

-A: Assessing the opportunities provided by a potential source of external grant funding, and the risks arising from the funding conditions and acting as accountable body.

Objectives

- Maximise funding for the benefit of the council and its citizens in accordance with the council's priorities as identified and agreed by its elected representatives on the council.
- Deploy the available funding effectively.
- Pursue the council's objectives within the area(s) subject to additional funding without destabilising or jeopardising other higher priorities.
- Deliver the outputs and outcomes that are being funded in accordance with the council's obligations.

Council Response (December 2015)

1 - All future material funding opportunities to include a business case assessed on, amongst other things: financial, legal, contribution to corporate priorities and reputation

2 - All material opportunities to be endorsed by the Council's 3 statutory officers, management team and members before any funding is sought.

Risks	Expected controls	Progress Report	Status
A:1 Funding opportunities are available but not identified, or the council does not respond, because officers lack the time or expertise to identify opportunities or	A:1:1 Senior members of staff with the time, knowledge and interest regularly assess developments in their professional areas and consider	This is a core competence of senior managers and will be incorporated into the generic elements of job descriptions currently being reviewed as part of the wider organisational review.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
to consider how they may effectively support the council's objectives.	how the council may respond effectively.		
A:2 The implications of the potential funding stream on the council's other priorities are not identified because sufficient time and resources at the right level are not available. The council's resources are therefore redirected into work it would not otherwise have prioritised and other objectives are destabilised.	A:2:1 The right individuals are involved at the outset and at key decision points to analyse the nature of the programme, and its potential impact on the council's agreed objectives.	All material projects are brought before the senior management team for assessment. The SMT will formally define the parameters which make a project a material project, potentially using something similar to the Council's risk Matrix and therefore to be included in the Performance Management Framework	In Place Awaiting Further action
	A:2:2 A critical analysis is prepared of the potential programme against the council's key objectives by the council's senior officers, on the basis of a full understanding of its implications and the council's capacity to deliver its intended	All material projects are measured against the council's key priorities (and risks) either at SMT or in reports to Members.	Awaiting Further Action

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>outputs and outcomes.</p> <p>A:2:3 Sufficient time is allocated to consider the operational and financial risks, and officers make considered rather than rushed assessments.</p>	<p>All material projects will be given careful due consideration either at SMT or Committee.</p>	<p>In Place</p>
<p>A:3 The financial risks and potential liabilities associated with the funding are not assessed because sufficient time and resources at the right level are not available or involved at a sufficiently early stage.</p>	<p>A:3:1 The right individuals are involved at the outset, including senior finance officers, to assess the likely overall financial impact on the council: its costs and benefits, opportunities and risks.</p>	<p>All material projects are brought before the senior management team for assessment (as A:2:1).as supported by the relevant Portfolio Holder</p>	<p>In Place</p>
<p>A:4 The funder is insufficiently explicit about its requirements, resulting in differing expectations of what will be provided and the requirements that must be met.</p>	<p>A:4:1 There is a clear assessment of the funding scheme within the council, and explicit, formal, agreement between the council and funder before significant financial</p>	<p>All such funding agreements are considered and signed off by the Monitoring Officer. All such arrangements go through the Council's Scheme of Delegation process or via Members, both routes involving input and comment from Statutory officers.</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	liabilities are incurred.		
	A:4:2 The objectives of the programme are clearly set out and included in the council's planning.	All such projects are standing items within the SMT meetings for consideration at each meeting	In Place
A:5 The funder's priorities, deadlines and/ or delays drive the council to act precipitately, without due process or consideration.	A:5:1 The council's officers are sufficiently aware of the council's procedures and the need to act in a considered manner that they are not unduly pressured by any external organisation.	The SMT reporting (or reporting to Members) and the continual consideration of Council priorities ensures that this not occur. The SMT take steps to ensure that the wider organisation is aware of policies, procedures and expected behaviours through training, daily messaging, team briefs etc. Knowledge of such procedures, policies and behaviours will be scrutinised and evaluated via regular supervision and staff surveys.(latest survey closing date 17/06/16)	Awaiting Further Action
	A:5:2 Officers are realistic about what can be properly achieved in the available time and are prepared to renegotiate what can be delivered, even at the expense of reduced funding, if	The SMT reporting (or reporting to Members) and the continual consideration of Council priorities will ensure that this not occur. (as A:5:1)	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rosendale Borough Council

Risks	Expected controls	Progress Report	Status
	necessary.		
	A:5:3 Senior officers are committed to supporting both good governance and the council's more junior officers, and accept that proper process must be followed, even in the face of external pressure.	The SMT reporting (or reporting to Members) and the continual consideration of Council priorities will ensure that this not occur. (as A:5:1 &2)	In Place
A:6 The council fails to claim the funds that are due in full because it lacks understanding of the funds available, or because it is unable to demonstrate its compliance with funding requirements.	A:6:1 Officers assess and understand the funder's requirements, in particular its grant funding claim process, and establish effective arrangements to meet them.	This is a core competence of senior managers and will be incorporated into the generic elements of job descriptions currently being reviewed as part of the wider organisational review. (see A:1:1)	In Place
A:7 The costs incurred on the programme are not covered by the funding because that the council operates beyond the limits of its own geographical area, and this is not agreed by the	A:7:1 In negotiating the funding with the external funder, the council's senior officers make it clear which organisations and which geographical area	This is a core competence of senior managers and will be incorporated into the generic elements of job descriptions currently being reviewed as part of the wider organisational review. (see A:1:1)	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
funding body.	they represent.		
	A:7:2 The funding agreement clearly acknowledges the scope of the work being funded.	This area is understood as part of the Monitoring officers due diligence before signing any funding agreement.	In Place

B: Designing and implementing a programme to achieve the council's objectives.

Objectives

- Align any proposed new programme with the council's current objectives and programmes so that these are not jeopardised and to achieve overall economy, efficiency and effectiveness in the use of the council's resources.
- Design a programme that uses the council's own resources and accesses specialist expertise if necessary most economically and effectively, balancing all the costs and benefits.

Council Response (December 2015)

1 - All material projects to be overseen by the Council's recently established officers Programme Board which will include a financial and legal assessment

2 - Sound project management principles to be adhered to including amongst others:

- Business case (including sensitivity analysis) / Project Initiation Documents / Definition of the outcome objectives / consideration of capacity (both internal and external).
- Project miles stones
- Outputs
- Change control
- Risk register
- Issues log
- Communications plan
- Governance – Programme Board, Project Sponsor, Project Lead, Council Members
- Project review at completion
- To ensure all projects consider the Council's wider corporate priorities, interaction with other service outcomes and the ability to cross promote one another.

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
<p>B:1 The council cannot initially adequately identify the scale of the programme or how to operate it either because officers have insufficient information or lack experience in the relevant area.</p>	<p>B:1:1 Senior officers are informed of the potential to develop the programme and oversee the work undertaken by the council's officers as they design the initial programme.</p>	<p>All material projects are brought before the senior management team for assessment (see A:2:1).</p>	<p>In Place</p>
	<p>B:1:2 The experience and resources already available to the council are taken into account and appropriately deployed.</p>	<p>As part of SMT's due diligence capacity, the programmes outputs/outcomes, risks, financial implications and Council priorities are considered as a whole.</p>	<p>In Place</p>
	<p>B:1:3 Senior officers consider the proposed programme, and assess whether it should be designed initially as a pilot and operated on a small scale with the potential for expansion as its viability is demonstrated, or as</p>	<p>All material projects are brought before the senior management team for assessment (see A:2:1). Part of any assessment would include consideration of scale and its implications, including amongst other things, pilot or full implementation alongside Council capacity, budget and appetite for risk</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	a full programme immediately.		
	B:1:4 The targets for outputs and outcomes negotiated with the funding body and accepted by officers are assessed as realistic, reflecting officers' best estimates of what is achievable over time.	This is a core competence of senior managers and will be incorporated into the generic elements of job descriptions currently being reviewed as part of the wider organisational review. (see A:1:1 / A4 & 5)	In Place
	B:1:5 A clear plan is developed, and endorsed by suitably senior officers, to operate the programme at an appropriate scale and with adequate flexibility to develop it further.	This is part of the original business case assessment and the Programme Board project management framework based on Prince II principles whose Members are the SMT. The Council does have in place a formal project management framework, managed by Microsoft 365/SharePoint, of which Business Case forms an integral part of. This means SMT will have access to project management updates beyond the confines for meeting dates.	In Place
	B:1:6 The potential to expand the programme if appropriate, and	This follows on from B:1:3 above. As all material projects are brought before the senior management team for assessment (see A:2:1). Part of any assessment would include	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>particularly if it is initiated as a pilot scheme, is acknowledged and planned from its inception; staffing and financial resource plans, commissioning and any legal contracts entered into are designed to facilitate expansion once the viability and operation of the programme are clearly understood.</p>	<p>consideration of scale and its implications, including amongst other things, pilot or full implementation and if the former the future implications for expansion.</p>	
	<p>B:1:7 If the programme is operated initially as a pilot, its operation is assessed at the end of the pilot period, and appropriately senior officers approve either its escalation into a full scale programme or its closure.</p>	<p>Part of project planning is an end of project evaluation as overseen by the Programme Board, from which expansion opportunities will be explored or the project closed</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rosendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>B:1:8 The projected financial outturn of the programme to its anticipated end date is regularly assessed by the council's senior managers, who make the explicit decision periodically either to continue or cease.</p>	<p>Part of the project management framework as overseen by the Programme Board and forms part of finance/ issues/risks assessment, etc. amongst others.</p>	<p>In Place</p>
<p>B:2 The full implications of a proposed course of action are not fully identified and understood before action is taken and the council's position is not fully protected.</p>	<p>B:2:1 Appropriately senior and experienced officers are alerted by staff, or are informed when routinely supervising staff, and provide advice when novel solutions are proposed. Officers are sufficiently aware of the council's normal business that they are able to identify when solutions are novel or contentious.</p>	<p>This is a core competence of senior managers and will be incorporated into the generic elements of job descriptions currently being reviewed as part of the wider organisational review in addition to core values of communicating and listening in order to, amongst other things, ensure a solutions based organisation. (see A:1:1 / A4 & 5/ B:) This does not imply a risk averse culture but one of invention and opportunity exploitation. The standards and behaviours of the Council expect regular supervision, appraisal and objective setting in line with Corporate Objectives</p>	<p>Awaiting Further Action</p> <p>In Place</p>
	<p>B:2:2 Appropriately senior and experienced</p>	<p>This is a core competence of senior managers and will be incorporated into the generic</p>	<p>Awaiting Further</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>officers are alerted by staff, or are informed when routinely supervising staff, and provide advice when action should be identified as necessary to protect the council's position.</p>	<p>elements of job descriptions currently being reviewed as part of the wider organisational review in addition to core values of communicating and listening. (see A:1:1 / A4 & 5/ B:) This does not imply a risk averse culture but one of invention and opportunity exploitation.</p>	<p>Action</p>
	<p>B:2:3 Senior officers consider the proposed action and make a conscious decision to pursue it, and the decision is formally made by members having taken officers' advice into consideration.</p>	<p>This is already embedded in a Member led, Officer driven culture as authorised within the authorities of the Constitution.</p>	<p>In Place</p>
	<p>B:2:4 Where appropriate – in particular where third parties are involved – the council's position is clear, consistent and is protected by legally enforceable agreements.</p>	<p>This ensured through appropriate project management as overseen by the Programme Board and including specialist advice from the Monitoring Officer.</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
<p>B:3 The overall cost of the programme outweighs its benefits to the district.</p>	<p>B:3:1 A cost-benefit analysis is undertaken by appropriately skilled and experienced officers on the basis of the information available at the outset.</p>	<p>This is ensured through the production of a robust business case, endorsed by a member of the SMT, including a financial analysis approved by the s151 officer.</p>	<p>In Place</p>
	<p>B:3:2 The council's officers make a well-informed appraisal of the expertise available internally and assess whether external support is required to operate the programme.</p>	<p>This is part of the original business case assessment and the assessment of internal capacity and resources (see B:3:1).</p>	<p>In Place</p>
	<p>B:3:3 The affordability of the external expertise required is assessed and considered as part of the cost-benefit analysis of the programme's viability.</p>	<p>This is ensured through the production of a robust business case including a financial analysis approved by the s151 officer (see B:3:1)</p>	<p>In Place</p>
	<p>B:3:4 The benefits of the programme are considered in light of</p>	<p>As part of SMT's due diligence , the programmes outputs/outcomes alongside the Council priorities are considered as a whole for</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>related areas of the council's objectives; the potential to house the district's homeless is considered at the same time as the opportunity to bring empty homes in the district into use.</p>	<p>cross cutting benefits. The programme board made up of the SMT from multi disciplines / service areas and their core competences assures that this is the case.</p>	
	<p>B:3:5 The cost-benefit analysis is regularly reviewed and updated until the programme has been fully developed and assessed as viable, and has been formally approved as such by senior officers and the decision take to progress it by members.</p>	<p>Part of the business case sign of by SMT and Members (as required by the Constitution) is the ongoing management and supervision of the Programme Board</p>	<p>In Place</p>
	<p>B:3:6 The financial outturn of the programme, as well as its performance in delivering the</p>	<p>This is part of the reporting to Programme Board and wider financial monitoring to managers and Members by the finance team. The Council also has a commitment to performance management and regular</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	intended outputs and outcomes, is regularly assessed by the council's senior managers.	reporting.	
B:4 The programme is pursued although it is apparent that it is unworkable in its original conception, or at all, because officers are unwilling or unable to consider stopping it.	B:4:1 The business case for the program is considered by senior officers after any material amendments have been made to its operation, and the decision to continue it in its revised form is made by members.	Any material change is considered by the Programme Board and acted upon accordingly.	In Place
B:5 The programme is intended to achieve more than one objective, but the secondary objectives are overlooked and no plans are made to achieve them.	B:5:1 The planning controls set out above are implemented in respect of each objective.	All projects go through the Programme Board whose objects have been clearly identified at the outset (see A: 4:2) and which continue to be assessed during the project.	In Place
	B:5:2 The decision-making and performance monitoring controls set out below are implemented in respect of each objective.	As above (B:5:1) all projects go through the Programme Board whose objects have been clearly identified at the outset (see A: 4:2) and which continue to be assessed during the project.	In Place

C: Taking a lead role, working with and on behalf of other local authorities.

Objectives

- Achieve the objectives of each local authority involved, including the council's, more economically, efficiently and effectively together than could be achieved individually.
- Operate within each local authority's constitution and the constitution of any formal partnership.

Council Response (December 2015)

1 - In all future projects, a key element of the legal considerations and assessment in any future partnership working be it with other public, private or the voluntary sector will be the need for “due diligence” of partners’ ability to manage project and deliver agreed outcomes and outputs, indemnities and the strength of partner covenants, together with a full risk appraisal process.

Risks	Expected controls	Progress Report	Status
C:1 The council acts within a partnership but has no authority to do so under its constitution because the decision to enter into the partnership has not been properly made.	C:1:1 Senior officers are made aware through routine supervision of their staff of any partnerships the council may be invited to join.	This is a core competence of senior managers in relation to: performance management, communications and 121s with direct reports.	In Place
	C:1:2 Appropriately senior officers with the relevant expertise consider the risks and potential rewards of the council's entry into any partnerships.	All partnerships, service level agreements and in particular legal arrangements are signed by the Monitoring Office after due consideration by the CEO, s151 Officer and relevant Portfolio Holder (and evidenced by Scheme of Arrangement) or approved by Members.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rosendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>C:1:3 The council enters into any partnership in full knowledge and understanding of the partnership's constitutional arrangements.</p>	<p>All constitutional arrangements of Partners are consider by the Monitoring Office prior to formal arrangements</p>	<p>In Place</p>
	<p>C:1:4 The decision to enter into a binding partnership is properly made under the council's own constitution.</p>	<p>All Council constitutional matters are consider by the Monitoring Officer prior to formal arrangements</p>	<p>In Place</p>
	<p>C:1:5 With the officers of the partner organisations, the council's senior officers ensure that the partnership is supported by a robust agreement.</p>	<p>All partnerships, service level agreements and in particular legal arrangements and other Governance arrangements are signed by the Monitoring Office after due consideration by the CEO, s151 Officer and relevant Portfolio Holder (and evidenced by Scheme of Arrangement) or approved by Members (see C:1:2)</p>	<p>In Place</p>
	<p>C:1:6 The implications of the decision to enter into a binding partnership is made clear to members by senior officers as the partnership is entered</p>	<p>All implications are considered by senior officers as part of the risk analysis be that: legal, financial, reputational, etc. These consideration form part of the original business case assessment and contribute to final decision making be that by Scheme of Delegation or Committee.</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rosendale Borough Council

Risks	Expected controls	Progress Report	Status
	into and are regularly reviewed by both officers and members.		
C:2 The council takes on the responsibilities and effectively also accepts the costs and/ or liabilities associated with a work programme on behalf of its partners without understanding the implications for the council.	C:2:1 Appropriately senior officers with the relevant expertise are involved and consider the risks, costs and potential rewards of the council's involvement in any specific projects on behalf of the partnership.	All risk and reward implications are considered by senior officers (including statutory officers) as part of the risk analysis be that: legal, financial, reputational, etc. These consideration form part of the original business case assessment and contribute to final decision making be that by Scheme of Delegation or Committee (see C:1:6)	In Place
C:3 The council takes on the responsibilities and effectively also accepts the costs and/ or liabilities associated with a work programme on behalf of its partners without making this explicit within the council or the partnership, or obtaining a decision to that effect because the	C:3:1 Appropriately senior officers with the relevant expertise fully engage with the partnership, attending its meetings regularly, being properly informed of its activity and advising the council about what work it may choose, or be obliged, to support.	The Councils project management framework identifies the senior offices of all projects in particular projects leads and the project sponsors all of which report to the Councils Programme Board (made up of the SMT). Consideration of project activities and what work the Council and officers may choose, or be obliged to support should be considered by the Programme Board.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
<p>need to do so is overlooked. The council's officers do not appreciate that an apparent decision to act is invalid or unconstitutional, but act on it nonetheless.</p>	<p>C:3:2 Either the council obtains indemnities from its partners for the costs of the action it takes under specific programmes on behalf of the partnership, or it explicitly recognises that it may incur costs for work that does not directly benefit the council or its citizens. In either case a formal decision is taken under the council's constitution.</p>	<p>Indemnities are now a standing item for consideration by the Monitoring Officer in all partnerships or other contractual arrangements</p>	<p>In Place</p>
<p>C:4 The council is in dispute with its partners because the terms of the partnership, and particularly its financial implications, are not clearly set out. The council later looks to the partnership to share any financial burden of its action for the partnership but its</p>	<p>C:4:1 A partnership agreement establishes the role of the partnership and each of the organisations within it, and how it will operate including the resources to be provided by each partner, and the mechanism by which</p>	<p>All partnerships, service level agreements and in particular legal, financial and governance arrangements and the extent of liabilities and conflict resolution are signed by the Monitoring Office after due consideration by the CEO, s151 Officer and relevant Portfolio Holder (and evidenced by Scheme of Delegation) or approved by Members. (See C:1:2 & 5)</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
claim is unsupported by any formal agreement to that effect.	conflicts will be resolved.		
C:5 The council's reputation is damaged because the partnership receives no feedback regarding the progress of the programme it has agreed that the council will implement.	C:5:1 The council's senior officers provide regular reports to the partnership addressing progress (planned and actual) towards the programme's outputs and outcomes, through agreed key performance indicators.	All partnership governance arrangements will be given due consideration including both internal and external reporting arrangements. Information produced by senior officers will complement and match information being reported to the Councils own Programme Board and reports to the wider Members.	In place
C:6 The grant funding conditions place obligations on the other local authorities but these are not met because they are unaware of them.	C:6:1 The council's officers ensure that they fully understand the grant funding obligations of all the partners and communicate these in sufficient time for the partners to respond.	This is a core competence of senior managers with regard to performance management (amongst other things reporting in a timely manner) and in which they are supported by legal and finance colleagues together with the SMT and their scrutiny remit.	In Place
	C:6:2 Officers diarise the dates of any information required from partner organisations and	This is a core competence of senior managers with regard to performance management (C:6:2)	In Palce

Response to Issues arising from 'Bringing Empty Homes Into Use'
Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	ensure that it is requested in sufficient time to ensure it is delivered in time to meet any obligations of the funding agreement.		

D: Commissioning, procuring and working with an external organisation to implement the council's objectives.

Objectives

- Establish the council's operational requirements within its financial constraints, the constraints of the grant funding and funder's requirements, and the need for flexibility where service needs are uncertain.
- Identify the most effective options to meet the council's operational requirements, recognising that there may be limited suppliers in the market.
- Comply with statutory requirements and the council's own policies and procedures to procure the service required most economically, efficiently and effectively from an external organisation.
- Obtain a legally enforceable contract, in accordance with the procurement process, that sets out the services that will be provided and the standards that will be met, the price that will be paid and the payment terms.
- Obtain a contract that covers the full period over which services are required, or undertake a further procurement exercise in due course if services are required over an extended period.
- Monitor the external organisation's performance against the contract, using robust, trustworthy data.
- Make payments to the external organisation due under the contract as service performance is verifiably delivered, or subject to claw-back if service delivery is contingent on later conditions being met.

Council Response (December 2015)

1 - We will ensure that any future procurement activity is fit for purpose by fully understanding the business case of the procurement, its risks, rewards and the legal obligations of Rossendale Borough Council

2 - All future contracts will have explicit ultra vires references to the passing off of the Council.

3 - The responsibilities and good practices for managing contracts and the supply of goods or services will be enshrined in the next update of the Council's constitution in with full training for all appropriate officers and Members.

Risks	Expected controls	Progress Report	Status
D:1 The council's	D:1:1 Officers with detailed	This is part of the original business case	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
requirements of any external provider and any constraints on the service are not adequately identified because there is insufficient understanding of the programme and the way it will operate.	knowledge of the programme critically assess the nature of the programme and the operational services the council needs to commission externally.	assessment and the Programme Board project management framework (as overseen by SMT) and a core competence of senior managers in their specialist fields together with resource management	
	D:1:2 Senior officers take an overview of the programme and its needs and assure themselves that the proposal to commission external services is appropriate.	This is part of the original business case assessment and the Programme Board project management framework (as overseen by SMT)	In Place
	D:1:3 The options developed are appropriately flexible where the operation of the programme – its scale and the assumptions that have been made – is uncertain.	This is part of the original business case assessment and the Programme Board project management framework (as overseen by SMT). Any business case should have sensitivity measures where there is uncertainty of either inputs or out puts.	In Place
	D:1:4 The support envisaged is obtained firstly through a pilot	This is part of the business case appraisal when either pilot or full implementation will be assessed by Officers, SMT and the Programme	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>scheme and later, explicitly, through a full programme whose operation has been determined during the operation of the pilot scheme.</p>	<p>Board</p>	
	<p>D:1:5 Senior officers provide specialist legal and financial advice regarding the proposed operational arrangements.</p>	<p>This is part of the business case appraisal and the role other Officers, SMT and the Programme Board including Legal and financial colleagues, with external assistance being called up on should the need arise.</p>	<p>In Place</p>
<p>D:2 The full range of viable options for commissioned services is not considered because officers are insufficiently aware of what could be available, or are unduly influenced by the options they are</p>	<p>D:2:1 Senior officers review proposals for the services being commissioned and critically assess the options that have been considered, and those that may not have been considered by the staff involved, before</p>	<p>The constitution sets out the procurement procedures for officers to be subsequently approved by Members or Officer Scheme of Delegation both of which involves statutory office scrutiny, comment or approval (Sch's of Del).</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
familiar with.	any procurement process begins.		
	D:2:2 Senior officers consider what they know of any (formal or informal) relationships between staff involved in developing the programme and any potential suppliers, and consider whether such relationships may have limited the options considered.	As part of the constitution all members of staff are obliged to record: <ul style="list-style-type: none"> Any outside interests or memberships which are relevant to the employment and conduct. Receipt of any gifts and hospitality are recorded in a register.	In Place
D:3 Only one supplier is both willing and able to provide the service the council requires and it is therefore unclear whether the council is obtaining value for money.	D:3:1 The market is tested through publication of a procurement exercise, even if it is believed that there are few willing and capable suppliers, to demonstrate whether or not that is the case.	The constitution details with Contract Procedure Rules, the procurement process required according to values together with the limited exceptions to the CPRs and in accordance with statute / legislation..	In Place
	D:3:2 The adequacy of the process by which the lack of alternative suppliers has been	A lack of alternative suppliers or exceptions to Contract Procurement Rules is considered by formal Officer scheme of delegation signed by	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>confirmed is considered by senior officers, and this is demonstrated in their approval of a decision to negotiate only with a single supplier.</p>	<p>the CEO, Monitoring Officer and s151 Officer.</p>	
	<p>D:3:3 The council negotiates with the single supplier to ensure that it is capable of providing the services required, and is willing to do so at what is considered to be a reasonable price.</p>	<p>This forms part of consideration within the scheme of delegation.</p>	<p>In Place</p>
<p>D:4 Statutory requirements or the council's own policies and procedures relating to procurement are breached because officers are unaware of their stipulations.</p>	<p>D:4:1 Officers in posts that may require them to comply with relevant statutory requirement or the council's own policies and procedures are informed and regularly reminded of them.</p>	<p>This area is dealt with in various ways, for example (though not restricted to):</p> <ul style="list-style-type: none"> • Annual input and review of the Constitution, Contract Procedure Rules, policies and strategies • Annual personal development reviews • Continued Professional Development and annual declarations to professional bodies • Participation in the SMT and peer 	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
		challenge	
<p>D:5 Statutory requirements or the council's own policies and procedures relating to procurement are breached because officers believe they are under pressure to act more quickly than formal timescales allow.</p>	<p>D:5:1 Senior officers clearly direct the commissioning and procurement processes, taking responsibility for the way these processes are conducted, and for their timescales. They ensure that due process is followed, particularly where any action is taken to waive stipulated timescales.</p>	<p>This is a core competency expectation of all senior managers (see above).</p>	<p>In Place</p>
	<p>D:5:2 The suppliers' viability and credentials in providing the service as specified are checked.</p>	<p>This is part of the procurement process for tendered services or supplies and a standard part of the ITT response from prospective contractors.</p>	<p>In Place</p>
<p>D:6 No legally enforceable contract is put in place with the supplier</p>	<p>D:6:1 Senior officers are aware of the development of the</p>	<p>Contract authorisation/signing is restricted in line with the constitution to the Monitoring Officer, Chief Executive or the Mayor after full</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
because officers are unaware that it is necessary or important.	programme and its progression through the commissioning and procurement stages, and expect to see an enforceable contract before the programme begins to operate.	consultation with the appropriate senior officers.	
D:7 No legally enforceable contract is put in place with the supplier because uncertainty about the services to be provided and then changes to these over time mean that its terms are never finalised.	D:7:1 A proper procurement process is conducted in accordance with statutory requirements and the council's own policies and procedures, and the terms agreed as a result of that process are set into a formal contract.	Officers often and as required consult with the Monitoring Officer for all material procurement activity particularly regarding the content of the ITT, tender evaluation methodology, statutory notices, other statutory requirements, etc.	In Place
	D:7:2 Senior officers review the contract during the procurement process, before it is signed, and before services commence to ensure that its terms are satisfactory	Officers consult with the Monitoring Officer for all procurement activity particularly regarding the content of the ITT, tender evaluation methodology, statutory notices, other statutory requirements, etc. (as above)	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	to the council and legally enforceable.		
	D:7:3 The contract terms include scope for flexibility where the operation of the services – their scale, timing or cost – is uncertain but are certain at any given point in time.	This will form part of consideration by the Monitoring Officer and legal departments.	In Place
D:8 A contract with terms reflecting any negotiations during the procurement process is agreed but over time its terms no longer address the council's needs, because the situation changes or does not unfold as anticipated.	D:8:1 Officers with expertise in procurement advise whether the service required has changed so substantially that a new procurement process is necessary.	This is a core competency of senior managers and supported by their peers, including the Monitoring officer and s151 Officer,	In Place
	D:8:2 The revised service, its standards and price, are negotiated with the supplier and documented in a variation to the contract.	This is a area that is overseen by the Monitoring officer with regard to the signing of contract variations.	In Place
D:9 In the absence of a sufficiently robust	D:9:1 The officers involved in overseeing and	This is a core competency of senior managers and supported by their peers, including the	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
<p>contract setting out the services to be provided and the standards to be met, the provider directs the work and its performance standards itself, possibly to its own objectives and financial benefit, rather than the council's.</p>	<p>managing the programme negotiate to ensure that the council's own objectives are met by the provider.</p>	<p>Monitoring officer and s151 Officer. (see above)</p>	
<p>D:10 The financial and operational performance of the programme and its operator are not clearly understood because officers do not seek this understanding; or ask and are not provided with it by its external service provider.</p>	<p>D:10:1 The provision of performance monitoring data is established in the service provider's contract, and its format is set out to meet the contractor's agreed key performance objectives.</p>	<p>This is a core requirement within all performance based contracts (eg Capita Revenues, Benefits and Customer Services) and captured in the Council's annual Corporate Business Plan</p>	<p>In Place</p>
	<p>D:10:2 Regular – say monthly, quarterly and annual – monitoring data is provided in an agreed, consistent format and is critically assessed by officers.</p>	<p>Where applicable this is a core requirement within all performance based contracts (eg Capita Revenues, Benefits and Customer Services) and captured in the Council's annual Corporate Business Plan – see above</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
D:11 The contract term ends before the programme it supports, and is not renewed in accordance with the council's procedures; milestones for review within the contract pass and are not marked; or the contract is not enforced, because it is regarded as peripheral to the actual arrangements being operated and therefore unimportant.	D:11:1 Senior officers oversee the arrangements being operated and assess these periodically against the contract in place to ensure that the contract is being adhered to in full by both parties, or else to identify that it requires amendment after formal re-negotiation. This oversight is both in accordance with the council's performance monitoring of the programme and in accordance with the contract's milestones, and these key dates are diarised and adhered to.	This is a core requirement within all performance based contracts (eg Capita Revenues, Benefits and Customer Services)	In Place
	D:11:2 Where services are not being provided as stipulated or to the standards agreed, or	This is a core competency of senior managers and supported by their peers, including the Monitoring officer and s151 Officer (see above). Where appropriate service	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	the contract term has ended, appropriate action is taken by officers under senior management's direction.	improvement notices will be served.	
D:12 Basic contractual requirements are not built into the contract because officers with the right expertise are not involved.	D:12:1 Officers with appropriate legal expertise are required to approve any contract the council enters into; other officers do not have the delegated powers to enter into contracts.	The Constitution details the authority limits of Officers and managers	In Place
	D:12:2 All contracts are checked against a standard template of necessary terms and conditions to ensure that all are included if appropriate. These may include matters to resolve breakdowns in the operational relationship, termination of the	The Council works to a set list of terms and conditions which accompany all ITTs and is overseen by the Monitoring Officer.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	contract and action in the event that the contractor ceases to trade, and a requirement to disclose any relationships or conflicts of interest between any officers and employees of the contractor.		

E: Designing and operating the on-going systems and processes required within the council to operate a programme with a commercial partner.

Objectives

- Direct the partner's activity to achieve the council's operational objectives with a full understanding of the programme's progress and performance.
- Obtain services from the commercial contractor to the specification and standards agreed in the contract.
- Limit the contractor's activity only to what is contractually agreed and satisfactory to the council.
- Achieve economy, efficiency and effectiveness in the design of the council's and its contractor's operating procedures.
- The contractor's status and that of its employees is clear, and cannot be confused with that of the council or its officers.

Council Response (December 2015)

1 - The enforcement of sound and fit for purpose project management principles will ensure that no single officer will have sole control of any future material project (eg via a Project Lead and a Project Sponsor)

2 - The additional controls necessary for the payment authorisation of goods and services as noted in 5.10 of the report, will be immediately enforced and made more specific and enshrined in the next update of the Council's constitution, scheduled for March 2016 (Governance working Group and Full Council) and officer training which will follow.

3 - The Council procurement rules and the Council's trading terms will nullify netting off of costs in order to ensure transparency, unless netting off is to the advantage of the Council.

4 - Future legal assessment of all material projects will give consideration to all legal relationships to ensure that they are robust and fit for purpose

5 - The Council's ICT policy will be amended to prohibit the use of Council email addresses to those individuals not employed directly or by way of agency or formal secondment.

Risks	Expected controls	Progress Report	Status
E:1 The contractor directs	E:1:1 The council obtains	This is a core element of all contracts which are	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
its own activity to meet its own objectives or understanding of the programme rather than the council's.	sufficient timely, accurate and complete information on the contractor's service provision and performance against the agreed specification and service standards.	subsequently overseen by a senior Manager.	
	E:1:2 Information provided by the contractor is critically considered and verified by the council's officers. Inconsistencies, omissions and misstatements are questioned thoroughly and explanations obtained.	Contract management is a core competency of all senior managers	In Place
	E:1:3 The council's officers maintain their own understanding of the progress of the programme and periodically verify the information provided by the contractor	This is linked with the core competency of project management.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	against this.		
	E:1:4 The direction of the contractor's work is discussed, agreed and documented at regular meetings of the senior officers of both the council and its contractor, supported by sufficiently detailed information about the progress of the programme and the contractor's performance.	This will be part of the reporting to the Programme Board for those projects which meet the materiality criteria	Awaiting Further Action
E:2 The council is unaware of action being taken by the contractor on its behalf or the contractor takes action that is outside the scope of its contract.	E:2:1 Through regular monitoring and discussion of the work the council's officers ensure that the contractor is clear regarding the scope of its work and its boundaries.	This falls under the area of contract management which is a core competency of all senior managers.	In Place
	E:2:2 If action is required that is outside the terms of the contract, the officers involved	This advice is available through representation on Programme Boards and directly from the relevant support service (legal, finance, etc.).	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	obtain advice from relevant colleagues including housing, finance and legal experts, and the relevant senior officers negotiate a variation to the contract.		
E:3 The contractor takes actions on behalf of the council that serve to bind the council in ways it would not have agreed to.	E:3:1 Regular monitoring of the contractor's activity and performance identifies the nature of the action being taken by the contractor, and officers clearly instruct the contractor to cease and rectify any action that is unacceptable.	This falls under the area of contract management which is a core competency of all senior managers.	In Place
	E:3:2 The council acts promptly to rectify any action taken inappropriately on its behalf with any third parties involved.	This falls under the area of contract management which is a core competency of all senior managers and the requirement to take appropriate action when incidents arise that are not part of agreed specifications.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
<p>E:4 The implications of actions taken by the contractor are not effectively understood by the council because it is not adequately engaged with the programme or its contractor.</p>	<p>E:4:1 The officers involved in day-to-day work with the contractor are regularly supervised by more senior and experienced officers who ensure that they obtain sufficient relevant information regarding the conduct of the contractor's work, and assess its implications for the council and the programme.</p>	<p>This falls under the Project Management framework alongside appropriate day to day supervision of staff and an appreciation of the skill sets and limitations by senior managers within their service areas.</p>	<p>In Place</p>
<p>E:5 The legal and financial liabilities to the council arising from the contractor's work are not identified and addressed by the council because it is not adequately engaged with the programme or its</p>	<p>E:5:1 The contractor provides sufficient timely information to the council regarding the work it does on the council's behalf.</p>	<p>This falls under the area of contract management which is a core competency of all senior managers. Managers are expected to set these reporting standards as part of contract terms.</p>	<p>In Place</p>
	<p>E:5:2 Information is passed within the council to the relevant officers.</p>	<p>Such information should form part of reporting to the Programme Board by which relevant officers can comment and/or take the</p>	<p>Awaiting Further Action</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
contractor.		appropriate action	
	E:5:3 The implications of this information are considered by sufficiently skilled and experienced officers, who respond appropriately, in particular in recording the liabilities and assessing them in relation to the council's overall financial and legal position.	As note in E:5:2 such information will form part of reporting to the Programme Board by which relevant officers, including amongst other the Monitoring and s151 Officers, can comment and/or take the appropriate action	In Place
E:6 Action taken by the contractor is not supported by corresponding action within the council because the council's officers are not adequately engaged with the programme or its contractor.	E:6:1 The officers involved in overseeing the programme ensure that their colleagues across the council are involved as appropriate: as a minimum, officers with financial and legal expertise are invited to engage with the programme.	As note in E:5:2 / 3 such information will form part of reporting to the Programme Board by which relevant officers, including amongst other the Monitoring and s151 Officers, can comment and/or take the appropriate action	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	E:6:2 Processes are designed and implemented that allow the council to record and monitor actual and expected financial transactions on a timely basis.	The council has in place finance systems which allows for expenditure commitments at the point of order and the “intelligent” matching of invoices with original purchase order to ensure payment of services in accurate and timely manner.	In Place
	E:6:3 Processes are designed and implemented that allow the council to record and monitor actual and expected contractual liabilities on a timely basis.	The council has in place finance systems which allows for expenditure commitments at the point of order and the ability to enter budget expenditure according to specific periods and the monitor spend activity against those budgets	In Place
	E:6:4 Processes are designed and implemented that allow the council to record and monitor actual and expected changes in its asset portfolio on a timely basis.	The Council has in place a procedure for formal reporting of expenditure (revenue and capital) on a quarterly basis to Members via Cabinet.	In Place
E:7 The contractor's work under the programme is not aligned with the	E:7:1 The relevant teams within the council are identified and	This is ensured via the project management framework and reports such as the project implementation document (PID). The size of	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rosendale Borough Council

Risks	Expected controls	Progress Report	Status
<p>council's own related work in other areas: the team responsible for housing the district's homeless is not practically engaged with the work to bring empty properties back into use.</p>	<p>involved at the outset as the programme is designed to ensure that all the council's objectives are aligned.</p>	<p>the organisation necessitates the involvement of project staff from the outset of the project.</p>	
	<p>E:7:2 The work of all the relevant teams within the council is considered when the programme is designed and as services are commissioned from an external contractor: working with the relevant teams is designed into the contract.</p>	<p>This is ensured via the project management framework and reports such as the project implementation document (PID). The size of the organisation necessitates the assessment of capacity and the use of external support appropriately evaluated.</p>	<p>In Place</p>
	<p>E:7:3 Processes are designed and implemented that allow all of the council's teams to support and benefit from the programme.</p>	<p>The programme framework included an end of project evaluation including lessons learned.</p>	<p>In Place</p>
<p>E:8 The contractor requests and is paid for work it has not</p>	<p>E:8:1 The council's officers are able to confirm by regular and routine</p>	<p>All contractor work is inspected by suitably qualified officers of the council or appointed agents re completion and standard of work</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
<p>undertaken, or has not completed to the agreed service specification and standards, because the council is unaware of the contract's specifications or of the work that has actually been done, or of the contract's terms regarding payment.</p>	<p>monitoring including its own spot checks on the work that the contractor has satisfactorily completed the work it claims payment for, to the standard required before claims are processed.</p>	<p>prior to payment to contractors.</p>	
	<p>E:8:2 The council's finance team obtains confirmation from the officers overseeing the contractor's work that the work for which payment is claimed has been completed before payment is processed.</p>	<p>Confirmation is made by appropriate officers approving the "goods received" element of the purchase order system with counter approval as required by other senior officers.</p>	<p>In Place</p>
<p>E:9 The contractor disregards agreed procedures; it takes payment for its work directly from funds that are due to the council and hands over only</p>	<p>E:9:1 Officers recognise that this is unacceptable immediately and insist that the contractor complies with agreed</p>	<p>There are no such arrangements currently in place with the Council. The setting off of funds will be expressly forbidden in the next revision of either Contract Procedure Rules, Council's terms and conditions or other Service Level Agreements..</p>	<p>Awaiting Approval</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
the net amount.	procedures or else it is in default of its contract.		
E:10 Performance data is unavailable to the council because its contractor will not provide it.	E:10:1 The provision of appropriate data to the council is included in the contract terms, having been considered and agreed during the procurement process.	This forms part of initial terms and conditions and contract outputs. Contract monitoring arrangements are in place for all contracts	In Place
	E:10:2 Senior individuals in the contractor organisation commit to obtaining this data.	Heads of Service will ensure that such performance data is delivered or contract payments will be withheld.	In Place
E:11 Performance data is inadequately designed because there is a lack of understanding of the programme and its objectives.	E:11:1 Individuals with the seniority and the right expertise within the council work with its contractor to assess the data required to support the programme's key performance indicators and agree that this will be	Programme Board ensure that the correct performance data is included as part of the programmes outputs.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	provided.		
<p>E:12 Performance data is unavailable or inaccurate because the contractor's IT or manual systems that should generate it lack the functionality.</p>	<p>E:12:1 Individuals with both the seniority and the right expertise ensure that the data required to support the programme's key performance indicators is capable of being generated by the contractor's IT and manual systems. If not, the performance indicators and available data are jointly reassessed until adequate performance information is capable of being generated.</p>	<p>This forms part of initial terms and conditions and contract outputs. Evidence of a contractors ability to provide necessary data forms part of the initial contract service and quality evaluation</p>	<p>In Place</p>
<p>E:13 Performance data on the work undertaken by the contractor is input inaccurately, leading to incorrect outputs.</p>	<p>E:13:1 The contract includes provision for the council to periodically to check the accuracy of the data provided by its contractor.</p>	<p>Standard element of Council terms and conditions</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	E:13:2 The council takes up this option and periodically tests the data provided by its contractor.	Standard element of Council terms and conditions	In Place
E:14 Performance data on the work undertaken by the council is input inaccurately, leading to incorrect outputs.	E:14:1 The officers involved in the day-to-day operation of the programme understand the importance of accurate and timely data and are committed to ensuring this through accurate input.	Performance management is a core management competence and corporate wide behaviour. Performance management is expected to be the day job and is practiced on a regular basis via 121, Covalent, etc	In Place
	E:14:2 Data input is regularly checked for accuracy and corrected by manual intervention (although this is inefficient).	Overseen by Senior Managers, People & Policy, Member Scrutiny and Internal Audit.	In Place
E:15 Performance data is inadequately interpreted due to a lack of time or understanding by the individuals accountable	E:15:1 Individuals with both the seniority and the right expertise critically review the programme's key performance	Overseen by Senior Managers, People & Policy, Member Scrutiny and Internal Audit.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
for the programme's performance.	indicators.		
E:16 The contractor's employees hold themselves out to be officers of the council, thereby achieving a different status with the council's funders and other contractors, facilitated by the council's officers.	E:16:1 The council's officers are aware of the distinction between a contractor and the council itself, and of the importance of this distinction to other external organisations.	This is understood by Officers of the Council and reinforced by the Council's monitoring officer.	In Place
	E:16:2 Individuals are given council email addresses and phone extensions only if they are verified as being council officers.	This is the case and will be incorporated into the Council's ICT policy to be authorised by HR (Revision due during 16/17)	Awaiting Approval
E:17 The council's own officers act beyond their authority because they do not understand the substance of the council's scheme of delegation and do not properly alert more senior officers to the need for approval.	E:17:1 Officers are aware of the council's scheme of delegation and are regularly reminded of the limits to the action they may take under delegated powers.	This is understood by Officers of the Council and reinforced and updated to all staff by the Council's monitoring officer. (via Management Team, Team Brief, Daily messages, etc.)	In Place
	E:17:2 Regular supervision of all officers provides the forum	The Council has in place policies and procedures to ensure regular supervision of all staff.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	for any proposed action to be considered and appropriately approved.		

F: Decision-making and corporate oversight of a programme and its performance in achieving the council's objectives, and the council's response to external concerns.

Objectives

- Make decisions and act in accordance with the council's appetite for risk, on the basis of the information which is, or ought to be, available.
- Comply with the council's constitution, in particular with respect to decision-making powers.
- Implement effectively the decisions made throughout the lifespan of the programme.
- Monitor the progress and performance of the programme, the achievement or otherwise of its outputs and intended outcomes, and the development of any further opportunities, in sufficient time to effect changes if necessary.
- Report transparently to stakeholders on the progress and performance of the programme to support effective decision making.
- Respond appropriately and effectively to any whistleblowing, complaints or other concerns from whatever source and safeguard the council's reputation against actual or alleged wrong-doing.

Council Response (December 2015)

1 - All material new projects will include Governance and authority levels required (ie Office or Member decision)

2 - Future projects involving Member authority will also stipulate the frequency of future updates to Members

3 - By ensuring robust project management due consideration can be given to any requirement for schemes of delegation to ensure that they are legitimate, fit for purpose and have been given due consideration

4 - Senior management override is a dangerous potential for any organisation. Any organisation needs to rely on the professionalism and competency of its most senior officers. Senior officers must communicate with other senior colleagues in an open and transparent manner. We will ensure that this is the case through the proposed changes to project management and the regular reporting to the Programme Board. Weekly management team meetings now take place to enhance this.

5 - Part of robust project management is the definition of outputs. Outputs include any reporting both internally (Members, etc.) and externally (Government agents, partners, etc). As part of good practice all such reports should be first endorsed by the

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Programme Board and highlighted as such (by reference to consultations) in the reports themselves in order that any such reports are robust, accurate and meaningful.

6 - The Council will review its own constitution to secure that it is consistent with 'The International Framework: Good Governance in the Public Sector' in ensuring that it has effective arrangements in order to ensure that it acts in the public interest at all times.

Risks	Expected controls	Progress Report	Status
<p>F:1 Members make a decision that is outside their powers under the constitution, that should be made by the council in partnership with others, or that should be treated as 'key' under the terms of the constitution, but the decision is not identified as such because its implications are not fully assessed or because officers overlook the council's or its partnership's constitution in preparing reports for members.</p>	<p>F:1:1 Appropriately senior officers with the relevant expertise assess whether decisions should be made by individual members, Cabinet, full Council, and/ or a formal partnership including the council and assess the adequacy of the report supporting the proposed decision in terms of the council's constitution.</p>	<p>Members and Officers are advised not only by senior officers familiar with the Council's constitution but all such decisions are overseen by the Monitoring Officer.</p>	<p>In Place</p>
<p>F:2 A decision is made by</p>	<p>F:2:1 Appropriately senior</p>	<p>Senior managers only are involved with the</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
<p>the council in partnership with other bodies that should be ratified by the council, but it is not because members and/ or officers are unaware that it has been made and needs to be ratified under the council's constitution.</p>	<p>officers with the relevant expertise are engaged with and support the council's partnerships and ensure that decisions made by such bodies are appropriately ratified by the council.</p>	<p>Council's major partnerships and are aware of responsibilities and powers under the constitution and will always seek the advice of the Monitoring Officer. PJ Seddon (01/03/16)</p>	
<p>F:3 Members make a decision to operate the programme on the basis of inadequate information and advice regarding the nature of the programme, and the results are not therefore what members expected.</p>	<p>F:3:1 The right resources are involved at the outset and at key decision points to analyse the nature of the scheme, the council's own capacity to deliver it, and its intended outputs and outcomes; they ensure that members are informed and in a position to make effective decisions.</p>	<p>In making decisions Members rely on the advice of senior officers and scrutiny from statutory officers. The nature of the scheme and its outcomes will firstly have been analysed by the senior management team (including the wider programme board with regard to projects).</p>	<p>In Place</p>
	<p>F:3:2 The officers involved in assessing and developing the</p>	<p>The sufficiency and quality of information in decision making is challenged and scrutinised by senior and statutory officers.</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rosendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>proposed programme obtain sufficient relevant and reliable information to support robust advice to members.</p>		
	<p>F:3:3 The proposal to operate the programme is set out in a report to members made in the context of a well-informed risk assessment that is within the council's appetite for risk.</p>	<p>Further guidance has been prepared and presented to both officers and Members in this matter and can be found in the updated Risk Management strategy (Feb 2016).</p>	<p>In Place</p>
	<p>F:3:4 Appropriately senior officers with the relevant expertise assess the financial, legal and operational implications of the proposed decision.</p>	<p>The scrutiny of all major decision making involves financial, legal and operational judgement and input from the appropriate officers.</p>	<p>In Place</p>
<p>F:4 A decision is made only after officers have already begun to take the action authorised by it, or a decision is not made at all,</p>	<p>F:4:1 Appropriately senior officers with the relevant expertise assess the action being proposed and consider whether a</p>	<p>Such action is taken by senior offices familiar with the Council's constitution and overseen by the Monitoring Officer who is able to give further guidance as to other authorities in place.</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
because officers overlook the requirement for members to do so under the council's constitution.	decision is required or whether the action is already authorised by an existing decision.		
	F:4:2 Once identified as required, the urgency procedure is invoked to make a decision as soon as possible even if action has already begun by officers and the option is given to members to decide to cease the activity.	This eventuality is directly overseen by the Monitoring officer who will guide and direct as necessary.	In Place
F:5 Officers take actions that are outside their authority because the reports supporting the decisions made by elected members are unclear or not sufficiently specific.	F:5:1 Decisions taken by elected members are supported by clear reports that have been reviewed by appropriately senior officers fully addressing the implications and the scope of action supported by them.	The reports on which Member decisions are made and the approval process are fully scrutinised by senior officers and statutory officers.	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
<p>F:6 The council does not assess the success or otherwise of the project in achieving its objectives and does not take it into consideration when deciding what other objectives to pursue or how.</p>	<p>F:6:1 Officers regularly assess the programme's overall direction and success (not just the contractor's performance) using robust information.</p>	<p>This is the role of the Programme Board and the project management framework to ensure outcomes and milestones are clear to all.</p>	<p>In Place</p>
<p>F:7 No further information is provided to members once the decision has been taken because the need to do so is overlooked by officers.</p>	<p>F:7:1 The council has a robust performance monitoring process to report the progress being made on each of the council's work programmes periodically to elected members. The process followed and frequency of reporting for each programme is dependent upon its scale and significance.</p>	<p>A number of check and balances ensure that this does not occur, amongst others: Programme Board, Business planning, risk register, covalent reporting, 121 supervision etc. Quarterly reports on the Council's Corporate Business Plan is scrutinised by O&S Committee and the Risk report now goes to Audit and Accounts Committee.</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	<p>F:7:2 This performance monitoring process encompasses work undertaken in accordance with a decision made by the council in partnership with others, and senior officers also report progress to that partnership body.</p>	<p>The governance arrangements of all such partnerships are, and continue to be, scrutinised by amongst others: statutory officers, the Programme Board and senior managers to ensure that robust reporting arrangements are in place.</p>	<p>In Place</p>
<p>F:8 No further information is provided to members once the decision has been taken because officers do not have the information required.</p>	<p>F:8:1 Officers design and implement a performance monitoring and management process addressing both the work undertaken by the contractor and the outputs and outcomes of the programme as a whole for the council.</p>	<p>This matter is captured by the Programme Board, within initial Project Initiation Documents and performance monitoring.</p>	<p>In Place</p>
<p>F:9 No further information is provided to members on a significant work</p>	<p>F:9:1 Members of the council retain an interest in a</p>	<p>Any significant work programme will form part of a service area's business plan to be monitored via Covalent and therefore reported</p>	<p>In Place</p>

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
programme once the decision has been taken because members overlook it once the initial decision has been made.	significant work programme, having been alerted to it and made a decision to implement it. If information is not provided by officers, members request it.	to Members. In addition, heads of service will report periodically to Portfolio holders on a regular basis. The programme board will also oversee and scrutinise the requirement to report more widely to all Members as required.	
F:10 The situation changes, events do not develop as anticipated, or the assumptions made prove to be incorrect and the programme is effectively unworkable in the form originally decided by elected members.	F:10:1 Regular performance monitoring and reporting to senior officers and elected members ensures that problems are identified, the reasons for variations from expected performance are assessed, and appropriate remedial action is determined.	Regular reporting is made to Programme Board and via covalent and to Members via the O&S Committee.	In Place
	F:10:2 The council operates a culture that allows challenge and the facility to propose changes to decisions that have already been made, or enables a course of	The Council has a number of avenues for challenge: Senior Management Team, Programme Board, portfolio meetings, O& S, Member & public questions, Whistle blowing., HR and 121's	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
	action to be discontinued if it is no longer appropriate.		
	F:10:3 A revised decision, supported by a report addressing the reasons for the new decision and the basis on which it is proposed, is made by members, promptly.	This will be and is an outcome of F:10:2 above	In Place
	F:10:4 The new decision is subject to the same controls as the original decision regarding its constitutional validity and the information on which it is made: see above.	The above controls be repeated and re-enforced as previously enforced.	In Place
F:11 Concerns are raised by individuals outside the council that are overlooked or not pursued effectively either because they are not taken seriously, or because there are	F:11:1 The council operates an effective whistleblowing line that is publicised both within the council and externally.	The council has such a policy in force which is well publicised to all staff (staff inductions, team briefs, daily message, etc.) and external users on our website front page.	In Place
	F:11:2 Both formally designated	All concerns are taken seriously, in full confidence and seriousness and are	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Progress Report	Status
insufficient available resources at the appropriate level.	whistleblowing concerns and concerns raised through other channels are taken seriously and considered by an appropriately senior officer.	considered by the Chief Executive in conjunction with the MO and HR Manager.	
	F:11:3 Such concerns are given priority and investigated until they are appropriately addressed (whether dismissed or found to have merit).	The Chief Executive ensures that all concerns are appropriately addressed and concluded.	In Place
	F:11:4 The information required to assess the concerns raised is identified and obtained.	The Chief Executive ensures that all relevant information is identified and obtained.	In Place

G: Other actions identified By Council in response to the Internal Audit report

Objectives

Risks	Expected controls	Council Action / Response	Lead Officer	Timeline	Progress Report	Status
		2 - The Council will ensure all relevant officers will receive relevant training in, amongst other things: risk management, project management, procurement, contract management, Council constitution, good governance, etc.	CEO	March 2016	Risk management training with Zurich is being arranged and our MO and Deputy s.151 Officer is providing procurement, contract management and Council constitution training to staff later in the year. In addition individual Personal Development Reviews will continue to identify specific training needs for individual members of staff	Awaiting Further Action
		3 - The Council will revise its risk register to make it much more detailed, establish a risk review panel to consider new projects from a risk perspective and establish a	s.151 Officer	March 2016	Head of Finance met with Chair of A&A (06/01/16) and concluded that the area of weakness was risk identification which drew out a number of	

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Council Action / Response	Lead Officer	Timeline	Progress Report	Status
		risk assessment process for Cabinet Members.			questions/considerations: <ul style="list-style-type: none"> • Ensure each service area has guidance on risk identification – <i>Action: Risk Strategy update and Management Team presentation</i> • Different prospective of risk: <ul style="list-style-type: none"> ○ Financial ○ Contractual ○ Reputational ○ Environmental ○ Strategic ○ Organisational ○ H&S ○ Regulatory / legislative ○ External (market forces) ○ Social Obligations <i>Action – Risk matrix update</i> • Corporate understanding of what each service area is doing. <i>Action completed re weekly management team</i> 	

Response to Issues arising from 'Bringing Empty Homes Into Use'
 Rossendale Borough Council

Risks	Expected controls	Council Action / Response	Lead Officer	Timeline	Progress Report	Status
					<p><i>updates as to departments key commitments. Project updates from teams also go in the monthly team brief.</i></p> <p>Risk register should provide further detail on Council assets. This may require an element of the Risk register and reporting to be taken in private due to commercial sensitivity. <i>Action – to be completed as part of 16/17 Risk Register update</i></p>	
					<p>The Risk Management Strategy has been updated (March 2016), to include amongst other things a wider evaluation of risk (as noted above). The update also includes a checklist for both the benefit of Members and Officers to aid with the identification of risk within the Councils projects and initiatives.</p>	In Place

Response to Issues arising from 'Bringing Empty Homes Into Use'

Rossendale Borough Council

Risks	Expected controls	Council Action / Response	Lead Officer	Timeline	Progress Report	Status
		4 - Future grant schemes in relation to property will always result in a local land charge where the law provides for this.	Monitoring Officer	March 2016	Local land charges within Rossendale have now been secure	In Place