



**OXFORD  
CITY COUNCIL**

# **Annual Governance Statement**

**2024 – 2025**

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## Executive Summary

Oxford City Council is committed to making Oxford a great place in which to live and work, supporting our communities. Our policies will address the climate emergency, and build a fairer, greener city in which everyone can thrive. These commitments are set out in the Council Strategy that establishes four interconnected priorities and how we will work to achieve them in a joined-up way.

The fifth priority and commitment in our Council Strategy is to be a “well-run council” reflecting our understanding that the foundation for the success of the Council is in good governance and sound financial management. The Annual Governance Statement is one of the key documents that ensures we are doing things in the right way and in line with our values.

This Statement incorporates the continuous review of the effectiveness of our governance arrangements throughout 2024/25, and due to the timing of the Annual Governance Statement it contains some reflections on significant events in 2025/2026. It sets out those areas where the Council has identified opportunities for improvement and it will make certain that we have the proper governance arrangements to ensure that the Council delivers on its commitments in its Council Strategy.

Throughout the year, the Council’s governance framework is continuously reviewed to ensure that the arrangements remain effective and to improve and streamline as needed. In reviewing the effectiveness of the Council’s governance framework, the commitments detailed within the Corporate Code of Corporate Governance (Appendix 1) are assessed, which is consistent with the principles of the 2016 CIPFA/Solace document, ‘Delivering Good Governance in Local Government’. This Annual Governance Statement has been prepared with reference to both.

The Leader of the Council and Chief Executive both recognise the importance of having good governance and sound financial management and provide their support and endorsement to the matters set out in this Statement, to further enhance and ensure the delivery of our Council Strategy.

The Leader and Chief Executive confirm they have been advised of the implications of the review by the Monitoring Officer, Section 151 Officer, other senior management as well as the Audit & Governance Committee and are satisfied that the steps outlined in this document will ensure the governance arrangements in place are robust and fit for the future.

Councillor Susan Brown, Leader of the Council

Caroline Green, Chief Executive

# Review of the Effectiveness of the Council's Governance Framework

## 1. Introduction

The Accounts and Audit (England) Regulations 2015 ("the Regulations") require that:

- the Council must conduct a review, at least once a year, of the effectiveness of its system of internal control;
- findings of this review should be considered by the Council;
- the Council must approve an Annual Governance Statement; and
- the Annual Governance Statement must accompany the Statement of Accounts.

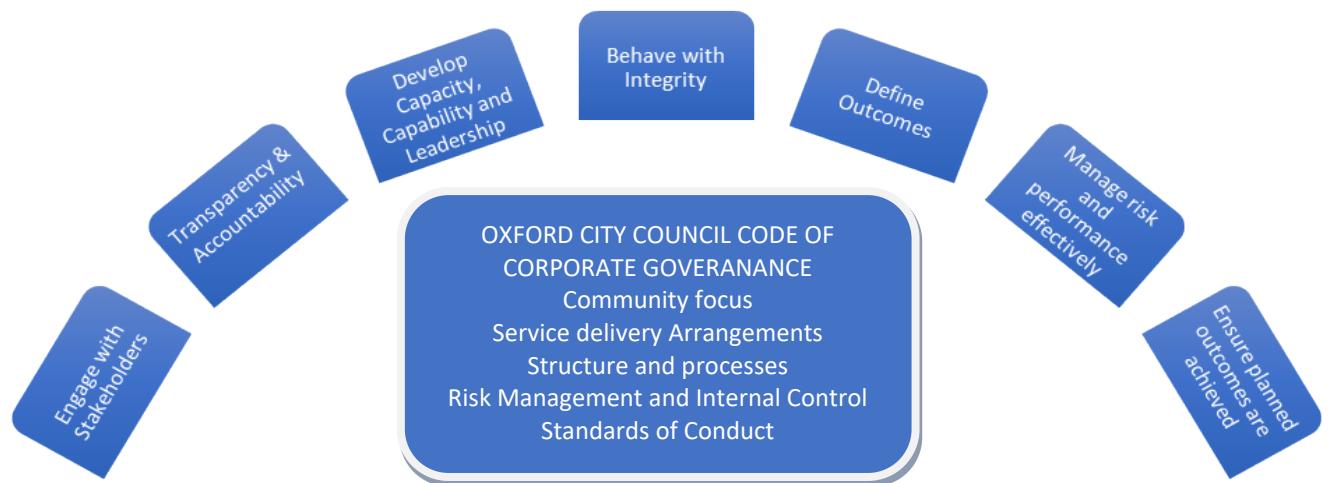
This statement is guided by CIPFA Bulletin 06 Application of the Good Governance Framework and describes the Council's governance framework, the steps taken to ensure that it is effective and establishes key actions that will be put in place to ensure the ongoing effectiveness of its arrangements.

Governance arrangements are reviewed and informed by senior officers, management, internal and external audit and review agencies. There is also strong corporate and political ownership and oversight, including through the Council's Statutory Officers.

Similar and proportionate oversight and governance arrangements apply to the Council's outsourced services, trading partnerships, shared service arrangements and arm's length bodies.

## 2. Governance Framework

The Council's Code of Corporate Governance sets out the principles the Council commits itself to in terms of its corporate governance arrangements and the steps it will take to enact them. They reflect the CIPFA/SoLACE Delivering Good Governance publication (2016) which defined the 7 core principles of good governance in the public sector:



The Council's Code of Corporate Governance is delivered via the Council's governance framework. The governance framework comprises the rules, systems, processes, cultures and values by which the authority is directed and controlled and various routes through which it accounts.

### 3. LGA Peer Review 2023

The Council invited in a Local Government Association (LGA) team to conduct a Corporate Peer Challenge (CPC) in July 2023. This was the first peer review the Council has had for eight years, and its purpose was to assess the work of the Council, ODSL and Oxford City Housing Investment Ltd, trading as OX Place, and gather an independent view from those running other councils on where the Council is doing well and where and how it might be able to improve.

A Progress Review was conducted in April 2024 to update LGA Peers on progress made against the action plan and the LGA Peer Review's recommendations.

In October 2024, the then Head of Corporate Strategy submitted a report to update the Cabinet on the Council's Action Plan based on feedback and recommendations from the Corporate Peer Challenge feedback report of April 2024.

The Cabinet agreed to:

- note the progress and updates in the Council's Action Plan update.
- note the Local Government Peer Challenge feedback report of April 2024; and
- incorporate the remaining tasks in the Council's Action Plan and the Council's ongoing work, which was to be monitored by the Corporate Management team.

Local Government Association – Corporate Peer Challenge: [The Council's Action Plan update](#) (following the 9 April progress review).

### 4. Cyber Security

Steps were taken in 2024/2025 to strengthen the Council's cyber security, with mandatory training rolled out for staff on a range of topics such as password security, fishing emails and reporting suspicious activity. The Council invested in its cyber security software following audit recommendations and Multi-Factor Authentication (MFA) was deployed.

Notwithstanding this, the Council was the victim of a cyber-attack in 2025/2026. A multi-disciplinary Cyber Incident Response Team was stood up, supported by external technical, communication and legal support. The Council implemented business continuity plans, with the immediate incident lasting a number of weeks before all systems were fully restored. A thorough post incident review has been completed resulting in a work programme of further improvements being instigated and along with additional resources as will be detailed in the AGS for the next financial year.

## **zHousing – Role as Social Housing Landlord**

Oxford City Council, along with other local housing authorities, has faced a number of major challenges that stem from being the local housing authority and needing to respond to increases in housing demand and supply, as well as the obligations that it also has as a social housing landlord. This includes new challenges brought by the Regulator for Social Housing and its Consumer Standards all of which represent a significant shift towards proactive regulation, demanding greater accountability, tenant satisfaction, safety and transparency.

Following a pilot inspection by the Regulator in early 2024, significant improvement work was undertaken starting with a fundamental strategic review of the HRA Business Plan, the development of a new Asset Management Strategy alongside a comprehensive reset of our tenant involvement work to ensure the development of both formal and informal structures through which tenants are able to influence and scrutinise the landlord function. A comprehensive set of reports were approved by the Council's Cabinet in December 2024 which set out a clear direction of travel and further improvements to be made.

A Housing Board was established with senior and statutory officer representation to govern this ongoing work. The Board was established to:

- maintain key strategic overview of the Housing Programme that involves management of the Council's Housing Revenue Account (HRA) business and associated strategies and policies, including quality & performance.
- oversee and steer the implementation and delivery of the overall Housing Delivery plan; and
- act as an advisory group and escalate key issues and decisions as appropriate

Reporting to the board are individual work streams which manage specific aspects of housing's work e.g. capital programmes, data quality, resident involvement are overseen. As the Board embeds, its role will be reviewed and refined.

The [Annual Housing Complaint Performance](#) was the second report since the introduction of the Housing Ombudsman complaint handling code.

From 1 April 2024 to 31 March 2025, we handled the following number of complaints at Stage 1:

- Stage 1 Complaints Handled by the Council - 226 (134 in 2023-24)
- Stage 1 Complaints Handled by ODS - 188 (431 in 2023-24)
- Stage 1 Complaints Total - 414 (565 in 2023-24)

And the following at Stage 2:

- Stage 2 Complaints Handled by the Council - 38 (19 in 2023-24)
- Stage 2 Complaints Handled by ODS - 13 (11 in 2023-24)
- Stage 2 Complaints Total - 51 (30 in 2023-24)

Whilst complaints handled by the Council have risen by 68.7%, the overall number of complaints is lower than last year due to the considerable drop in complaints handled by ODS. This is as a result of realigning responsibility for complaints.

48.6% of Stage 1 complaints handled by the Council and 100% of Stage 1 complaints handled by ODS were responded to within the Housing Ombudsman's Complaint Handling Code timescales.

83.8% of Stage 2 complaints handled by the Council and 100% of Stage 2 cases handled by ODS were responded to within the Housing Ombudsman's Complaint Handling Code timescales

In 2024/25, we received 7 decisions from the Housing Ombudsman, made up of 5 determinations, 1 finding that it was outside of jurisdiction, and 1 case resolved with Ombudsman intervention prior to investigation.

Overall, on the points investigated within the determinations they found:

- 6 instances of service failure
- 3 instances of maladministration
- 1 instance of no maladministration
- 2 instances of reasonable redress

Across the Housing sector, there has been an increase in complaints received over the last few years, with the Housing Ombudsman reporting accepting more than double the number of cases for investigation in 2023/24 than they did in 2021/22.

## 5. Corporate Complaints

The Corporate complaints and housing complaints functions were separated out in April 2024 in line with guidance and best practice and reflective of the fact that each regime has its own ombudsman.

Corporate Complaints in 2024/2025 were subject to a refresh with a session being held for all staff which outlined what a complaint was and the process and requirements.

The introduction of recording and responding to complaints using our Customer Relationship Management (CRM) system has provided great benefits, and we are continuing to make modifications to our systems and processes to gain better insight into the types of complaints we receive and the residents we serve, as well as monitoring learning and outcomes. This should enable us to provide greater insight moving forward, and we already have much more data available to us than we have previously.

The Corporate complaints process was updated and adopted in August 2024 to reflect the Ombudsman guidance. A policy is in development for complaints to supplement this which will be adopted in 2026/2027.

A Vexatious Citizen Policy was introduced in line with the Local Government Ombudsman and Information Commissioners Officer guidance to ensure a clear and robust process for dealing with citizens who meet the thresholds set out therein and setting out clear expectations of the Council as to unacceptable treatment of Staff and Councillors.

There has been some delay in responses to corporate complaints which is currently being addressed. An action plan is in place to deal with the backlog and also to ensure that new complaints are dealt with in a timely manner. The issue has arisen primarily due to staff absences. A focused review of the service is planned to improve overall process and resilience.

## 6. Information Governance

Our FOI Team (“the Team”) has been built on a comprehensive transformation initiative which had the primary goal of enhancing the efficiency of processes within the FOI function. The overarching objective was to elevate our on-time response rate by addressing inefficiencies that had previously hindered our performance.

The transformation initiative focused on process improvement, enhanced documentation, and the introduction of new technology to centralise our case management system. Notable changes included the introduction of new email and document templates, expediting response creation times. Workbasket filters were implemented to facilitate team workload prioritisation, while automatic reminders were introduced to minimise the need for manual follow-ups on contribution requests.

Additionally, a new disclosure log aimed at enhancing citizen experience and reducing FOI requests was implemented. The performance of the Team in terms of the timeliness of responses to FOI requests is published on the Council’s website.

As a result of these changes, significant improvements were achieved.

- Timeliness rates surged as a result and were maintained over the course of the year despite an increase in the volume of requests received over the course of the year.
- Time spent on sending out contribution requests to colleagues was halved.
- The volume of contributions requiring follow-up further decreased.

The Team also rolled out and promoted a new FOI training module to everyone in the organisation and implemented a refreshed Freedom of Information Policy.

Data Protection Audits by the team and the Internal Auditor have been conducted in 2024/2025 going into 2025/2026, which have identified concerns over corporate record keeping in relation to retention schedules, Records of Processing Activity and data sharing logs. These have been reviewed, updated and also challenged in the various service areas as a result of the cyber incident in 2025. They will be finalised early in 2026 with a programme of regular review being established.

In terms of corporate performance on Information Governance In 2023/2024:

### FOIA/EIR

- we received 954 FOIA/EIR requests, an average of 80 a month;
- 44 of the requests were subject to an internal review;

- 13 of the requests were referred to the Information Commissioners Officer, though 5 of those pertained to one individual and one topic.

There is a small increase in requests, but overall the work remains static and compliance with the statutory deadlines for responses are well met.

### **Data Protection**

- There were 81 data incidents/breaches (two of which were serious enough to be referred to the ICO).
- The Council had 138 Data Subject Access Requests (DSAR).
- Only one Data Subject Access Request was subject to an internal review.

This is an increase on the previous years in terms of DSAR and also breaches, though the number reported to the ICO remains unchanged. In the coming year there will be a refresh of training, with all staff required to attend, and then a development of new targeted training modules to address common issues arising and specific areas of the council with additional risks and responsibilities.

### **7. Health and Safety**

New governance arrangements for the Council's Health and Safety Management were introduced and are now in place with oversight by specific boards with the relevant senior managers and operational staff in attendance to challenge and monitor.

Governance arrangements are currently under review for the Council's wholly owned companies to improve oversight and monitoring of health and safety management and key performance indicators and address any gaps.

The Health and Safety Policy has been recently updated, and a new health and safety system has been procured to better support managers and reporting.

Quarterly reporting to the Corporate Leadership Team ("the CLT") is working well and has led to improved engagement with health and safety across the organisation.

There has been a focus on rolling out targeted staff training and ensuring mandatory training is undertaken by all staff through the new health and safety system and this continues to be reviewed, with refresher training required at appropriate intervals.

### **8. Homelessness and Housing Needs including Temporary Accommodation**

In response to the need to respond to increases in housing demand and supply the Council has developed and is delivering a comprehensive temporary accommodation mitigation strategy to manage the demand, supply and financial implications linked to the provision of temporary accommodation.

This has included building up an increased supply of private sector leases to manage the demand, developing a comprehensive framework for procuring additional accommodation as well as investing in prevention services and rapid move-on services.

Over the coming year, a refreshed mitigation plan will be implemented which goes even further to meet the increasing demand.

## 9. Procurement

The Council has established a Procurement Board (“the Board”), attended by key senior officers and specialist, as a platform/forum for sharing, learning, and collaborating amongst procurement, commercial and commissioning professionals who are subject to the Public Contract Regulations 2015 and who are also now subject to the new procurement regime – Public Procurement Act 2023 (Public Procurement Regulations 2024).

The Board’s purpose is to enhance procurement capability through peer support, by ensuring that new best practice is created and shared, challenges are discussed, and trends and risks are identified and addressed.

The Procurement Team adopted a Business Partnering Model during 2025 with the aim of supporting the Council in the transition to the Public Procurement Act 2023 (the Act), and the many requirements of the Act (17 Notices) giving regard to the National Procurement Policy Statement, pipeline identification, contract management, social value, transparency requirements to name but a few.

A new draft procurement Strategy has been developed which will be presented to Cabinet in December 2025.

## 10. Council Owned Companies

The Council has three wholly owned companies, Oxford Direct Services Limited (ODSL), Oxford Direct Trading Services Limited (ODSTL) and Oxford City Housing Limited (OCHL).

OCHL has two wholly owned subsidiaries, Oxford City Housing Development Limited (OCH(D)L) and Oxford City Housing Investment Limited (OCH(I)L), trading as OX Place although following the transfer of all properties held in OCH(I)L to the Council, this subsidiary is currently dormant.

In addition, the Council has a 50% share in the joint venture entities, Oxford West End Development Limited in partnership with Nuffield College for the development of land at Oxpens and Barton LLP in partnership with Grosvenor Developments for the development of social and market housing on land previously held by the Council at Barton.

Governance arrangements are in place for the companies and partnerships with the Council as Shareholder, with a dedicated part of the Finance and Performance Working Group (or the Scrutiny Committee) and feedback taken to the shareholder meetings (SHJVG). Non-Executive Directors were for each company, appointed against a job description which sought to secure board members with appropriate skill sets for the nature of the particular entity. The Shareholder role is performed by some members of the Cabinet collectively appointed to the relevant Shareholder Committee.

In light of the Local Partnerships Local Authority Company Review Guidance 2023 a review was undertaken in relation to the Articles and Shareholder Agreement of ODS and ODSTL, a review of Ox Place's governance documentation will commence in this coming municipal year (2026/2027).

Other areas of practice, whilst adequate, have been identified for improvement with a work plan in draft for the financial year 2024/2025. The areas of focus are as follows.

	At present	Improvements planned / in progress 2024/2025
Scrutiny Function	<p>The Scrutiny Committee is now involved in the process for shareholder decision making (via the Finance and Performance Working Group (of the Scrutiny Committee)) and matters proceed to the Scrutiny Committee prior to the SHJVG for consideration as the Committee determine.</p>	<p>The Scrutiny function will continue as it has this last municipal year. Work is required with the companies to ensure that decisions and update reports are on the forward plan in a timeframe to allow the Scrutiny Committee to consider the matters it may want to have before it.</p>
Intelligent Client	<p>The Council has had a light touch approach to clienting, which is historic from when the entities were established.</p> <p>This has presented some questions this year in terms of issues that have arisen in the services provided to the Council. The Council has recognised the need to review this to strengthen clienting of services commissioned by the council.</p> <p>Arrangements have been strengthened this year in relation to works contracts that the Council has with ODSL to ensure robust oversight of the CDM compliance by the Council and ODSL.</p>	<p>A clienting review and, in time, review of the contractual arrangements is underway. This will establish a framework for intelligent clienting, specifically, to enable challenge of the entity, holding it to account using performance data to ensure there is clarity about what is being provided for the Council and whether it meets expectations.</p> <p>Reviews of specifications of services and KPIs will take place to ensure that they adequately describe the service being provided to the Council. Client managers have been appointed for all service areas and monthly meetings are held between client and ODSL managers to discuss operational matters with highlight reports being reported</p>

	At present	Improvements planned / in progress 2024/2025
		to a monthly Strategic Companies Board.
Company Governance Documentation	<p>The Council has in place shareholder agreements with each entity that set out matters reserved to the Council as shareholder, including things such as Non-Executive Director (NED) appointments.</p> <p>The companies have adopted articles which are broadly the same across the entities.</p> <p>As part of the company governance review these have been amended for ODSTL and ODSL.</p>	OCHL governance documents review will take place during the coming municipal year (2026/2027) and thereafter there will be regular reviews of each. This will include consideration against those of ODSTL/ODSL and the best practice guidance issued by Local Partnerships.
Statutory Officers	<p>The Council's Statutory Officers, or their representative, attend the SHJVG meetings. The Monitoring Officer and S151 (or their deputy) advise the SHJVG at the meetings as required.</p> <p>The S151 and Monitoring Officer have pre-publication sight of reports via the Corporate Leadership Team.</p> <p>The S151 and Monitoring Officer provide commentary to the SHJVG on reports as part of the agenda pack.</p> <p>In line with best practice the Chief Executive meets with the Managing Director (or equivalent) and Chair of the Board of the companies on a regular basis.</p>	There is a need to refine the pathways for shareholder decision making to ensure that the Council officers are in receipt of the papers in advance of them being sent for decision so that there can be a proper consideration of them.
Business Case	When creating an entity, a business case is produced and presented to the Cabinet.	Best practice suggests that the business cases of each entity should be reviewed

	At present	Improvements planned / in progress 2024/2025
	<p>This will include detail on all the implications, responsibilities, risks and benefits of establishing the entity.</p> <p>No entity will be considered without a business case.</p> <p>Through the business case the Council has a clear understanding of what it wants to achieve by establishing an entity and is able to articulate clearly what success looks like in terms of achieving social outcomes and a return on investment.</p>	<p>periodically. This has not been undertaken since the entities were established.</p> <p>It is proposed to review the business case for the entities, but this will tie in with other connected areas of work, such as the consideration of the structure of the housing group of companies.</p> <p>There will then need to be agreement on a regular basis for reviewing them moving forward.</p>
Conflict Management	<p>The Council ensures that no Statutory Officers are on the board of any entity.</p> <p>The Council and each entity has a code of conduct and policy on conflicts of interest.</p> <p>The selection of NEDs from officers in the Council will be made regarding their responsibilities in post and the possibility of a conflict arising.</p>	<p>Training should be arranged on a regular basis for all NEDs on directors' duties and conflicts of interest.</p> <p>Guidance should be produced for council officers specifically in relation to interaction with the Council's companies and conflicts of interest.</p> <p>This should be mirrored in the entities.</p>
Board performance	<p>The Council has an updated Job Description for its NEDs as of 2024. This has been used in the latest round of recruitment. It reflects the skills and qualities needed for an effective NED of the Council's companies.</p> <p>There are regular 121's and performance reviews with the chair of the relevant board.</p>	<p>The boards of ODSTL and ODSL have been refreshed in 2025 and composition addressed so that there is a minimum of 50% NEDs. The Board of OCHL will be refreshed in Early 2026 when the currently serving NEDs' terms come to an end.</p>

The current business plan for OCHL expires in 2034 due to a declining development programme on existing planned sites and a lack of further pipeline. The Council and the company have jointly procured external consultants to consider the best future options for the company including what changes may need to be instigated to secure the way forward.

## 11. Statutory Assurances and Controls

## Head of Paid Service

The Chief Executive, as the Head of Paid Service, is responsible for the overall corporate and operational management of the Council. These responsibilities have been considered within the context of this Statement and the Chief Executive can confirm that proper arrangements have been put in place for the overall operation and management of the Council.

The Chief Executive has no significant concerns to report and continues to evolve the senior management structure and organisational strategy to align responsibilities and resources to deliver the Council's ambitions and priorities.

## S151 Officer

The Chief Finance Officer is responsible for the development and maintenance of the Council's financial, risk, and control framework, ensuring lawfulness and financial prudence of decision making and the administration of financial affairs, in accordance with Section 151 of the Local Government Act 1972.

These responsibilities have been considered within the context of this Statement and the Chief Finance Officer can confirm that the Council's arrangements conform to Section 151 of the Local Government Act 1972 and that the Council complies with the CIPFA Statement on the Role of the Chief Financial Officer (CFO) in Local Government (2016).

A significant part of the conformity review relates to financial control the Council's Medium Term Financial Plan (MTFP) and the Council's Statement of Accounts. Financial controls are monitored and maintained by the Management Accounts Team acting in a business partnering role with service directors and operational managers. Other staff in the Financial Services Team ensure there are appropriate controls in place that are adhered to for processes such as procurement, ordering and payment for goods and services, collection of income and the security of assets terms. Assessment of the design of the control framework and the effectiveness of these controls is subject to continuance assessment by the Council's internal auditors BDO, more detail on which is given below. Reports from the auditors are regularly presented to the Audit and Governance Committee on areas subject to audit and recommendations from these reports tracked until they have been implemented in full.

The Council's Medium Term Financial Plan set for 2024-25 in February 2024 provided a balanced budget for the year as well as the following 3 years. General Fund revenue outturn for the year is shown as a £2.3 million deficit around £1.2 million adverse to budget. The forecast General Fund revenue outturn for 2025-26 currently indicates an adverse variance of around £700k. The Council's balanced MTFP for the four-year period commencing 1-4-2026 is about to be submitted to Cabinet in December 2025, although in reality the Council's future beyond April 2028 is uncertain, given the upcoming Local Government Review. Notwithstanding this, the Council's level of reserves in the opinion of the Section 151 Officer are adequate for foreseeable future.

The Statement of Accounts for 2024-25, accompanying this statement, will continue to be disclaimed by the Council's auditors. In 2022-23 and 2021-22 the auditors did not have sufficient time to complete the audit and consequently were unable to express an opinion to comply with the Government backstop dates for reporting of December 2024. The accounts for 2023-24 were finalised and audited by the backstop date of February 2025 albeit with a disclaimed opinion. It is expected that Ernst and Young, in order to meet the February 2026 backstop date will once again issue a disclaimed opinion for the 2024-25 Statements, given the balances brought forward from prior years have been disclaimed. This process is likely to continue for the next few years.

#### **Monitoring Officer**

The Monitoring Officer is required to report to the council in any case where it appears that any proposal, decision, or omission by the authority has given rise to or is likely to or would give rise to any contravention of any enactment, rule of law or code of practice or maladministration or injustice in accordance with Sections 5 and 5A of the Local Government and Housing Act 1989; (LGHA 89).

These responsibilities have been considered within the context of this Statement and the Monitoring Officer has no significant concerns to report for the period 2024/2025.

The Monitoring Officer has reported to the Information Commissioners Officer (ICO) on two occasions a data breach, against which no further action has been taken by the ICO. Suggested courses of actions from the ICO together with learning and improvements have been implemented as a consequence of each, within the relevant department and corporately.

Because of the cyber-attack that the Council was victim to in 2025, a report to the ICO was made and this is still in progress in terms of ICO consideration. This will be reported in the 2025/2026 Annual Governance Statement, along with resulting actions, but is of note at this stage.

The Monitoring Officer also has no significant concerns regarding overall Member conduct however there have been three complaints this year that have proceeded to a hearing and with a finding of breach. Training sessions have been held during the year for Members of the council and were updated to be more interactive, with positive feedback. Overall, however, there has continued to be a relatively low number of complaints alleging a breach of the Member Code of Conduct during the past year which have all been dealt with in accordance with the Council's adopted procedures for handling such complaints.

The Monitoring Officer also considers that the Council has an effective Standards Committee which reviews a regular report at each of their meetings on the progress of the code of conduct complaints. That said the procedures for dealing with standards complaints are due a review to address some issues that have arisen in light of the three matters that proceeded to hearings.

The refresh of the governance around the forward plan and report pathways and templates has been positive in terms of improving decision making however there remains work to be done. We have seen a reduction in urgent decisions, which was a concern of the Scrutiny Committee and Leader, and we continue to ensure this is the case.

The constitution has had an annual review and been updated also on a responsive basis as needs arise. It will have its annual review in 2026/2027, including a review of the member standards procedures.

There was an increase in urgent and urgent key decisions during 2024/2025 which were subject to a report to the Council's Scrutiny Committee. These are reported to Council as taken, and taken in line with the Constitution. Work has been undertaken to ensure that urgent decisions are kept to a minimum and the Forward Plan was refreshed to be clearer and easier to use, with automated forms for submission. It is reviewed by the Corporate Leadership Team (CLT), in order to ensure senior oversight and capture any that may be missing. This has seen a reduction in urgent decisions and removal of call in.

Report templates were reviewed and refreshed to ensure that they were capturing all the information required in decision making, including bringing in a link to the Forward Plan and ensuring exempt papers are individually exempted and explained. This includes the introduction of a Delegated Decision template for publication of key decisions and those delegated to officers other than in the constitution. This has increased clarity around who is taking decisions and why.

#### Opinion of Internal Audit

In July 2025 the Council's internal auditors, BDO, presented their Internal Audit Annual Report and Statement of Assurance 2024-25 to the Council's Audit and Governance Committee. In their report the auditor provided

'Moderate assurance that there is a sound system of internal control, designed to meet the Council's objectives, that controls are being applied consistently across various services, with some levels of non-compliance'.

This opinion is in line with previous opinion from the internal auditor.

#### 12. Review of Effectiveness

The Council has a legal responsibility to conduct an annual review of the effectiveness of its governance framework, including the systems of internal control. After conducting this review, the Council has assurance that its governance arrangements and systems of control are robust and reflect the principles of the Code of Corporate Governance.

There is a clear separation of powers within the Council between the Leader and the Cabinet (the Executive) and the full Council. Both entities have a number of sub-groups and committees which have tailored rules and delegations in the Constitution relating to their governance.

Overall the Council is satisfied it has robust internal controls in place, good governance practices and is assured that the Code of Corporate Governance is working effectively.

Overall rating*	Strengths	What needs attention
Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law		
382	<ul style="list-style-type: none"> <li>Demonstrable consistent implementation and use of the Code of Conduct for members</li> <li>Code of Conduct training undertaken by councillors post May elections in a revised format which increased engagement and participation and was well received.</li> <li>Parish Councils invited to attend the Code of Conduct training.</li> <li>6 Independent Persons were appointed in 2025, compared to the previous two.</li> </ul>	<ul style="list-style-type: none"> <li>Guidance and clarity provided within the organisation on who can seal and sign documents with the introduction of electronic signature solutions due in 2026.</li> <li>With the amendment to the Council's Contract Rules there is a need to develop a section specifically outlining property and grants rules and these will be removed from the Contract Rules as it is not the right place for them.</li> <li>The Governance review of OCHL will need to be undertaken upon the appointment of a Company Secretary.</li> <li>The process for officer declaration of gifts, hospitality and conflicts of interests needs to be reviewed in terms of where and how matters are registered by staff and how this connects to requirements under the Procurement Act 2023.</li> <li>A review of the arrangements for dealing with Member Code of Conduct complaints will be carried out in 2026</li> <li>Governance Training to be introduced and made mandatory with the introduction of a new e-learning system in 2026.</li> </ul>

Ensuring openness and comprehensive stakeholder engagement	
	<ul style="list-style-type: none"> <li>Residents Survey Results demonstrate improved satisfaction with area as a place to live, with how the council runs things and how the council keeps residents informed.</li> <li>We have engaged public and stakeholders extensively this year in the development of proposals for future unitary councils under local government reorganization.</li> <li>We have reset our relationship with tenants and leaseholders, co-designing a new Resident Involvement Strategy that sets out a wide range of actions to further ensure transparency and accountability of services to residents. This includes the establishment of a new Tenant and Leaseholder Board.</li> <li>Utilisation of the Council's online Residents' Panel - a group of c1000 residents providing feedback on various topics, including the Council's current work, services, and broader issues. The independently managed panel is broadly representative of the population to ensure diverse voices are heard.</li> <li>The Council is involved in a number of active strategic partnerships working together at all levels – from large anchor institutions to small community groups. Including: <ul style="list-style-type: none"> <li>Oxford Strategic Partnership</li> <li>Oxfordshire Joint Leaders Committee (previously Future Oxfordshire Partnership)</li> <li>Oxfordshire Health and Wellbeing and Health Improvement Boards</li> <li>Oxfordshire Children's Trust Board</li> </ul> </li> </ul>

	<ul style="list-style-type: none"><li>• Oxford Youth Partnership Board</li><li>• Oxfordshire Strategic Schools Partnership</li><li>• Oxford Localities Forum Meetings</li><li>• Oxford Community Safety Partnership</li><li>• Fast Growth Cities Group</li><li>• Oxford to Cambridge Pan-Regional Partnership</li><li>• Zero Carbon Oxfordshire Partnership</li><li>• Oxfordshire Inclusive Economy Partnership</li><li>• Oxford Economic Growth Steering Group</li><li>• University and Innovation Partnerships</li><li>• Councillor representation on community groups</li><li>• District Councils Network</li><li>• Local Government Association</li><li>• Oxfordshire Safeguarding Children Partnership</li><li>• Oxfordshire Adult Safeguarding Board</li></ul>	
	<p><b>Defining outcomes in terms of sustainable economic, social, and environmental benefit</b></p> <ul style="list-style-type: none"><li>• The Council's Strategy sets out objectives and outcomes and outlines the planned work against five priorities:<ul style="list-style-type: none"><li>◦ Good, affordable homes</li><li>◦ Strong, fair economy</li><li>◦ Thriving Communities</li><li>◦ Zero Carbon Oxford City Council.</li><li>◦ Well Run Council</li></ul></li><li>• A review and refinement of the existing policy and strategy development toolkit was undertaken and implemented.</li><li>• The Council has a suite of 18 quantifiable corporate key performance indicators (KPIs) to measure delivery of the Council Strategy.</li></ul>	<ul style="list-style-type: none"><li>• There will be a review and refinement of the role and membership of the Policy Officers group in 2026/2027. The People Strategy has been reviewed and updated for 2024- 2026. One of its objectives remains to support local communities by working with local schools and promote apprenticeship opportunities. This supports delivery of the Council's social value commitments. In addition, we have procured local suppliers to deliver training programmes.</li><li>• Procurement processes support the securing of social value on appropriate</li></ul>

	<ul style="list-style-type: none"> <li>• In addition to these corporate KPIs, the Council sets 105 operational KPIs that are reviewed regularly by the Corporate Management Team. Many of these tracking operational metrics are reported as part of regular performance updates to Finance &amp; Performance Scrutiny, the annual Business Plan and the budget process.</li> <li>• The Council's People Strategy 2024 reinforces the corporate aims of putting the citizen at the heart of what we do as an entity.</li> <li>• The Council has voluntarily adopted the Socio-Economic Duty to help: <ul style="list-style-type: none"> <li>◦ Reduce inequality</li> <li>◦ Promote fairness</li> </ul> Enhance inclusive decision making</li> </ul>	procurements and Match My Project platform is being used to match needs with offers of support.
Determining the interventions necessary to optimise the achievement of the intended outcomes		
	<ul style="list-style-type: none"> <li>• The Council's annual Business Plan sets out publicly its priority work programme activities for the year required to achieve the outcomes set out in the Council Strategy. An annual update report informs of progress that has been made in delivering the Business Plan.</li> <li>• The Council has a strong policy framework with a robust schedule for developing, monitoring, and reporting policies and strategies to the CLT quarterly. Monthly horizon scanning highlights internal, county, and national policy and strategy developments</li> </ul>	<ul style="list-style-type: none"> <li>• LGR will require new programmes of work to prepare for mobilisation and implementation, these need leadership and resourcing and will be carefully planned to minimise disruption to delivery of BAU, service improvements and planned projects.</li> </ul>

382	<p><b>Developing the entity's capacity including the capability of its leadership and the individuals within it</b></p> <ul style="list-style-type: none"> <li>• Clear standards are in place for managers and leaders across the organisation</li> <li>• Management development for 150 managers at all levels has been delivered to build a culture where high performance is both motivated and managed</li> <li>• The annual staff survey measures employee satisfaction with their immediate manager and the leadership of the authority</li> <li>• Opportunities for development through secondment is supported</li> <li>• An aspiring manager programme is designed to develop future leaders and is a positive action initiative to improve the diversity of colleagues in management and leadership roles</li> <li>• The Councillor Induction Programme was updated and expanded to include additional support on key issues affecting the Councillor role, as well as providing clarification on the expected standards of behaviour of councillors.</li> <li>• Our People Strategy was refreshed in 2024 and takes into account the current challenges facing the Council, and sets objectives designed to build a high performing organisation that meets the needs of the community it serves. The People Strategy also aims to support the Council's planned work against its five priorities.</li> <li>• Mandatory training for Councillors reviewed and refreshed, with format of delivery being reviewed</li> </ul>	<ul style="list-style-type: none"> <li>• Following the Senior Management Restructure further leadership development work with CLT and senior managers will take place to support greater delegation of operational decision making and create opportunities for progression.</li> <li>• Leading through change will need to be a focus of leadership development to ensure we are prepared for LGR and that staff are in the best possible position to benefit from opportunities that arise.</li> <li>• Introductory workshops for new managers will be implemented, with an opportunity for existing managers to attend for a refresh</li> <li>• A review is ongoing of councillor development and training non-mandatory. This will focus on providing councillors with the training needed to undertake their role and targeted where required particularly in relation to regulatory, corporate, wellbeing and safety priorities. It will also focus on encouraging engagement with sessions by councillors.</li> </ul>
Managing risks and performance through robust internal control and strong public financial management		

	<ul style="list-style-type: none"> <li>• A balanced four-year medium term financial plan with robust scrutiny from Corporate Leadership Team and Scrutiny members</li> <li>• Regular financial reporting to CLT and Members</li> <li>• Regular risk monitoring, supported by a Risk Management Group and reporting of risks to Corporate Leadership Team and Cabinet</li> <li>• Oversight of the financial performance of companies and regular catch up with Company Finance Directors</li> <li>• Independent commentary by Statutory Officers on reports from Companies and joint entities presented to shareholders</li> <li>• Operational and corporate KPIs dashboard regularly reviewed by CMT</li> <li>• Regular review by Audit and Governance Committee of internal audit reports and the implementation of recommendations</li> <li>• Moderate internal audit assurance opinion from internal auditors i.e. no major weaknesses in the internal control systems</li> <li>• Compliance with the Government backstop dates for the presentation of audit opinions on the Statement of Accounts and this Annual Governance Statement alongside that</li> <li>• The Corporate Leadership team undertook a piece of work to fundamentally review our corporate risk register to ensure it is strategic and cross-cutting. Some which were considered to be service-related measures were placed in service risk registers and KPIs were reviewed and updated.</li> </ul>	<ul style="list-style-type: none"> <li>• There will be continued adherence to policies and procedures in order to ensure good financial management and internal control across the authority.</li> <li>• Review and refresh of cost centre management guidance and training including the use of key financial systems</li> <li>• Review of Corporate Credit Card use and embed approval process in organisation.</li> <li>• The Corporate Dashboard will be refreshed to improve CLT oversight of performance, risk and escalation.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Legislative requirements for meeting papers adhered to for all committees</li> <li>• Clear policies on access to information for members</li> <li>• FOIA and DSAR response times remain consistently within the statutory limits</li> <li>• Good practice in publishing officer / delegated decisions, with all delegated decisions being published correctly and any key decisions being added to the Forward Plan in good time with an improvement in the year on reduction in urgent decisions which were avoidable.</li> <li>• Disclosure log now in place and updated with FOIA releases</li> <li>• Forward plan now included SHJVG matters</li> <li>• Scrutiny by members to ensure management are held to account to its electorate for the financial stewardship of funds and operation of processes. This includes a monthly committee and three specialised working groups to provide scrutiny of three strategic areas for the Council</li> <li>• Implemented processes and templates to ensure that the exemption of documents from published decision making is properly done and justified.</li> </ul>	<ul style="list-style-type: none"> <li>• Work is continuing to review and publish internally departmental schemes of delegation</li> <li>• Earlier engagement of wide-reaching reports to the Scrutiny Committee to be reviewed to ensure more focussed and engaged feedback and any amendments can be included before submission to Cabinet or Council.</li> <li>• Add to the forward plan decisions to be taken at Audit and Governance and Licensing Committees to ensure senior leadership has oversight of decisions and relevant matters</li> <li>• Review the access to information policy for members</li> </ul>
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	<p>There are sound policies and processes in place which are working across services that provide for good governance arrangements and support compliance with the requirements of this principle and the achievement of the Council's aims and objectives. There may be minor areas for continuous improvement, but these do not represent a significant or material risk to the Council's overall governance framework.</p>
	<p>Whilst there are policies and processes in place, there are some areas which remain a challenge for the Council or require further improvement, which may impact the effectiveness of elements of the Council's Governance Arrangements, compliance with this principle and achievement of the Council's aims and objectives. The Council has in place an action plan to address challenges and improvement matters</p>

 The Council has significant challenges in relation to the policies and processes which may impact the effectiveness of elements of the Council's Governance Arrangements, compliance with this principle and achievement of the Council's aims and objectives. We have implemented plans for corrective actions to manage these risks

# Action Plan 24/25

Action to be taken	Lead Officer	Reporting / Monitoring
Review of the governance documents and arrangements for OCHL group	Emma Jackman	SHJVG / CMT & A&G
Review of the Money Laundering Policy	Nigel Kennedy	A&G October 2024
Review of the Risk Management Strategy	Nigel Kennedy	Cabinet / CMT & A&G
Deliver a plan to support the new competency and conduct standard for Social Housing being introduced in October 2026. (covered below by Nerys?)	Gail Malkin	Cabinet/ CLT
Each Service Area to develop and publish on the intranet their own scheme of delegation for powers flowing to them from Cabinet and/or Council	Each Head of Service	Cabinet / CMT & A&G
Review and refine the existing policy and strategy development toolkit by August 2026	Lucy Cherry	CMT
Implement our comprehensive action plans for transforming the organisation, operation and governance of all aspects of our housing services, controlling and driving down our temporary accommodation, as well as ensuring compliance with the Consumer Standards and Social Housing Act in our role as a social housing landlord	Nerys Parry	Cabinet / CMT
Continue through the Procurement Board to review of the Council's processes and procedures	Annette Osborne	CMT
Review guidance documents for all processes	Annette Osborne	CMT
Work with legal to finalise the tender documents for all processes (RFQ's, ITT's, CFP, Assessment summaries, evaluation matrices)	Annette Osborne	CMT
Deliver Contract Management Training	Annette Osborne	CMT
Deliver Evaluation Training	Annette Osborne	CMT
Work with legal to finalise new sets of terms and conditions with guidance as to how each set should be used	Annette Osborne	CMT
Complete the refresh of the Service KPI reporting and process	Mish Tullar	CMT
Continue to build capability for adoption of new technology, particularly Artificial Intelligence, and business transformation to drive efficiency and effectiveness	Gail Malkin	CMT
Review Councillor development and training	Jonathan Malton	Standards Committee
Prepare for compliance with the new Employment Rights Bill	Gail Malkin	CLT

Action to be taken	Lead Officer	Reporting / Monitoring
Prepare the organisation for LGR through individual development, resource management challenges and preparedness for change.	Gail Malkin	CLT
Implement the 2024 to 2026 revised People Strategy	Gail Malkin	CLT
Senior Management Review	Caroline Green	
Review and produce complaints policies for corporate and housing related complaints	Tom Hook / Nerys Parry	CLT / Cabinet
<b>Constitutional Amendments</b>		
Review of arrangements for dealing with Code of Conduct complaints	Emma Jackman	Standards Committee
Annual Review to be undertaken and signing of agreements governance to be reviewed upon the implementation of e-signature solutions	Emma Jackman	Council / CMT
Develop a section specifically outlining property and grants rules	Emma Jackman	Council / CMT
Refresh the Whistleblowing Policy	Emma Jackman	Council / CMT

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