Cabinet

Monday 18 January 2016

2:00pm, Colman and Cavell Rooms
South Norfolk House, Cygnet Court, Long Stratton, Norfolk, NR15 2XE

If you have any special requirements in order to attend this meeting, please let us know in advance
Large print version can be made available

Contact Claire White on 01508 533669 or democracy@s-norfolk.gov.uk
Members of the Cabinet

Mr J Fuller (Chairman)
Mr J Wilby (Vice Chairman)

Portfolio Holders

Mrs Y Bendle
Mr M Edney
Mr L Hornby
Mrs K Mason Billig

Group Meetings

Conservatives – 1:00 pm, Cabinet Office
Liberal Democrats – 1.30 pm, Ancillary Pod 2

This meeting may be filmed, recorded or photographed by the public; however anyone who wishes to do so must inform the chairman and ensure it is done in a non-disruptive and public manner. Please review the Council’s guidance on filming and recording meetings available in the meeting room.
Agenda

1. To report apologies for absence;

2. Any items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act, 1972. Urgent business may only be taken if, "by reason of special circumstances" (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency;

3. To Receive Declarations of Interest from Members;  
   (please see guidance – page 5)

4. To confirm the minutes of the Cabinet meeting held on 7 December 2015;  
   (attached – page 6)

5. Digital Engagement Strategy;  
   (report attached – page 18)

   (report attached – page 41)
7. Proposed Corporate Environment Policy; (report attached – page 87)

8. Article 4 Direction: Cringleford; (report attached – page 95)

9. Whistleblowing Policy, Counter Fraud, Corruption and Bribery Strategy, and Anti-Money Laundering Policy - Updates; (report attached - page 103)

10. Cabinet Core Agenda; (attached - page 163)

11. Exclusion of the Public and Press

   To exclude the public and press from the meeting under Section 100A of the Local Government Act 1972 for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act (as amended)

12. Purchase Notice – King’s Head, Pulham St Mary; (report enclosed separately for members)

   (NOT FOR PUBLICATION by virtue of Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972)
DECLARATIONS OF INTEREST AT MEETINGS

Members are asked to declare any interests they have in the meeting. Members are required to identify the nature of the interest and the agenda item to which it relates.

- In the case of other interests, the member may speak and vote on the matter.
- If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed.
- If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting.
- Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.
- In any case, members have the right to remove themselves from the meeting or the voting if they consider, in the circumstances, it is appropriate to do so.

Should Members have any concerns relating to interests they have, they are encouraged to contact the Monitoring Officer (or Deputy) or another member of the Democratic Services Team in advance of the meeting.
CABINET

Minutes of a meeting of the Cabinet of South Norfolk District Council held at South Norfolk House, Long Stratton on Monday 7 December 2015 at 2.00 pm

Members Present:

Cabinet: Councillors J Fuller (Chairman) *
M Wilby, Y Bendle, L Hornby and K Mason Billig

Apologies: Councillor M Edney

Non-Appointed: Councillors B Bernard, D Goldson, M Gray, T Lewis, J Mooney and R Savage

Officers in Attendance: The Director of Business Improvement (D Lorimer), the Director of Growth and Localism (T Horspole), the Housing Access and Standards Manager (T Cooke), the Business Improvement Manager (S Pontin), the Corporate Customer Services Manager (A Adams), the Corporate Business Officer (C Lawrie), the Housing and Public Health Partnerships Officer (L Pickering), the Policy Officer (P Chapman), and the Licensing, Food and Safety Team Leader (C Coker)

*Cllr Fuller was not in attendance for the first 15 minutes of the meeting.

2409 MINUTES

The minutes of the meeting held on Monday 2 November were agreed as a correct record and signed by the Chairman.
CORPORATE PLAN 2016-2020

The Subject of the Decision

Members considered the report of the Strategy and Corporate Development Officer, which presented Cabinet with the Corporate Plan for 2016-17.

The Corporate Business Officer presented the report to members, explaining that the format was different to that of previous years, in that it was an interactive, web based document, which encouraged people to view the document on-line, as opposed to viewing it on paper. The document contained tabs across the top of each page, enabling users to easily navigate to areas of interest, and also contained hyperlinks to areas of additional information on website pages. The Corporate Business Officer went on to demonstrate the content and layout of the plan, explaining that following Council approval on 14 December, it was hoped that the Plan would be published on the Council’s website in early January.

Members noted that each priority page would include a link to a video, whereby the relevant portfolio holder would outline the overarching vision and priorities. Officers were currently working with members to record these videos.

Members commended officers for the production of the Plan, and welcomed its content and new structure.

Cllr K Mason Billig had noted that within the Plan, an “s” had been omitted from the end of the word “Standards” and officers agreed to amend this error. Cllr T Lewis made reference to the ambitious targets relating to commercial waste and the number of new homes built. Cabinet agreed that these targets were challenging, but agreed that no amendments were required.

The Decision

RESOLVED TO RECOMMEND THAT COUNCIL approves the Corporate Plan 2016-2020, subject to minor amendments.

The Reasons for the Decision

To ensure the Corporate Plan focuses on the priorities of the Council, and is accessible to all.
Other Options Considered

None

2412 SOUTH NORFOLK HOUSING STRATEGY 2016-19

The Subject of the Decision

Members considered the report of the Housing and Public Health Partnerships Officer, which presented Cabinet with the South Norfolk Housing Strategy 2016-19 and associated Action Plan, for approval.

In presenting his report, the Housing and Public Health Partnerships Officer explained the vision of the Housing Strategy for South Norfolk, and the need to recognise the wider impact that the provision of housing had on the community and the lives of residents in South Norfolk. He referred to the key stages in the development of the Strategy and the feedback received from the consultation process. Drawing attention to the Action Plan detailed at Appendix B of the report, he explained actions had been linked to the strategic aims of the priorities, on which the Strategy was based.

Cllr Y Bendle commended the Strategy to members, referring to the links between housing, health, and wellbeing and prosperity. She explained that the Action Plan had been carefully co-ordinated with the Council’s partners, and members noted the shared responsibility in delivering the desired outcomes.

During discussion, mention was given to the Housing and Planning Bill and the impact this would have on the Strategy. The Housing Access and Standards Manager explained that amendments to the Strategy would be made as necessary, once the Council was fully aware of the full impact of the final Act. Reference was made to the Right to Buy on affordable housing, and it was noted that Saffron, as a dominant Registered Social Landlord, had been selected to take part in the national pilot.

The Decision

RESOLVED: To:

1. Note the responses received as part of the consultation process;
2. Endorse the resultant Action Plan;
The Reasons for the Decision

To ensure a strategy that will contribute to the Council’s priorities and wider aims of the Council.

Other Options Considered

To request further development of the Strategy and to re-timetable its adoption.

2413 GREATER NORWICH HOMELESSNESS STRATEGY

The Subject of the Decision

Members considered the report of the Housing and Public Health Partnerships Officer, which presented members with the Greater Norwich Homelessness Strategy, for approval.

Cllr Y Bendle introduced the report, explaining that the Strategy had been produced, in conjunction with Broadland District and Norwich City Councils. She referred to the Council’s excellent record in homelessness, and the preventative and early intervention approach, which had been enhanced through the work of the Early Help Hub.

The Housing and Public Health Partnerships Officer referred to the key stages in the development of the Strategy, consultation with key stakeholders, and the four priorities on which the Action Plan was based.

The Chairman stressed the wider effects that homelessness had on the health, well being and prosperity of individuals, and recognised the need for the Council to provide support for homeless people outside of the District, and to work together with neighbouring authorities.

The Decision

RESOLVED: To:

1. Approve the Greater Norwich Homeless Strategy 2015-20;
The Reasons for the Decision

To support a Strategy and Action Plan that are in line with the Council’s priorities.

Other Options Considered

None.

2414 COMMUNITY INFRASTRUCTURE LEVY (CIL). EXEMPTIONS FOR RESIDENTIAL EXTENSIONS AND INSTALMENT POLICY

The Subject of the Decision

Members considered the report of the Business Improvement Manager, which proposed amendments to the administration of the Community Infrastructure Levy (CIL).

The Business Improvement Manager began by referring to the application of CIL on domestic extensions, and the administrative costs involved. He further explained that there were very few circumstances where relief for CIL would not be granted on domestic extensions. With regard to the proposed changes to the instalment policy, he explained that the proposal to reduce the lower level whereby payments of CIL could be made by instalments, from £60,000 to £25,000, had come about following requests from smaller developers, to ease cash flows.

Cllr L Hornby expressed his support for the proposals, referring them to be a common sense approach that would provide consistency with the operation of CIL in the Broadland area of Norwich.

The Chairman also commended the proposals, advising Cabinet that he had recently been asked by Brandon Lewis MP to lead on a review panel, looking at the effectiveness of CIL and to recommend any changes that might improve its operation.

In response to queries, the Director of Growth and Localism confirmed that should Cabinet approve the proposals, the sum of £3,000, already received as payment for CIL on a residential extension, would be reimbursed.
The Decision

RESOLVED: To:
1. Agree to no longer apply CIL to residential extensions in view of the high cost of implementing this part of the Regulation;
2. Amend the instalment policy as outlined in paragraph 4 of the report.

The Reasons for the Decision

To administer CIL in line with the Broadland area of Norwich, and to provide staff efficiency savings. To assist the smaller developers, who, for cash flow reasons, prefer to make payments of CIL by way of instalments.

Other Options Considered

- To continue to apply CIL to residential extensions
- To continue to apply the instalment policy as previously adopted.

2415 COUNCIL TAX SUPPORT SCHEME 2016/17

The Subject of the Decision

Members considered the report of the Corporate Customer Services Manager, which presented Cabinet with the Council Tax Support Scheme for 2016/17.

The Corporate Customer Services Manager explained that the proposed scheme for 2016/17 still had regard to the guiding principles which were laid out by the original working party back in 2012. The amendments proposed had all been considered in conjunction with the impact of the recent Welfare Reform changes, further proposed national changes from April 2016, and the feedback received from the consultation process.

With regard to the changes, the Customer Services Manager explained that the new scheme provided more of an emphasis on making work pay and this was achieved through the proposed increase in the earnings disregard. It was noted that the proposals also aligned any new claims with the forthcoming rules for Housing Benefit and Universal Credit through the removal of the family premium and changing the maximum period to claim for backdated support to 28 days.
The Customer Services Manager referred members to the Equality Impact Assessment, provided at Appendix 1 of the report, stressing that members should have regard to its outcomes, when considering the proposals.

During discussion, officers confirmed that the Discretionary Fund would continue to be available during 2016/17, and explained that the current year’s fund was on track to be spent in full at the end of the financial year. Cllr Y Bendle reminded members that not all the support provided was financial, and that officers worked closely with the Early Help Hub to provide additional support where needed. Cabinet welcomed this holistic approach.

The Decision

RESOLVED: TO RECOMMEND THAT COUNCIL:
1. Agrees the proposals outlined at paragraph 4 of the report;

The Reasons for the Decision

To ensure that the scheme supports the objectives of the Council, supports families, incentivises work and is efficient to manage.

Other Options Considered

To retain the current scheme.

2416 STATEMENT OF LICENSING POLICY

The Subject of the Decision

Members considered the report of the Licensing and Enforcement Officer, which presented Cabinet with a revised Statement of Licensing Policy.

Cllr L Hornby commended the report to members, explaining that in accordance with the Licensing Act 2003, the Council was required to publish its Statement of Licensing Policy at least every 5 years.
The Licensing, Food and Safety Team Leader presented the report to Cabinet, explaining that the Policy had been revised as part of a Norfolk Working Group, and that there had been no relevant representations made as part of the consultation. Minor tweaks to the Policy had been made following its consideration by members at the Licensing Committee on 17 November.

**The Decision**

**RESOLVED:** TO RECOMMEND THAT COUNCIL adopts the Statement of Licensing Policy, as set out in Appendix A of the report, and authorises the Director of Growth and Localism to carry out all regulatory processes to enable the policy to come in to effect on 7 January 2016.

**The Reasons for the Decision**

To ensure that licensing functions continue, in accordance with the regulations.

**Other Options Considered**

None.

2417 **STATEMENT OF GAMBLING POLICY**

**The Subject of the Decision**

Members considered the report of the Licensing and Enforcement Officer, which presented members with the Statement of Gambling Policy.

The Licensing, Food and Safety Team Leader outlined the key issues of the report to members, explaining that the Policy had been revised as part of a Norfolk Working Group. One relevant representation had been received as part of the consultation process, and had resulted in minor amendments being made. The Licensing Committee had considered the Policy at its meeting held 17 November and had recommended its approval by Council.

During brief discussion, the Chairman queried why there was no mention in the Policy of Fixed Odds Betting Terminals, and the Licensing, Food and Safety Team Leader agreed to look in to the matter and report back to the Chairman after the meeting.
The Decision

RESOLVED: TO RECOMMEND THAT COUNCIL adopts the Statement of Gambling Policy as set out in Appendix A of the report, subject to minor amendments, and authorises the Director of Growth and Localism to carry out all regulatory processes to enable the policy to come into effect on 31 January 2016.

The Reasons for the Decision

To ensure that a Policy is in place, in line with statutory requirements.

Other Options Considered

None.

2418 NORFOLK COUNTY COUNCIL – RE-IMAGINING NORFOLK CONSULTATION

The Subject of the Decision

Members considered the report of the Director of Business Development, which summarised the main proposals in the Norfolk County Council Re-imagining Norfolk Consultation, and presented Cabinet with a recommended response.

The Director of Business Development outlined the salient points of her report to members, explaining how the County Council’s approach was not dissimilar to that adopted by South Norfolk Council. She referred to the areas where the Council felt it could continue to collaborate and work more effectively with the County Council, and she drew attention to the risks and considerations associated with the proposals.

During discussion, the Chairman made reference to the County Council’s intention to carry out a separate piece of work to improve waste management and recycling, and he stressed the need to emphasise the importance of brown bins. In response to queries, he explained that he understood the need for County to balance any potential rise in their share of the Council Tax, with the need to cut services, but that he hoped that it would explore other proposals and avoid rises where possible. The Director of Business Development confirmed that the deadline for responses was 14 January, and that although a joint response had not been issued, she was aware of discussions between the district councils, with regard to the consultation response.
The Decision

RESOLVED: To approve the formal response to Norfolk County Council Budget Consultation as outlined at Appendix A of the report, subject to minor amendments.

The Reasons for the Decision

To minimise the impact on residents, and to ensure that any savings made are overall savings to the public purse

Other Options Considered

None.

2419 CABINET CORE AGENDA

Members noted the latest version of the Cabinet Core Agenda.

2420 EXCLUSION OF THE PUBLIC AND PRESS

It was

RESOLVED: that under Section 100A (4) of the Local Government Act 1972, the public and press be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 Schedule 12A of the Act (as amended).
2421 LEISURE PRICING, REFUND AND CANCELLATION REVIEW AND PROPOSALS FOR FUTURE DELIVERY

The Subject of the Decision

Members considered the exempt report of the Head of Leisure Services, which reviewed the pricing structure and refund and cancellation policy at the Council’s leisure centres.

The Head of Leisure Services outlined the key points of his report, explaining that the proposed pricing structure and associated changes would allow the leisure facilities to remain competitive with a fair and consistent pricing structure, whilst reducing the Leisure Service subsidy. He drew attention to the potential risks in implementing the proposals, and the need to balance these risks with the benefits that could be achieved.

Members were advised of a minor error within the Cancellation and Refund Policy as detailed in the report, and noted the correct figures that were being proposed.

Members agreed that the Council was in an excellent position to make the proposed changes.

The Decision

RESOLVED: To agree:

1. Implementation of the proposed pricing structure for core prices as outlined in paragraphs 4.1 and 4.2 of the report;
2. To delegate any other decisions on pricing at leisure centres, including incentive schemes, to the Head of Leisure;
3. The associated refund and cancellation policy as described in paragraph 4.4 of the report, subject to minor amendment

The Reasons for the Decision

To maximise income whilst remaining competitive
Other Options Considered

- No change
- Phased increases
- Smaller increases

(The meeting concluded at 3.59 pm)

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Chairman
Digital Engagement Strategy

Report of the Director of Community Services
Cabinet Member: Cllr Michael Edney, ICT Portfolio Holder

CONTACT
Paula Boyce 01508 533703
pboyce@s-norfolk.gov.uk
1. Introduction

1.1. As a modern and progressive Council, South Norfolk’s ambition for its residents, communities, visitors and businesses relies upon the ability to deliver services that are responsive, efficient and cost effective. Technology will continue to shape and transform our lives, with an increasingly tech-savvy population now expecting its interactions with government agencies and local authorities to match the simple and efficient end-to-end service delivery that is offered by organisations in the private sector.

1.2. To support the Council’s corporate priorities and drive commercial focus a Digital Engagement Strategy (Appendix 1) has been developed which aims to underpin the implementation of the Council’s ICT Strategy that was approved on 2 November 2015 (Minute 2406).

1.3. Along with other traditional communication channels the intention of the Strategy is to enable greater access to digital or online services in a way that ensures that our customers have multi-channel access to information and services that are convenient for them. In this context the term ‘Digital’ is an umbrella term used to capture a broad base of online or web accessible media, channels, technologies or devices such as websites, social media networks and messaging services.

2. Background

2.1. The development of transactional services both online and on mobile devices is flourishing. Completing consumer transactions online has become second nature, with more and more people going online for shopping, banking,
information and entertainment. Consumers have moved to online services because they tend to be quicker, more convenient and cheaper to use. Technology is moving into the digital age with the proliferation of the internet and ever more intuitive offerings.

2.2. As the public sector moves towards being commercially focused and financially sustainable, embracing digital technology is key for this Council. The ability to develop and deliver customer focused, intuitive systems using tried and tested technology will enable South Norfolk Council to continue to provide timely, quality and cost effective services when and how our residents and businesses expect.

2.3. Cognisant that the Council’s ambition as an organisation to deliver a channel shift in providing council services is dependent on the community’s ability to access broadband and other WiFi infrastructure locally, the Council is working with Norfolk County Council to improve access to superfast broadband.

2.4. Through the Council’s new Economic Growth Strategy, a focus on the digital economy will also enable progress to be made in both digital infrastructure and platforms and shape digital capacity to build ‘online confidence and capability’ for local businesses, entrepreneurs and residents, through training and mentoring, to enable them to fully access the opportunities from the digital economy.

3. Digital engagement work streams

3.1. Creating a channel shift (i.e. encouraging customers to use the contact channels most appropriate for them) is a key component to this Strategy. This will ensure customers make use of the most cost effective communication channel and can ‘self-serve’ to undertake transactions or search for information without the assistance of SNC staff. Self-service channels currently account for less than 10% of the Council’s service requests.
3.2. There is a significant opportunity to create a step change in customer satisfaction through a streamlined website that is mobile friendly and allows users to access council services wherever and whenever they want. Our Digital Engagement Strategy will support the delivery of services that customers need, when they need them. Our ambition is to put the customer in control, provide access for all, support growth in our business areas and work to provide seamless digital services together with our partners.

3.3. The Strategy will therefore provide a framework to enable South Norfolk Council to be technologically progressive in its use of integrated platforms to reach the Council’s customers at the right time and place. In doing so we will deliver better outcomes for residents and our customers through streamlined service improvement. The Strategy will ensure our services continue to be:

- designed from the customer’s perspective;
- efficient and fully aligned to the Council’s objectives to be ever more efficient and provide services people value;
- reflective of ongoing changes in technology and user behaviour; and
- Constantly improving and responsive to customer feedback.

3.4. The work streams that will flow from the Digital Engagement Strategy will be structured to:

- **Transform how we engage** - we will improve and build on our existing digital channels to make it easier for our customers to interact with us.

- **Ensure the customer is in control** - this is about putting our customers’ needs at the heart of what we do and making online services so straightforward and convenient that people prefer to use them. We will ensure information and services are made available in a way that ensures the customer is in control and transparency is optimised through self-service where possible.
Support growth in the local digital economy - through the Council’s proposed Economic Growth Strategy, a focus on the digital economy will enable progress of local digital infrastructure, platforms and capacity.

4. Measuring performance

4.1 In line with the Government’s Digital by Default commitment, our roadmap to improve digital engagement and transactional channel shift will be measured using a series of new Key Performance Indicators (KPIs) as part of the Council’s Business Plan monitoring and reporting mechanism:

- **KPI 1: Cost per Transaction** - Cost per transaction is an important measure of a service’s efficiency. As services become more efficient, the cost per transaction should reduce.

- **KPI 2: User Satisfaction** – will measure user satisfaction will help us gauge the overall quality of the service.

- **KPI 3: Completion Rate** - will measure how many people successfully make use of services to complete a transaction.

- **KPI 4: Digital Take-up** - a long term strategic KPI which will measure how well the Council’s new digital services are being taken up.

4.2 To expedite the process of measuring transactions we are proposing to use industry average transactional costs as a base line measure and thereafter work as a Council to determine cost efficiencies as our internal data set becomes more readily available.
4.3 Subject to Member comment and approval of the Digital Engagement Strategy, the first visible sign of South Norfolk’s Digital Engagement Strategy being implemented will be our online presence in the form of a new Council website in 2016 and associated digital services. The aim is to incorporate a single customer view or journey through re-design of key services that are quick wins for delivery on this new platform.

5. Risks and Implications arising

5.1. **Financial** – capital investment based on the principle of invest to save will reduce ongoing transactional costs in the long term and provide a greater ability to generate income. A suitable capital sum is proposed as part of the ICT Capital Programme from 2016/17. The details of which will be presented as part of the Capital Programme Report to Cabinet in February 2016.

5.2 **Equalities** – it is recognised that some residents will require or will still wish to access council services using traditional communication methods be it face to face, in writing or via the telephone. These communication channels will continue to exist and therefore we perceive there to be no equality of access issues.

5.3 **Environmental** – no issues.

5.4 **Crime and disorder** – no issues.

6. Recommendation

6.1. That Cabinet approves the Digital Engagement Strategy as part of the wider ICT Strategy and proposed capital spend subject to any final amendments in consultation with the Portfolio Holder for ICT and Director of Community Services.
South Norfolk Council
Digital Engagement Strategy 2015 – 2020

Introduction
This Strategy sets out how South Norfolk Council (SNC) will embrace digital engagement as a central pillar for customer interaction and service delivery to meet the needs of residents, businesses, and visitors.

Digital is an umbrella term used to capture a broad base of online or web accessible media, channels, technologies or devices such as websites, social media networks and messaging services.

<table>
<thead>
<tr>
<th>Customer Access Channels</th>
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</thead>
<tbody>
<tr>
<td>Online via website</td>
</tr>
<tr>
<td>Email</td>
</tr>
<tr>
<td>Social media – Twitter/Facebook</td>
</tr>
<tr>
<td>Social media – LinkedIn</td>
</tr>
<tr>
<td>Telephone</td>
</tr>
<tr>
<td>Post/letter</td>
</tr>
<tr>
<td>Mobile devices</td>
</tr>
<tr>
<td>Face to face</td>
</tr>
</tbody>
</table>

Creating a channel shift (i.e. encouraging customers to use the contact channels most appropriate for them) is a key component to this Strategy. This will ensure customers make use of the most cost effective communication channel and can ‘self-serve’ to undertake
transactions or search for information without the assistance of SNC staff. Self-service channels currently account for less than 10% of the Council’s service requests.

There is a significant opportunity to create a step change in customer satisfaction through a streamlined website that is mobile friendly and allows users to access council services wherever and whenever they want.

1. Why is digital important?
Completing consumer transactions online has become second nature, with more and more people going online for shopping, banking, information and entertainment. Consumers have moved to online services because they tend to be quicker, more convenient and cheaper to use. Technology will continue to shape and transform our lives, with an increasingly tech-savvy population now expecting its interactions with government agencies and local authorities to match the simple and efficient end-to-end service delivery that is offered by organisations in the private sector.

The development of transactional services online and on mobile devices is flourishing. Technology is moving into the digital age with the proliferation of the internet and ever more intuitive offerings. Individuals are regularly using two to three portable devices to access information and services online. Social media is maturing and becoming a key channel across which conversations are being had.

To facilitate the provision of effective customer engagement these channels are being leveraged by the private sector, raising expectations generally across all sectors. As the public sector moves towards being commercially focused and financially sustainable, embracing digital technology is key for this Council. The ability to develop and deliver customer focused, intuitive systems using tried and tested technology will enable South Norfolk Council to continue to provide timely, quality and cost effective services when and how our residents and businesses expect.
Key digital facts: UK-wide 2015:

- 86% of households in Great Britain (22.5 million) have access to the internet.
- The internet was accessed every day, or almost every day, by 78% of adults (39.3 million) in Great Britain in 2015, compared with 35% (16.2 million) in 2006.
- 76% of adults bought goods or services online.
- 99% of adults aged 16 to 24 years use the internet.
- 33% of adults aged 75 years and over use the internet.
- 76% of UK adults now own a smartphone
- 96% of adults aged 16 to 24 accessed the internet “on the go”
- Social networking was used by 61% of adults, and of those, 79% did so every day or almost every day.
- The Government’s Digital Efficiency Report suggested that digital transactions are 20 times cheaper than by phone, 30 times cheaper than by post and as much as 50 times cheaper than by face-to-face meetings

But:
- 11% of the adult population in the UK has never used the internet (5.9 million people in total).
- 23% of small businesses don’t have basic Digital Skills.

Key digital facts: South Norfolk 2015:

- 94% of South Norfolk households have moderate to high internet usage
- In the order of 89% of households have a high propensity to ‘self-serve’
- 18% are likely to be social media (Facebook) users
• 10% are likely to be social media (Twitter) users
• The Council’s customer engagement through social media has risen steadily over the past 3 years where numbers have tripled on Twitter (534 to 1,594 Followers) and on Facebook (67 to 1,150 Likes) via the main Council social media channels

But:
• 12% of households in South Norfolk do not receive broadband speeds of at least 2 megabits per second*
• 14.5% of adults in South Norfolk have never been online*
• 79% of adults in South Norfolk have all five Basic Digital Skills (See Appendix A for further details)*

*Source: Go ON UK Digital Exclusion Heatmap - developed with support from the BBC as part of their Make It Digital and wider digital literacy initiatives, the Local Government Association and The London School of Economics and Political Science, using fresh insight into Basic Digital Skills in association with Lloyds Banking Group.

2. Strategic Context

Key priorities from our Corporate Plan

• Economic Growth, Productivity and Prosperity: Providing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities.

• Health, Well-being and Early Help: Proactively working with communities to provide help at the earliest opportunity and enhancing the health and well-being of our residents.
• **Place, Communities and Environment:** Improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages

3. Where are we now?

**Council services** - Elements of connectivity already exist between the Council’s front and back office systems but creating a cohesive design for digital services that integrate with existing workflows will reduce duplication of data capture. A more responsive service for customers is key to this Strategy. As part of our ICT upgrade programme a full refresh of public and private WiFi has taken place at all council sites.

Existing digital and transactions via other channels with an estimate of monthly usage cost is shown below based on published UK transactional costs (The level of transactions is a monthly average from April to October 2015):

<table>
<thead>
<tr>
<th>Contact Channel</th>
<th>Monthly use</th>
<th>UK unit cost</th>
<th>Estimated monthly cost (rounded)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Online/Website hits</td>
<td>35,000 hits</td>
<td>£0.17 ³</td>
<td>£6,500</td>
</tr>
<tr>
<td>• Website self-service forms</td>
<td>3,320 transactions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• CST e-forms via telephone on behalf of customers</td>
<td>3,830 transactions</td>
<td>£5.00 ³</td>
<td>£19,000</td>
</tr>
<tr>
<td>• Email</td>
<td>5,990 emails</td>
<td>£2.67¹</td>
<td></td>
</tr>
<tr>
<td>• Telephone</td>
<td>33,750 calls</td>
<td>£5.00 ³</td>
<td>£169,000</td>
</tr>
<tr>
<td>• Post/letter</td>
<td>7,700 items</td>
<td>£6.62²</td>
<td>£51,000</td>
</tr>
<tr>
<td>• Face to face</td>
<td>780 visitors</td>
<td>£14.00 ³</td>
<td>£11,000</td>
</tr>
<tr>
<td>• Web chat</td>
<td>Nil</td>
<td>£2.26³</td>
<td></td>
</tr>
<tr>
<td><strong>• Social media</strong></td>
<td><strong>2,550 engagements</strong></td>
<td></td>
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<td>-------------------</td>
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<td></td>
<td></td>
</tr>
<tr>
<td><strong>• Mobile devices</strong></td>
<td><strong>Nil</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Estimated transactional monthly cost = £272,500**

1 Source: The UK Contact Centre HR & Operational Benchmarking Report 2015-16 - 5th edition
2 Source: Driving Standards Agency Report 2011/12
3 Source: SOCIITM Insight Potential for channel shift in local government (England) 2012

**Better Broadband for Norfolk** – working with BT, this countywide project aims to deliver more than 80% of Norfolk’s homes and businesses access to superfast broadband (24 Megabits per second plus) with a minimum broadband speeds of 2 Megabits per second available to all Norfolk premises by the end of 2015. This includes the geographic area that is South Norfolk. The benefits of better broadband for South Norfolk householders includes everything from having improved access to online shopping, banking and public services and being able to stay in touch with family and friends, to setting up a business and running it from home. Children will be able to do their homework and learn independently online and adults will have improved opportunities for life-long learning.

Connection speeds have improved in Norfolk with superfast broadband available in many areas of South Norfolk although broadband speeds are a limitation and non-existent in some areas. As part of our IT upgrade programme a full refresh of public and private WiFi has taken place. We are also looking to implement a series of digital platforms across our market towns which will require the phased introduction of Wi-Fi and Better Broadband coverage. This will enable us to improve both the digital capacity of the district and the ability for our smaller businesses to compete in the online marketplace.

Through the Council’s new Economic Growth Strategy, a focus on the digital economy will enable progress in the following areas:
- **Digital Infrastructure** - to improve the 'enabling infrastructure' including high speed broadband, public WiFi, Internet of Things connected sensor technologies etc. and related infrastructure such as Click & Collect Hubs and Co-working Spaces for digital entrepreneurs.

- **Digital Platforms** - to enable business growth and promotion through business and tourism digital products, retail platforms (for independent retailers) and specialist products e.g. Digital Stories/Heritage platform.

- **Digital Capacity** - to build 'online confidence and capability' for local businesses, entrepreneurs and residents, through training and mentoring, to enable them to fully access the opportunities from the digital economy.
Digital High Street
- Online retail platform
- Virtual shop tours
- Click and collect hubs

Digital Enterprise
- Digital entrepreneurs
- Coworking spaces
- On/Offline networks

Digital Skills
- Building business capacity
- Digital literacy
- Next generation

Digital Community
- Online communities
- Online safety
- Digital Champions

Digital Infrastructure
- High speed Broadband roll out
- Public WiFi / mobile tech
- iBeacons / smart sensors / IOT

Digital Heritage
- Digital stories/video platform
- AR/VR Connectivity
- Tourism promotion/products

Innovation
Connectivity
Collaboration
Enterprise
4. Where do we want to be?
South Norfolk Council will be technologically progressive using integrated platforms to reach the customer at the right time and place. We will save both the customer and the organisation time and money by creating digital services that are viewed by customers as the access channel of choice. In doing so we will deliver better outcomes for residents and our customers through streamlined service improvement.

It follows that our customer service philosophy will be:

- Designed from the customer’s perspective
- Efficient and fully aligned to the Council’s objectives to be ever more efficient and provide services people value
- Reflective of ongoing changes in technology and user behaviour
- Constantly improving and responsive to customer feedback

Our Digital Engagement Strategy will support the delivery of services that the customers need, when they need them.

We will do this by:

- Enabling our customers to access services at a time that is convenient to them by providing a user-friendly, intuitive website, which enables our customers to self-serve.
- Meeting our customers’ needs by providing an efficient and effective Customer Contact Centre.
- Ensuring our services are accessible and promoted to all our residents and businesses by utilising the potential of social media to interact with our community.
Our ambition is to put the customer in control, provide access for all, support growth in our business areas and work to provide seamless digital services together with our partners.

5. Delivering our Digital Engagement Strategy
Three workstreams have been identified to achieve the strategic goals for digital engagement by South Norfolk Council. These provide a framework for tasks and projects that will create the change in processes and approach required:

A. Transforming how we engage
We will improve and build on our existing digital channels to make it easier for our customers to interact with us:

- Re-design services for digital delivery, accessible how and when they are needed.
- Use digital technology and platforms to achieve process efficiencies and increase productivity leading to improved service delivery.
- Present a single customer view utilising a Customer Relationship Management (CRM) system to automate and streamline transactions.
- Help customers to channel shift by providing assisted digital support.
- Create a secure, easy to use website that our customers view as their channel of choice.
- Integrate social media into our customer service approach.
- Managing and co-ordinating data across the Council to plan and design services aligned to meet customers' future needs.
- Develop an agile and flexible workforce where staff have the skills to take advantage of digital opportunities in carrying out their role and delivering customer focussed services.
B. Customer in control

This is about putting our customers’ needs at the heart of what we do and making online services so straightforward and convenient that people prefer to use them. We will ensure information and services are made available in a way that ensures the customer is in control and transparency is optimised through self-service where possible to:

- Offer multiple channels of delivery and providing assisted digital support to increase the number of customers who can self-serve.
- Optimise customer contact channels to enable access to other council services that may be relevant to our customers through a single customer view.
- Enable customers to tell us what information they want.
- Support income generating opportunities for chargeable services in order to re-invest in priority services.
- Harness the potential provided by technology to improve customer satisfaction and service efficiency.
- Utilise the potential of social media to interact with our community to ensure our services are accessible and promoted to all our residents.
- Measure customer satisfaction and track over time.
- Proactively capture feedback through all channels such as on website ‘Was this what you were looking for?’ functionality.
- Develop communications and marketing that inform and update customers on new ways to access council services.

C. Supporting growth in the local digital economy

Through the Council’s new Economic Growth Strategy, a focus on the digital economy will enable progress of local digital infrastructure, platforms and capacity. The Digital Engagement Strategy will enhance and support the use of this infrastructure through:
✓ Giving residents the confidence to embrace technology and use digital channels through access to local training providers.
✓ Supporting the local business community to transact safely online raising awareness of cyber security.
✓ Encouraging SMEs, community and voluntary organisations to develop and grow by providing easy and affordable access to technology services.
✓ Making use of digital services that promote South Norfolk as a destination of choice to support tourism and inward investment.
✓ Supporting South Norfolk’s market towns by facilitating and promoting digital infrastructure and platforms.
✓ Supporting our businesses to grow and to encourage new businesses to establish in the area supported by six digital drivers:

6. What does success look like?

Outcomes:

A. Transforming how we engage
   1. Digitally re-designed priority services and delivery of a new customer facing website in 2016.
   2. We will have actively implemented a ‘Digital by Default’ approach and culture by 2017.

B. Customer in control
   3. Migration of over 70% of customer actions to a digital channel by 2025.
C. Supporting growth in the local digital economy

4. Support in place for our community to learn and adopt new digital skills.

5. Customers will be aware of the range of channels available to access our services.

Through good design of digital services we will be proactively utilising data to provide greater awareness of the mix of services accessed by our customers. Opportunities to track customer insight data will then help shape future services. We will look to:

- Track digital trends and build into continuous improvement processes within the council’s online service offering.
- Support communities to interact digitally through access to training and support services to ensure people have the confidence, skills, and where practical equipment to go online.
- Continue to provide a range of channels for people to access council services including telephone and online assistance.

Key performance indicators have been identified to measure outcomes and the level of change in relation to our Digital Engagement Strategy. These represent the three work streams and are based on existing performance data. Further KPIs for individual projects will be ascertained at project initiation stage.
Key Performance Indicators – Government Standards

**KPI 1: Cost per Transaction** - Cost per transaction is an important measure of a service’s efficiency. As services become more efficient, the cost per transaction should reduce.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Measure</th>
<th>Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost per transaction using industry standards as a base line.</td>
<td>The number of different transactions per quarter with use of a yearly average to investigate the cost of transacting with the customer.</td>
<td>Reduction of cost by moving customers to digital engagement methods.</td>
</tr>
</tbody>
</table>

This KPI to be measured on a quarterly basis covering the previous 12 months to eliminate seasonal fluctuations.

The total cost of providing each service; these services are currently defined as:

- Online via website
- Email
- Social media – Twitter/Facebook
- Social media – LinkedIn
- Telephone
- Post/letter
- Mobile devices
- Face to face

**KPI 2: User Satisfaction** - Measuring user satisfaction will help us gauge the overall quality of the service.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Measure</th>
<th>Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer satisfaction using all methods of contact should be recorded. Feedback</td>
<td>Feedback ratings from customers gathered</td>
<td>To be rated excellent in all contact points</td>
</tr>
</tbody>
</table>
options should be available for every transaction. This KPI to be measured on an ongoing basis and reported quarterly. This will allow for continuous improvement.

from digital and customer service transaction. within the organisation.

<table>
<thead>
<tr>
<th>KPI 3: Completion Rate</th>
<th>measures how many people successfully make use of services to complete a transaction.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Indicator</strong></td>
<td><strong>Measure</strong></td>
</tr>
</tbody>
</table>
| The number of customers successfully completing transactions by digital methods. This KPI to be monitored on an ongoing basis and reported quarterly. Ongoing monitoring and feedback will ensure sure continuous improvement picks up services that have a low completion rate. | The total completed number of transactions as a percentage of transactions commenced but not completed. **Channel Shift**  
   a) Telephony to digital  
   b) Face to face to digital | 95% |

| KPI 4: Digital Take-up - a long term strategic KPI which measures how well the Council's new digital services are being taken up. |
|------------------------|--------------------------------------------------------------------------------------------|
| **Indicator** | **Measure** | **Target** |
| | | |
The number of customers successfully completing transactions by digital methods. This KPI to be measured monthly and reported on a quarterly basis.

The number of digital transactions as a percentage of the total number of customer requests/enquires in to the Council.

Specific measures will include:

**Digital interaction**

a) Active customer login accounts  
b) Increase in e-Billing  
c) Increase in Direct Debit  
d) Reduction in cash, cheque and postal order payments

As a long term target the aim is to achieve a progressive increase in digital interaction and communication to include:

- 10% of households registered in 2017  
- 30% of households registered in 2018  
- 50% of households registered in 2020  
- 70% of households registered in 2025

**7. Monitoring and reviewing the strategy**

During the delivery of the Strategy we will undertake quarterly monitoring meetings to ensure that the Strategy is delivering against its original vision and objectives. In these meetings we will also make sure that any horizon scanning that has taken place in the previous quarter is incorporated into the ongoing delivery. This may include new methods of communication or changes in the digital landscape. We will also review any projects that are inflight or have been previously delivered to assess the relative successes and failures in terms of uses, activities and cost.

The Strategy will be fully reviewed every 6-12 months to determine if it is still fit for purpose and that the necessary resources are in place in the correct teams in order to deliver the next project within the strategy. It is important that we record any lessons learnt in order to enhance the Strategy and embed iterative learning to continuously improve and develop.
In addition we will incorporate a number of new light touch processes that will allow all staff and members to raise issues that will act as an early warning system which will give us the opportunity to communicate how we are performing and where any potential problems or potential new gains can be made. A light touch process will allow us to track progress through digital analytics to assess traffic and popularity of transactional channels. This will allow us to amend tactics or minor make changes to the Strategy without having to increase overheads, allowing the Strategy to be flexible in the ever-changing digital media landscape.

Whilst implementing this Strategy, and beyond, the implementation team will work with other teams around the Council to ensure that the Strategy remains aligned to the Council’s Corporate and Business Plans and other service-specific strategies across the Council.

### Appendix A

#### Go ON UK – Basic Digital Skills framework

<table>
<thead>
<tr>
<th>Description</th>
<th>Managing information</th>
<th>Communicating</th>
<th>Transacting</th>
<th>Problem-solving</th>
<th>Creating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Find, manage and store digital information and content</td>
<td></td>
<td>Communicate, interact, collaborate, share and connect with others</td>
<td>Purchase and sell goods and services, organise your finances and use digital government services</td>
<td>Increase independence and confidence by solving problems and finding solutions using digital tools</td>
<td>Create basic digital content in order to engage with digital communities and organisations</td>
</tr>
<tr>
<td>Assess the accuracy of sources of information; use security tools when browsing; regularly update and run virus-checking software; manage parental controls</td>
<td></td>
<td>Use secure websites for financial transactions; protect your personal data; respect the privacy of others</td>
<td>kidnapped</td>
<td>Use accurate sources of support; avoid malicious websites, scams and pop-up windows</td>
<td>Be aware of copyright law; protect your personal data; respect the privacy of others</td>
</tr>
<tr>
<td>Use a search engine to find the information you need</td>
<td>Keep in touch using email, instant messaging, video calls and social media</td>
<td>Understand and use marketplaces to buy and sell</td>
<td></td>
<td>Teach yourself simple tasks using tutorials</td>
<td></td>
</tr>
<tr>
<td>Search for deals on comparison websites</td>
<td>Post on forums to connect with communities</td>
<td>Order your shopping</td>
<td></td>
<td>Use feedback from other internet users to solve common problems</td>
<td></td>
</tr>
<tr>
<td>Bookmark useful websites and services</td>
<td>Communicate with organisations about their products and services</td>
<td>Book your travel</td>
<td></td>
<td>Access support services</td>
<td></td>
</tr>
<tr>
<td>Store data on a device or in the cloud</td>
<td></td>
<td>Manage your bank account</td>
<td></td>
<td></td>
<td>Create a social media post</td>
</tr>
<tr>
<td>Store digital information on suppliers and customers</td>
<td></td>
<td>Set up and manage a Universal Credit account</td>
<td></td>
<td></td>
<td>Create a text document such as a CV</td>
</tr>
<tr>
<td>Search for new suppliers to find the best deals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Create and share a photo album</td>
</tr>
<tr>
<td>Understand who uses your website</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Create and share feedback about products and services</td>
</tr>
<tr>
<td>Discover potential growth opportunities for your business</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Create an informational or e-commerce website</td>
</tr>
<tr>
<td>Maintain customer and client relationships</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Create content (pictures, logos, text) to promote your organisation and reach customers</td>
</tr>
<tr>
<td>Use social media to promote your business and connect with new customers</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Use social media and create communities to engage with customers</td>
</tr>
<tr>
<td>Improve your customer service by providing accessible product information and answers to frequently asked questions</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Create resources to improve employee skill levels</td>
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<tr>
<td>Maximise your selling potential through a website</td>
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<tr>
<td>Save time by applying for government business permits and licences</td>
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<td></td>
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<tr>
<td>Manage invoices and accounts</td>
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<tr>
<td>Receive payments or donations</td>
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<td></td>
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<tr>
<td>Protect yourself from fraud or scams</td>
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<td></td>
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<tr>
<td>Save on business travel and be more efficient by using video conferencing</td>
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<tr>
<td>Quickly understand which products and services work based on online feedback</td>
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<tr>
<td>Interpret simple analytics to improve website performance</td>
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<td></td>
<td></td>
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<tr>
<td>Get solutions to problems from safe, accurate sources</td>
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40
AGENDA ITEM: 6

South Norfolk Economic Growth Strategy 2016-21

Report of the Head of Growth and Economic Development
Cabinet Member: Councillor John Fuller

CONTACT
Julian Munson – 01508 533763
jmunson@s-norfolk.gov.uk
1. Introduction

1.1. This report presents to Cabinet the Draft Economic Growth Strategy 2016-21 which provides a framework and basis for supporting economic development activity in South Norfolk until 2021. The Draft Strategy promotes further collaborative work through partnerships including, but not limited to, the New Anglia Local Enterprise Partnership and Greater Norwich Growth Board, to drive economic growth, inward investment, business support and employment creation within the District.

1.2. The Draft Strategy has previously been circulated to the Growth and Communities Committee and their comments noted.

2. Background Context

2.1. The Growth and Communities Committee have overseen the development of this new Strategy which builds on progress to date as well as setting out a more innovative and integrated approach to economic growth. When adopted, the Strategy will provide the context for economic development activity within South Norfolk until 2021.

2.2. South Norfolk Council’s recent economic development strategy expired in 2014-15 and since it was initially compiled there have been significant changes nationally in terms of Government policy and strategy as well as ongoing structural changes in the UK economy, labour market and consumer habits as a result of the global economic downturn. As the UK economy continues to move forward, new global opportunities are emerging around key growth sectors as well as the digital economy.

2.3. The landscape for economic development at the more local level has also changed (and continues to evolve) with the New Anglia Local Enterprise Partnership (LEP) and Local Councils increasingly having more decision making powers, greater levels of funding for initiatives and new ‘intervention tools’ to help grow the local economy and create employment.
2.4. There is also an increasing focus on ‘Functional Economic Geographies’, which may span multiple Local Authority areas, to drive economic growth and inward investment. These include the Greater Norwich Area and the A11 Corridor linking into Suffolk and Cambridgeshire.

2.5. A completely revised Economic Growth Strategy has therefore been developed for South Norfolk for 2016-21 to respond to these changes and key issues effecting growth as well as better aligning with new collaborative opportunities as a result of activity by Government and the New Anglia LEP and also importantly at the more local level with the Greater Norwich Growth Board.

2.6. A renewed focus on key sectors with high-value employment and competitive advantage is also a priority as well as a more innovative approach which will help maximise the benefits of the digital economy for South Norfolk businesses and residents as well as enhancing productivity.

2.7. Government targets have been set for employment, housing and skills and this Strategy will enable South Norfolk Council to help deliver, in partnership with others, at the local level. A stronger focus on Greater Norwich, working with the Greater Norwich Growth Board, will help enable the 27,000 new jobs and 37,000 new homes needed in the area by 2026 through a collaborative and targeted approach to strategic infrastructure, skills development, business support and inward investment.

2.8. The Draft Economic Growth Strategy aligns and integrates with South Norfolk’s new 5-Year Corporate Plan. The Strategy will contribute to the delivery of the new Corporate Priorities:

- **Economic Growth, Productivity and Prosperity**: Providing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities

- **Place, Communities and Environment**: Improving the quality of life or our communities and enhancing the built and natural environment in our towns and villages

- **Health, Well-being and Early Help**: Proactively working with communities to provide help at the earliest opportunity and enhancing the health and well-being of our residents
3. Current Position

3.1. The Draft Economic Growth Strategy is attached and sets out how economic development contributes to the Council’s wider aims and is the responsibility of multiple Departments and Teams (internally) and organisations and stakeholders (externally). The Draft Strategy is for the Council, our partners and our communities and aims to achieve the following;

- Address key economic and labour market issues impacting on economic growth within South Norfolk and Greater Norwich
- Provide the right conditions, support and infrastructure to allow businesses to start-up, grow and invest
- Create more employment and training opportunities for local people
- Leverage greater levels of funding and investment into South Norfolk
- Maximise economic and community benefits to South Norfolk residents as a result of growth
- Progress a more integrated approach to economic growth across service areas (internally) and in collaboration with others (externally)

3.2. Delivery of the strategy will be through a focus on four core themes – People, Place, Innovation and Enterprise – and six work streams:

- **Connecting People to Place** – Promote a sense of place and culture, connecting residents and visitors, to enhance the local economy
- **Enterprising Places** – Create the ideal environment for start-up enterprises, business growth and attraction of inward investment
- **Enterprising People** – Support a dynamic economy through building capacity of local people and instilling a culture of entrepreneurship
• **Place for Innovation** – Enhance key infrastructure and specialist spaces to enable a more innovative, dynamic and productive economy
• **Enterprise through Innovation** - Grow innovative and knowledge based enterprises through the commercialisation of research and cross-sector innovation
• **Innovative People** – Drive a knowledge-based economy by building the innovative and technical capability of the resident labour force

In addition there are **Catalyst Programmes**; _key strategic activities_ that have the potential to provide a significant positive impact (economic and social) and will enable and facilitate a number of other activities and projects to occur. These include an evolution of the successful Market Towns Initiative as well as a focus on advancing Enterprise Zones and initiatives to leverage opportunities from the growing digital economy.

4. **Proposals**

4.1. To undertake a period of public consultation on the Draft Economic Growth Strategy, to end of February 2016, covering the following proposed activities:

- Draft Strategy published on South Norfolk Council website for comment and editorial included in the next issue of the South Norfolk Council publication The Voice
- South Norfolk Economic Growth Seminar to be organised with key selected external public and private sector stakeholders
- Economic Growth Workshop (internal) to be arranged with key internal stakeholders across service areas and departments
4.2. On conclusion of the consultation process (to end of February 2016), feedback will be reviewed, analysed and responded to and reported back to the Growth and Communities Committee and Cabinet.

4.3. A final version of the South Norfolk Economic Growth Strategy will be designed and published alongside an action plan (revised annually) for April 2016 onwards. In addition a ‘South Norfolk Economic and Labour Market Assessment’ (underpinning background data and intelligence) will be completed and updated on a regular basis to track ‘performance’ of the local economy and benchmark against the Greater Norwich Area, Norfolk and the LEP area where possible.

4.4. A formal public launch and business reception is proposed for late Spring 2016 for key stakeholders and business leaders.

5. Risks and Implications arising

5.1. Financial – no direct implications in creating the Strategy – any Council expenditure is decided within the annual budget-setting process. Proposals within the Strategy present increasing opportunities to enhance net wealth within the local economy and increasing income as a result of growth. A more innovative and commercial approach to is encouraged.

5.2. Equalities – the Strategy seeks to help South Norfolk communities and residents, including those that are disadvantaged, into employment and learning opportunities.

5.3. Risks – non-delivery or lack of progress in certain areas. Officers will ensure that an Annual Action Plan will be developed and kept under review and that adequate resources are prioritised to deliver key projects under the main activity areas.

6. Conclusion

6.1. The Draft Economic Growth Strategy reflects the fact that the vitality of the local economy is central to wealth creation for local communities as well as building social capital, community cohesion and environmental benefits through the provision of greater employment and learning opportunities for South Norfolk residents. It will therefore contribute to delivering the Council’s corporate priorities.
7. Recommendation

7.1. That Cabinet:

- Approves the Draft Economic Growth Strategy 2016-21
- Endorses the consultation process as outlined.
Vision:

South Norfolk is a major driver of economic growth for Greater Norwich and beyond with a high value, prosperous economy and employment opportunities for all
South Norfolk SMART GROWTH

Place, Communities and Environment

- Enterprise Zones
- Gtr Norwich/A11
- Market Towns
- Business Space & Infrastructure

- Future Skills/Talent
- Science/Technology
- Industry-Education
- Apprenticeships

Health, Well-being and Early Help

SMART GROWTH

Place

- Innovation Hubs
- Commercialisation
- Tech. Infrastructure
- Digital Platforms

People

- Start-ups
- Growth Enterprises
- Key Sector Focus
- Inward Investment

Economic Growth, Productivity and Prosperity
Foreword

To be added

John Fuller, Leader, South Norfolk Council
Introduction

South Norfolk Council is a District Council covering a significant area around Greater Norwich, a number of attractive market towns and a wider rural area connecting with the border of Suffolk. It covers 350 sq miles with a population of over 124,000 and around 5,000 businesses across diverse sectors.

South Norfolk has a diverse and growing economy and has wider connections via its rail and road infrastructure, particularly the recently enhanced A11 highway through to Greater Cambridge and London. The district is also home to world class research in life sciences, food and health centred on the Norwich Research Park.

Purpose

South Norfolk’s Economic Growth Strategy is a key part of the emerging Greater Norwich economic development activity via an integrated and collaborative approach. It aims to achieve the following;

- Address key economic and labour market issues impacting on economic growth within South Norfolk and Greater Norwich
- Provide the right conditions, support and infrastructure to allow businesses to start-up, grow and invest
- Create more employment and training opportunities for local people
- Leverage greater levels of funding and investment into South Norfolk
- Maximise economic and community benefits to South Norfolk residents as a result of growth
- Progress a more integrated approach to economic growth across service areas (internally) and in collaboration with others (externally)

How Will We Achieve This?

We aim to deliver this strategy through a focus on four core themes – People, Place, Innovation and Enterprise – and six work streams:

1. **Connecting People to Place** – Promote a sense of place and culture, connecting residents and visitors, to enhance the local economy
2. **Enterprising Places** – Create the ideal environment for start-up enterprises, business growth and attraction of inward investment
3. **Enterprising People** – Support a dynamic economy through building capacity of local people and instilling a culture of entrepreneurship
4. **Place for Innovation** – Enhance key infrastructure and specialist spaces to enable a more innovative, dynamic and productive economy
5. **Enterprise through Innovation** - Grow innovative and knowledge based enterprises through the commercialisation of research and cross-sector innovation
6. **Innovative People** – Drive a knowledge-based economy by building the innovative and technical capability of the resident labour force
In addition there are **Catalyst Programmes**; *key strategic activities* that have the potential to provide a significant positive impact (economic and social) and will enable and facilitate a number of other activities and projects to occur.

**South Norfolk Corporate Plan**

**Our Priorities**

South Norfolk Council has three priority areas where we focus our resources and efforts. These areas are underpinned by our customer focussed, collaborative and commercial approach to service delivery.

![Diagram](image)

The Economic Growth Strategy aligns and integrates with South Norfolk’s new 5-Year Corporate Plan across all economic, social and environmental agendas. In particular the Strategy is underpinned by the *Economic Growth, Productivity and Prosperity* theme.
High Level Vision

For this Economic Growth Strategy the high level vision is:

**South Norfolk is a major driver of economic growth for Greater Norwich and beyond with a high value, prosperous economy and employment opportunities for all**

Via this Strategy, South Norfolk Council will progress a ‘step change’ approach to local economic development. This recognises the importance of partnerships and collaboration as well as ensuring that it leverages its place, human and technological assets to grow the economy, enhance productivity, promote research and innovation and ultimately achieve greater employment self-containment in the future.

The ultimate aim is to shift South Norfolk’s economy from a lower-skill, lower-wage, lower aspiration base to a higher skilled, higher wage economy with greater employment and learning opportunities for residents. This is driven by knowledge based sectors and a focus on innovation to enhance productivity, competitiveness and stimulate growth. This can be referred to as ‘Smart Growth’.

We aim to do this by providing and enhancing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities.
“A greater focus on innovation and productivity to enhance growth in local businesses, leveraging commercial opportunity from our local research and development activity, where possible, will help drive a more knowledge based local economy in the future.” - John Fuller, Leader, South Norfolk Council

5 Year Targets (to 2021)

- 3400 jobs to be created in the District overall
- 1200 SMEs provided with advice and assistance per annum (average)
- 75 business start-ups supported per annum (average)
- 5 new businesses and 45 jobs created at Poringland Business Centre
- 350 apprenticeship placements established
- Day Visits increase by 5.3%
- Tourism Spend increase by 4.3%
- Footfall in market towns outperform the national average by 5%
- 8 new businesses and 100 new jobs created at Food Enterprise Zone
- 5,600 new jobs in high value sectors at NRP Enterprise Zone (over 25 years)
- 20 ha of land developed at Norwich Research Park
- Over 150 ha of employment land developed by 2026 across the District (10 year target)
- 10 new businesses created along A11 Corridor
- Progress 3 key strategic development sites along A11 Corridor – Hethel, Wymondham and NRP
- 1016 new homes completed per annum in the South Norfolk part of Norwich Policy Area
- New external inward investment to increase by 1%
- External funding identified and brought into the District – increase by £1.5 million
- X% increase in business rates income
- Y% increase in commercial development planning approvals
- Productivity measure/GVA per head measure (to be added)

Strategic Alignment

South Norfolk’s Economic Growth Strategy is aligned with a range of national policies and strategies as summarised in the table in Appendix 1. Its’ main objectives align directly with those national agendas that relate to economic growth for the Country as a whole as well as the New Anglia Local Enterprise Partnership. It also responds directly to local needs and opportunities to enable South Norfolk residents to fully benefit from future growth.
**New Anglia Local Enterprise Partnership (LEP) - Strategic Economic Plan and City Deal**

The New Anglia LEP Strategic Economic Plan aims to create 95,000 additional jobs, 117,000 homes and 10,000 businesses by 2026 whilst eliminating the gap in the Gross Value Added (GVA) per job in Norfolk and Suffolk compared to the rest of the nation.

There has been good progress by working in partnership with Government for the signing of City Deals for Greater Norwich and Greater Ipswich, the development of an Enterprise Zone in Great Yarmouth and Lowestoft and a new Enterprise Zone announced late 2015 (including Norwich Research Park).

The combined investment by Government in the A11 in Suffolk and Norfolk, the A14 in Cambridgeshire and the Northern Distributor Road around Norwich are also key strategic investments which will support unlocking more jobs and growth in the wider area.

South Norfolk Council will continue to work closely with the New Anglia LEP and other partners across industry, education, Local Government and key agencies to deliver economic growth and new job creation.

A stronger focus on Greater Norwich, working with the Greater Norwich Growth Board, will help enable the 27,000 new jobs and 37,000 new homes needed in the area by 2026 through collaboration and targeted investment in strategic infrastructure, skills development, business support and inward investment.

**Background and key issues**

At a macro level, compared to other areas in the UK, the County of Norfolk has weathered the economic downturn since 2008 well. This is largely due to its diverse economy which is not reliant on any one sector. Both employment levels and Gross Value Add (GVA) are back to where they were before the downturn levels. The value of Norfolk’s economy is £18.6 billion.

However there are a number of issues and challenges facing the County particularly around an overreliance on a low wage, low skilled economy compared to the UK and East of England. The gap is not closing on either in terms of GVA and business start-ups.

South Norfolk’s local economy remains relatively robust across a number of key indicators. However, projections and forecasts indicate some potential underlying issues and structural change ahead in the local economy. Action is required now in order to mitigate future problems which may impact negatively on economic growth.

Refer to Appendix 2 ‘Summary of Key Issues’
South Norfolk’s Smart Growth Model

South Norfolk’s Economic Growth Strategy takes a long term perspective and presents a vision and plan for the next five years and beyond. Sustainable and smart economic growth will be achieved through maximising business, investment and employment opportunities via a clear, measured approach to diversifying the economy, working in partnership with others.

South Norfolk Council has approached the development of this strategy with a clear mandate to identify *strategic competitive advantage* to enhance the local economy.

We face enormous economic opportunities, both nationally and globally, and so developing innovative, creative and productive local businesses as well as attracting new investment to the area is the primary focus. Ensuring that we maximise commercial opportunities for local businesses will not only drive the regional and national economy but enhance local employment for local communities.

Businesses create wealth and employment and drive local economic development. However, the role of other agents, in particular Government and Universities, has become increasingly more important in recent times. With the devolution of power, decision making and fiscal control, local partnerships across industry, Local Government, education and voluntary sectors will become even more important in the future to drive local economic growth.
Universities, education and research institutes are regularly viewed as drivers of economic and social agendas to underpin the growth of knowledge-based economies and Government has an important role to play in facilitating and coordinating activity to support business and community needs. For example working more closely with the Norwich Research Park, including the University of East Anglia, will be a high priority.

In order to fully realise the business and jobs growth targets set by Government and the New Anglia Local Enterprise Partnership, a step change is required and one that will rely on a more collaborative and partnership led approach to economic development across wider functional economic geographies. The success of the delivery of this growth strategy ultimately is the responsibility of not one organisation but a range of partners from across Government, business, education and the not for profit sectors.

South Norfolk Council, guided by its own 5 year Corporate Plan, the Greater Norwich City Deal and the New Anglia LEP Strategic Economic Plan has set out a clear framework with a more regionally focussed, collaborative approach to economic development and one that has much greater emphasis on delivery and measurable outcomes.

This step change also recognises and responds to the increasing importance of digital technologies and infrastructure as a fundamental enabler of economic growth. As more and more people, devices and things become connected there is enormous potential to develop new infrastructure, digital platforms and networks and build capacity and capability to transform South Norfolk into a more innovative and globally focused hub of economic activity. The rapid adoption of new technologies and access to information will continue to transform society; for individuals, communities and businesses.

The South Norfolk Economic Growth Strategy is more reflective of and responsive to local and global issues and opportunities. It aims to leverage the District’s place, human and technological assets and encourage a culture of entrepreneurship and innovation to help drive and attract new investment and higher value jobs resulting in a more dynamic and resilient local economy.
**PEOPLE: SUMMARY OVERVIEW**

<table>
<thead>
<tr>
<th>Key Issues</th>
<th>Response</th>
<th>Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lower skill levels</td>
<td>Effectively identify and map business needs</td>
<td>More people living and working locally</td>
</tr>
<tr>
<td>Lower aspiration levels</td>
<td>Support and intervention via Early Help Hub</td>
<td>Local skills base and qualifications enhanced</td>
</tr>
<tr>
<td>Lower wages</td>
<td>Strengthen industry education linkages</td>
<td>Higher wage levels</td>
</tr>
<tr>
<td>Leakage of skilled talent</td>
<td>Develop and promote apprenticeships</td>
<td>Lower youth unemployment</td>
</tr>
<tr>
<td>Youth unemployment</td>
<td>Activity to attract and retain creative talent</td>
<td>Increase in apprenticeships</td>
</tr>
<tr>
<td>Industry &amp; education disconnect</td>
<td>Promotion of STEM and technology based jobs</td>
<td>More people in high value jobs</td>
</tr>
<tr>
<td>Lower take up of STEM subjects</td>
<td>Enhance digital capacity</td>
<td>Enhanced online opportunities for people</td>
</tr>
<tr>
<td>Weak digital literacy / skills</td>
<td>Programmes to enhance productivity</td>
<td>More joined up approach to service delivery</td>
</tr>
<tr>
<td>‘Hidden’ resident knowledge capital</td>
<td></td>
<td>Increase in productivity</td>
</tr>
<tr>
<td>Lower worker productivity</td>
<td></td>
<td>Less reliance on public funds</td>
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</tbody>
</table>

**PEOPLE**

There is an opportunity to transition to a higher wage, higher value local economy with more ‘strategic employment’. However in order to achieve this, a much greater focus on building capacity and capability within the local workforce is required.

Average earnings for Norfolk lag considerably behind the East of England and the Country as a whole and the gap is not closing. Supporting and encouraging strategic employment and higher value sectors will help raise average earnings more in line with the national average.

South Norfolk has multi-level local labour markets. On one level it has a significant number of resident workers who live in the District and who commute out daily to other localities, including Norwich and Cambridge, for higher value, professional jobs. There are also residents who work remotely from home or on a more flexible basis, perhaps spending part of the time in other localities such as London.

It can be difficult to identify these ‘resident knowledge workers’ who work more flexibly and often from home and their requirements may be different.

Providing the infrastructure and services for resident knowledge workers and home based entrepreneurs and enterprises will become increasingly important in future. Higher speed broadband infrastructure and mobile connectivity is critical. Consideration can also be given to perhaps locally-based collaborative work spaces/hubs in market towns, home worker networks or digital platforms to connect entrepreneurs and businesses.
On another level there are a significant proportion of local people in lower skilled, lower wage jobs. This type of employment can often be part time and with less opportunity for career progression. There is scope however to work more closely with local businesses to help structure pathways into employment as well as supporting plans for training and apprenticeships to try and influence the longevity and sustainability of these types of jobs.

Finally South Norfolk is also home to the Norwich Research Park (NRP) which attracts highly skilled, highly qualified people in research and education, often from around the world. These workers may be more internationally mobile and may only live in the area for a fixed period of time. There is a growing trend for highly educated, mobile international workers following specific jobs and relocating to areas based on a range of financial and personal factors.

Overall there is greater opportunity for South Norfolk Council to work more collaboratively with others to develop programmes to support people into work and to enhance more long term, sustainable employment and build social capital.

Raising aspirations of young people is critical as well as inspiring the next generation of workers for future jobs, particularly in the emerging and knowledge based sectors.

Underpinning this is enhancing skills/qualifications – particularly in the areas of Science, Technology, Engineering and Mathematics (STEM). Strengthening links between local schools, colleges, universities and Norwich Research Park, Hethel Engineering Centre and locally based high growth companies will ensure that we maximise those educational and employment opportunities for young people locally.

Finally it is important that we support structured programmes for aspiring entrepreneurs and start-up enterprises. Enhancing digital literacy and skills is a particularly important area for any business type and relevant programmes to build capacity and capability in this area should be supported and promoted.

“More than ever before, the traditional ‘bricks and mortar’ drivers of economic growth are giving way to an economy based on ‘brains and creativity’. The skills, aptitude, knowledge, creativity and innovation of a workforce – which can collectively be viewed as the talent pool in the economy – have become increasingly important drivers of economic growth and activity”. - IBM Institute for Business Value Global Center for Economic Development Research 2011
PLACE

As a place, the County of Norfolk is complex with a range of disparate localities, micro economies and labour markets with various issues and challenges. There are multiple functional economic areas spanning district and county boundaries and whilst this can present challenges for local councils it also presents significant opportunities to work across wider geographies based more on business clusters and the needs and aspirations of industry.

There are a number of issues to address relating to the place of South Norfolk however. These range from a lower than average share of tourism visitors and falling high street footfall through to lower levels of high speed broadband and mobile connectivity and availability of ready serviced employment land in key centres.

Improving the connectivity of people to place will help not only from a social and community based perspective but also from an economic development viewpoint encouraging more people to live and work locally.

South Norfolk Council continues to support the focus on Greater Norwich and the evolution of the Joint Core Strategy as well the delivery of the City Deal to help drive investment, business growth and skills development across the wider area.
In addition to the Greater Norwich Area, the A11 Corridor is another important growth area identified in the New Anglia Strategic Economic Plan.

The A11 Corridor, linking Norwich and Cambridge, is an exciting growth opportunity which can create an estimated 15,000 additional jobs in higher value, technology based sectors such as agri-tech and advanced engineering.

It is anticipated that an estimated £373m in net additional annual Gross Value Added (GVA) can be delivered, in conjunction with 20,000 new homes. This investment opportunity can both relieve pressure from Greater Cambridge as well as strengthening connections between Cambridge and the Norwich Research Park.

A number of strategic development sites have been identified including Hethel, Wymondham and Norwich Research Park in South Norfolk as well as a greater focus on a technology hub centred on Hethel Engineering Centre.

Strengthening the position of South Norfolk in relation to Greater Norwich and Greater Cambridge as well as highlighting and improving the connectivity with the financial capital and global City of London will help enhance our competitive edge.

Overall across the District, a more coordinated and collaborative approach will enable South Norfolk to actively bring forward and promote employment sites. Highlighting the investible opportunities to the market and helping to lower risk for developers and investors will enable development to occur and provide an environment conducive for business growth.

There is a significant ‘opportunity cost’ to be considered with any new proposed development however. Further utilisation of employment land for population driven employment e.g. retail and food services – particularly in market towns - should be considered carefully in light of potentially forgoing a future opportunity to attract more strategic level employment e.g. ICT, scientific and professional services.
INNOVATION

Innovation can be defined as the process of developing better products, services, processes and business models and then commercialising those ideas by building new businesses around them.

Innovation is critical to the prosperity of an area because it is the source of the differentiated high-value products, services and business models that help underpin high value economic growth. It is also central to our ability to increase productivity and economic resilience by working smarter.

South Norfolk is in a strong position with two of the New Anglia LEP’s four ‘innovation hubs’ located here – Hethel Engineering Centre and Norwich Research Park (NRP). Working closely with these centres will enable further growth in the more innovative, higher value, knowledge sectors and scope to link with other technology hubs such as Cambridge and elsewhere in the world.

There are also particular opportunities around developing the Enterprise Zone at NRP and attracting a Catapult Centre and also building the case for a new Technology Park at Hethel.

Importantly though it is the cross-fertilisation of ideas through the innovation process that leads to commercial opportunities across sectors. Activity to encourage cross-sector innovation will result in higher economic growth and resilience in those knowledge sectors.
One of the major areas of change impacting on society and the global economy is technological with increasing shifts in the ways we are using new technology to do things very differently. Digital technologies are both disruptive and transformative, for communities and businesses, and again, present significant opportunities and challenges.

The global growth in the digital economy is highly significant with 3.2 billion people now online (source: ITU Annual Report 2015). Over 22 million households across Great Britain have access to the internet and 76% of UK adults owning a smart phone. Importantly 99% of adults aged 16-24 use the internet. Businesses across all sectors need to be supported in improving their digital capacity and capability in order to maximise opportunities from the growth of the digital economy.

Underpinning this is continued improvement in the enabling infrastructure – high speed broadband, public WiFi and mobile connectivity. Superfast broadband is regarded as the ‘fourth utility’ and the continued roll out will remain a high priority for South Norfolk Council to ensure that the vast majority of residents have access to a minimum of 24 Megabits per second.

South Norfolk and Greater Norwich has an important contribution to the UK’s position as a world leader in science and technology, in line with national Government strategy particularly through a focus on the Norwich Research Park.

Norwich Research Park brings together an outstanding research cluster comprising four world leading research organisations, the John Innes Centre, the Institute of Food Research, the Genome Analysis Centre and the Sainsbury Laboratory plus the world top 1% ranked University of East Anglia (UEA) and the Norwich and Norfolk University Hospital.

This provides a critical mass of over 3,000 scientists and clinicians and the cluster is ranked 4th in the UK only behind London and Oxbridge for its research publications.

Norwich Research Park aims to deliver solutions to the global challenges of healthy ageing, food and energy security, sustainability and environmental change. The Park assists in the translation of world leading innovative research from the academic base into innovative products for the international market.

“For a step change in productivity, we need a step change in innovation” – John Fuller, Leader, South Norfolk Council
ENTERPRISE

South Norfolk is home to around 5,000 businesses and although the total number has decreased slightly over the past 5 years (in line with the County), there has been an upturn more recently.

Business start-up rates in Norfolk continue to lag behind national trends however and so a more concerted effort is required to not only support and nurture early stage enterprises but to ensure longer term sustainable growth. This requires targeted intervention building on existing initiatives such as the Growth Hub and working with key agencies to provide continued support.

Jobs growth in the business sector can be attributed to three main areas;

- New start-ups
- Growing existing enterprises
- Attracting new businesses

South Norfolk’s Economic Growth Strategy has a focus on all three of these areas as it is important that there is a diverse range of enterprises from individual entrepreneurs, home based businesses, micro-small enterprises and medium-large businesses (including major foreign owned companies).

Strengthening links across these is vital to ensure not only stronger local supply chains but also to ensure that businesses can learn from and support each other at the various stages of their growth. Building stronger business networks is important.
Greater Norwich is an important driver for new business growth in the region and it is important that South Norfolk works collaboratively and has a strong focus on supporting new start-ups and micro enterprises and sustaining growth at the local level.

Providing a range of appropriate business space is important but targeted programmes to support and mentor enterprises and help commercialise research is equally important. This Strategy is in support of this.

Around one in four jobs in South Norfolk are attributable to approximately 100 businesses and organisations. These include not only the major employers such as the Norfolk and Norwich Hospital and Lotus Cars but also a range of growing Small-and-Medium-Sized Enterprises as well as a number of micro enterprises with serious growth potential.

Through this Strategy a Top 100 Growth Account Management Programme will be developed which will enable South Norfolk Council to build and maintain stronger, positive relationships with these business (across departments) to ensure that we maximise chances of their long term success and economic impact.

Finally a greater focus on developing stronger investment propositions based around the key sectors and development sites and a more proactive, more targeted approach to inward investment will ensure that South Norfolk has a stronger pipeline of potential investors and a greater chance of attracting new businesses to the area.

This will require a collaborative effort working with other local councils, New Anglia LEP, private sector intermediaries, including developers/land owners, and UK Trade and Investment as well as locally with Norwich Research Park (Enterprise Zone) and Hethel Engineering Centre for example.
## SIX WORK STREAMS

<table>
<thead>
<tr>
<th>Work stream</th>
<th>People</th>
<th>Place</th>
<th>Innovation</th>
<th>Enterprise</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Connecting People to Place</strong></td>
<td>✖️  ✔️</td>
<td>✖️  ✔️</td>
<td></td>
<td>Promote a sense of place and culture, connecting residents and visitors, to enhance the local economy</td>
</tr>
<tr>
<td><strong>Enterprising Places</strong></td>
<td>✖️  ✔️</td>
<td></td>
<td>✖️  ✔️</td>
<td>Create the ideal environment for start-up enterprises, business growth and attraction of inward investment</td>
</tr>
<tr>
<td><strong>Enterprising People</strong></td>
<td></td>
<td>✖️  ✔️</td>
<td></td>
<td>Support a dynamic economy through building capacity of local people and instilling a culture of entrepreneurship</td>
</tr>
<tr>
<td><strong>Place for Innovation</strong></td>
<td>✖️  ✔️</td>
<td></td>
<td>✖️  ✔️</td>
<td>Enhance key infrastructure and specialist spaces to enable a more innovative, dynamic and productive economy</td>
</tr>
<tr>
<td><strong>Enterprise Through Innovation</strong></td>
<td></td>
<td>✖️  ✔️</td>
<td></td>
<td>Grow innovative and knowledge based enterprises through the commercialisation of research and cross-sector innovation</td>
</tr>
<tr>
<td><strong>Innovative People</strong></td>
<td></td>
<td>✖️  ✔️</td>
<td></td>
<td>Drive a knowledge-based economy by building the innovative and technical capability of the resident labour force</td>
</tr>
</tbody>
</table>
Catalyst Programmes

‘Catalyst Programmes’ are defined as *key strategic activities* that are cross cutting and progress the majority of the six work streams highlighted above. They have the potential to provide a significant positive impact (economic and social) and will enable and facilitate a number of other activities and projects to occur. There are currently four proposed Catalyst Programmes;

1. **Market Towns Initiative** (Phase III) – Building on success from Phases I and II of the initiative there are plans to develop a more commercial and sustainable model. This may involve a range of place based and event support services to stimulate and enhance economic and community activity in the Market Towns (and potentially other localities) and a stronger focus on business engagement and tourism.

2. **Enterprise Zones** – Norwich Research Park (NRP) and Greater Norwich Food Enterprise Zone (FEZ). The NRP Enterprise Zone has potential to generate 5,600 new jobs in high value sectors relating to the commercialisation of research and attraction of new investment and development of commercial sites working closely with New Anglia LEP. The proposed Greater Norwich Food Enterprise Zone is a collaborative effort between South Norfolk Council, Broadland District Council and other agents including Defra, NRP and land owner(s) to advance a new zone based around food processing and agri-tech.
3. **Cambridge-Norwich A11 Corridor** – Building on research carried out in 2015, a collaborative effort across South Norfolk, Breckland and West Suffolk into Cambridgeshire has the potential to generate over 7,000 direct jobs in higher value sectors and unlock new housing and commercial land development. Forging stronger links between Greater Cambridge and the Norwich Research Park with key technology hubs along the Corridor (including Hethel) will raise the profile of the area as a leading European location for new technology, innovation and research.

4. **Digital Programme** - Focussing on the global digital economy and ‘connecting communities’ through new technology will enable progress in the following areas:

   i. **Digital Infrastructure** – to improve the enabling infrastructure including high speed broadband, public WiFi, Internet of Things connected sensors etc and related infrastructure such as Click and Collect Hubs and Coworking Spaces for digital entrepreneurs

   ii. **Digital Platforms** – to enable business growth and promotion through business and tourism digital products/platforms, retail platforms (for independent retailers) and specialist products e.g. digital stories/heritage platform

   iii. **Digital Capacity** – to build ‘online confidence, capacity and capability’ for local businesses, entrepreneurs and residents, through training and mentoring, to enable them to fully access the opportunities from the digital economy

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**SNC Digital Model**

- **Digital Enterprise**
  - Digital entrepreneurs
  - Coworking spaces
  - Online/offline networks

- **Digital Community**
  - Online communities
  - Online safety
  - Digital Champions

- **Digital Heritage**
  - Digital stories/video platform
  - Digital/VR/AR
  - Tourism promotion/products

- **Digital Infrastructure**
  - High speed broadband roll out
  - Public WiFi/mobile tech
  - Sensors/smart sensors/IoT

- **Digital Skills**
  - Building business capacity
  - Digital literacy
  - Next generation

- **Digital High Street**
  - Online retail platform
  - Virtual shop tours
  - Click and collect hubs

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*Innovation, Connectivity, Collaboration, Enterprise*
Financing Future Growth

Financing growth and attracting investment – public and private – can be challenging in an increasingly competitive environment. This strategy presents an opportunity for a more cohesive, joined up approach to attracting new investment into the wider areas of Greater Norwich, A11 Corridor and Norfolk and LEP areas as a whole.

There are also opportunities for South Norfolk Council to have a more proactive approach to developing its pipeline of key projects to leverage external public and private sector investment and help unlock growth where required. We will do this by focusing on the following key areas:

- Identifying, attracting and leveraging external grants and funding (UK Government, European Union and other sources)
- Developing new and innovative models for financing growth
- Considering collaborative public/private joint venture models
- Considering financing growth from private bonds and similar mechanisms
- Developing strong business cases and writing bids around key priority areas and a pipeline of major projects
- Promoting and supporting key initiatives such as Enterprise Zones
- Attracting investment to enable new infrastructure and unlock development sites (employment and housing)

Enhancing Internal Capability

Economic development and growth relates to virtually all parts of Local Government and it is therefore essential that South Norfolk Council continues to drive a cross-organisational culture focused on supporting business growth and investment. The following key actions are recommended to enhance efficiency and collaboration across the organisation which ultimately will improve levels of business engagement and service delivery.

Seven Point Plan - Key Internal Actions

1. Establish a new Business Investment Team (BIT) with representatives from each of the service areas that provide direct services to business. Meeting monthly the team will track and report on key business investments and major enquiries and encourage the cross promotion of services. The BIT will report into the revised Economic Development Group (see point 4)
2. Develop an Account Management programme (The BIT will also take responsibility for this) to monitor, track and report on the engagement with the major employers and high growth enterprises
3. Develop a relationship management tool (internally) to link key databases and systems to improve service delivery and communication with the high growth businesses and major employers, enhance our local business intelligence and improve cross referral of services
4. Review the internal Economic Development Group and change membership as required. Group to meet quarterly and chaired by the Director of Growth and Localism to drive outcomes from this Strategy.

5. Develop an internal KPI dashboard to monitor and report on economic related and business engagement activity

6. Undertake independent research surveying local businesses to identify further scope to improve business service delivery across key areas including (but not limited to) Development Management, Commercial Waste, Economic Development, Food, Health and Safety, Business Rates, Building Control

7. Investigate developing a business micro-site to promote all business services packaged in a more accessible and business friendly format. Consider opportunity to develop a membership or subscription based approach. Proposal to be developed.

**Sector Focus**

The New Anglia Strategic Economic Plan (SEP) sets out an approach to supporting growth in a range of key sectors for Norfolk and Suffolk.

The New Anglia area has four long-established sectors which underpin economic performance. They are;

- Agriculture
- Financial and Business Services
- Ports and Logistics
- Tourism and Culture

There exist a range of opportunities to add value and create new employment particularly through the application of new technology and new innovation. These include sub-sectors such as agri-tech, fin-tech, software development and new tourism product development.

The high impact sectors defined by the New Anglia LEP cover five areas;

- Advanced Manufacturing and Engineering
- Agri-Tech
- Energy
- ICT and Digital Creative
- Life Sciences

These sectors are recognised nationally as significant and of higher priority. They also have potential deliver high GVA per job per annum and higher value jobs.

South Norfolk has high potential for growth in most if not all of these sectors. Further work will be undertaken to identify our competitive advantage and strategic value and track performance over time. However in summary the broad area of focus for South Norfolk will concentrate on the following groupings of high value sectors:
1. Food, Health and Agri-Tech

We are already home to 4 out of the 8 UK Biotechnology and Biological Sciences Research Council (BBSRC) institutions at Norwich Research Park, strengthened with a £26m investment in 2011 to deliver innovation from biosciences. These Institutes and university departments, which are at the forefront of areas of scientific research and development, are vital to agriculture and related technologies, eg research from the John Innes Institute has led to gross increases in wheat productivity which is worth approximately £400m per annum to the UK and £8.7bn worldwide.

Norwich Research Park is acknowledged as having the fourth greatest concentration of 'most highly-cited researchers' in the UK, after London, Oxford and Cambridge and is at the vanguard of global food and health research, including food security, healthier and more nutritious food, resilient crops and industrial biotechnology. Home to around 40 science and IT based businesses, with over 12,000 skilled people including 3,000 scientists and an annual research spend of over £100m, the Norwich Research Park is Europe's leading centre for research in Food, Health and the Environment.

The Park is home to six leading research organisations; the John Innes Centre, Institute of Food Research, Sainsbury Laboratory, the Genome Analysis Centre and University of East Anglia (UEA). With the Norfolk and Norwich University Hospital, Norwich Medical School and School of Pharmacy, the Park is perfectly placed for biomedical and clinical studies on health benefits.

The life science and health sector has been identified as one of the Government’s key growth sectors and is currently responsible for more than 14% of the world's most highly-cited research papers. Life science research produced by the NRP (ranked within the top 1% globally) is critical to underpinning the UK’s pharmaceutical industry which is ranked 4th...
globally and represents one of the UK’s top manufacturing exports with a net trade position of £7bn p/a (BIS Industrial Strategy).

A specific mention should be made of the important health and social care and aged care sectors. With an aging population there will be an increasing requirement for skilled professionals in these health and social care and aged care sectors and a greater focus on skills and training will be needed.

2. Advanced Engineering and Specialist Technologies

The sector is supported by the Hethel Engineering Centre, the region’s advanced manufacturing/engineering hub, which has ambitions to become a Technology Park - similar to the Norwich Research Park for biosciences - aiming to develop 2,200 skilled engineering jobs as well as additional business incubation space.

The Hethel Engineering Centre is located close to the Lotus manufacturing facility and offers scope for businesses operating in the automotive supply chain as well as other emerging technologies such as info-tech, clean-tech and other energy and environmental based technologies for the region’s growing focus on the wider energy sector – on and offshore.

South Norfolk is part of an extensive supply chain and skills base particularly in the areas of automotive and composite technologies. It is home to a wide range of engineering specialisms, including companies that are global leaders in their field. Working more closely with these businesses and their supply chain will ensure a greater understanding of their requirements and opportunities.

3. Information Communications Technology (ICT) and Digital Creative

The latest Tech City Report highlighted Norwich as one of the official UK Tech Clusters. There has been a 21% increase in the number of digital companies incorporated between 2010 and 2013 in Norfolk. The study found that although all clusters experienced digital sector employment growth, in Norfolk, digital job growth outpaced overall regional growth by the highest margin.

Referenced in the Government’s Industrial Strategy Sector Analysis (2012) as part of ‘knowledge-intensive traded services’, ICT and digital creative are part of a rapidly burgeoning sector. The UK computer software industry is estimated to be worth £9.2bn and is currently the second largest market by value in the EU and accounts for 5% of the worldwide market. The UK IT services market was estimated to be £25.2bn in 2009 and accounts for 21% and 7.2% of the EU and the global market respectively, as well as contributing to over 7% of UK GVA.

Whilst much of the creative digital sector is focused on Norwich City Centre, there are a number of enterprises and entrepreneurs resident in South Norfolk, often home based business and micro enterprises.
Importantly there are a range of businesses involved in the digital and mobile communications space as well as some specialist and emerging specialist technologies including robotics, sensor-based technologies (Internet of Things), big data and virtual simulation.

There is much scope to work more closely with these ‘niche sectors’, several of which underpin or relate to other sectors, and support further growth across the District.

4. Visitor Economy

The Visitor Economy represents economic activity that relates to attracting and servicing visitors to the District either on a regular basis e.g. daily shopping trips into market towns or unique visitations e.g. for an event.

This is broader than the term ‘tourism’ and for the purposes of this strategy it applies to the following key areas;

- Accommodation and Food Services
- Arts, Culture and Recreational Services
- Retail Trade
- Visitor Attractions

A highly significant number of jobs in South Norfolk relate to the Visitor Economy and whilst some of these jobs are of lower wage and part time the wider impact on the local economy from these activities may be high value.

The value of the Visitor Economy for Norfolk is in the region of £3 billion and tourism represents almost 17% of all employment across the County.

South Norfolk is positioned between the Broads National Park, the City of Norwich, the Brecks and the Waveney Valley with the North Norfolk Coast within easy reach. With recent enhancements to the A11 highway there is expected to be an increasing number of visitors attracted from London and Cambridge as well as a small proportion from overseas.

The business and conference market also has potential to grow and there exist significant opportunities for the hotels and conference venues as well as smaller accommodation providers.

A greater focus on new product development based around themes such as local food and drink, heritage and culture and a strong link to the Market Towns will enable South Norfolk to raise its profile and share of tourism spend. Collaboration with industry and Government stakeholders will continue to be important.

Finally there is an important ‘underpinning’ sector that requires specific mention. The Construction sector has contributed most to economic growth in the New Anglia LEP area over the past year expanding by 10.6%
(compared with 9.2% nationally). With increasing demand for new housing and future employment land development, it is vital that we have a strong provision of skilled workers to continue to help ‘build’ the economy.

The CITB have quoted that East Anglia alone will require 4,260 skilled people per year between 2015 and 2019. A greater focus on skills and training will be needed and apprenticeship programmes and initiatives such as the Centre for Construction Skills at Easton and Otley College should be supported.

Population Driven Employment vs Strategic Employment

**Strategic Employment** is a result of economic activity related to the transfer of goods, services and knowledge to an external market i.e. of value to markets outside the immediate catchment

**Population Driven Employment** can be defined as employment resulting from economic activity servicing the needs of a local population

Strategic economic activity tends to include higher value-add activities and higher wage productivity for employees and thus is more likely to have greater positive multiplier effects on the local economy. A more diverse range of economic activity also ensures greater resilience as minimises risk associated with economic downturns in a single market.

This strategy places a higher priority on developing and attracting strategic employment and these types of jobs are typically associated with sectors such as education and research, professional and scientific services, agri-tech, advanced engineering, ICT and higher level specialised services (including specialist health professionals). Supporting the growth of strategic employment is critical to the long term prosperity of a local economy and also its resilience.

Sustaining the high level of liveability is critical for economic development as increasingly a quality lifestyle is the major draw card for attracting and retaining people (workers), which in turns attracts new business investment and commercial opportunities.

This economic development strategy recognises the importance of leveraging our strategic assets and maintaining and enhancing our lifestyle attractors, an important responsibility shared across South Norfolk Council and with other organisations, businesses and community groups.

Pride of place and community ownership have proven to be important factors in successful local economic development in many parts of the world and thus our approach will be to continue to build on successful initiatives such as the Market Towns Initiative.

**Drivers of Change**

Across the world, communities are being impacted upon by major shifts in environmental, social, economic, technological and political conditions that are
effectively changing the way people live and work. Understanding and responding appropriately to these changes is vital in ensuring our local communities continue to evolve in a sustainable way. South Norfolk has the potential to help find solutions to world problems resulting from these major shifts through building on critical research in life sciences, food and health.

The Value of Economic Development

Economic development enhances prosperity and improves quality of life across the whole community and is achieved via a range of value-adding initiatives and services that foster and support a sustainable and prosperous business environment. The value of economic development to the local community within South Norfolk is multifaceted and includes the following:

- Fosters economic growth and prosperity
- Promotes innovation and enhances business and labour productivity
- Encourages and supports local commercial activity in local towns and villages
- Maximises local economic multiplier effects from major investment projects
- Enhances quality of life and health and well-being for local people
- Improves visual and aesthetic appeal of the built environment
- Develops skills, knowledge base and educational opportunities
- Enhances employment opportunities for all local residents reducing reliance on public financial assistance and help
- Raises the profile of the District as a business and visitor destination
- Promotes environmental and social benefits via connecting people and jobs locally and minimising impact on transport infrastructure
- Grows business rates income to generate greater fiscal benefits and reinvestment back into the community and local services and further enhancing economic growth.
The role of South Norfolk Council in economic development

Economic development in its broadest sense can be defined as increasing an area's level of income and capital and distributing that wealth throughout the community through local expenditure and job creation.

Councils play a pivotal role in economic development through local engagement with community and business stakeholders, enabling business investment and employment growth and facilitating and coordinating development and investment. Ultimately, this creates and sustains local employment opportunities enhancing community wellbeing and quality of life.

South Norfolk Council is recognised as a proactive and 'pro-business' local council which has enabled growth and employment creation over the years.

The main roles of South Norfolk Council with regard to economic development and growth broadly cover the following key areas:

- **Enabler** – enabling local development through delivering effective development management and business enquiry handling processes and providing policies and clear direction in relation to future development and growth objectives

- **Communicator** – Facilitating positive communication between the Council and the local business community via a range of channels as well as promoting partnership and cross referral activity with key business associations and organisations

- **Promoter** – Raising the profile of the District to attract investment, businesses, entrepreneurs, visitors and new residents and promotion to local businesses and residents to raise awareness of economic opportunities

- **Collaborator** – Collaborating with key stakeholders - Government, industry, education, community - to advocate for and deliver key infrastructure, services and programmes to support growth

- **Developer** – Instigating and encouraging major development projects across the District and wider area to create and leverage economic value in populations centres, strategic locations and business clusters

- **Leader** – Showing clear leadership to the local business community and key partner organisations, demonstrating best practice with a more commercial and innovative approach to economic development.
Appendix 2: Summary of Key Issues

Population Growth and Social Change
Norfolk’s population exceeds 954,000 in 2016. Despite a 2 year rise of 8.7% (since 2014), the working population is only expected to increase by 2.8% to 541,000.

An ageing indigenous population as well as increasing numbers of retirees moving to the area creates additional challenges.

A Business in the Community report (2015) highlighted that nationally 14.5 million vacancies will open up between 2012 and 2022 through people leaving the workforce and the expansion of the labour market. It estimates that only 7 million young people will leave school or college over this period, leaving a 7 million shortfall to be filled by the over 50s.

Moving forward a priority will be to tackle the skills needs at both ends of the age spectrum.

Average Earnings
Average earnings for Norfolk lag considerably behind the East of England and the Country as a whole and the gap is not closing.

Higher value jobs with higher average earnings need to be created and attracted to the area to ensure that we not only enhance the wealth creation for residents but we maximise the positive impact on the local economy, enhancing local spend and supporting business growth.

<table>
<thead>
<tr>
<th>Average Earnings</th>
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</thead>
<tbody>
<tr>
<td>Norfolk</td>
</tr>
<tr>
<td>East of England</td>
</tr>
<tr>
<td>England</td>
</tr>
</tbody>
</table>

Business Start ups
Between 2009 and 2013, new business start-ups increased by 48% nationally and the rate for the East of England was 38%. However the figure for Norfolk was only 20%. South Norfolk Council area has fared slightly better in the past but a greater focus is required on nurturing start-ups businesses and ensuring we are providing access to support and guidance for entrepreneurs.

Greater Norwich is an important driver for new business growth in the region and it is important that South Norfolk works collaboratively and has a strong focus on supporting new start-ups and micro enterprises and sustaining growth at the local level.

Net business stock has decreased slightly in South Norfolk over the past 5 years (broadly in line with a decrease at the County level) – see Figure 2 – although there has been a slight upturn more recently. Further work will be required to grow the number of businesses across the area.
Unemployment
Unemployment and claimant levels in the County continue to reduce, in line with the national trends. However further work is required to maximise participation rates and ensure the particular target groups and the long term unemployed are supported and provided the early help required to help the transition into local and longer term employment.

Young people, long term unemployed and people with disabilities require specific attention. A more targeted approach through the Early Help Hub and collaboration with other agencies will be advanced through this strategy.

Innovation
Linked to low GVA levels, there is much room for improvement in terms of innovation, which is key to business productivity, competitiveness, growth and sustainability. The Enterprise Research Centre’s 2013 survey (of 14,000 firms, based on innovation activity 2010-12) ranked New Anglia 42nd out of 45 LEPs (including Scotland and Wales). We fared better for innovation in manufacturing processes (25th) but came 43rd for product/service innovation.

Similarly, looking at Grant Thornton’s High Growth Index for Places, which measures a combination of 3 factors - economic growth (business stock; employment), social growth (population, working age population) and environmental growth (dwelling stock, commercial floorspace) - of the 47 sub-regions, Norfolk ranked Norfolk 32nd and Suffolk 36th, compared to Cambridge’s 5th.

On a positive note, South Norfolk is one of the high performing districts within the County (with City of Norwich) for economic growth and social growth.

Further work on encouraging and promoting innovation within local businesses will be taken forward, in partnership with key organisations.

Productivity
Productivity can be measured in relation to particular inputs, or factors of production, such as land, labour or capital. Often, references to productivity in the media or political debate refer to the productivity of labour – how much output is being produced per worker employed.

Alternatively, an overall measure of so called total factor productivity seeks to assess the productivity of all inputs combined, including the less tangible impacts of improvements in skills or technology, and is often seen as the real driver of growth in an economy.

Since the recent recession, UK productivity levels have not revived to the extent of other comparator economies - referred to as the ‘productivity gap’.

“Productivity is the single most important determinant of average living standards and is tightly linked to the differences in wages across countries”. “Rising employment has been a major source of growth, but over the longer term, productivity is the more essential ingredient” - HM Treasury Fixing the Foundations: Creating a more prosperous nation (2015)
Government and New Anglia LEP place a high priority on boosting productivity and targeted programmes to enhance business and labour productivity should be a priority in moving towards a more competitive and higher wage economy.

The Government’s national framework for raising productivity is built around two pillars:

- Encouraging long-term investment in economic capital, including infrastructure, skills and knowledge
- Promoting a dynamic economy that encourages innovation and helps resources flow to their most productive use

South Norfolk’s Economic Growth Strategy is directly aligned with these two pillars and supports the Government’s fifteen-point plan to raise productivity and lift living standards.

Self-Containment
Self-containment is a measure of how closely matched local jobs are to local people as represents the proportion of residents both living and working in the same locality. This is particularly important to help track economic and labour market performance of market towns and help identify issues such as out commuting, skills development and employment land allocation.

Moving forward an economic index will be developed which will include identifying the self-containment for each of the key population centres within the District to help inform future planning policy in terms of employment land allocation and possible intervention to encourage local jobs.

Employment Land Allocation and Availability
A number of major development sites exist across the County with allocations for employment use but for various reasons are not coming forward for development. It is imperative that not only appropriate allocations for employment sites are made close to or within population centres such as market towns but also support is provided to ensure that appropriate infrastructure is in place to bring forward these sites for development for a range of employment types.

Communications Infrastructure
South Norfolk Council has lower levels of coverage of both high speed broadband and mobile connectivity than the national average. The Council supports the Better Broadband for Norfolk Programme and through this Economic Growth Strategy will identify alternative solutions and technologies to further enhance coverage (to 95% and above) of high speed broadband (25+ Mbps) as well as enhancing mobile communications where possible.
Appendix 3: Economic and Labour Market Assessment [to be updated]

![6 Point Guide: South Norfolk Economy](image)

**Figure 2: Business Stock – New Anglia LEP Area [source: ONS]**

<table>
<thead>
<tr>
<th></th>
<th>2009</th>
<th>2010</th>
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<td>29,880</td>
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<td>Breckland</td>
<td>4,650</td>
<td>4,545</td>
<td>4,430</td>
<td>4,365</td>
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<td>Broadland</td>
<td>4,645</td>
<td>4,550</td>
<td>4,520</td>
<td>4,460</td>
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<td>Great Yarmouth</td>
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<td>3,000</td>
<td>2,975</td>
<td>3,065</td>
<td>3,055</td>
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<td>King's Lynn and West</td>
<td>4,995</td>
<td>4,920</td>
<td>4,050</td>
<td>4,765</td>
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<td>North Norfolk</td>
<td>4,100</td>
<td>3,995</td>
<td>3,995</td>
<td>3,945</td>
<td>3,915</td>
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<tr>
<td>Norwich</td>
<td>4,590</td>
<td>4,550</td>
<td>4,610</td>
<td>4,580</td>
<td>4,745</td>
<td>4,845</td>
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<td>South Norfolk</td>
<td>5,000</td>
<td>4,910</td>
<td>4,875</td>
<td>4,780</td>
<td>4,640</td>
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<td>Suffolk County</td>
<td>27,085</td>
<td>27,455</td>
<td>27,170</td>
<td>26,620</td>
<td>27,215</td>
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<td>Bebergh</td>
<td>3,090</td>
<td>3,010</td>
<td>3,040</td>
<td>3,020</td>
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<td>Forest Heath</td>
<td>2,325</td>
<td>2,245</td>
<td>2,230</td>
<td>2,240</td>
<td>2,260</td>
<td>2,315</td>
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<td>Ipswich</td>
<td>3,950</td>
<td>3,890</td>
<td>3,910</td>
<td>3,850</td>
<td>3,960</td>
<td>4,070</td>
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<td>Mid Suffolk</td>
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<td>4,310</td>
<td>4,230</td>
<td>4,240</td>
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<td>St Edmundsbury</td>
<td>4,395</td>
<td>4,285</td>
<td>4,195</td>
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<td>4,200</td>
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<td>Suffolk Coastal</td>
<td>5,240</td>
<td>5,105</td>
<td>5,040</td>
<td>4,565</td>
<td>4,825</td>
<td>5,090</td>
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<td>Waveney</td>
<td>3,745</td>
<td>3,715</td>
<td>3,845</td>
<td>3,680</td>
<td>3,660</td>
<td>3,760</td>
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<td>Theme</td>
<td>Agenda</td>
<td>Source and organisation</td>
<td>Key Messages and actions</td>
<td>Targets</td>
<td>SNC targets</td>
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<tr>
<td>National</td>
<td>Address the slowdown of productivity growth in the UK by:</td>
<td>Fixing the Foundations: Creating a more prosperous Nation July 2015</td>
<td>- Encouraging long term investment in infrastructure, skills and knowledge</td>
<td>• Raise GDP by 31% equating to £21,000 per annum for every UK household</td>
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<td></td>
<td>- Promoting a dynamic economy encouraging innovation.</td>
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<td></td>
<td>• Raise annual trend growth by 0.1% so the UK economy is £35 billion larger by 2030 equating to £1,100 extra for every household</td>
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<tr>
<td>Enterprise</td>
<td>Create a higher pay, lower welfare society through incentivising</td>
<td></td>
<td>• Personal allowance increase to £11,000 by 2016/17 and £12,500 by the end of parliament</td>
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<tr>
<td></td>
<td>people back into work through:</td>
<td></td>
<td>• New minimum wage to become £9/hr by 2020 and become 60% of median earnings by 2020</td>
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<td></td>
<td>- Reduction in household benefit cap</td>
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<td></td>
<td>- 4 year freeze in working age benefit</td>
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<td></td>
<td>- Reform of Universal Credit</td>
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<td></td>
<td>Introduce a youth obligation for 18-21yrs to encourage young people</td>
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<tr>
<td></td>
<td>to work, take up apprenticeships or go on mandatory work placements.</td>
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<tr>
<td>Local LEP</td>
<td>Middle ranking economy in most areas 14th out of 39 LEP area economy.</td>
<td>New Anglia Strategic Economic Plan 2014</td>
<td></td>
<td></td>
<td>95,000 more jobs</td>
<td></td>
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<td></td>
<td>low productivity GVA per job in EA was £36,224 10% below UK average.</td>
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<tr>
<td></td>
<td>54,800 enterprises in 2011</td>
<td></td>
<td></td>
<td></td>
<td>10,000 new businesses by 2026 av.1,000 a year</td>
<td></td>
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<tr>
<td>National</td>
<td>Facilitating the growth of new and existing businesses:</td>
<td>Fixing the Foundations: Creating a more prosperous Nation July 2015</td>
<td>- Allow small businesses to scale up</td>
<td>Business banks to facilitate up to £10 billion of finance by 2019</td>
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<td></td>
<td>- support growth in management and leadership skills</td>
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<td>Theme</td>
<td>Agenda</td>
<td>Source and Organisation</td>
<td>Key Messages</td>
<td>Targets</td>
<td>SNC targets</td>
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</tbody>
</table>
| Enterprise    | Trade                                                                  | Fixing the Foundations: Creating a more prosperous nation July 2015                    | Improve export performance and support trade agreements beyond the EU:  
- enhance the relationship with key emerging markets  
- create and identify opportunities for UK firms in markets like China, India etc.                                                                 | £1 trillion of exports by 2020 and 100,000 more companies exporting by 2020                                              |                                                                                                                          |
|               | Inward Investment                                                      | Fixing the Foundations: Creating a more prosperous nation July 2015                    | Tax system that supports productive investment                                                                                                     | £1 of tax relieved by research and development, tax credits stimulates between £1.53-£2.35 of additional R&D investment |                                                                                                                          |
|               |                                                                        | Inward Investment Report 2014/15                                                        | The UK produced the highest growth among G7 countries at 2.8 percent.                                                                                                                                    | UK to become the third most sought after country in the world for investment in the 2015 AT Kearney FDI Confidence Index. |                                                                                                                          |
| Local LEP     | Business start-up support                                              | New Anglia Strategic Economic Plan 2014                                                 | Increase flexibility and greater access to national providers of specialist start-up advice and guidance                                           | 10,000 new Businesses by 2026  
Start Ups in New Anglia Growth programme set at 185 by 2019                                                                 | Match business start-up rates in rural Cambridgeshire and Suffolk by 2020                                              |
|               |                                                                        | Norfolk County Council Rural Strategy 2014                                              |                                                                                                                                                                                                          |                                                                                                                          |                                                                                                                          |
| National      | Sectors                                                                | Fixing the Foundations: Creating a more prosperous nation July 2015                    | Look for opportunities to develop UK’s network of Catapult centres for commercialising technology                                                  | 30 Catapults in the UK by 2030                                                                                           |                                                                                                                          |
|               |                                                                        | Towards ambition 2020: Skills, Jobs, Growth 2009                                       | Too few businesses in high skill, high value added industries. Too few workplaces are creating too few high skilled jobs.                                                                                     |                                                                                                                          |                                                                                                                          |
|               | Agri Tech                                                              | Agri Tech Strategy (currently under review)                                            | UK to become a world leader in agricultural technology, innovation and sustainability:  
- exploit opportunities to develop and adopt new and existing technologies, products and services to increase productivity  
- Contribute to global food security and international development                                                                                                   |                                                                                                                          | Worth over £50bn pa and employs over 165,000 people in 200 businesses GVA=122k per head                                    |
|               | Life Sciences                                                          | Strategy for Life Sciences 2011                                                         | Sets out a vision where academia, NHS, charities and industry come together to create an unrivalled ecosystem.  
Quick entry to the market for new discoveries and innovations and access to anonymised patient data and patients for clinical trials.                                                            |                                                                                                                          |                                                                                                                          |
<table>
<thead>
<tr>
<th>Theme</th>
<th>Agenda</th>
<th>Source and Organisation</th>
<th>Key Messages and actions</th>
<th>Targets</th>
<th>SNC targets</th>
</tr>
</thead>
</table>
| Enterprise                        | Agricultural and Food and Drink                                       | Towards a one nation economy: A ten point plan for boosting productivity in rural areas Aug 2015 | • Increase productivity by 0.1% p/a to 2030  
• Superfast broadband of at least 24Mbps to 95% of UK households by 2017  
• Triple the number of apprenticeships in food and farming                                                                                                                                                  |                                                                                                                                                                                                       |             |
| Energy                            | Fixing the Foundations: Creating a more prosperous nation July 2015    | Fixing the Foundations: Creating a more prosperous nation July 2015       | Improve productivity in energy generation, production, supply and usage through developing the shale industry, decarbonisation of the UK’s energy sector. Deliver significant expansion in new nuclear power in the UK                                                                 | • £14bn of investment over the next 10 years to expand EDF’s nuclear capacity at Sizewell  
• Offshore renewables and nuclear estimated to be worth £50 billion to NA area over the next 10 years                                                                                                           |             |
<p>|                                  | Smart Specialisation in England 2015                                 | Smart Specialisation in England 2015                                     |                                                                                                                                                                                                                        |                                                                                                                                                                                                       |             |
| Local                             | Advanced manufacturing and engineering                               | Employed over 24,500 people in more than 1,000 businesses worth 1.5bn pa in GVA | • To increase the proportion of rural jobs in engineering, manufacturing and the supply chain by 2020                                                                                                                     |                                                                                                                                                                                                       |             |
|                                  | Life sciences                                                         | Commitment to commercialisation of NRP research through creating spin out businesses- building on P26 financial investment | • Creating in the region of 3,000 new spin outs businesses by 2020                                                                                                                                                      |                                                                                                                                                                                                       |             |
|                                  | ICT                                                                    | New Anglia Strategic Economic Plan 2013                                   |                                                                                                                                                                                                                        |                                                                                                                                                                                                       |             |
|                                  | Agricultural and Food and Drink                                       | Employs over 10% of the workforce generating 2.2bn pa GVA. Produce 12% of all England’s cereal production and 20% of UK vegetables |                                                                                                                                                                                                                        |                                                                                                                                                                                                       |             |
|                                  | Tourism and culture                                                   | Employs around 74,000 people tourism worth £1.3bn in GVA                 |                                                                                                                                                                                                                        |                                                                                                                                                                                                       |             |
|                                  | Energy                                                                | Employs 7,700 people directly in NE thousands more indirectly, worth £994m pa with GVA per job £129k and predicted to grow from £150 billion to over £600 billion by 2020 |                                                                                                                                                                                                                        |                                                                                                                                                                                                       |             |</p>
<table>
<thead>
<tr>
<th>Theme</th>
<th>Agenda</th>
<th>Source and Organisation</th>
<th>Key Messages and actions</th>
<th>Targets</th>
<th>SNC targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>People</td>
<td>Fixing the Foundations: Creating a more prosperous nation</td>
<td>National</td>
<td>Issues remain at basic and intermediate skill levels with England being in the bottom four countries for literacy and numeracy skills among 16-24 year olds. Too few young people fail to gain the basic, employability and low level skills needed to progress in work</td>
<td>• 93% of adults will be functionally literate and 89% will be functionally numerate by 2020</td>
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<td>Introduce a new compulsory apprenticeship levy to fund high quality apprenticeships that met business needs</td>
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<td>Streamline and simplify qualifications so a clear route of progression to acquire high level skills</td>
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<td>Deliver prestigious Institutes of Technology</td>
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<td>Introduce income contingent loans for postgraduate study</td>
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<td>Skills/Education</td>
<td>Towards ambition 2020: Skills, Jobs, Growth</td>
<td>National</td>
<td>Almost a ¼ of employers in the UK have never funded or arranged training. Less of our training is certified and training investment costs are low in comparison to EU average</td>
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<td>Fundamental transformation of career advice and information to ensure the quality, breadth and depth of provision is equal across England</td>
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<td>UK Commission for Employment and Skills 2009</td>
<td>National</td>
<td>Businesses to have a supply of skilled workers as 17% of employers report consistent skills gap</td>
<td>Vision to incorporate face to face, online, up to date and forward looking market intelligence to clearly set out the skills and requirements of sectors by XXX</td>
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<td>New Anglia Investment Fund to give employers more control over skills programmes and incentivise them to provide training</td>
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<td>Develop a locally responsive skills system</td>
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<td>Theme</td>
<td>Agenda</td>
<td>Source and Organisation</td>
<td>Key Messages and actions</td>
<td>Targets</td>
<td>SNC targets</td>
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<td><strong>People</strong></td>
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<td>STEM</td>
<td>Fixing the Foundations: Creating a more prosperous nation July 2015</td>
<td></td>
<td>Introduce new, rigorous GSCE and A levels in maths and science and increase the uptake of STEM subject.</td>
<td>• Train an additional 17,500 teachers in STEM by 2020</td>
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<td>Apprenticeships</td>
<td>Fixing the Foundations: Creating a more prosperous nation July 2015</td>
<td></td>
<td>Critical need for high numbers of new technical and professional skilled workers to enter the workforce</td>
<td>• 3.6 million jobs in medium-skilled occupations, including skilled trades and health care professions by 2022</td>
<td>• 30% increase in apprenticeship starts by the end of this parliament in comparison to the last approx. 3 million</td>
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<td><strong>Skills</strong></td>
<td>New Anglia Skills Manifesto (currently being refreshed)</td>
<td></td>
<td>New Anglia will lead by example, together with employers and educators, to provide world class skills delivery, communication, mentoring, learning and apprenticeship schemes.</td>
<td>• 5,000 new Apprenticeships</td>
<td>• 50% of our employers having achieved the Employer Marque</td>
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<td>Our employers will inspire and enable our local talent to thrive in a global green economy</td>
<td>• Creating in the region of 3,000 new spin outs businesses by 2020</td>
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<td>Our educators will lead in supporting the development of an adaptable, resilient and highly skilled workforce able to take full advantage of future opportunities.</td>
<td>• 500 SMEs investing more in apprenticeships and other formally accredited training through a Direct Employer Payment scheme</td>
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<td><strong>Infrastructure</strong></td>
<td>Fixing the Foundations: Creating a more prosperous nation July 2015</td>
<td></td>
<td>More houses available to buy. Every reasonable sized housing site should include a proportion of starter homes</td>
<td>• 200,000 starter homes for first time buyers</td>
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<td>Attendees</td>
<td>Fixing the Foundations: Creating a more prosperous nation July 2015</td>
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<td>Norfolk County Council Rural Strategy 2013</td>
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<td>• London Mayors 2020 vision with at least 42,000 homes needed over the next 20 years</td>
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<td>Additional rural housing is needed to accommodate the projected 9% or greater increase in the population of all rural Norfolk districts by 2026</td>
<td>• Doubled the 2011/12 rate at which new affordable housing is built in rural districts by 2020</td>
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<td><strong>Transport</strong></td>
<td>Fixing the Foundations: Creating a more prosperous nation July 2015</td>
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<td>Without investment congestion on the strategic road network predicted to increase by 204%</td>
<td>• Invest £38 billion into rail network</td>
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<td><strong>Digital Infrastructure</strong></td>
<td>Fixing the Foundations: Creating a more prosperous nation July 2015</td>
<td></td>
<td>Support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure</td>
<td>• High speed broadband will increase GVA increase by 6.3 billion</td>
<td>• At least 24Mbs available to 95% of UK households by 2017</td>
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<td>• Additional £50 billion in expenditure</td>
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<td>• Creation of 225,000 jobs</td>
<td>• 5% per annum over the next ten years</td>
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<td><strong>Tourism</strong></td>
<td>A Strategic Framework for Tourism 2011-2020</td>
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<td>• Universal superfast broadband to every dwelling and business to meet the EU digital Access target of 30Mbs by 2020</td>
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<td>• remove all remaining mobile phone ‘notspots’ by 2017</td>
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<td>• Increase the accessibility of mobile data services in rural Norfolk by 2017</td>
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<td>Theme</td>
<td>Agenda</td>
<td>Source and Organisation</td>
<td>Key Messages and actions</td>
<td>Targets</td>
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| Innovation | Science and Research                                                                 | Fixing the Foundations: Creating a more prosperous nation July 2015                   | Science and innovation audits to be held to map strengths of different regions with universities, LEP’s and cities | - Invest 9.6 billion in the UKs research infrastructure up to 2021  
- Specific science investments up to 128 million in the UK  
- Research, Partnership Investment Fund- £400 million to support capital investment in scientific grand challenges |
|         |                                                                        | Our plan for growth– science and innovation 2014                                      | Be the best in the world for science and business by:  
- Deciding priorities  
- Nurturing scientific talent  
- Investing in our scientific infrastructure  
- Supporting research  
- Catalysing innovation  
- Participating in global science and innovation | - £5.9 billion to science capital from 2016 to 2021  
- £2.9 billion towards scientific grand challenges  
- £3 billion to support individual research projects and our institutions’ world class laboratories |
|         |                                                                        |                                                                                        |                                                                                         |                                                                                                                                                                                                       |-------------|
Proposed Corporate Environment Policy

Report of the Head of Environmental Services

Cabinet Member: Cllr. Kay Mason Billig
Environment and Recycling Portfolio Holder

CONTACT
Bob Wade 01508 533787
bwade@s-norfolk.gov.uk
1. Introduction

1.1. As a provider of services to residents, the community and businesses in South Norfolk, the Council has a central role in the shaping of the local environment in its widest sense through its conduct of council business and how it influences and works with local communities.

1.2. The purpose of this Report is to seek agreement from Cabinet for a Corporate Environment Policy and thereafter to adopt it as a policy of the Council.

1.3. The proposed Corporate Environment Policy supports the Council’s vision, ambition and priority of improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages. It is a natural evolution from the Council’s previous strategies namely; the Corporate Environmental Strategy 2008-2012 and the Carbon Management Plan 2010-2014.

1.4. This policy is to be supported by an action plan as part of the Council’s Business Plan from 2016/17 onwards to demonstrate our commitment to continuous improvement. Although there is no legal prerogative to have such a policy it is considered good business practice.

2. Background

2.1. There are a number of drivers which provide support to this proposed corporate policy. These include-
• Community leadership – the policy will support our endeavours and demonstrate our commitment to realistic continuous environmental improvements. The policy will support a number of other policy and strategy developments in the Council such as the Health and Wellbeing Strategy and the draft Community Assets Strategy.

• Legal – comprehensive legal compliance is essential for the management of corporate and reputational risk. This policy will support the management of these risks.

• Financial/performance – tied in with the above, active management of our assets and our performance can lead to a better use of resources e.g. energy, water, etc.

• Corporate direction of travel – including the commercialisation agenda – as the Council transforms to more of a trading and contracting entity there is an ongoing business prerogative to re-affirm and demonstrate commitment to our environmental compliance and Corporate Social Responsibility (CSR).

The Policy is attached as Appendix 1 to this Report.

3. Current Position

3.1. Comments were invited and on a draft version of this Policy from Members, internal stakeholders and through consultation with external stakeholders and the community on the Council’s website. The Policy is designed not to create ‘new’ work but to be part of ‘business as usual’ by fitting in with business plans, supporting the Council’s vision and priorities and the existing corporate direction of travel. Action planning as part of the business plan will therefore include, amongst other things, the following notable elements:

• Energy and asset management - for example the recent leisure centre improvements have resulted in the use of a range of more energy efficient lighting and enhanced design features.
- Transport and travel – continued investment in the Council vehicles, active fleet management and optimisation of our refuse collection fleet is giving rise to the more efficient use of fuel and resulting in savings.
- Recycling and waste – the Council will continue to promote recycling, waste prevention and reuse both to our customers but also as a business.
- Water management – the planning regime has a key role in supporting the delivery of sustainable development and the management of water and in particular minimising the risk of flooding.
- Built and unbuilt environment – the planning, asset management and draft community assets strategy are all supportive of enhancing the local environment.
- Procurement and risk – procurement decisions will continue to include CSR and sustainability elements.

The detail of the above will be monitored as part of the business planning cycle commencing in 2016/17.

4. Proposals

4.1. Cabinet is invited to consider, comment and agree the proposed Corporate Environment Policy.

5. Risks and Implications arising

5.1. Financial – clearly the application of the proposed Policy has financial implications but these are built into the business planning of the Council and there are opportunities for efficiencies in the use of resources.
5.2. Legal – there is no legal requirement to have a policy but there are benefits in demonstrating the Council’s commitment to good practice and compliance.

5.3. Environmental – the Policy serves as a positive indicator of commitment to the environment and the communities of South Norfolk.

5.4. Equalities – no implications.

5.5. Crime Reduction – may contribute to local environmental quality and potentially the reduction of crime.

6. Other Options

6.1. There is an option not to have a policy as it is not a legal requirement.

7. Recommendation

7.1 Subject to any further comments, that Cabinet approves the Corporate Environment Policy for ratification by Council.
Corporate Environment Policy

Our Commitment:

The Council plays a key role as a provider of services, enabler and leader both within and beyond the South Norfolk community. This role includes environmental stewardship which is encompassed in the Council’s corporate vision and ambition. The vision is:

‘To retain and improve the quality of life and prosperity of South Norfolk, for now and future generations, to make it one of the best places to live and work in the country’

As part of this vision our corporate priorities are:

- Economic growth, Productivity and Prosperity – providing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities
- Health, Well-being and Early Help – proactively working with communities to provide help at the earliest opportunity and enhancing the health and well-being of our residents
- Place, Communities and Environment – improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages

The Council is committed to managing and enhancing the environment locally and in the wider sense as part of our work and given the vision of the Council.
Our aims

- **Leadership** – seek to reduce and manage the environmental impact of our activities commensurate with our responsibilities, vision and priorities. We will consider the environmental implications and opportunities of our approach to doing business and working with the community.

- **Legislative compliance** – notwithstanding our corporate responsibility to comply with all environmental legislation we will influence suppliers and partners to do likewise and encourage good practice. In line with our policies apply the law in a fair and proportionate way to those we regulate to protect the environment.

- **Transport & travel**- encourage the use, where economically advantageous, of travel and transport arrangements which reduce environmental impact. This includes management of our vehicle fleet.

- **Energy**- as part of our management of assets, and where economically advantageous, we will reduce the demand for energy, improve energy efficiency and where appropriate consider renewable energy technologies.

- **Recycling & Waste**- to manage the waste we collect and that which we produce according to the waste hierarchy by as far as practicable reducing, reusing and recycling. Endeavour to influence others to adopt this approach given the role of the Council in this respect.

- **Water**- as part of its management of assets, and where economically advantageous, we will reduce the demand for water and safeguard it as a sustainable resource. We will also support measures to sustainably manage water to minimise flooding which causes adverse impact.

- **Built and unbuilt environment**- promote and support the conservation and enhancement of the built and ‘natural’ environment. This includes encouraging and supporting local biodiversity, landscape character, the built environment and...
enhancing the cultural and historic interest of the district. We will promote and encourage the community to make use of the local environment to support health and wellbeing.

- **Environmental Risk**- given, amongst other things and taking into consideration the economic advantages, support services to be resilient to changes to the environment.
- **Procurement**- to manage and reduce the environmental impact of the goods and services we procure by working with suppliers and contractors to mutual benefit.

This Policy should be viewed alongside the corporate business plan which outlines our specific targets, milestones and outcomes. We will report annually in relation to achievement of our aims.

This Policy will be reviewed annually and updated as necessary.

Name:  
Signature:  
Date:
Article 4 Direction: Cringleford

Report of the Director of Growth and Localism
Cabinet Member: Lee Hornby

CONTACT
Tim Horspole, 01508 533806
thorspole@s-norfolk.gov.uk
1. Introduction

1.1. The Council has received a Prior Notification for the Cringleford Business Centre to change its use to residential. This is considered permitted development, which presents the Council with very limited room to resist the change in use. Cringleford Parish Council have made a request for South Norfolk Council to undertake an immediate Article 4 Direction on the centre, to remove the permitted development rights; this report seeks Cabinet’s views and subsequent authority on the way forward.

2. Background

2.1. Permitted Development allows for certain types of building work to take place without the applicant having to undertake a full planning permission process; the rights are set out within the Town and Country Planning (General Permitted Development) (England) Order 2015.

2.2. Local Authorities, in certain circumstances, have the ability to withdraw permitted development rights by means of an Article 4 Direction. As highlighted by the DCLG in the Planning Practice Guidance, “the use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. The potential harm that the direction is intended to address should be clearly identified…”. It is not the intention of Government for these powers to be used to be used widely to restrict development.
3. Current Position / Findings

3.1. On 10 December, the Council received a Prior Notification to change the use of Cringleford Business Centre from a building for office use to 35 dwellings (see planning application reference 2015/2843). Permitted Development rights are set nationally by Government and are laid out in the 2015 Order. In the case of the permitted change from residential to offices these apply as long as the premises are not listed, within the curtilage of a listed building or the site forms part of a safety hazard or military explosives storage area, none of which apply in this case. In considering prior notifications for such change of use, prior approval can only be required in regard to transport and highway impacts of the development, contamination risk on the site and flooding risks on the site. The site falls within the Cringleford Neighbourhood Plan area and in cases where planning permission is required proposals would need to comply with policies in the Cringleford Neighbourhood Plan along with South Norfolk Local Plan policies and national policy within the National Planning Policy Framework. It should be noted though that these policies do not apply to the consideration of the prior notification submitted. A plan showing the site’s location is attached as Appendix 1.

3.2. Following the undertaking of a formal consultation exercise, in January 2016 Cringleford Parish Council formally requested South Norfolk Council to suspend permitted development rights using an Article 4 order. The Parish Council were of the view that this would be necessary as:

3.2.1. It would enable South Norfolk Council to examine the plans more closely than might otherwise be possible;
3.2.2. The change of use is contrary to Policy ECN3 of the Cringleford Neighbourhood Plan, which indicates that proposals for change of use of existing business premises away from employment activity will be resisted unless it can be
demonstrated that the existing use is no longer economically viable, i.e. that the site has been marketed at a reasonable price for at least one year for that or any other suitable employment or service trade use

3.2.3. No evidence has been provided that the site is no longer economically viable possible alternative uses has been tested

3.3. In mitigation, the Parish Council recognised the lack of 5 year land supply across the Norwich Policy Area.

3.4. Whilst the General Permitted Development order indicates that the local planning authority may use an Article 4 direction where it is satisfied that it is expedient to do so, the DCLG guidance on the use of Article 4 directions is clear that they should only be used in “exceptional circumstances” where there is clear evidence that exercising permitted rights would harm local amenity or the proper planning of the area (this view is maintained by paragraph 200 of the National Planning Policy Framework). A Council must be clear in making its direction of the harm the direction is intended to address and in particular, whether the exercise of permitted development rights would undermine the visual amenity of the area or damage the historic environment; undermine local objectives to create or maintain mixed communities; lead to the subdivision of agricultural land other than for purposes for agriculture; lead to an intensification of development in close proximity to a military or aviation safeguard zone; have a direct and significant adverse effect on a flood risk area or lead to an intensification of development or use in areas affected by coastal erosion.

3.5. The Council is within its rights to make an article 4 direction covering any geographic area (whether a specific site to the whole of the authority); rights related to operational development or a change in the use, and rights with a temporary or permanent effect. Whilst rights can be non-immediate, given the nature of the situation it would only be feasible to issue an immediate direction which would withdraw permitted development but local consultation must be undertaken within 6 months or else the direction will lapse.
3.6. It is important to highlight that should a local authority issue an article 4 which would result in refusal of a permitted development prior notice, then it is likely to be liable to pay compensation for any abortive expenditure incurred, or other loss or damage directly attributable to the withdrawal of rights.

3.7. The DCLG has tended to be unfavourable towards article 4 directions which seek to restrict the conversion of offices. In 2014, the Secretary of State quashed an article 4 direction issued by the London Borough of Islington for this purpose even though the Borough had sought to reduce the area to which the article originally applied, and also reduced a similar article 4 direction issued by Broxborne Borough Council. More locally, Norwich City Council applied at the time the permitted development rights were introduced to have a number of areas such as parts of the city centre made exempt from the new permitted development rights. Government did not agree to any of the exemptions, as was the case in the majority of applications for exemption nationally.

4. Proposals

4.1. Whilst officers consider that the arguments put forward by Cringleford Parish Council are logical, they do not satisfy the requirements of exceptional circumstances that would warrant an article 4 direction to be issued, and having carefully considered the balance, officers are similarly minded that the nature of the development put forward is not sufficiently exceptional to justify such a measure.

4.2. Legal advice was also sought on the likely success of an Article 4 direction. This has now been received and backs the views of officers that there is not sufficiently strong justification for an Article 4 direction in this instance. The advice received is that we would probably be unsuccessful in obtaining Secretary of State confirmation for such an Article 4 direction.
5. Risks and Implications arising

5.1. An Article 4 Direction would potentially restrict the ability to change the use of the site; the Council could be liable to pay compensation to the developers should this arise.

5.2. If the Article 4 Direction was not issued, then it is likely the development would proceed. This would lead to the loss of the commercial units on the site, and therefore the diversion of businesses and employment to other sites within the District (or, more likely in this instance, outside of the District to Norwich). In mitigation, there is the potential of some employment during construction of the development, and the additional residential units which would contribute towards the Council’s 5 year land supply.

6. Other Options

6.1. The only other option than that proposed is to authorise the Director of Growth and Localism to issue the Article 4 Direction. If this option is taken, Cabinet would need to also determine whether the Direction should just be applied to the site in question, or a wider area (potentially the Cringleford Neighbourhood Plan area, the part of the district within the Norwich Policy Area or the whole of the District). Cabinet would also be required to give clear direction in line with paragraph 3.4 as to why they consider this to be exceptional circumstances where an Article 4 Direction should be given.

7. Recommendation
7.1. Cabinet is recommended to refuse to issue an Article 4 Direction with respect to the change of use of Cringleford Business Park
Whistleblowing Policy, Counter Fraud, Corruption and Bribery Strategy and Anti-Money Laundering Policy - Updates

Report of the Internal Audit Consortium Manager
Cabinet Member: Councillor Edney, Finance and Resources

CONTACT
Emma Hodds 01508 533791
ehodds@s-norfolk.gov.uk
1. Introduction

1.1. The Committee are asked to review the Whistleblowing Policy, the Counter Fraud, Corruption and Bribery Strategy and the Anti-Money Laundering Policy together due to the intrinsic links between the three documents.

1.2. The Whistleblowing Policy, the Counter Fraud, Corruption and Bribery Strategy and the Anti-Money Laundering Policy require review by both the Finance, Resources, Audit and Governance Committee and the Joint Consultative Strategy prior to review, acceptance and endorsement by Cabinet.

2. Background

2.1. South Norfolk Council has had a Whistleblowing Policy for a number of years, with the latest revision being approved by Cabinet in October 2013. The Policy sets out that the Council is keen to encourage staff, councillors, partner bodies and members of the public to raise concerns that they have, in the knowledge that the Council will aim to ensure that they face no reprisal or victimisation as a result of taking such action.

2.2. Likewise the Counter Fraud, Corruption and Bribery Strategy has been in place for a number of years, with the latest revision also being approved by Cabinet in October 2013. The Strategy sets out the Council’s commitment to a zero tolerance attitude towards fraud, corruption and bribery.

2.3. The Anti-Money Laundering Policy has also been in place for a number of years, with the latest revision being approved by in December 2010. The Policy clarify how suspicions of money laundering activities should be disclosed within the
organisation, and where appropriate, how such matters should be in accordance with legislative and regulatory requirements.

3. Current Position / Findings

3.1. The Whistleblowing Policy, the Counter Fraud, Corruption and Bribery Strategy and the Anti-Money Laundering Policy have been reviewed to ensure that best practice continues to be followed, have been consulted upon with Senior Leadership Team and key Senior Officer and has also been compared to other Council’s arrangements.

3.2. Historically the Council has had few whistleblowing cases reported under the Whistleblowing Policy. However, the consequences of the failure to act should issues be reported can be significant; the Council has a duty to respond to matters that are in the public interest and to protect its employees.

3.3. At the Finance, Resources, Audit and Governance Committee on the 27 November the members suggested that the relevant Cabinet member be made aware when an investigation was taking place. Although members agreed that an amendment to the policy was not necessary, the Committee felt that this point should be highlighted to the JCC and Cabinet.

3.4. At the Joint Consultative Committee on the 16 December it was highlighted that the Whistleblowing Policy has the necessary protections and safeguards in place for the whistle-blower, however there is no mention of the procedures relating to how the person accused of “wrong doing” is handled. It was confirmed that this is documented with the Counter Fraud, Corruption and Bribery Strategy within the Investigative Approach (Appendix 1). The Committee suggested that reference could be made to this in the Whistleblowing Policy, and this has now been referenced at section 14 – How the Council will respond, paragraph 4.10.
4. Proposals

4.1. The revised Whistleblowing Policy is attached at Appendix 1 to this report. The Policy has remained similar in terms of scope and coverage, with the main changes being updates in relation to responsible officers. The opportunity has also been taken to ensure that the Policy reflects the responsibilities of the Internal Audit Consortium Manager and the Monitoring Officer, with the lead for this Policy now being the Internal Audit Consortium Manager, supported by the Monitoring Officer.

4.2. The revised Counter Fraud, Corruption and Bribery Strategy is attached at Appendix 2 to this report. Likewise the Strategy remains similar in terms of scope and coverage, with the main changes being updates to the responsible officers and clarification of the role of the Internal Audit Consortium Manager and the Monitoring Officer.

4.3. The revised Anti-Money Laundering Policy is attached at Appendix 3 to this report. The Policy has been updated to reflect updates to relevant staff and changes in legislation / Acts, but the procedures remain the same.

4.4. The changes that have been made have been subject to careful consideration and consultation with key senior officers and the Senior Leadership Team.

4.5. Following acceptance and endorsement of these policies the Internal Audit Consortium Manager will organise learning hours for the Council, in conjunction with the Senior Investigations and Enforcement Officer and Monitoring Officer. In addition specific training will be provided to teams where particular focus is needed for example Leisure and the Depot, where there a number of new staff and also fraud is more likely.
5. Risks and Implications arising

5.1. Financial – safeguarding the Council’s assets and the Public Purse.

5.2. Legal – ensure that the Council is discharging its duties under the legal framework and following best practice.

5.3. Environmental – ensuring that concerns relating to the environment are raised appropriately and that those concerns are responded to in order to minimise any potential impact.

5.4. Equalities – ensuring that the Council does not victimise or discriminate against any employee who raises concerns within the organisation.

5.5. Crime reduction – ensuring that concerns relating to criminal activity are raised appropriately and that those concerns are responded to in order to minimise any potential losses.

5.6. Risks – there are significant risks posed to the Council if people cannot safely raise concerns, and if the Council fails to respond to those concerns in an appropriate manner.

6. Recommendation

6.1. It is recommended that Cabinet:
   - Note the changes to the Whistleblowing Policy, the comments made by FRAG, the amendment suggested by JCC and formally accept and endorse the Policy.
   - Note the changes to the Counter Fraud, Corruption and Bribery Strategy, and formally accept and endorse the Strategy.
• Note the changes to the Anti-Money Laundering Policy, and formally accept and endorse the Policy.

Appendix 1 – Whistleblowing Policy
Appendix 2 – Counter Fraud, Corruption and Bribery Strategy
Appendix 3 – Anti-Money Laundering Policy
SOUTH NORFOLK COUNCIL

WHISTLEBLOWING POLICY AND PROCEDURE

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WHISTLEBLOWING POLICY

INTRODUCTION TO THE POLICY
1. What is Whistleblowing?
2. What is the purpose of the Policy?

AIMS AND SCOPE OF THE POLICY
3. What types of concerns are covered by the policy?
4. What is not covered by the Policy?

SAFEGUARDS
5. Protecting the Whistleblower and Preserving Confidentiality
6. Anonymous Allegations
7. Assurances to Third Parties
8. Untrue Allegations

RESPONSIBILITY FOR WHISTLEBLOWING
9. Responsible Officer for Whistleblowing
10. Responsibility for the Whistleblowing Policy

WHISTLEBLOWING PROCEDURE

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12. Guidance for Employees
13. Sources of Support for the Whistleblower
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EFFECTIVE DATE – 18 January 2016 28 June 2013

This policy will be subject to regular review with any significant variations leading to re­presentation of the Policy.

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Version 2 – 18 January 2016 – administrative changes only
THE WHISTLEBLOWING POLICY

INTRODUCTION TO THE POLICY

1. What is Whistleblowing?

1.1 Whistleblowing is the raising of a significant concern. Concerns may cover issues of fraud, misconduct, or illegality, and this policy is designed to ensure that people know how to raise a genuine concern, and can do so in the knowledge that they will not face reprisal for their action.

1.2 Public Concern at Work (a charity which provides independent advice and information on whistleblowing) draws the following distinction between whistleblowing and pursuing a complaint:

“When someone blows the whistle they are raising a concern about danger or illegality that affects others (e.g. customers, members of the public, or their employer). The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concern - they are simply trying to alert others. For this reason, the whistleblower should not be expected to prove the malpractice. He or she is a messenger raising a concern so that others can address it.”

2. What is the purpose of the Whistleblowing Policy

2.1 Employees, councillors and others who deal with the Council may be the first to spot things that may be wrong or inappropriate within the Council. However, they might not say anything because they think this would be disloyal, or they might be concerned that their suspicions are unjustified or might turn out to be so after enquiry. They may also be worried that they or someone else might be victimized, or are unclear with whom to raise their concern. However, if the Council has the chance to deal with a potentially serious problem at the earliest opportunity this can minimize the risks before serious damage can be caused to persons, property or reputation. Allegations made under the whistleblowing policy should relate to a matter within the public interest and not in relation to a personal or employment matter.

2.2 Members of the public may also have concerns, but be unsure how and when to express them.

2.3 South Norfolk Council has produced this Whistleblowing Policy to help:
   • Councillors
   • Employees (including temporary and agency staff)
   • Others with whom the Council has dealings (e.g. contractors, partners, suppliers and voluntary organisations), and

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• Helping members of the public understand how and when to contact the Council with their concerns.

2.4 It is also expected that contractors will be required to have their own whistleblowing policies and arrangements established in accordance with thresholds set in the Council’s contract conditions through the tendering process. Where a contractor does not have its own policy, it is expected that the principles and arrangements of the Council’s policy and associated procedures will apply.

2.5 The Council is committed to maintaining an open culture with the highest standards of honesty and accountability. It takes all inappropriate behaviour very seriously and is committed to investigating any genuine concerns raised.

2.6 This policy aims to ensure that any concerns can be raised with confidence and without any worry on the part of the whistleblower about being victimized, discriminated against or disadvantaged in any way as a result.

AIMS AND SCOPE OF THE POLICY

3. What types of concern are covered by the policy?

3.1 The Policy aims to:
• encourage you to feel confident in raising serious or sensitive concerns about inappropriate behaviour and to question and act upon concerns;
• provide avenues for you to raise those concerns and receive feedback on any action taken;
• ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied; and
• Reassure you that you will be protected from possible reprisals or victimization if you have a reasonable belief that you have raised any concern in good faith.

3.2 This policy is intended to deal with serious or sensitive concerns about inappropriate behaviour. The Public Interest Disclosure Act 1998, as amended by the Enterprise and Regulatory Reform Act 2013, sections 17-20, outlines that a “protected” disclosure of a concern is one which demonstrates one or more of the following:
• A criminal offence has been committed, or is likely to be committed
• Disclosures related to a miscarriage of justice
• A failure to comply with a legal obligation
• The endangering of an individual’s health and safety
• Unnecessary damage to the environment (for example, by pollution)
• Deliberate concealment of information relating to any of the above.

3.3 Beyond the legal context above, the Council would encourage employees, members of the public, and any other interested parties to raise any significant concerns that they may have, as soon as they are reasonably aware of them. These concerns could be about any aspects of the Council’s activities, e.g. with reference to Council employees, Members, or suppliers acting on behalf of the Council, and relate to issues that are either occurring now or likely to happen in the future.
4. **What is not covered by the Policy?**

4.1 The Council has a number of policies and procedures to address other matters, for example:
   - Employees’ complaints about their terms and conditions of employment. These matters are dealt with through the Grievance Procedure.
   - Instances of bullying and harassment of Council’s employees are dealt with through the Bullying and Harassment Policy.
   - Complaints from members of the public about the Council’s services. These are dealt with through the Council’s Complaints Procedure.
   - Concerns with reference to members should be referred to the Monitoring Officer.

4.2 It should be emphasized that this Policy is intended to assist individuals who have discovered malpractice or serious wrong doing, provided they make the disclosure in accordance with the Policy. Individuals who make disclosures outside the arrangements set out here will not be protected under this Policy and may not be protected under the Act.

4.3 The Policy is not designed to question financial or business decisions taken by the Council nor may it be used to reconsider any matters that have already been addressed under the harassment, grievance, disciplinary or complaints procedures.

**SAFEGUARDS**

5. **Protecting the Whistleblower and Preserving Confidentiality**

5.1 In accordance with the Public Interest Disclosure Act 1998, South Norfolk Council undertakes to protect, as best it can, an employee who blows the whistle from personal claims, victimisation, harassment or bullying as a result of his or her disclosure. This assurance is not extended to someone who maliciously raises a matter they know are untrue; such instances may be subject to the Council’s disciplinary procedures.

5.2 The Council recognizes that the decision to report a concern can be a difficult one to make. If you raise your concern based on a reasonable belief and in good faith, you should have nothing to fear because you will be doing your duty to your employer and the public. The Public Interest Disclosure Act 1998 will protect you from dismissal or other detriment.

5.3 The Council will, at the request of the whistleblower, keep the nature of concerns confidential. It will not reveal names or positions without permission, unless it has to by law, or an enquiry results in a criminal investigation in which the whistleblower might be required as a witness. Whistleblowers should be aware, however, that the fact that enquiries are being made might result in their identity becoming known. Where possible, the Council will make you aware if your identity is likely to be compromised through investigation.

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5.4 All these matters will be explained at the time a concern is raised so the whistleblower can decide whether or not to proceed. The Council will also keep the whistleblower informed if the situation significantly changes.

5.5 Any investigations into allegations arising from your whistleblowing will not influence or be influenced by any other personnel procedures to which you may be subject.

6. **Anonymous Allegations**

6.1 The Council encourages whistleblowers to give their name when making an allegation. It will do all it can to protect the whistleblower. Concerns raised anonymously tend to be far less effective and if, for example, the Council does not have enough information, it may not be able to investigate the matter at all.

6.2 Also, from a practical point of view, it is impossible to provide protection to a person whose identity is unknown and more difficult to judge whether the concern is made in good faith or maliciously.

6.3 If whistleblowers feel that they cannot give their name, the Council will make a judgment on whether or not to consider the matter depending upon such things as:
- The seriousness of the issue;
- The quality of any documentary evidence submitted with the allegation;
- Whether the concern is believable; and
- Whether the Council can carry out a robust investigation based on the information provided to confirm the validity of the original allegation made.

7 **Assurances to Third Parties**

7.1 The assurances provided to employees raising concerns set out in section 5 above cannot be given in the same way to third parties. For example, the Council cannot guarantee protection to employees of third party (contractor) organizations. However, we expect that all contractors are aware of the Council’s whistleblowing procedures, and act in accordance with these.

7.2 Further, with regard to members of the Public, whilst they are not afforded statutory protection in the same way as employees, the Council is committed to treating all citizens fairly. Raising a concern under this policy will not affect the rights of any council citizens as set out within Article 3 of the Council’s Constitution.

8 **Untrue Allegations**

8.1 If a whistleblower makes an allegation which they believe is true, but it is not confirmed by an investigation, the Council will not take any action against them.
However, if a whistleblower makes a deliberately false or malicious allegation which they know is untrue, the Council will take appropriate disciplinary or legal action against them. Allegations of this nature are not protected by the Public Interest Disclosure Act 1998.

RESPONSIBILITY FOR WHISTLEBLOWING

9. Responsible Officer for Whistleblowing

9.1 The Council’s Monitoring Officer is the Senior Officer in the Council who can take an independent view of any concerns raised. A record of concerns raised will be maintained and the outcomes will be reported as necessary, see 10.1 below (in a format to protect your confidentiality). Other Senior Officers in the Council support the Monitoring Officer in this role, as set out at Appendix 1.

9.2 All concerns raised will be handled in line with the Whistleblowing Procedural Guidance, as attached to this policy.

10. Responsibility for the Whistleblowing Policy

10.1 All concerns raised and the outcomes will be reported to the Finance, Resources, Audit and Governance Committee and the Standards Committee, by the Monitoring Officer Internal Audit Consortium Manager, annually in a form that does not endanger confidentiality. However, if no concerns are raised no report will be provided.

10.2 This policy is to be reviewed at least every 3 years by the Internal Audit Consortium Manager (or more frequently if required by changes to statutory legislation) and the following parties will be consulted prior to finalising and submitting the Policy to Cabinet for subsequent approval:
   - Senior Council Officers responsible for receiving whistleblowing concerns
   - The Senior Leadership Corporate Management Team
   - Finance, Resources, Audit and Governance Committee
   - Joint Consultative Committee

10.3 On an annual basis, Appendix 1 of the policy, which provides details of the key parties responsible for whistleblowing, shall be reviewed by the Monitoring Officer and the Internal Audit Consortium Manager to ensure that details remain relevant and up-to-date. This review will not require re-endorsement of the policy.

10.4 The Internal Audit Consortium Manager is also responsible for making staff aware of the Policy’s requirements through training and publicising initiatives.
THE WHISTLEBLOWING PROCEDURE

HOW TO RAISE A CONCERN

11. Guidance for Members of the Public, Contractors, Councillors and Partners

11.1 Members of the Public, Contractors, Councillors and those involved with partner organization who suspect a Council Employee, another Councillor, Organisational Partners or other Contractors (in their dealings with the Council) of impropriety or illegality should contact one of the following:

- The Chief Executive
- The Deputy Chief Executive / Monitoring Officer
- The Deputy Monitoring Officer
- The Internal Audit Consortium Manager
- The Senior Investigations and Enforcement Officer

11.2 If your concern relates to the Chief Executive, this should be raised with the Leader of the Council (or the Deputy Leader of the Council if the Leader is unavailable) or Ernst and Young, as the Council’s External Auditor. Conversely, if your concern relates to the Deputy Chief Executive / Monitoring Officer, the Deputy Monitoring Officer or the Internal Audit Consortium Manager, this should be referred to the Chief Executive.

All contact details are included within Appendix 1 of the whistleblowing policy.

12. Guidance for Employees

12.1 Whistleblowers should not attempt to investigate any concern themselves, but raise their concern using one of the avenues shown below.

12.2 A Council employee should first raise a concern with their manager or Director. Guidance to employees on how to proceed is contained in the document “Checklist for employees - How to react to concerns of inappropriate behaviour” – see Appendix 3.

12.3 Guidance to managers on how to deal with a concern is contained in the document “Checklist for Managers – How to react to concerns of inappropriate behaviour” – see Appendix 4.

12.4 If the employee feels that it is inappropriate to raise a concern with their manager or Director given the person involved and/or the seriousness or sensitivity of the matter, contact should be made with one of the following officers

- The Chief Executive
- The Deputy Chief Executive / Monitoring Officer
- The Deputy Monitoring Officer
- The Internal Audit Consortium Manager
- The Senior Fraud Investigations and Enforcement Officer

These officers can also provide advice and guidance on how concerns may be pursued.

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12.5 If your concern relates to any of the Officers above, this should be referred to the Chief Executive. If your concern relates to the Chief Executive, then this matter can be raised with the Leader of the Council (or the Deputy Leader of the Council if the Leader is unavailable) or Ernst and Young, as the Council’s External Auditors. Conversely, if your concern relates to the Deputy Chief Executive / Monitoring Officer, the Deputy Monitoring Officer, the Internal Audit Consortium Manager, or the Senior Fraud Investigations Officer, this should be referred to the Chief Executive.

12.6 Whistleblowers are encouraged to raise concerns promptly and where possible in writing, giving as much information as possible, such as relevant background, names, dates, places and the reason for their concern. In addition any evidence to support the concern / suspicions should also be attached... Appendix 5 to these procedures provides a form that can be utilised as a starting point. However, concerns can be raised by telephone or by meeting the appropriate officer. The earlier you express the concern the greater the likelihood that an appropriate intervention may be made, to minimize the risk, impact or continuation of the concern in question.

12.7 Although it will not be necessary to prove beyond doubt that an allegation is true, a whistleblower will be expected to demonstrate that there are reasonable grounds for voicing their concern.

12.8 Any whistleblower will be asked to declare any personal interest they may have in the concern being raised.

12.9 In matters concerning the health, safety and welfare of those on our premises (whether members of staff, contractors or visitors) anyone, including an elected safety representative, who becomes aware of a hazard (actual or potential) or dangerous occurrence should immediately notify the Corporate Health and Safety Advisor, before contacting any outside body, to ensure that immediate action can be taken if necessary to deal with the hazard. Contact can be made by telephone, email or the sending of a written report as appropriate to the situation.

13. Sources of Support for the Whistleblower

13.1 You may wish to discuss your concerns with a friend or colleague first. You/They may then find it easier to raise a concern if others share the same experiences or concerns.

13.2 For employees, trade union representatives can give general support and advice, or act on their behalf if this would help. This could be useful, particularly if the employee wishes to remain anonymous, to the extent that is possible.

13.3 The Council will encourage the trade unions to support any member of staff who raises a concern with them.

13.4 The Council further welcomes any member of staff to consult with Public Concern at Work if they are not sure about whistleblowing. Public Concern at Work is an independent charity which provides confidential support and advice to whistleblowers through a telephone helpline and the internet. Further details for Public Concern at
Work are included in Appendix 1. In addition a summary regarding the remit of Public Concern at Work is included at Appendix 2.

14. How the Council will respond

14.1 Whoever you raise your concerns with, and whether the concern is made by an employee, member of the public, contractor, Councillor or partner, an impartial person will be appointed to investigate your concern and you will be informed of who this is. Confidentiality will be maintained in accordance with section 5 of this policy.

14.2 In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate, and, if so, what form it should take. The overriding principle which the Council will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, harassment or discrimination issues) will normally be referred for consideration under those procedures.

14.3 Following these initial enquiries the Council will respond to your concerns as appropriate and establish whether or not:
   • your concerns should be considered under this policy;
   • your concerns can be allayed satisfactorily without invoking a formal investigation;
   • no further investigation is necessary;
   • your concerns may be resolved by other mechanisms or action e.g. mediation, training or review; or
   • There is sufficient substance behind your concerns to trigger an investigation.

14.4 Where there is sufficient evidence behind the concerns to trigger an investigation the concern will:
   • be investigated by management or internal audit; or
   • be referred to the police; or
   • be referred to the external auditor; or
   • Form the subject of an independent inquiry.

14.5 Some concerns may be resolved by action agreed with you without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

14.6 Within 10 working days of a concern being raised, the person appointed to investigate your concern will contact you (in a way which does not arouse suspicions in your workplace):
   • acknowledging that the concern has been received;
   • indicating how we propose to deal with the matter;
   • giving an estimate of how long it will take to provide a final response;
   • telling you whether any initial enquiries have been made;
   • supplying you with information on staff support mechanisms;
   • advising you of your entitlement to seek advice and representation from your trade union representative;
   • telling you whether further investigations will take place and if not, why not; and
• To agree with you how to proceed if you have chosen to remain anonymous.

14.7 The Council will do what it can to minimise any difficulties, which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Council will arrange for you to receive advice about the procedure and other appropriate support.

14.8 Once the person appointed to investigate your concern has completed their investigations, they will produce a written report that sets out:
• the background to the whistleblowing concern;
• the findings of fact and associated evidence;
• the decision and reasons for the decision; and
• The recommendations and associated action plan.

14.9 The Council accepts that you need to be assured that the matter has been properly addressed. Subject to legal constraints and any confidentiality or other issues, we will inform you of the outcome of any investigation.

14.10 The approach taken by the Council, should your concern need to be investigated, is set out in the Counter Fraud, Corruption and Bribery Strategy, explicitly at Appendix 1 – Investigative Approach.

15 Withdrawing your allegation

15.1 You have the right to withdraw any allegation previously made under this policy and procedure. You should think very carefully before taking this course of action, bearing in mind an investigation may have started and you may need to explain this change of decision.

15.2 If it is considered appropriate, despite the complainant withdrawing the allegation, the investigation of the allegation may continue if it is deemed necessary.

16 Raising issues with an External Party

16.1 This Policy seeks to encourage you to raise concerns directly with the Council. However, there may be situations where you feel it is inappropriate to raise the concern internally, or unable to do so. Alternatively, you may have already raised a concern and are dissatisfied with the outcome. In these situations, there are a number of other parties to whom you may turn:
• The National Audit Office Audit Commission’s dedicated telephone hotline for receiving disclosures
• Relevant Regulatory Organizations (e.g. the Environment Agency, Health and Safety Executive or Local Government Ombudsman)
• The Police (where a criminal matter is involved)
• Public Concern at Work

Contact details for all parties are included within Appendix 1.
16.2 Before consulting an external party, the Council recommends that the whistleblower seeks independent legal advice (disclosure to a legal advisor is protected by law). The law most readily protects disclosures that are seen to be “reasonable”, i.e. disclosures that are made within the Council or to an appropriate regulator at an early stage. If the matter is taken outside of the Council, the whistleblower should ensure they do not disclose information about a third party that may be covered by a duty of confidentiality (e.g. commercially sensitive information or personal, private data). It is recognised that potentially the Public Interest Disclosure Act and the Data Protection Act could have some bearing on disclosures, however one statute does not overrule the other and both must be complied with, and thus each case would need to be considered on its individual merits.

16.3 If you do take the matter outside the Council, you should ensure that you do not disclose confidential information. If you do this then you may need to check whether the information is confidential. Depending on the nature of the information, it may be confidential to South Norfolk Council, commercially sensitive to a third party or personal and private to an individual.
## Appendix 1

### Contacts for Whistleblowing

#### Raising concerns internally

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Email</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive</td>
<td>Sandra Dinneen</td>
<td><a href="mailto:sdnineen@s-norfolk.gov.uk">sdnineen@s-norfolk.gov.uk</a></td>
<td>01508 533603</td>
</tr>
<tr>
<td>Deputy Chief Executive—Monitoring Officer</td>
<td>Leah Mickleborough</td>
<td><a href="mailto:lmickleborough@s-norfolk.gov.uk">lmickleborough@s-norfolk.gov.uk</a></td>
<td>01508 533954</td>
</tr>
<tr>
<td></td>
<td>Andy Radford</td>
<td><a href="mailto:aradford@s-norfolk.gov.uk">aradford@s-norfolk.gov.uk</a></td>
<td>01508 533857</td>
</tr>
<tr>
<td>Deputy Monitoring Officer</td>
<td>Emma Goddard</td>
<td><a href="mailto:egoddard@s-norfolk.gov.uk">egoddard@s-norfolk.gov.uk</a></td>
<td>01508 533747</td>
</tr>
<tr>
<td>Interna Audit Consortium Manager</td>
<td>Emma Hodds</td>
<td><a href="mailto:ehodds@s-norfolk.gov.uk">ehodds@s-norfolk.gov.uk</a></td>
<td>01508 533791</td>
</tr>
<tr>
<td></td>
<td>Sandra King</td>
<td><a href="mailto:scking@s-norfolk.gov.uk">scking@s-norfolk.gov.uk</a></td>
<td>01508 533863</td>
</tr>
<tr>
<td>Senior Fraud Investigations and Enforcement Officer</td>
<td>Bob Harvey (Acting)</td>
<td><a href="mailto:brharvey@s-norfolk.gov.uk">brharvey@s-norfolk.gov.uk</a></td>
<td>01508 533900</td>
</tr>
<tr>
<td>Leader of the Council</td>
<td>John Fuller</td>
<td><a href="mailto:jfuller@s-norfolk.gov.uk">jfuller@s-norfolk.gov.uk</a></td>
<td>01508 588280 (home)</td>
</tr>
</tbody>
</table>

#### Raising Concerns Externally

<table>
<thead>
<tr>
<th>Service</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Concern at Work</strong></td>
<td><a href="http://www.pcas.org.uk">www.pcas.org.uk</a></td>
</tr>
<tr>
<td>For support with how to raise concerns, and action to take in relation to all matters of malpractice and/or wrong doing.</td>
<td>3rd Floor, Bank Chambers 6 – 10 Borough High Street London SE1 9QQ 020 7404 6609 <a href="mailto:whistle@pcaw.org.uk">whistle@pcaw.org.uk</a></td>
</tr>
<tr>
<td><strong>Ernst and Young</strong> – External Auditors</td>
<td>One Cambridge Business Park Cambridge CB4 0WZ</td>
</tr>
<tr>
<td><strong>The Local Government Ombudsman</strong> – <a href="http://www.lgo.org.uk">www.lgo.org.uk</a></td>
<td>01223 394400</td>
</tr>
<tr>
<td>__________________________________________________</td>
<td>____________________________________________________________________________________</td>
</tr>
<tr>
<td>The Commission for Local Administration in England</td>
<td>PO Box 4771 Coventry CV4 0EH 0300 061 0614</td>
</tr>
<tr>
<td>For Complaints against Councils – will cover all complaints</td>
<td>Operations and Communications Centre Jubilee House Falcons Chase Wymondham Norfolk NR18 OWW 0845 456 4567</td>
</tr>
<tr>
<td><strong>Norfolk Constabulary</strong> – <a href="http://www.norfolk.police.uk">www.norfolk.police.uk</a></td>
<td><strong>Serious Fraud Office</strong> – <a href="http://www.sfo.gov.uk">www.sfo.gov.uk</a></td>
</tr>
<tr>
<td>For all breaches of the law (except as noted below)</td>
<td>2 -4 Cockspur Street London SW1Y 5BS</td>
</tr>
<tr>
<td>Norfolk Constabulary</td>
<td><a href="mailto:Confidential@sfo.gsi.gov.uk">Confidential@sfo.gsi.gov.uk</a></td>
</tr>
<tr>
<td>Operations and Communications Centre Jubilee House Falcons Chase Wymondham Norfolk NR18 OWW</td>
<td><strong>National Audit Office</strong></td>
</tr>
<tr>
<td><strong>Serious Organized Crime Agency</strong> – <a href="http://www.soca.gov.uk">www.soca.gov.uk</a></td>
<td><a href="mailto:Investigation-team@nao.gsi.gov.uk">Investigation-team@nao.gsi.gov.uk</a> 020 7798 7000 (main switchboard)</td>
</tr>
<tr>
<td><strong>National Crime Agency</strong> – <a href="http://www.nationalcrimeagency.gov.uk">www.nationalcrimeagency.gov.uk</a></td>
<td>For Money Laundering Issues</td>
</tr>
<tr>
<td>National Crime Agency</td>
<td>For Health and Safety contraventions</td>
</tr>
<tr>
<td>2 -4 Cockspur Street London SW1Y 5BS <a href="mailto:Confidential@sfo.gsi.gov.uk">Confidential@sfo.gsi.gov.uk</a></td>
<td>Rosebury Court 2nd Floor St Andrews Business Park Norwich Norfolk NR7 0HS</td>
</tr>
<tr>
<td>For Health and Safety contraventions</td>
<td>The Health and Safety Executive – <a href="http://www.hse.gov.uk">www.hse.gov.uk</a></td>
</tr>
<tr>
<td><strong>The Health and Safety Executive</strong> – <a href="http://www.hse.gov.uk">www.hse.gov.uk</a></td>
<td>Rosebury Court 2nd Floor St Andrews Business Park Norwich Norfolk NR7 0HS 0370 496 7622</td>
</tr>
<tr>
<td>For Health and Safety contraventions</td>
<td>National Customer Contact Centre PO Box 544 Rotherham S60 1BY 03708 506 506</td>
</tr>
<tr>
<td><strong>The Environment Agency</strong> – <a href="http://www.environment-agency.gov.uk">www.environment-agency.gov.uk</a></td>
<td>South Norfolk Council Fraud Hotline 0800 389 6109</td>
</tr>
<tr>
<td>For environmental crimes</td>
<td>National Benefit Fraud Hotline 0800 854 440</td>
</tr>
<tr>
<td><strong>South Norfolk Council Fraud Hotline</strong></td>
<td><strong>National Audit Office</strong></td>
</tr>
<tr>
<td><strong>National Benefit Fraud Hotline</strong></td>
<td><a href="mailto:Investigation-team@nao.gsi.gov.uk">Investigation-team@nao.gsi.gov.uk</a> 020 7798 7000 (main switchboard)</td>
</tr>
</tbody>
</table>

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PUBLIC CONCERN AT WORK

Public Concern at Work (PCaW) is the independent authority on public interest whistleblowing. Established as a charity in 1993 following a series of scandals and disasters, PCaW has played a leading role in putting whistleblowing on the governance agenda and in developing legislation in the UK and abroad. All their work is informed by the free advice they offer to people with whistleblowing dilemmas and the professional support they provide to enlightened organisations.

They have four activities. They:

- offer free, confidential advice to people concerned about crime, danger or wrongdoing at work;
- help organisations to deliver and demonstrate good governance;
- inform public policy; and
- Promote individual responsibility, organisational accountability and the public interest.

They do:

- advise how to raise concerns
- explain the public interest
- separate message from messenger
- provide an impartial, objective view

They don’t:

- duck difficult questions
- claim we have all the answers
- litigate or investigate
- encourage anonymous informing

Whistleblowing dos and don’ts as publicised by Public Concern at Work

Do:

- Keep calm;
- Think about the risks and outcomes before you act
- Remember you are a witness, not a complainant
- Phone us for advice - 020 7404 6609!

Don’t:

- Forget there may be an innocent or good explanation
- Become a private detective
- Use a whistleblowing procedure to pursue a personal grievance
- Expect thanks

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CHECKLIST FOR EMPLOYEES

HOW TO REACT TO CONCERNS OF INAPPROPRIATE BEHAVIOUR

The action you take when you suspect inappropriate behaviour may have happened, or be about to happen, can be crucial. Inappropriate behaviour is described in the Council’s Whistleblowing Policy as:

- Any criminal offence, particularly fraud or corruption
- Disclosures related to a miscarriage of justice
- A failure to comply with a legal obligation
- The endangering of an individual’s health and safety
- Unnecessary damage to the environment (for example, by pollution)
- Deliberate concealment of information relation to any of the above

Following these simple rules should help the Council in carrying out enquiries into any concerns you have.

**DO**

- Make an immediate note of your concerns.
  Note all relevant details, such as what was said in telephone or other conversations, the date, time and the names of any parties involved.

- Convey your suspicions to someone with the appropriate authority and experience in accordance with the Council’s Whistleblowing Policy.

- Deal with the matter promptly if you feel your concerns are warranted.
  Delay may cause the Council to suffer further financial loss or make further enquiry more difficult.

**DON’T**

- Do nothing.

- Be afraid of raising your concerns.
  You will not suffer any recrimination from the Council as a result of voicing a reasonably held suspicion. The Council will treat the matter sensitively and confidentially, and will take reasonable steps to protect anyone who raises a well-intentioned concern.

- Approach or accuse any individuals directly.

- Try to investigate the matter yourself.
  There are special rules surrounding the gathering of evidence. Any attempt to gather evidence by people who are unfamiliar with these rules may weaken or destroy any future prosecution should that be thought appropriate.

- Convey your suspicions to anyone other than those indicated in the Council’s Whistleblowing Policy.
The Public Interest Disclosure Act 1998 - will protect you from any reprisals as long as you meet the rules set out in the Act. The rules are:

- You must disclose the information in good faith
- You must reasonably believe it to be substantially true
- You must not seek any personal gain
Appendix 4

GUIDANCE FOR MANAGERS

HOW TO REACT TO CONCERNS OF INAPPROPRIATE BEHAVIOUR

The action you take when you identify, or are made aware of, suspected inappropriate behaviour can be crucial in determining the success of any subsequent enquiries. Inappropriate behaviour is described in the Council’s Whistleblowing Policy as:

- Any criminal offence, particularly fraud or corruption
- Disclosures related to a miscarriage of justice
- A failure to comply with a legal obligation
- The endangering of an individual’s health and safety
- Unnecessary damage to the environment (for example, by pollution)
- Deliberate concealment of information relating to any of the above

Following these simple rules will help to ensure that matters are properly handled.
As a manager you should familiarise yourself with both the Council’s Strategy to help fight Fraud and Corruption and its Whistleblowing Policy

DO

✓ Be responsive to employees’ concerns.
As part of the Council’s anti-fraud and corruption culture, you should encourage employees to voice any reasonably held suspicion. As a manager you should treat all employees’ concerns seriously and sensitively.

✓ Note details.
Get as much information as possible from the employee reporting the suspicion and encourage them to record this in writing. If the employee has made any notes, request access to these
Note any documentary evidence which may exist to support the allegations made, but do not interfere with this evidence in any way.

✓ Evaluate the allegation objectively
Before you take the matter further determine whether any suspicions appear to be justified.
Be objective when evaluating the issue. Consider the facts as they appear based on information you have to hand.

If in doubt, report your suspicions anyway.
If you consider that no further action is necessary, you should still record your decision and also inform the Head of Internal Audit Consortium Manager of the original notification details.

✓ Advise the appropriate person
If you feel that a suspicion is justified advice an appropriate officer in accordance with the Council’s Whistleblowing Policy

Version 1 – 28 June 2013
Version 2 – 18 January 2016 – administrative changes only
✔ Deal with the matter promptly if you feel your concerns are warranted. Delay may cause the Council to suffer further financial loss or make further enquiry more difficult.

DON’T

☒ Ridicule suspicions raised by employees
The Council cannot operate an effective anti-fraud and corruption culture or Whistleblowing Policy if employees are reluctant to pass on their concerns to management due to fear of ridicule or recrimination. You need to ensure that all employee concerns are given a fair hearing. You should reassure employees that they will not suffer recrimination by raising any reasonably held suspicion.

☒ Approach or accuse any individuals directly

☒ Convey your suspicions to anyone other than those indicated in the Council’s Whistleblowing Policy

☒ Try to investigate the matter yourself
Investigations by employees who are unfamiliar with the requirements of evidence are highly likely to jeopardise a successful outcome. They may also alert the suspect and result in the destruction of evidence.

Your primary responsibility is to report the issue and all associated facts to the appropriate officer, wherever possible.
Appendix 5

WHISTLEBLOWING FORM

Please complete this form and email it send it to: lmickleborough@s-norfolk.gov.uk
Alternatively this can be sent to:
Monitoring Officer
Strictly Private and Confidential
South Norfolk District Council, Swan Lane, Long Stratton, Norfolk NR15 2XE

Name:

Address or contact details:

Telephone:

Best time to contact you:

Person assisting you (e.g. relative, friend, union official( if appropriate:

Address or contact details:

Telephone:

Details of your concern (please continue on a separate sheet if necessary and attach any evidence supporting your concern):

Signature: __________________________________________ Date: ________________________

Version 1 – 28 June 2013
Version 2 – 18 January 2016 – administrative changes only
SOUTH NORFOLK COUNCIL
COUNTER FRAUD, CORRUPTION AND BRIBERY STRATEGY

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Effective Date: 18 January 2016 28 June 2013
This Strategy will be subject to regular review with any significant variations leading to re-presentation of the Strategy.
INTRODUCTION:

1. Why have a Strategy

1.1 South Norfolk Council has three priority areas Corporate Priorities where we focus our resources and efforts. These areas are:

- Economic Growth, Productivity and Prosperity
- Health, Well-being and Early Help
- Place, Communities and Environment

These areas are underpinned by our customer focussed, collaborative and commercial approach to service delivery.

which have been established to drive forward continuous improvement to the way we deliver services to our residents. The priorities are:

- Enhancing our quality of life and the environment we live in
- Promoting a thriving local economy
- Supporting communities to realise their potential
- Driving services through being businesslike, efficient and customer aware

1.2 In order to deliver against our priorities, we need to ensure that we minimise losses to fraud, corruption and bribery. For every pound we lose to these activities, there is a pound less we can spend on delivering our objectives. As a public service authority, we have a duty to ensure we promote effective stewardship and value for money in the use of our public funds. Fraud, corruption and bribery reduce the reputation, and confidence that can be placed in the Council and public service bodies generally.

1.3 Historically, the Council has relatively low levels of detected fraud activity in relation to its business operations. Where such activity has been identified, we have addressed this promptly and sought sanctions as appropriate. However, this does not mean that the Council is immune to future activity, and so it is important that this strategy makes clear our commitment to ensuring losses to fraud and corruption are minimised, enabling resources to be used for their intended purpose, which is to deliver quality services to the community in accordance with identified requirements.

1.4 The Bribery Act 2010 places an expectation that organisations will have appropriate and adequate procedures in place to minimise the risk of bribery occurring. This Strategy seeks to reduce this risk, and to outline the Council’s anti-bribery approach.

2. Objectives of the Strategy

2.1 The key objectives of this strategy are to:

- Increase staff and members awareness of the corporate counter fraud culture which the Council actively supports and encourage individuals to promptly report suspicious of fraudulent and corrupt behaviour.
- Communicate to partners, suppliers, contractors and other organisations that interact with the Council that it expects them to
maintain high standards aimed at minimising fraud and corruption in their dealings with the Council.

- Further embed and support the management of fraud risk within the Council.
- Demonstrate the arrangements that the Council has in place to counter fraud and corruption.
- Minimise the likelihood and extent of losses through fraud and corruption.

3. Statement of Intent / Policy Statement

3.1 South Norfolk Council is determined that the culture and tone of the organisation is one of honesty and opposition to fraud and corruption.

3.2 There is an expectation and requirement that all individuals and organisations associated in whatever capacity with the Council will act with integrity and that Council members and staff, at all levels, will lead by example in these matters.

3.3 The Council’s staff and elected members are an important element in its stance on fraud and corruption and they that are positively encouraged to raise any concerns which they may have on those issues where they are associated with the Council’s activity. They can do this in the knowledge that such concerns will be treated in confidence, properly investigated and fairly dealt with.

4. Definitions and Examples

4.1 CIPFA define fraud as “the intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain.”

4.2 With reference to corruption, CIPFA describes this as “the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person”.

4.4 We might usually term this as bribery – for example, if someone was to try to offer an incentive to ensure that a planning application was approved, or, conversely someone accepted or asked for something of material value from contractors, suppliers or persons in return for their being approved to provide services / goods to the Council.

4.5 The legal framework for fraud and corruption is defined by a number of acts. Primarily, the Fraud Act 2006 establishes a criminal liability for fraud through either false representation, failing to disclose information or abuse of position. Section 17 of the Theft Act 1968 creates an offence of destroying, defacing, concealing or falsifying any account, record or document made, or required, for any accounting purposes. The Bribery Act 2010 makes it an offence to attempt to bribe someone, or receive a bribe where that may result in improper discharge of a public function.

4.6 Examples of fraud and corruption are:
• Theft of Council property or services
• Evading liability for payment
• False accountancy, including the destruction, concealment or falsification of any account or record, or giving misleading, false or deceptive information
• Obtaining property by false pretences
• Misuse of office
• Bribery
• Working while on sick leave
• Falsifying time or mileage sheets, including flex time
• Selling Council equipment inappropriately
• Failure to declare an interest
• Fraudulent tendering process
• Fraudulent property letting
• Accepting any gift or consideration as an inducement for doing or refraining from doing anything in relation to Council business

5. Responsible Officers

5.1 There are many stakeholders who have roles and responsibilities in relation to fraud, corruption and bribery; these are noted in sections 8 through to 13.

5.2 In particular the Internal Audit Consortium Manager is responsible for reviewing and updating the Counter Fraud, Corruption and Bribery Strategy, along with -

Whilst the Deputy Monitoring Officer is responsible for making staff aware of the Strategy’s requirements through training and publicising initiatives.

5.3 Concerns can be raised in confidence and with the knowledge that they will be properly addressed, in line with the Whistleblowing Policy. If necessary, a route other than a line manager may be used, as follows:

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Email</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive</td>
<td>Sandra Dinneen</td>
<td><a href="mailto:sdinneen@s-norfolk.gov.uk">sdinneen@s-norfolk.gov.uk</a></td>
<td>01508 533603</td>
</tr>
<tr>
<td>Monitoring Officer / Deputy Chief Executive</td>
<td>Leah Mickleborough</td>
<td><a href="mailto:lmickleborough@s-norfolk.gov.uk">lmickleborough@s-norfolk.gov.uk</a></td>
<td>01508 533954</td>
</tr>
<tr>
<td></td>
<td>Andy Radford</td>
<td><a href="mailto:aradford@s-norfolk.gov.uk">aradford@s-norfolk.gov.uk</a></td>
<td>01508 533857</td>
</tr>
<tr>
<td>Deputy Monitoring Officer / Compliance and Risk Manager</td>
<td>Emma Goddard</td>
<td><a href="mailto:egoddard@s-norfolk.gov.uk">egoddard@s-norfolk.gov.uk</a></td>
<td>01508 533747</td>
</tr>
<tr>
<td></td>
<td>Leah Mickleborough</td>
<td><a href="mailto:lmickleborough@s-norfolk.gov.uk">lmickleborough@s-norfolk.gov.uk</a></td>
<td>01508 533954</td>
</tr>
<tr>
<td>Internal Audit Consortium Manager</td>
<td>Emma Hodds</td>
<td><a href="mailto:ehodds@s-norfolk.gov.uk">ehodds@s-norfolk.gov.uk</a></td>
<td>01508 533791</td>
</tr>
<tr>
<td></td>
<td>Sandra King</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
5.4 All concerns raised and the outcomes will be reported to the Finance, Resources, Audit and Governance Committee, by the Internal Audit Consortium Manager, annually in a form that does not endanger confidentiality. However, if no concerns are raised no report will be provided.

5.5 This strategy is to be reviewed at least every 3 years (or more frequently if required by changes to statutory legislation) and the following parties will be consulted prior to finalising and submitting the strategy to Cabinet for subsequent approval:

- Senior Council Officers
- Senior Leadership Team
- Finance, Resources, Audit and Governance Committee
- Joint Consultative Committee

5.6 On an annual basis the details of the responsible officers shall be reviewed by the Internal Audit Consortium Manager to ensure that details remain relevant and up to date. This review will not require re-endorsement of the strategy.

### PREVENTION AND DETERRENCE

#### 6. Corporate Framework

6.1 The Council has a number of policies, procedures and guidance that are designed to support this policy in countering, and preventing fraud occurring. These policies take account of legislation and expected standards in public life. Such documents include:

- The Codes of Conduct for Members and Employees;
- The Council Constitution;
- Disciplinary Procedures;
- Complaints Procedures;
- Whistleblowing Policy;
- Anti-Money Laundering Policy; and
- Housing and Council Tax Benefit Anti-Fraud and Corruption Policy;
- Housing and Council Tax Benefit Prosecution Policy; and,
- Register of Interests and Register of Gifts and Hospitality.

#### 7. Cultural Framework

7.1 The Council is determined to promote a culture of honesty, integrity and opposition to fraud, corruption and bribery. The prevention and detection of this is the responsibility of all. **To deliver this the Council will:**

- Accurately identify the risk of fraud
• Create and maintain a strong counter fraud culture
• Take action to deter, prevent and detect fraud, investigate and apply sanctions and seek redress where fraud is proven
• Record and report our outcomes annually (where appropriate) to the Finance, Resources, Audit and Governance Committee

7.2 To this end, the Council has adopted the Seven Principles of Public Life (the Nolan Principles) that encourage Council members and officers to operate with selflessness, integrity, objectivity, accountability, openness, honesty and leadership. Further details in respect of the principles are included within the Council’s Constitution and Code of Conduct for Members and Employees.

7.3 The Council has adopted a Whistleblowing Policy, which encourages employees, members and other parties to raise concerns, in the knowledge that they will not suffer victimisation, or harassment, as a result.

7.4 The Council endeavours to be open and transparent in the way that it conducts business and in making decisions. The Council’s Constitution outlines the decision making framework within the Council, and demonstrates where functions may be delegated. The Council has published details of all expenditure over £250 on its website, and will endeavour to meet all transparency requirements of Central Government. The Council has policies and procedures to respond to Freedom of Information Act requests.

7.5 Both Councillors and Employees ensure that they avoid situations where there is a potential for a conflict of interest. Such situations can arise with externalisation of services, internal tendering, planning and land issues, etc. Effective role separation will ensure decisions made are seen to be based upon impartial advice and avoid questions about improper disclosure of confidential information.

8. Members

8.1 All Councillors are expected to maintain high standards of Conduct when performing the public duties, and in particular to ensure compliance with the Nolan Principles of Standards in Public Life. The Monitoring Officer works with the Standards Committee to monitor standards of conduct and provide advice, guidance and training with both the legal requirements, and the Council’s own expectations.

8.2 Members are provided a copy of the Code of Conduct, advice and guidance on the declaration of interests, gifts and hospitality, and protocols on Member / Staff behaviour and involvement in planning and other judicial matters.

8.3 The Council’s Finance, Resources, Audit and Governance Committee is responsible for the oversight of the production and delivery of this strategy.

9. Employees

9.1 A successful counter fraud culture is one where acts of fraud, corruption and bribery are widely recognised as unacceptable behaviour and whistleblowing is perceived as a public-spirited action. The Council has put in place a
number of policies, procedures and other actions to promote an anti-fraud culture to the Council’s officers, as detailed in paragraph 6.1.

9.2 All officers must abide by the Council’s Code of Conduct for Employees, which sets out the Council’s requirement on personal conduct. Professionally qualified officers of the Council are also expected to follow any Code of Conduct or Ethics as required by their Professional Institute.

9.3 In particular the Chief Executive has overall responsibility for the Council’s Counter Fraud, Corruption and Bribery arrangements. Directors, Heads of Service and Service Managers support the Chief Executive in this role; they are responsible for the prevention and detection of theft, fraud, corruption and other irregularities within their area of responsibility. They are expected to:

- Identify, be familiar with and assess the types of risks and fraud or corruption that might occur within their area;
- Promote the Strategy, publicity and relevant training of staff and bodies they do business with;
- Be alert for any indication of fraud or corruption; and
- Be ready to take appropriate action in a timely way should there be a suspicion of theft, fraud or corruption.

The Director of Business Development Head of Finance has a statutory duty to report where a decision has been made that would involve expenditure, or a loss, which is unlawful. This officer will also ensure the Council has adequate resources in place for the provision of an Internal Audit Service that is able to provide an annual opinion on the quality of systems of internal control which inform the Council’s Annual Governance Statement.

The Senior Investigations and Enforcement Officer Corporate Fraud Team is responsible for Benefit Fraud and Corporate Fraud all areas of Housing and Council Tax Benefit Fraud, and in addition may be required to investigate fraud / corruption of a corporate nature.

9.3 The Council also has disciplinary procedures for all categories of employee. Any breach of conduct will be dealt with under these procedures and may result in dismissal.

9.4 Officers must comply with the Code of Conduct in respect of the declarations of interests, and in particular section 8 sets out that you must declare any financial or non-financial interests that could conflict with the Council’s interests, or could cause your conduct to be questioned.

10. Partners, Suppliers, Contractors and Other Organisations that the Council interacts with

10.1 The Council expects the highest standards from all organisations that have dealings with it. Any partners, suppliers, contractors and other third parties funded by or in receipt of payments from the Council are required to adopt or abide by Council policies, procedures, protocols, and codes of practice, where appropriate, in order to prevent and detect fraud.

10.2 All transactions with suppliers and other organisations will be entered into in line with the Council’s Contract Standing Orders. These make appropriate provisions for declaring interests and the circumstances where such
regulations may not apply, and rules regarding entering into contracts and verifying contract conditions. In addition, prior to entering into significant, ongoing transactions, Procurement Procedures require that appropriate due diligence checks are undertaken to ensure that suppliers have an appropriate financial and risk profile before transactions are entered into.

11. Members of the Public

11.1 Members of the public have an important role to alert the Council to any concerns about the potential for fraud, corruption or bribery that they may become aware of. They are encouraged to report their concerns, either through the Council’s complaint procedure or by contacting the officers, as noted.

12. Internal Control environment

12.1 The Council’s internal control environment plays a key role in ensuring that fraud can be prevented. Soundly designed systems, with adequate checks built in, minimise the opportunities for untoward activities. This could be through automated controls, or through management oversight of transaction activity.

12.2 Management retains responsibility for the oversight of the internal control environment within their specific service areas, internal and external inspections additionally play an important role in ensuring that operational arrangements are operating effectively.

For example, Internal Audit prepares a risk based audit plan each year, which is cognisant of those areas where historically, there has been the potential for fraud and corruption, and effectively provides for a work programme which encompasses those services and systems (financial and non financial) that are subject to the highest level of inherent risk.

In the course of completing audit assignments, Internal Audit will also separately identify fraud risks, determine what management control mechanisms have been put in place to address those risks and review their adequacy and effectiveness. Recommendations will be put forward aimed at strengthening systems of internal control which are designed to remove potential opportunities for fraud and corruption in the future. This also ensures that any concerns that External Audit may have with regards to the risk of misstatement due to fraud and error is both sufficiently addressed and appropriate recommendations made where necessary.

12.3 The Council also recognises that a key preventative measure against the possibility of fraud or corruption is to take effective steps at the recruitment stage to establish, as far as possible, the propriety and integrity of potential employees. This include temporary and contract staff. Agencies providing temporary staff should be required to confirm references have been obtained and validated.

The Council requires recruitment to be in accordance with the Council’s Recruitment Policy. Written references should be obtained and any relevant qualifications should be confirmed prior to appointment.
Once recruited, employees are subject to an induction process. Similarly, upon election, members are also required to complete an induction. As part of this induction, members and officers are encouraged to review the relevant Codes of Conduct, and familiarise themselves with the Whistleblowing Policy and this strategy.

13. Working with others – External Audit and National Fraud Initiative

13.1 External Audit are charged with ensuring that the Council is correctly reporting its arrangements in relation to counter fraud, corruption and bribery and where cases are uncovered involving sums in excess of £10,000 or of a particularly complex nature, these are being brought to its attention by Internal Audit. In the event that External Audit suspects a fraud, they will pass this over to Internal Audit for investigation, or in exceptional circumstances reserve the right to retain control over a fraud investigation.

13.2 Annually the Internal Audit Consortium Manager also provides a response to the External Auditors; “Internal Audit’s Views on the Risk of Fraud”. This provides information to assist the External Auditors in assessing the Council in relation to:

- Knowledge of any actual, suspected or alleged fraud affecting the Authority;
- Views about the risks of fraud at the Authority;
- Areas within the Council at greater risk of fraud;
- Procedures used by Internal Audit to detect fraud; and
- Management’s response to any findings as a result of these procedures.

13.3 The Council participates, wherever possible, with exercises specifically developed to ensure that opportunities to identify instances and risks of fraud and corruption are maximised. In this regard, the Council takes part in activities such as the National Fraud Initiative (NFI) and utilises data from the Housing Benefit Matching Service (HBMS), as well as being a member of the National Anti Fraud Network (NAFN) and being responsive to their bulletins and guidance.

13.4 The Council has also regularly embarked on a reviews of Single Person Discount, the first round of this was completed in 2012/13 and this has occurred annually since the second stage is due in 2013/14.

13.4 In addition, the Council seeks to work with partners and other stakeholders to make the best use of resources and exchange information (subject to provisions of the Data Protection Act and Human Rights Act) to minimise losses. Other partners include the Police, the Department for Work and Pension, the National Health Service and other local Council’s.

DETECTING AND INVESTIGATING

14. Detecting Fraud that has occurred
14.1 The Council has several measures in place designed to detect fraudulent activity.

14.2 Managing the risk of fraud, corruption and bribery is the responsibility of Corporate Directors, Heads of Service and Service Managers. Hence, the Council expects its Senior Managers to be vigilant regarding the possibility of fraud or corruption having occurred within their spheres of control. However, it is often the alertness of other employees, councillors or members of the public that enables detection to occur and appropriate action to take place.

14.3 Despite best efforts some fraudulent activity or corrupt acts will be discovered by chance, “tip off” or via a whistleblowing incident. The Council has developed appropriate arrangements to enable such matters to be handled through the Whistleblowing Policy.

14.4 Employees are required to by the Rules for Financial Governance to report any suspicion they have that fraud or corruption has taken place or may be about to take place. The Code of Conduct for Employees also advises them to report any aspect of the provision of service or behaviour of a colleague which might, if more widely known, bring the Council into disrepute.

14.5 In addition, participating in activities such as NFI and utilising data from HBMS more readily helps the Council to identify where fraud has potentially occurred. The work of Internal Audit, the Senior Investigations and Enforcement Officer Corporate Fraud Team, and the Council's External Auditors may lead to detection of fraud.

15. Investigative approach

15.1 The primary means of investigating frauds that have occurred to date has been through the Senior Investigations and Enforcement Officer Corporate Fraud Team, who is “trained in” Professionalism in Security (PINS) trained staff, and has have the necessary expertise to undertake investigations, and apply appropriate sanctions. This will apply to all benefits related fraud, and the majority of other “internal” frauds.

15.2 However, it is also recognised where there are situations where additional expertise may be required, or it may not be appropriate for the Corporate Fraud Team to undertake the investigation. There are provisions in the Internal Audit Service contract to engage Counter Fraud trained auditors, to work under the direction of the Internal Audit Consortium Manager, and in addition, the Internal Audit Consortium Manager Management Team can be involved in such special investigations. Appendix 1 provides the detailed processes that need to be followed.

15.3 The Monitoring Officer is responsible for monitoring and ensuring the investigation of Whistleblowing concerns received. Where such cases involve an instance of fraud and corruption, these will need to be jointly overseen by the Monitoring Officer and the Internal Audit Consortium Manager.

15.4 The Internal Audit Consortium Manager Deputy Monitoring Officer shall be responsible for the reporting of the outcomes of non-housing and council tax
support benefits fraud cases to Council members, through providing updates in response to any cases that arise.

SANCTIONS AND REDRESS

16. Taking action where necessary

16.1 Where it has been identified that fraud, corruption or bribery has occurred, the Council is committed to ensuring that all appropriate sanctions and courses of redress are undertaken.

16.2 Although the Council’s primary means of sanction and redress of employees is through the Disciplinary Procedure, and members may be investigated through the Standards Committee, this does not preclude the Council taking additional action.

16.3 The Council will seek to work with other parties, in particular the Police, wherever necessary or appropriate. Further, the Council has a PINS trained officers who may seek to pursue cases through to conviction, and the Council also has a public duty to seek financial redress, wherever feasible.
Investigative approach

1. Introduction

1.1 The purpose of the Council’s Fraud, Corruption and Bribery Investigative Approach is to set out the action to be taken when a fraud is suspected or discovered. This plan forms part of the Council’s overall approach to countering fraud and corruption.

1.2 Adhering to this will enable the Council to ensure that all incidents of fraud, corruption and bribery are handled in a consistent and responsible manner and the relevant responsibilities when responding to an incident are clear.

2. Reporting Concerns of Fraud, Corruption and Bribery

2.1 Anyone who has a concern that a potential incident of fraud, corruption or bribery has arisen should always attempt to raise these concerns at the earliest opportunity. The Council acknowledges that this can be a difficult and challenging act to do in some cases, and the Whistleblowing Policy has been established to provide those raising concerns with a safe avenue with which to do so. It also offers sources of advice and guidance that they may turn to.

2.2 The Whistleblowing Policy makes clear that the Council will always respect the confidentiality of those who raise a concern. Wherever possible, it encourages the whistleblower not to remain anonymous, and ensure that concerns are in writing to ensure that the facts of the situation are clarified.

2.3 Wherever the concern raised or identified relates to a matter of fraud, corruption and bribery (that is not housing and council tax support benefits fraud), it is important to ensure that the Internal Audit Consortium Manager is notified in order that they can ensure appropriate investigatory measures are undertaken. Wherever possible, and whilst respecting confidentiality, the Internal Audit Consortium Manager will work with other officers to ensure that the right people are kept informed of incidents; in particular, they may need to notify the Section 151 Officer and members of the Senior Leadership Corporate Management Team. The Monitoring Officer and the Internal Audit Consortium Manager should liaise to ensure that cases raised in respect of whistleblowing are appropriately addressed, and to ensure the Internal Audit Consortium Manager is aware of all issues that may impact upon delivery of the Annual Internal Audit Plan.

3. Reacting to reports of fraud, corruption and bribery

3.1 All reported cases will be handled in a fair and consistent manner. The Council will remain mindful of the legislative framework governing the investigation of concerns, in particular:

- Freedom of Information Act 2000
- Data Protection Act 1998
• Human Rights Act 1998
• Criminal Procedures and Investigations Act 1996
• Police and Criminal Evidence Act 1984

3.2 As the whistleblowing policy identifies, if someone raises a malicious allegation they know is untrue, then the Council will not investigate the case further. The Council will also endeavour to be sensitive to the alleged wrongdoers, to ensure minimisation of damage where subsequently, allegations cannot be substantiated.

3.3 Any investigations which involve potential fraud in relation to housing and council tax support benefits will be undertaken in line with the Senior Investigations and Enforcement Officer’s Corporate Fraud Team standard procedures, which follow guidance issued by the Department of Work and Pensions. The team will remain responsible for monitoring all statistics and the progression of cases in line with their standard framework. As such, the processes for the conduct of investigation set out below only relate to cases that are not of a benefits fraud nature.

4. Conducting Investigations

4.1 The Internal Audit Consortium Manager is responsible for overseeing the progress of fraud, corruption and bribery investigations to ensure they are undertaken in a consistent and appropriate manner, and undertaken in line with legisatory requirements and agreed procedures. If the concern directly affects the Internal Audit Consortium Manager, this role will be adopted by the Section 151 Officer.

4.2 The Internal Audit Consortium Manager will also remain responsible for liaising with Service / Directorate management as to the incident raised and the progression of the investigation. Should disputes arise during the course of an investigation, these will be referred to the Deputy Chief Executive Director of Business Development (and, if necessary, the Chief Executive) to assist resolution.

4.3 A number of options will be considered when determining who will be responsible for undertaking investigative work but for the most part, the Senior Investigations and Enforcement Officer Corporate Fraud Team will be called upon to perform this work, unless the investigation directly affects an officer within that team, or it is deemed that additional expertise is required to undertake the review. If necessary, external investigators (e.g. forensic auditors) may be appointed to undertake the investigation.

4.4 At the commencement of any investigation, the Internal Audit Consortium Manager will agree the method and terms of reference for the investigation. Although it is acknowledged that flexibility will be required depending on the nature of the case, it is expected that the following will need to be considered:
• Who will conduct the investigation
• The arrangements for collecting and documenting evidence
• Estimated time span for the investigation
• Consideration of direct referral to / liaison with other authorities (e.g. Police)
• Agreeing the mechanism for reporting progress and the final outcomes

• Liaison with the Human Resources and Organisational Development (HR & OD) Manager over potential suspension / transfer / disciplinary action with regards alleged wrongdoers

4.5 Where it is deemed necessary to refer cases to the police, careful consideration will be given as to whether to proceed with internal investigation. However, it is expected that all staff, members and third parties will be expected to comply with both internal and police investigations as appropriate, and wherever possible Council and police enquiries will be co-ordinated to maximise their effectiveness.

4.6 Upon completion of any investigation, it is expected that a report will be produced highlighting the main findings. The report will be shared with the Internal Audit Consortium Manager, who will then be responsible for identifying the further necessary action in line with other appropriate officers (e.g. liaison with the Human Resources and OD Manager if disciplinary action is required, or referral to the Section 151 Officer where inappropriate spending has been identified). Where it has been found that fraud or corruption has occurred, then a summary of the findings will be presented to the Senior Leadership Corporate Management Team. Where fraud or corruption could not be proven, the findings will only be shared with those who have a genuine and legitimate need to know.

4.7 The Internal Audit Consortium Manager will also keep the person raising the concern informed of the progress of the investigation, however will not necessarily be able to share either the report or the conclusions of the investigation. Where this relates to a whistleblowing case, the Internal Audit Consortium Manager will continue to work with the Monitoring Officer in this regard.

4.8 It is the responsibility of management to ensure that any losses arising from an investigation are recovered, provided that there are reasonable grounds for doing so. There are various methods of recovery the Council can utilise, for example recovery from the perpetrator, through the Council’s insurers, or through legal proceedings.

5. General Processes

5.1 This investigative approach will be available to staff and members through the Council’s intranet. It is acknowledged that circumstances may dictate further updates to the plan, and as such any changes can be made subject to agreement with the Deputy Chief Executive Director of Business Development, Internal Audit Consortium Manager and Human Resources and OD Manager.

5.2 The Internal Audit Consortium Manager will remain responsible for ensuring that records in respect of fraud cases are appropriately maintained, and, in line with guidance issued by The National Archives, records relating to proven frauds will be maintained for at least 6 years.
## Corporate Counter Fraud Awareness Action Plan

<table>
<thead>
<tr>
<th><strong>Aim</strong></th>
<th><strong>Actions</strong></th>
<th><strong>Outcome</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>In the short term to maintain a specialist fraud investigative team and to investigate the future provision for fraud in light of the Single Fraud Investigation Service. Following the establishment of the Single Fraud Investigation Service the Council has maintained a specialist fraud resource.</td>
<td>We have a dedicated Senior Investigations and Enforcement OfficerCorporate Fraud Team working to counter fraud on a daily basis. All audit staff are trained to prevent and detect fraud, as part of their professional studies. Investigate the future provisions that are available for the Corporate fraud provision.</td>
<td>Targeted, consistent fraud resources, to identify, professionally investigate and deter fraud.</td>
</tr>
<tr>
<td>To measure exposure to fraud risk and address fraud risks identified.</td>
<td>There is a corporate risk register and relevant fraud risks are recorded therein. There is also national data available though the National Fraud Initiative which is analysed periodically, data from the Housing Benefit Matching Service, information from National Anti Fraud Network and information sharing with External Audit.</td>
<td>A record of potential fraud risks and a record of these are mitigated and monitored.</td>
</tr>
<tr>
<td>To undertake validation / verification checks on areas at risk of fraud.</td>
<td>These are identified as part of the annual audit planning process and also during each audit. These will be tested to gain assurance that fraud risks are appropriately mitigated.</td>
<td>A Council that is pro-active in mitigating the risk of fraud.</td>
</tr>
<tr>
<td>To increase internal fraud awareness</td>
<td>We will increase the awareness of fraud among employees through:</td>
<td>A counter fraud and corruption culture.</td>
</tr>
</tbody>
</table>
| | • Targeted fraud awareness training for key teams and staff in high fraud risks areas;  
| | • General fraud training for all staff and members;  
| | • Consideration of other publicity methods i.e. counter fraud item in Council’s magazine, counter fraud newsletter, counter fraud pages on the Intranet.  
| | • Regular promotion of the Whistleblowing Policy and ways staff can report concerns;  
| | • This Strategy and the Whistleblowing Policy being accessible to staff through the Intranet. | Staff are alert to the risk, and indicators, of fraud.  
| | | Staff know when and how to report fraud concerns.  
| | | Fraudsters are deterred from committing fraud. |
SOUTH NORTHERN COUNCIL

ANTI-MONEY LAUNDERING POLICY

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- Money Laundering Report Form
- Money Laundering Disclosure Form – to be completed by the Money Laundering Reporting Officer
- Customer Due Diligence Form – Private Individual
- Customer Due Diligence Form – Business

Effective Date – 18 January 2016

This Policy will be subject to regular review with any significant variations leading to re-presentation of the Policy.

Version 1 – 6 December 2010
Version 2 – 18 January 2016
INTRODUCTION

1. Context

1.1 This Policy, and the accompanying procedures and reporting forms, represents an important part of the Council’s approach to dealing with the risk of fraud and corruption, and thus this Policy seeks to complement the Corporate Counter Fraud and Corruption Strategy and Whistleblowing Policy and contribute to the overall framework of Corporate Governance established to ensure that the Council is well managed and fulfils its statutory and regulatory duties in a proper and responsible manner.

2. Purpose and Rationale

2.1 The risks to the Council of contravening money laundering legislation are relatively low and some aspects of the legal and regulatory requirements do not apply to public authorities. However, it is recognised that the Council is not completely immune from the risks surrounding money laundering. For this reason, the purpose of the Anti-Money Laundering Policy is to clearly demonstrate that the Council embraces the underlying principles of money laundering legislation and is taking reasonable steps to minimise the likelihood of such activities occurring, by developing a suitable framework of arrangements to safeguard itself against action of this nature, whilst making satisfactory provisions to achieve compliance with to legal and regulatory requirements, where appropriate.

3. Scope of the Policy

3.1 This Policy applies to all employees of the Council and aims to prevent criminal activity through money laundering. It is extremely important that all employees are familiar with their legal responsibilities and are vigilant at all times: serious criminal sanctions may be imposed for breaches of the legislation. The key requirement on employees is to promptly report any suspected money laundering activity to the Money Laundering Reporting Officer (MLRO).

3.2 Failure by any employee to comply with the procedures set out in this Policy may lead to disciplinary action being taken against them. Any disciplinary action will be deal with in accordance with South Norfolk Council’s Disciplinary Policy and Procedure.

4. What is Money Laundering?

4.1 Money laundering is a term designed to cover a number of offences. These offences may relate to the improper handling of funds that are the proceeds of criminal acts, or terrorist acts, so that they appear to come from a legitimate source. There are six main offences that may be committed under money laundering legislation, as established by the Proceeds of Crime Act 2002, as amended by the Serious Organised Crime and Police Act 2005.
• Concealing, disguising, converting, transferring or removing criminal property from anywhere within Great Britain and Northern Ireland;

• Being concerned in an arrangement which a person knows or suspects facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person;

• Acquiring, using or possessing criminal property;

• Doing something that might prejudice an investigation – for example, falsifying a document;

• Failing to disclose information relating to any of the above money laundering offences; and,

• “Tipping off” – informing someone who is, or is suspected of being involved in money laundering activities, in such a way as to reduce the likelihood of their being investigated.

These money laundering offences may be committed by an organisation or by individuals working for an organisation.

4.2 ‘Criminal property’ has a relatively broad definition in money laundering legislation and no financial ceiling has been specified, above which organisations are obliged to take action when money laundering activities are suspected. Benefiting from ‘criminal property’ can work on two levels, an individual benefiting financially from the proceeds of a crime they have committed themselves, or an individual benefiting from the proceeds of a crime/dishonest activities perpetrated by someone else. No matter how large or small the sum of money involved in these dishonest activities, the full weight of the money laundering legislation and regulations will apply regardless of the financial sums identified.

5. The Legal and Regulatory Framework and the Obligations that it places on the Council

5.1 There are t main laws and regulations which set out the money laundering regulations:


• The Terrorism Act 2000 (amended by the Anti-Terrorism and Security Act 2001 and Terrorism Act 2006, and further amended by the Mooney Laundering Regulations 2007)

• The Money Laundering Regulations 2007 (which supersede the Money Laundering Regulations 2003, and were further amended by the Money Laundering Regulations 2015).

5.2 Under the Terrorism Act 2000, all individuals and businesses in the UK have an obligation to report knowledge, reasonable grounds for belief or suspicion about the proceeds from, or finance likely to be used for terrorism or its laundering, where it relates to information that comes to them in the course of their business or employment.
5.3 The 2007 Money Laundering Regulations establish that as long as businesses are not operating within the “regulated sector”, then the offences of failing to disclose suspicions of money laundering, and tipping off, do not apply. The list of businesses within the regulated sector does not include local authorities, and as such these offences do not apply to the Council. Furthermore, the 2003 Money Laundering Regulations, which preceded the 2007 regulations, made organisations responsible for undertaking “relevant business” to have appropriate systems in place for the reporting of money laundering, staff training, and identifying and keeping records of money laundering.

5.4 The Chartered Institute of Public Finance and Accountancy (CIPFA) has issued guidance on how legal and regulatory provisions impact on public authorities. The latest information to be produced on the subject was circulated in 2009 and this has been taken into account when drawing up the Policy. CIPFA has now confirmed that local authorities were not a “relevant business” in terms of the 2003 Money Laundering Regulations, and thus were not required to have systems in place to identify, record and report money laundering. Moreover, the guidance provided in 2009 has additionally confirmed that public authorities are not legally obliged to apply the provisions of the Money Laundering Regulations 2007.

5.5 However, CIPFA has also advised that ‘it is prudent and responsible practice for public service organisations, including those outside the scope of the regulations, to put in place appropriate and proportionate anti-money laundering safeguards and reporting arrangements, designed to enable them to detect and avoid involvement in the crimes described in the legislation and regulations.’ CIPFA guidance further emphasises that there could be a “substantial reputational risk for an authority which does not have such procedures in place”.

5.6 This Policy and the working practices aligned to it have thus been designed to address the risk the Council may face if it does not properly address the potential for money laundering. As a responsible authority, we need to be mindful that a money laundering offence could be committed by an employee, or the Council could be a victim of such an offence.

THE COUNCIL’S RESPONSE

6. The Money Laundering Reporting Officer

6.1 The Council has nominated the Senior Investigation and Enforcement Officer Monitoring Officer as the Money Laundering Reporting Officer (MLRO). Their contact details are as follows:

Bob Harvey
Senior Investigation and Enforcement Officer
South Norfolk Council
Swan Lane
Long Stratton
Norfolk
NR15 2XE
Telephone: 01508 533900
E-mail: rharvey@s-norfolk.gov.uk
In the absence of the MLRO, the Internal Audit Consortium Manager and / or the Monitoring Officer are authorised to deputise for him and can be contact at the above address or as follows:

Internal Audit Consortium Manager
ehodds@s-norfolk.gov.uk
01508 533791

Monitoring Officer
Imickleborough@s-norfolk.gov.uk
01508 533954

Mr. Stuart Shortman, the Solicitor to the Council is authorised to deputise for him and can be contacted at the above address or on:
Telephone: 01508 533671
E-mail: sshortman@s-norfolk.gov.uk

7. Reporting to the Money Laundering Reporting Officer (MLRO)

7.1 The primary duty of any employee, member or third party under this Policy is to ensure that any suspicions or concerns that money laundering has occurred, or is likely to occur, should be reported to the MLRO as soon as the suspicion arises. It is essential that an employee comes forward as soon as practical to the MLRO. The disclosure should be within 'hours' of a suspicious activity coming to an individual officer’s attention, rather than several days or weeks later. **Should this not be done, the employee may be liable to prosecution.** To support the above process, Appendix 1 provides information on the types of activities where the Council may be subject to money laundering offences and guidance to staff on situations where money laundering activities could occur.

7.2 Suspicions can be raised through direct contact with the MLRO, however it is preferable to use the reporting form which has been developed at Appendix 2, and e-mail the completed form to the MLRO.

7.3 The employee, member or third party should not make any further enquiries into the matter themselves, and any further action must be with the approval of the MLRO. Those who have raised a concern should ensure that they do not then voice their suspicions to the suspect and in so doing, tip them off to the concern.

7.4 The MLRO is required to promptly evaluate any concerns/disclosures raised and determine whether they require further investigation and hence referral to the National Crime Agency (NCA), using the reporting forms included at Appendix 2. The MLRO should not undertake investigation of any concerns themselves. Where legal professional privilege may apply, the MLRO must liaise with the Solicitor of the Council to determine the further action to be taken.

7.5 In some cases, it may be necessary to seek approval from NCA before the Council can undertake any further activity in respect of the transaction. Where the MLRO has made such a referral to NCA, they will notify the person raising the concern, and again inform the individual when NCA has provided permission for the transaction to proceed.
7.6 If a request for consent has been made to NCA, no action should occur for a period of 7 days or until NCA gives consent. If this results in a transaction having to be deferred or delayed, it should be carefully handled to ensure that the customer is not tipped off as to the money laundering concern.

7.7 After 7 days, if NCA does not notify otherwise, they are deemed to have given consent to the transaction. If NCA instead notifies they refuse to give consent, a moratorium period of 31 days starts on the day the Council receives the refusal notice. During this period, the Council cannot proceed with the matter for which the consent was applied. At the expiry of the moratorium period, NCA is deemed to have consented to the request and the Council can proceed.

7.8 The MLRO should retain the details of any referrals made, including correspondence with the necessary bodies, using the forms included in Appendix 2. All information should be retained for a minimum of 6 years.

7.9 To ensure the Council minimises the risk of tipping off, and to minimise any reputational damage should the suspicion be unfounded, the confidentiality of the matter will be respected at all times; the MLRO will only inform anyone of the suspicion where there is a genuine business need.

8 Customer Due Diligence

8.1 The Council does undertake activities that may be considered, under the Money Laundering Regulations, to be regulated, however it does not undertake these activities by way of business, and therefore would not normally be expected to undertake due diligence in respect of any clients to whom it provides these services. The types of activities that are regulated are, for example, tax services, treasury services, financial and accounting services, audit services, estate functions, assisting the formation, operation or arrangement of a company or trust, and dealing in goods with a cash payment of more than €15,000.

8.2 However, it is good practice that wherever the Council does enter into such activities with a third party then due diligence checks should be actioned before the establishment of a relationship/transaction with the third party. Anyone entering into such transactions should refer these to the MLRO to undertake due diligence checks.

8.3 Undertaking customer due diligence checks can take a number of forms. HM Revenues and Customs The Office of Fair Trading has issued “core guidance” in this area. Consideration should be given to taking one or more of the following, where applicable:

- Confirming the identity of the client via documentation, data or information obtained from a reliable and independent source, e.g. passport, and/or position within an organisation, where appropriate.
- Obtaining confirmation from Companies House as to the registration details of the Company and details of the Company business.
- Seeking electronic verification, e.g. performing credit checks.
- Obtaining confirmation to regulated industries bodies (e.g. in the case of accountants, checking to CCAB certified bodies).
- Requesting copies of financial statements.
• Requesting details of interests and beneficial ownerships – with reference to the latter this is any individual who holds more than 25% of the shares, voting rights or interest in a company, partnership or trust.
• Obtaining information on the purpose and intended nature of the business relationship.

8.4 Any checks undertaken should remain proportionate to the risks of the individual business and the relationship. Additional checking may need to be performed if the person is not physically present to be identified, or they are politically exposed, by virtue of holding a prominent public function. Details of such checks should be recorded on the reporting forms in Appendix 2 and retained for a minimum of 6 years, with an electronic copy of every customer due diligence record being retained by the MLRO to meet the requirements of the regulations and in case of inspection by the relevant supervising body.

8.5 There is also now an ongoing legal obligation to check the identity of existing clients and the nature and purpose of the business relationship with them at appropriate times. One option to review these matters might be to do so as part of the ongoing monitoring of the business arrangements, as is usually provided for in the Terms of Business Letter, Service Level Agreement or other written record, as well as scrutinising transactions as they occur, paying particular attention to complex or unusually large transactions, unusual patterns of transactions and/or unexpected transactions, etc.

9 Training

9.1 The Council will take appropriate measures to ensure that all employees are made aware of the law relating to money laundering and will arrange targeted, ongoing training to key individuals most likely to be affected by the legislation.

10. Further Information

10.1 Further information can be obtained from the MLRO and the following sources:

- [www.NCA.gov.uk](http://www.NCA.gov.uk) – website of the National Crime Agency;
- Money Laundering Guidance at [www.lawsociety.org.uk](http://www.lawsociety.org.uk);

11. Review of the Policy

11.1 The Policy will be reviewed at least every 3 years by the Senior Investigations and Enforcement Officer, with the Internal Audit Consortium Manager (or more frequently if required by changes to statutory legislation), and the
following parties will be consulted prior to finalising and submitting the Policy to Cabinet for subsequent approval:

- Senior Council Officers responsible for receiving suspicions of money laundering activities
- The Corporate Management Senior Leadership Team
- Finance, Resources, Audit and Governance Committee
- Joint Consultative Committee
- The Accounts and Audit Committee

11.2 On an annual basis, Section 6 of the Policy, which provides details of the key parties responsible for money laundering reporting activities, shall be reviewed by the Money Laundering Reporting Officer and the Head of Internal Audit Consortium Manager to ensure that details remain relevant and up-to-date. This review will not require re-endorsement of the Policy.

11.3 These officers are also responsible for making staff aware of the Policy’s requirements through training and publicising initiatives.
Appendix 1

How the Council may be exposed to Money Laundering

1. Guidelines to staff and members on concerns or suspicions

1.1 If you do have any suspicions or concerns about an individual or transaction then it is always better to raise those concerns appropriately. If necessary, you may wish to use the Council’s Whistleblowing Policy for further support and guidance on how to raise a concern. Conversely, if in doubt, seek advice from the MLRO.

1.2 Although some offences and suspicions may be fairly apparent, some can be more difficult to identify. The simple guidance is to be vigilant, and not be afraid to question something if you don’t think it looks right. If you think something looks suspicious, then the probability is someone else may also think the same. It is better for the Council to be safe when handling public money – it would not reflect well on the Council's reputation if it was found we had taken monies that were obtained through theft, drug trafficking, terrorism, etc.

1.3 It is recognised that a lot of the Council’s activities are sensitive in nature, and in cases what, to some people, may be suspicious or concerning behaviour, from a money laundering perspective may not necessarily be in line with the activity occurring. However, people should always be mindful of genuine concern and suspicion.

2. The types of activities that may be affected

2.1 The following table sets out the types of activities that might be suspicious, and how the Council may come across those activities. It is not intended to be exhaustive, and just because something you are suspicious about is not on the list, it doesn’t mean you shouldn’t report it.

<table>
<thead>
<tr>
<th>Activity</th>
<th>The types of activity that may be affected</th>
</tr>
</thead>
</table>
| New customers with high value transactions | • Selling property to individuals or businesses  
• Renting out property to individuals or businesses  
• Entering into other lease agreements  
• Undertaking services for other organisations |
| Secretive clients | • Housing benefit claimants who have sums of money entering into / out of their bank account (even if we do not award them benefit, we should still consider money laundering implications)  
• People buying or renting property from the Council who may not want to say what it is for  
• People receiving grant funding who refuse to demonstrate what funding was used for |
| Customers who we think are acting dishonestly or illegally | • People paying for Council services who do not provide details about themselves  
• People making odd or unusual requests for payment arrangements. |
| **Illogical transactions** | • People paying in cash then requesting refunds in the event of sizeable overpayments made  
• Requests for the Council to pay seemingly unconnected third parties in respect of goods / services provided to the Council  
• Requests for the Council to pay in foreign currencies for no apparent reasons |
| **Payments of substantial sums by cash** | • Large debt arrears paid in cash  
• Refunding overpayments  
• Deposits / payments for property |
| **Movement of funds overseas** | • Requests to pay monies overseas, potentially for “tax purposes” |
| **Cancellation of earlier transactions** | • Third party “refunds” grant payment as no longer needed / used  
• No payment demanded even though good / service has been provided  
• Sudden and unexpected termination of lease agreements |
| **Requests for client account details outside normal course of business** | • Queries from other companies regarding legitimacy of customers  
• Council receiving correspondence / information on behalf of other companies |
| **Extensive and over-complicated client business structures / arrangements** | • Requests to pay third parties in respect of goods / services  
• Receipt of business payments (rent, business rates) in settlement from seemingly unconnected third parties |
| **Poor accounting records and internal financial control** | • Requests for grant funding / business support indicates third party not supported by financial information  
• Companies tendering for contracts unable to provide proper financial information / information provided raises concerns |
| **Unusual property investments or transactions** | • Requests to purchase Council assets / land with no apparent purpose  
• Requests to rent Council property with no apparent business motive |
| **Overcomplicated legal arrangements / multiple solicitors** | • Property transactions where the Council is dealing with several different parties  
• Property transactions where funds are received for deposits or prior completion from an unexpected source or where instructions for settlement of funds to be paid to unexpected destination. |
MONEY LAUNDERING REPORT FORM

Employee Details

Name _______________________________________________________

Directorate and Team __________________________________________

Date Reported ________________________________________________

Contact details ________________________________________________

Offence Details

Give full details of the name (s) and address (es) of person(s) / company (s) / public body (s) / Directorship (s) involved.

_________________________________________________________________

_________________________________________________________________

Nature, value and timing of the activity involved – please include full details of what has happened, is on-going or imminently due to happen, where and how it has arisen and the amount of money/assets involved. Why exactly are you suspicious? Please continue on another sheet if necessary.

_________________________________________________________________

Investigations – has any investigation already occurred, as far as you are aware? If so, please detail below
Discussions – have you discussed your suspicions with anyone – including any advisory bodies? Please identify who you have contacted and why such discussions were necessary.

Disclosure – is there any reason why you believe this should not be disclosed to the National Crime Agency (NCA).

Further Information – if there is any further information you believe to be relevant, please include here:
Signed

Date

Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described.

This form, upon completion, should be forwarded to the MLRO
MONEY LAUNDERING DISCLOSURE FORM – TO BE COMPLETED BY THE MONEY LAUNDERING REPORTING OFFICER

Date of Money Laundering Report Form being received ______________________

Date when acknowledged receipt of Money Laundering Report Form ____________

Report Form related to:

______________________________________________________________

Report Form completed by: _______________________________________

Officer contact details: ___________________________________________

Action taken to review Report Form


Findings of review


Are there reasonable grounds for suspecting money laundering activity? If yes, please give details.


157
If there are reasonable grounds for suspicion, will a report be made to NCA? If no, please explain reasons for non-disclosure.

If yes, please complete the following details

Date or report to NCA:

Details of liaison with NCA regarding the report:

Notice period:

Moratorium period:

Is consent required from NCA? Has consent been received?

Date consent given by MLRO to employee for Council to proceed with the transaction

Version 1 – 6 December 2010
Version 2 – 18 January 2016
Date consent given by MLRO to employee for any prohibited act transactions to proceed:

________________________________________

Other relevant information

Signed _______________________________________________________
Name ________________________________________________________
Date _________________________________________________________
CUSTOMER DUE DILIGENCE FORM – PRIVATE INDIVIDUAL (TO BE COMPLETED BY MONEY LAUNDERING REPORTING OFFICER)

Officer referring customer ____________________________________________

Contact details for officer ____________________________________________

Name of individual __________________________________________________

Address
___________________________________________________________________
___________________________________________________________________
___________________________________________________________________

Date of Birth ______________________________________________________

Telephone number _________________________________________________

E-mail address _____________________________________________________

Summary of Transactions and role of the individual
___________________________________________________________________

Evidence of Identity obtained: (photocopies of all evidence should be attached to this form)
___________________________________________________________________

Face to Face Contact? Yes / No

Is the Client Politically Exposed? Yes / No

Is the transaction by nature high risk? Yes / No

Is further enhanced verification required (if yes to any of the above three questions, enhanced verification is required): Yes / No
If enhanced verification required, please detail all checks performed:

Signed ________________________________
Date ________________________________
CUSTOMER DUE DILIGENCE FORM – BUSINESS (TO BE COMPLETED BY MONEY LAUNDERING REPORTING OFFICER)

Officer referring customer ______________________________________________________________

Contact details for officer ____________________________________________________________

Name of business ________________________________________________________________

Purpose of business ______________________________________________________________

Companies House Registration Number ________________________________________________

Registered business address
------------------------------------------------------------------------

Telephone number ____________________________________________________________

E-mail address ________________________________________________________________

Type of organisation (PLC, LLC, Sole trader etc) ________________________________

Who are the Companies Directors – are there any beneficial owners (i.e. any person / company who owns more than 25% of the company in question)

Date of first contact with Company _______________________________________________

Nature of transaction with company

Please attach details of all checks undertaken to verify the evidence of this company.

Signed ________________________________________________________________

Date ________________________________________________________________
### CABINET CORE AGENDA 2016

<table>
<thead>
<tr>
<th>Date</th>
<th>Key, Policy, Operational</th>
<th>Key Decision/Item</th>
<th>Lead Officer</th>
<th>Cabinet Member</th>
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<td>O</td>
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<td>J Munson</td>
<td>J Fuller</td>
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<td>Whistleblowing Policy, Counter Fraud, Corruption and Bribery Strategy, and Anti-Money Laundering Policy</td>
<td>E Hodds</td>
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<td>Performance/Risks/Revenue Budget Q 3</td>
<td>A Mewes/ E Goddard / M Fernandez-Graham</td>
<td>M Edney</td>
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<td>O</td>
<td>Capital and Treasury Management Report Q3</td>
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<td>Budget Consultation</td>
<td>M Fernandez-Graham</td>
<td>M Edney</td>
</tr>
<tr>
<td></td>
<td>K</td>
<td>Treasury Management Strategy 16/17</td>
<td>M Fernandez-Graham</td>
<td>M Edney</td>
</tr>
<tr>
<td></td>
<td>K</td>
<td>Revenue Budget and Council Tax 2016/17</td>
<td>M Fernandez-Graham</td>
<td>M Edney</td>
</tr>
<tr>
<td></td>
<td>K</td>
<td>Capital Programme 2016-2021</td>
<td>M Fernandez-Graham</td>
<td>M Edney</td>
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<tr>
<td></td>
<td>O</td>
<td>Consultation on proposed Changes to National Planning Policy</td>
<td>A Nicholls</td>
<td>J Fuller</td>
</tr>
<tr>
<td></td>
<td>O</td>
<td>Business Plans 2016-17</td>
<td>A Mewes</td>
<td>J Fuller</td>
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<td>Better Broadband for Norfolk – Superfast Extension Programme</td>
<td>J Munson</td>
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<td>Procurement Consortium</td>
<td>L Mickleborough</td>
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**FURTHER INFORMATION**

Key decisions are those which result in income, expenditure or savings with a gross full year effect of £100,000 or 10% of the Council’s net portfolio budget whichever is the greater which has not been included in the relevant portfolio budget, or are significant (e.g. in environmental, physical, social or economic) in terms of its effect on the communities living or working in an area comprising two or more electoral divisions in the area of the local authority.