financial plan and annual budget.	Key stakeholders are consulted on key projects for example stakeholder views were sought when developing the corporate plan. Member workshops are run at budget setting. Cabinet approved the consultation process with stakeholders on the draft budget. Consultation responses are reported to Council.
M 	The council uses an appropriate documented option appraisal methodology to demonstrate the value for money of its decisions.	An investment proposal template has been created and utilised. More work is needed to refine the processes around agreement and priority of the investment appraisals put forward.

Section 6: Monitoring Financial Performance

Standard Reference & RAG Status	Financial Management	2024/2025 Update
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N 	The leadership team takes action using reports enabling it to identify and correct emerging risks to its budget strategy and financial sustainability.	<ul style="list-style-type: none"> Monthly reports are considered by budget holders and reported to the Strategic Leadership Team. Quarterly Finance revenue and capital reports are presented to Cabinet. Treasury management reports are taken to Cabinet on a quarterly basis, any significant issues identified are reported to the Senior Management Team.
O 	The leadership team monitors the elements of its balance sheet that pose a significant to its financial sustainability.	The balance sheet is monitored by the relevant service department accountants as part of the budget monitoring process. With the balance sheet being reviewed by the Director of Finance as part of the closure of accounts process.

Section 7: External Financial Reporting

Standard Reference & RAG Status	Financial Management	2024/2025 Update
P 	The Director of Finance has personal and statutory responsibility for ensuring that the statement of accounts produced by the local council complies with the Code Practice in Local Council Accounting in the United Kingdom.	The Director of Finance's responsibilities are set out in the "Statement of responsibilities" within the Statement of accounts. This clearly sets out that the Director of Finance is responsible for the preparation of the council's Statement of Accounts in accordance with proper practices as set out by the Code of Practice on Local Council Accounting in the United Kingdom. The annual audit letter confirms that the statement of accounts has been prepared on time and in accordance with the code of practice.
Q 	The presentation of the final outturn figures and variations from budget allows the leadership team to make strategic financial decisions.	The outturn figures are reported to Strategic Leadership Team and Cabinet and is included in the narrative report of the Statement of Accounts.