

Norfolk County Council & District Councils Norfolk Parking Partnership Joint Committee

Date: **Thursday 20 September 2012**
Time: **2.00pm**
Venue: **Council Chamber – County Hall**

Membership

County Councillors

Mr G Plant (Chairman)

District Councillors

Mr K Kiddie	South Norfolk District Council
Mrs E Nockolds	Kings Lynn & West Norfolk District Council
Mr M Castle	Great Yarmouth Borough Council

Substitute

Mr B Long	Kings Lynn & West Norfolk District Council
Mr B Spratt (Vice Chairman)	Norfolk County Council

Non-Voting District Council Representatives

Mr B Bremner	Norwich City Council
Mr K Johnson	North Norfolk District Council
Mr M Kiddle-Morris	Breckland District Council

A G E N D A

1. Apologies for Absence

2. Minutes

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To receive the minutes of the meeting held on 23 March 2012.

3. Declarations of Interest

If you have a Disclosable Pecuniary Interest in a matter to be considered at the meeting and that interest is on your Register of Interests you must not speak or vote on the matter. It is recommended that you declare that interest but it is not a legal requirement.

If you have a Disclosable Pecuniary Interest in a matter to be considered at the meeting and that interest is not on your Register of Interests you must declare that interest at the meeting and not speak or vote on the matter.

In either case you may remain in the room where the meeting is taking place. If you consider that it would be inappropriate in the circumstances to remain in the room, you may leave the room while the matter is dealt with.

If you do not have a Disclosable Pecuniary Interest you may nevertheless have an Other Interest in a matter to be discussed if it affects

- your well being or financial position
- that of your family or close friends
- that of a club or society in which you have a management role
- that of another public body of which you are a member to a greater extent than others in your ward.

If that is the case then you must declare an interest but can speak and vote on the matter.

4. Progress Report

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Report by the Director of Environment Transport and Development

5. Norfolk Parking Partnership Financial Performance

(Page 5)

Report by the Head of Finance

6. Norfolk Audit Services: Appointment of Internal Auditor, Internal Audit Terms of Reference, Code of Ethics and Strategy

(Page 7)

Report by the Head of Finance

7. Meeting dates for 2013

To agree two meeting dates in 2013.

County Hall

Martineau Lane
Norwich
NR1 2DH

12 September 2012

Enquiries to: Kristen Jones 01603 223053

Chris Walton

Head of Democratic Service



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**Norfolk County Council & District Councils
Norfolk Parking Partnership Joint Committee**

Minutes of the Meeting held on 23 March 2012

Present:

Cllr Graham Plant (Chairman)	Norfolk County Council
Cllr Elizabeth Nockolds	Borough Council of King's Lynn & West Norfolk
Cllr Keith Kiddie	South Norfolk District Council
Cllr Keith Johnson	North Norfolk District Council

Also Present:

Martin Chisholm	Borough Council of King's Lynn & West Norfolk
David Collinson	Norfolk County Council
David Cumming	Norfolk County Council
Tim Durrell	South Norfolk District Council
Jill Fisher	North Norfolk District Council
Robert Ginn	Norfolk County Council
Gary Hewett	Norwich City Council
Chris Kutesko	Norfolk County Council
Peter Warner	Great Yarmouth Borough Council

1. Apologies

Apologies were received from Cllr Charles Reynolds

2. Minutes

No matters were arising from the minutes of the meeting dated 22 September 2011.

3. Declarations of Interest

The Chairman declared an interest as a Member of Great Yarmouth Borough Council (GYBC).

4 Progress Report

- 4.1 The Committee received a progress report updating on actions since the last meeting in September 2011. Attendees were thanked for their support and contributions so far and were advised that the Civil Parking Enforcement (CPE) went live on 7 November 2011 following a period of staff training, equipment procurement and changes to the penalty charge notice processing systems. All the developed policies and procedures have been put into place.
- 4.2 The bedding-in period had been a success and overall the business plan had been met.

4.3 The following key points were raised during the discussion:-

- A Memorandum of Understanding (MOU) had been drafted between this Committee and Norfolk Constabulary clarifying where responsibilities lay. This was awaiting signature.
- Regular meetings would be held with Norfolk Constabulary to develop key areas (such as parking at schools and deployment of traffic cones) and to feedback on any issues.
- All agreed that a policy framework was needed to make the scheme sustainable going forward, to make changes and to manage income.
- A discussion was held around school parking. Officers advised that they had spoken with Norfolk Constabulary who were content with the current system and believe it would be difficult to enforce school keep clear markings at 450 schools. The Chairman suggested a system of looking at each school on a case by case basis and dealing with any issues as they arose.
- Concerns were raised regarding the safety of children if working on a case by case basis was adopted. Discussion was held around whether schools could work with the Children's Services Education Department to encourage initiatives such as children walking to school, which would help to alleviate the problem. The Committee noted that all schools had travel plans in place and it was up to them to maintain and update these as necessary. It was explained that the Committee did not have powers to deal with general dangerous highway obstructions and hazards – this power still lay with Norfolk Constabulary.
- New regulations are expected in 2014 which may make "keep clear" markings at schools enforceable without Traffic Regulation Orders (TROs). It was agreed that the Committee should have input into responding to consultations on any proposed changes to the regulations, if this did take place. It was agreed that in the meantime school parking issues should be considered on a case by case basis.

RESOLVED: That the Committee should have input into responding to consultations on any proposed changes to the regulations, if this did take place.

5 Parking Principles

5.1 The Committee received a report on parking principles which set out suggested guidelines for how local authorities would deal with requests for changes to parking principles in order to help with the decision making process and ensure a consistent approach across Norfolk.

5.2 The following key points were raised during the discussion:-

- The parking principles had been drafted by Norfolk County Council in liaison with District authorities. It was explained that this was a live document, and the principles could be changed following further feedback from Districts.
- Concerns were raised regarding principle 5 – parking facilities for people with disabilities - regarding the suggestion of offering 1 hour of free parking. It was

noted that this was a suggested principle rather than a definitive proposal and the whole document was an early guide, but the consensus was for that statement to be removed.

- The aim is to bring the report to Cabinet and Full Council in May 2012.
- It was noted that local Member views should be sought on the document before final approval.
- Agreement was reached that officers would discuss this document with their local Members and supply any suggested changes or agreement within 2 weeks; this could take place via email.

RESOLVED: to feedback any comments and changes which need to be reflected in the draft principles report to David Cumming by 10 April 2012

6 Finance Update

6.1 The Committee received a verbal report on the first financial quarter – 7 November 2011 – 31 January 2012 for Great Yarmouth Borough Council and South Norfolk Council, as follows. Information was outstanding from the other districts.

Sum of £	District Partner		
	Great Yarmouth Borough Council	South Norfolk Council	Grand Total
Capital Set Up Costs	£ 47,076	£ 3,707	£ 50,783
Operating Costs	£ 34,681	£ 5,933	£ 40,614
Income	-£ 26,770	-£ 4,260	-£ 31,030
Operating (Surplus)/Deficit	£ 7,911	£ 1,673	£ 9,584

- Great Yarmouth would need to confirm exactly what period the income collected on behalf of South Norfolk covered, for this table the current assumption was income received during 1st Quarter

7 Date of Next Meeting

The date of the next meeting was confirmed as September 20th 2012, at 2pm.

The meeting concluded at 3.35pm

CHAIRMAN



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Progress Report

Report by the Director of Environment Transport and Development

Summary

This report provides information on the development of the Civil Parking Enforcement project since the last Joint Committee meeting on 23 March 2012. The report also includes, as an Appendix, a Parking Management Schemes Development Guidelines document, which has been previously circulated for comment. These Guidelines complement the Parking Principles which were submitted to this Joint Committee in March.

The Joint Committee is asked for its views on the adoption of these Guidelines for use as a framework document in considering the introduction of parking management measures to improve the long term financial sustainability of the CPE project.

1. Background

- 1.1 Norfolk County Council (NCC) as local traffic authority has a network management duty under Part 2 of the Traffic Management Act 2004 (TMA) to secure the expeditious movement of traffic on its road network and to make arrangements as it considers appropriate for carrying out the action to be taken in performing that duty. This network duty cannot be delegated to District Councils.
- 1.2 In order to assist in meeting its TMA responsibilities, the County Council introduced Civil Parking Enforcement (CPE) in Norfolk (outside Norwich) with effect from 07 November 2011. Under CPE, the enforcement of on-street parking restrictions has ceased to be the responsibility of the Police (and their Traffic Wardens) and passes to the local traffic authority. The Police remain responsible for endorsable traffic offences.
- 1.3 One of the benefits of CPE is to permit the introduction of a common enforcement service for both on-street and off-street parking by Civil Enforcement Officers (CEOs). This allows the service (including the resulting administration, processing and queries through the Central Processing Units) to be more uniform and efficient for all users, for example by issuing common Penalty Charge Notices (PCNs).
- 1.4 A main benefit of CPE is that the local control of on-street parking can enable consistent, efficient and effective enforcement provision across the county, thereby assisting the traffic authority to use its network management duty in such a way as to focus on key issues such as highway safety, accessibility and local environment. Consequently, CPE can be used to benefit both business and the community, to introduce/enforce Traffic Orders and to set up new measures as may be identified in the Parking Principles and the Traffic Management Programme. More fundamentally, it ensures at least an essential level of enforcement.
- 1.5 The CPE business case is based on the premise that any on-street income generated from CPE either through PCNs, pay and display or permit charging is retained and offset against the cost of the scheme and its ongoing enforcement. In addition, where there is an operational surplus, this can be used to support parking operation and other transport initiatives. This does not affect the revenue generated through off-

street car parks, which are owned by the district councils who will continue to exercise their own controls.

- 1.6 Within Norfolk (outside Norwich), CPE is being operated by the delegation of functions jointly and severally to the Borough Council of King's Lynn and West Norfolk (BCKLWN), Great Yarmouth Borough Council (GYBC) and South Norfolk District Council (SNDC).

2. **Current situation**

2.1 **Operational Position**

- 2.1.1 Civil Parking Enforcement commenced across most areas of Norfolk on 07 November following an intensive programme of staff training, equipment procurement and changes to the penalty charge notice processing systems. There were no insurmountable problems which compromised the hand-over of enforcement duties from the Police to the local authorities.
- 2.1.2 Dialogue has continued with the Police to ensure that there is agreement over the precise division of responsibilities, given that the Police are still responsible for enforcing moving traffic offences as well as where vehicles are parked on pedestrian crossings or where there is physical obstruction of the carriageway, footway or an exit from premises. A Memorandum of Understanding has been agreed between the Police and the Norfolk Parking Partnership.
- 2.1.3 Approximately 9000 penalty charge notices were issued in the 20 weeks from 07 November to 31 March. This has exceeded the business case prediction by 25% and was due to particularly effective enforcement across the area covered by BCKLWN. Details of the financial results over this period are included in the Financial Performance report.
- 2.1.4 The Department for Transport (DfT) requires a performance and financial monitoring report to be submitted annually, within about 6 months of the end of each financial year. It has requested however that we should not submit a report for the period November 2011 to March 2012 but rather that the first report should cover 2012/13. The draft report will therefore be brought to this Joint Committee in September 2013 prior to submission to DfT

2.2 **Current Development Issues**

- 2.2.1 Although there have been a number of issues which have become apparent since CPE was introduced, these are not in general considered to be more numerous nor more serious than would have been expected with such a significant change of operation.
- 2.2.2 One area which has been discussed with the Police is where vehicles are observed to be parked in pedestrianised areas. There are several such areas in towns across Norfolk and it has become apparent that the Traffic Regulation Orders (TROs) which introduced the pedestrianised area by restricting the entry of motor vehicles did not generally include a similar restriction on parking within the area.
- 2.2.3 This did not appear to create a particular concern when both moving traffic offences such as entering a restricted zone and parking contraventions were enforced by the Police and Traffic Wardens. The split of responsibilities has however led to the situation where the Police are not willing to enforce against vehicles parked in pedestrianised areas unless they have also been observed to have driven into the area in contravention of entry restrictions. Civil Enforcement Officers meanwhile are unable to issue penalty charge notices because there aren't any waiting restrictions in force.
- 2.2.4 In order to resolve this issue and to avoid compromising the public's perception of CPE, the existing TROs for pedestrianised areas have been examined and a remedial programme has been drawn up for each area. This will comprise consultations and

advertisement of proposals, the introduction of new TROs and appropriate signing and lining so that parking enforcement can be carried out.

3 Future Developments

- 3.1 It is important to sustain the future viability of CPE and to ensure financial break even as a minimum in order to avoid long term dependency upon other funding streams.
- 3.2 The current business case model relies on limited revenue opportunities generated from unpredictable levels of PCNs, together with some of the surplus produced by on-street charging in Great Yarmouth (previously ring-fenced for transport related expenditure in the Borough). Although the business case predicts that the use of this surplus should be sufficient to cover the operating deficit in the short-term (and this is the basis on which CPE has been supported by GYBC), it is unsustainable into the future as the income stream is too heavily reliant on PCN revenue. New revenues therefore need to be identified or costs will have to be reduced as ongoing subsidy is not a viable option.
- 3.3 NCC Cabinet has therefore agreed that we should seek to increase on street revenues from sources other than PCNs and locations other than Great Yarmouth in order that we may move forward to a sustainable longer term solution. Such measures will need to include detailed consideration of introducing additional on-street charging with an aim to achieve financial break even within each District Council area. County and District Councils are currently working together to identify locations where potential parking management schemes could be brought forward.
- 3.4 At present, the way that local authorities deal with parking is set out in high-level documents such as the county council's Local Transport Plan and the district councils' Local Development Frameworks. However, these documents are high-level and provide little detail about parking.
- 3.5 A light touch set of Parking Principles, intended to be used to provide a steer on how to address parking across the county in conjunction with the different local circumstances that exist in particular places, was considered at the Joint Committee meeting in March and the County Council Cabinet agreed to adopt these principles in May.
- 3.6 The Parking Principles do not however include sufficient detail to provide a framework for assessing the merits of parking management proposals, either individually or on an area wide basis. A Parking Management Schemes Development Guidelines document which sets out the process for taking forward changes to parking provision has therefore also been prepared and consulted upon. This document, in conjunction with the Parking Principles, is intended to provide the framework for the development of parking management schemes which will underpin the future financial viability of CPE.
- 3.7 The latest draft of the Parking Management Schemes Development Guidelines is included as an Appendix to this report. The Joint Committee's views on the adoption of these Guidelines for use as a framework document in considering the introduction of parking management measures are sought.

4 Resource Implications

4.1 Finance:

- 4.1.1 There are financial implications resulting from the implementation of CPE, including legal and contractual procedures to be undertaken, equipment and software to be procured. NCC has currently both revenue and capital budget allocations to cover the

costs of CPE implementation. There are no further budget allocations after March 2013.

- 4.1.2 The capital costs of implementing CPE are £250,000 for equipment, including hand held computers and vehicles and software upgrades. Future equipment renewals and upgrades etc will be charged to the CPE on-street operating account.
- 4.1.3 A further capital bid of £250,000 for the provision on-street pay and display equipment where suitable new locations are agreed for the introduction of on-street charging was approved by Cabinet in January 2012. The introduction of additional on-street charging should however increase parking revenue receipts.
- 4.1.4 The District Councils to whom the functions are delegated have accepted no financial liability arising out of or in relation to the on-street enforcement service. The Joint Committee will be aware of the financial risks that this poses to the County Council and will appreciate the need for partnership working to mitigate these risks as far as possible.
- 4.2 **Staff:** Staffing is a key issue for the implementation of CPE. The District Councils employ back office and/or enforcement staff (CEOs), including those transferred from the Traffic Warden service in accordance with the Transfer of Undertaking (Protection of Employment) Regulations 2006 (TUPE). Staff have been trained to undertake CPE duties, including on-street enforcement and there will be a need to roll out common procedures as new and replacement staff are taken on. The County Council has taken on the parking manager function to monitor the delegation and ensure our statutory duties are discharged.
- 4.3 **Property:** No requirements other than those associated with the staff to be engaged on CPE duties.
- 4.4 **IT:**
 - 4.4.1 To function efficiently and economically a CPE scheme must base its administration and ticketing facilities on established hardware and software systems which, where appropriate, are compatible with other highways and traffic regulation management systems. For such systems to function at the peak efficiencies good telecommunication links are also necessary.
 - 4.4.2 The CPE back office function is being undertaken by both BCKLWN and GYBC. The County Council has been responsible for the costs of converting the existing software to operate CPE and funding the hand held terminals for operation by on-street enforcement staff.
 - 4.4.3 The benefits to the CPE operation in having an ICT solution for the management of Traffic Regulation Orders has been investigated in detail and a process is currently nearing completion. The benefits of such a process expand beyond the CPE requirements.

5 Other Implications

5.1 Legal Implications:

- 5.1.1 The Delegated Function arrangements as implemented are subject to an understanding that ultimate responsibility for proper conduct and management will continue to lie with the County Council.
- 5.1.2 As an executive function, the legal basis for the delegation is under section 19 of the Local Government Act 2000 and the Local Authorities (Arrangements for the Discharge of Functions) (England) Regulations 2000 which leaves the executives of the District Councils to assume responsibility for it.

- 5.1.3 A formal agreement between all four parties has been signed which sets out the basis of the arrangements, financial matters and the appropriate management structure for the delegation of functions. For information, the agreement is subject to the statutory rights and duties of the County Council.
- 5.1.4 Implementation of CPE has required a Designation Order to be prepared by the DfT and for a Statutory Instrument to be signed by the Minister and laid before Parliament.
- 5.2 **Equality Impact Assessment (EqIA):** A detailed assessment of the changes (if any) considered likely to result from the introduction of CPE has been carried out. A broad assessment is that a more focussed and visible enforcement service should be beneficial, particularly for pedestrians and disabled drivers.
- 5.3 **Communications:** A communications strategy and key stakeholder consultation have been implemented. A Norfolk Citizens' Panel survey in 2009 explored attitudes to parking enforcement. On-line consultation has been undertaken with businesses and local councils through the 'Norfolk Matters' and 'Business Matters' electronic newsletters to help establish these key stakeholders' parking enforcement priorities. The wider public have been kept informed through council magazines, including updates in Your Norfolk. (where appropriate) A Stakeholder Communications Mapping exercise has recently been carried out.
- 5.4 **Health and Safety Implications:** The better enforcement of waiting restrictions should make a positive contribution to road safety, particularly where the incidence of footway parking can be reduced. (where appropriate)
- 5.5 **Other Implications:** Officers have considered all the implications which members should be aware of. Apart from those listed in the report (above), there are no other implications to take into account.

6 **Section 17 – Crime and Disorder Act**

- 6.1 It is considered that the presence of identifiable uniformed personnel patrolling the streets during daytime, and in some locations up to the early hours of the morning, can arguably do much to increase the public's perception of safety and lead to a reduction in anti-social behaviour and opportunist crime. Whilst the overall level of on-street parking enforcement resource has not changed significantly from that previously provided by the traffic wardens, its visibility has increased particularly where the same enforcement staff undertake both on and off street enforcement duties in an area.

7 **Action Required**

- 7.1 The Norfolk Parking Partnership Joint Committee is asked for its views on the adoption of the Parking Management Schemes Development Guidelines for use as a framework document in considering the introduction of parking management measures to improve the long term financial sustainability of the CPE project.

Background Papers

The Civil Enforcement of Parking Contraventions Designation Order 2011 No. 2431

Officer Contact

If you have any questions about matters contained in this paper please get in touch with:

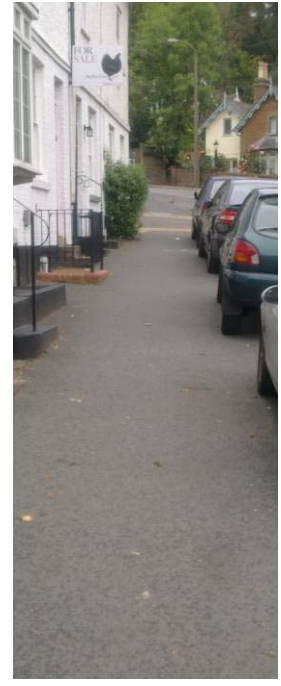
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Parking Management Schemes: Development Guidelines (Draft for Consideration)

June 2012

Norfolk County Council

Parking Management Schemes: Development Guidelines **(Draft for Consideration)**

June 2012

Norfolk County Council

Norfolk County Council
County Hall
Martineau Lane
Norwich
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Issue and revision record

Revision	Date	Originator	Checker	Approver	Description
A	June 2012	RH			Draft Discussion Paper

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1. Introduction

1.1 Setting the Scene

The needs of the county regarding parking provision are complex. It is necessary to ensure that what parking is available is appropriate to meet the requirements of the different demand groups and areas, whilst being sustainable, financially viable and supporting economic regeneration.

It is also recognised that parking is a controversial and sensitive issue with opinions on how it should be controlled often based on perceptions. The recently published Portas Review (an independent review on the future of high streets) illustrates that parking is one issue which will unite communities in opposition to the 'unfairness and unreasonableness' of changes to what is perceived to be correct.

In our successful application for CPE in November 2011, the county council gave a commitment to update and replace its parking strategy in the light of adopting the new Local Transport Plan (Connecting Norfolk). This has been undertaken by developing a set of Parking Principles which have been consulted on and now adopted. These set out where different parking schemes may be appropriate, and outline the different types of scheme that the Council will develop and implement in on-street locations, and in other situations for which it has responsibility, such as Park and Ride schemes.

These development guidelines complement the Parking Principles. They provide a formal and transparent approach to the consideration of parking management opportunities that will inform the decision making process and provide support and confidence to officers and Members for progressing schemes.

In addition, the adoption of formal procedures that stand up to scrutiny will enable the county council and district partners to describe their decisions for progressing schemes and importantly, also manage limited resources by focusing on those schemes that demonstrate the most need; those that have been prioritised as part of this process.

Introduced below is the outline for an appraisal and development procedure for on-street parking management schemes that will guide the council through a defined process to ensure that all opportunities are considered, ensuring that the most advantageous and appropriate solutions are progressed, relevant to the specific needs of an area and in close consultation with town and district partners. This includes, separately, the consideration and development of parking schemes in response to requests from received by the council as well as schemes driven by the council.

Importantly, the following narrative aligns the proposed procedure with other council strategies and policies, and defines the process in this context. It also introduces the assessment criteria that will assist in informing and recommending preferred ways to proceed and, if appropriate, the decision making process and overall timeline 'gateways'.

It is recommended that prior to progressing parking schemes in accordance with these guidelines that Norfolk County Council's published Parking Principles document should be referred to. The Parking Principles set out the framework for the decisions that the Council will make about parking: that is, whether it is appropriate in particular types of location to provide parking; to charge for parking; to introduce restrictions etc...

2. The Broader Principles of Parking Management

2.1 Introduction

The pressures of car parking demand, such as a lack of parking spaces at peak times or the physical dominance of parked cars and associated vehicle movements in sensitive locations are common to most towns across the country, including those in Norfolk.

Overcoming these problems by developing sensitive and strategic parking management measures can be good for a town by reducing the dominance of the car while also enhancing access.

Evidence suggests that better-managed parking can benefit a town's economy. It is important to remember however that different parking needs and priorities exist according to the purpose of the trip (residents, shoppers or commuters for example).

Different categories of visitor with varying demands and requirements will wish to access appropriate parking in Norfolk's towns to suit their particular needs. Above all, visitors value the certainty of being able to park conveniently when and where they want to.

Parking facilities should be managed and regulated to encourage more efficient use of parking resources and the most efficient form of travel. This often involves making the most convenient parking spaces available to certain higher-value uses such as shoppers in retail areas.

Parking restrictions are designed to control parking for the benefit of everyone and enforcing these restrictions effectively often results in improved highway capacity which, in turn, helps smooth traffic flow and improves road safety.

2.2 Philosophy of Managing Parking

It is rare for there to be a genuine lack of parking in a town. If it is identified that there is a justifiable opportunity for increasing the amount of parking available it is often due to the inefficient allocation of existing parking supply, which can be resolved without the need for additional spaces.

Parking management can involve a large number of individual measures across a town including:

- setting maximum waiting times to differentiate the parking stock according to different identified customer needs;
- introducing charging for at least some of the parking stock to encourage appropriate use, to ensure turnover and hence improve the availability of parking spaces;

- considering the introduction of residents' and business' permit schemes, where there is significant conflict between residents and other users; and
- enhancing the quality of parking by providing high quality information, signage and amenities in the parking areas.

Access is important, but it is not simply about providing more car parking spaces. Ensuring that parking spaces are available to those that need them should be the paramount determinant. The car is often the dominant mode of access for many towns which tend to have large hinterlands and as a result, an adequate supply of short-stay parking located close to the town centre will be attractive.

However, this does not mean that the council simply provide as many car parking spaces as physically possible. Rather, it means ensuring that spaces in popular locations are available to priority visitors, who could be shoppers or other shorter-stay visitors, and not taken up by those parking all day who are generally prepared to walk slightly further to or from their ultimate destination.

The broader transport philosophy for a town should support the objective of enhancing accessibility by promoting alternative means of access for those who can use them (such as encouraging residents who live within the town to walk or cycle). Parking spaces of greater value can be made available for those who cannot use alternative modes, such as people who live in surrounding rural areas with limited or no bus services and tourists visiting resort centres, recognising that parking demand can often derive from outside the county.

A parking management regime should be seen as just one part of an integrated transport and accessibility strategy for the area being considered and as such, parking issues must be considered alongside other initiatives including:

- Promoting smarter travel
- School and other travel plans
- Promoting walking, cycling and public transport accessibility

In addition, parking policies should be supported by the planning process. Applications for new housing, commercial and retail developments should be scrutinised to ensure the volume and nature of car parking fits existing objectives, both parking and otherwise. District councils, as planning authorities, have the opportunity to place conditions on how parking is used and managed in new developments, to support the broader principles.

A complementary approach to on-street and off-street parking is an important objective. The fact that different bodies may be responsible (county councils for on-street and district councils for off-street parking) is of no interest to the public.

It is also important that changes on the ground are considered in the context of the financial situation. Changes will only be made where there is a strong, well supported case for which funding can be found. This will mean that many proposals can only be taken forward if external funding is forthcoming (or the proposals are self-financing), and this funding would need to take into account not only the design and implementation costs but also any ongoing revenue issues like upkeep of equipment.

2.3 Norfolk County Council Parking Principles

Norfolk County Council has published a set of over arching Parking Principles that set out the underlying philosophy for where parking schemes will be considered and what can realistically be achieved in Norfolk.

The Parking Principles should be taken into account in conjunction with these guidelines as they will provide the framework for deciding whether a parking scheme is appropriate to pursue in any particular location; and what that parking scheme might comprise. They should therefore be used as a starting point for making decisions about parking provision within Norfolk.

2.4 The Need for a Procedural Document

Demand management, which often equates to restricting parking, is an extremely emotive subject with the local communities and businesses who are directly affected. Therefore, local community support will be crucial and a clearly defined approach should be adopted that requires the collation of information, data and evidence to support whatever scheme is progressed. This will encourage an understanding of the intentions and anticipated outputs from a parking management proposal.

At present, the way parking is considered is defined in approved documents such as the county council's Local Transport Plan, Connecting Norfolk, and the district councils' Local Development Frameworks. However, these documents are high-level and provide little detail about parking. The Parking Principles take matters to the

next level of detail by providing a framework for making a decision about whether to pursue a parking scheme.

These guidelines provide a more detailed procedure that explains why the proposed parking measures are being considered and guides stakeholders through the detailed decision-making process. The intention is that a demonstrable rationale will be adopted in order to justify the introduction of parking management measures anywhere in the county, particularly where they currently do not exist.

Encompassed within this procedure is a set of criteria that will be considered to establish a preferred way forward. These will link to relevant adopted council transport policies to inform council decisions.

3. The Assessment Process

3.1 The Assessment Process

The assessment process should contain logical, coherent and transparent criteria that are clearly defined and will stand up to scrutiny. These criteria will support and justify the development of parking management proposals. It is also important that clear links are established between these criteria and adopted council transport objectives and policies. In this regard two key documents are relevant; the 'Norfolk County Council Parking Principles', and the county council's 3rd local transport plan 'Connecting Norfolk'.

The Parking Principles were adopted by the county council's Cabinet in May 2012. The aim of the principles is to have a set of concise, easy to understand statements setting out the expectations for how parking will be provided and managed in the different circumstances that exist across the county. The principles are intended to apply to both on-street and council owned off-street public parking.

Connecting Norfolk has been adopted by the county council. This describes the county's strategy and policy framework for delivery up to 2026. It is used as a guide for transport investment and considered by other agencies when determining planning or delivery decisions. This document contains the overarching transport vision for Norfolk, which is **'A transport system that allows residents and visitors a range of low carbon options to meet their transport needs and attracts and retains business investment in the county'**.

Connecting Norfolk reflects the views of local people and stakeholders, identifying six priorities for transport. Four of these are directly relevant to these guidelines and include:

- Delivering sustainable growth in employment and tourism
- Improving road safety
- Improving accessibility
- Reducing emissions

Encompassed within Connecting Norfolk are 17 policies to help guide decisions towards fulfilling the aspirations of the transport vision for the county. Those that are specifically relevant to these assessment guidelines and should be considered as part of this procedure are as follows:

- **Policy 2: Traffic Management** - Measures to increase journey time reliability, particularly for public transport, should be pursued on Norfolk's main roads. This should include demand management where it does not disadvantage rural communities.

- **Policy 6: Transport Infrastructure to Support Growth** - To bring about sustained growth priority should be on enabling public transport, walking and cycling from new development sites. Recognition should also be given to required improvements on the highway network at bottlenecks. These should be matched with sustainable travel packages or measures to encourage regeneration. Contributions should be secured to help mitigate any adverse effects of new development on the transport network.
- **Policy 9: Travel Choice** - Emphasis should be on enhancing travel choice where options offer a viable alternative to single occupancy car travel and potential for modal shift. Improving and promoting active travel options (walking and cycling in particular) for short journeys to schools, services and places of employment in market towns and urban areas should be the priority.
- **Policy 12: Tackling Poor Accessibility** - Agencies in Norfolk should tackle accessibility problems in partnership, targeting those communities most in need. Improvements may involve travel opportunities, better join up of service delivery or place responsibility on service providers, such as health, to enhance their delivery mechanisms. Accessibility should be planned as part of service delivery.
- **Policy 13: Access to Town and Urban Centres** - Efficient movement to town and urban centres should be enabled for all modes. Priority should be on achieving a balance between access for car drivers, including the availability of car parking, and the attractiveness of sustainable travel options like walking, cycling and public transport.
- **Policy 14: Sustainable Tourism and Leisure** - Opportunities for sustainable tourism or leisure trips should be pursued, and particularly in the tourist hot-spots of the Broads, Brecks, Great Yarmouth and along the Norfolk coast.
- **Policy 15: Access for all** - Accessibility for all, especially for disabled people, should be considered as part of all transport maintenance and improvement works and opportunities sought to ensure adequate facilities are provided.
- **Policy 16: Alternatives to Travel** - Agencies in Norfolk should work together to encourage alternatives to travel, with priority on interventions that result in fewer trips generated or a reduction in total distance traveled.
- **Policy 17: Funding** - All potential sources of funding should be investigated and pursued if appropriate to achieve delivery of Connecting Norfolk.

It is intended that the adoption of these procedures for the development of parking management schemes in Norfolk will lead to the

development of proposals that understand local issues, are sympathetic to local need and provide justification by presenting a coherent argument to support the proposed parking measures.

The intention is that a demonstrable rationale is adhered to by following an agreed procedure that is transparent and closely aligned with adopted transport policies, principles and strategies.

It is important to recognise that not all of the tasks identified will always be necessary.. This will be determined by the specific location, the types of issues to be addressed and the type of scheme being considered.

Throughout the course of the procedure there are ‘gateways’ at various stages that are required to be satisfied to seek approvals to proceed to the next phase, and to release funds where appropriate. These gateways can be less formal at certain points such as at the early assessment phase. However, later phases may require formal approvals from Members perhaps as part of a statutory process.

Scheme promotion is likely to fall into one of four categories as shown in Table 3.1.

Table 3.1: Example drivers for new parking schemes

Item No.	Promoter	Example Description
1	Directed Scheme	Council led scheme as part of a broader transport study such as urban realm improvements
2		Developer led scheme in response to an application that may include s106 elements
3	Requested Scheme	A request received from a local community, such as a resident’s association
4		A request from a commercial interest group or representative body such as Chamber of Trade

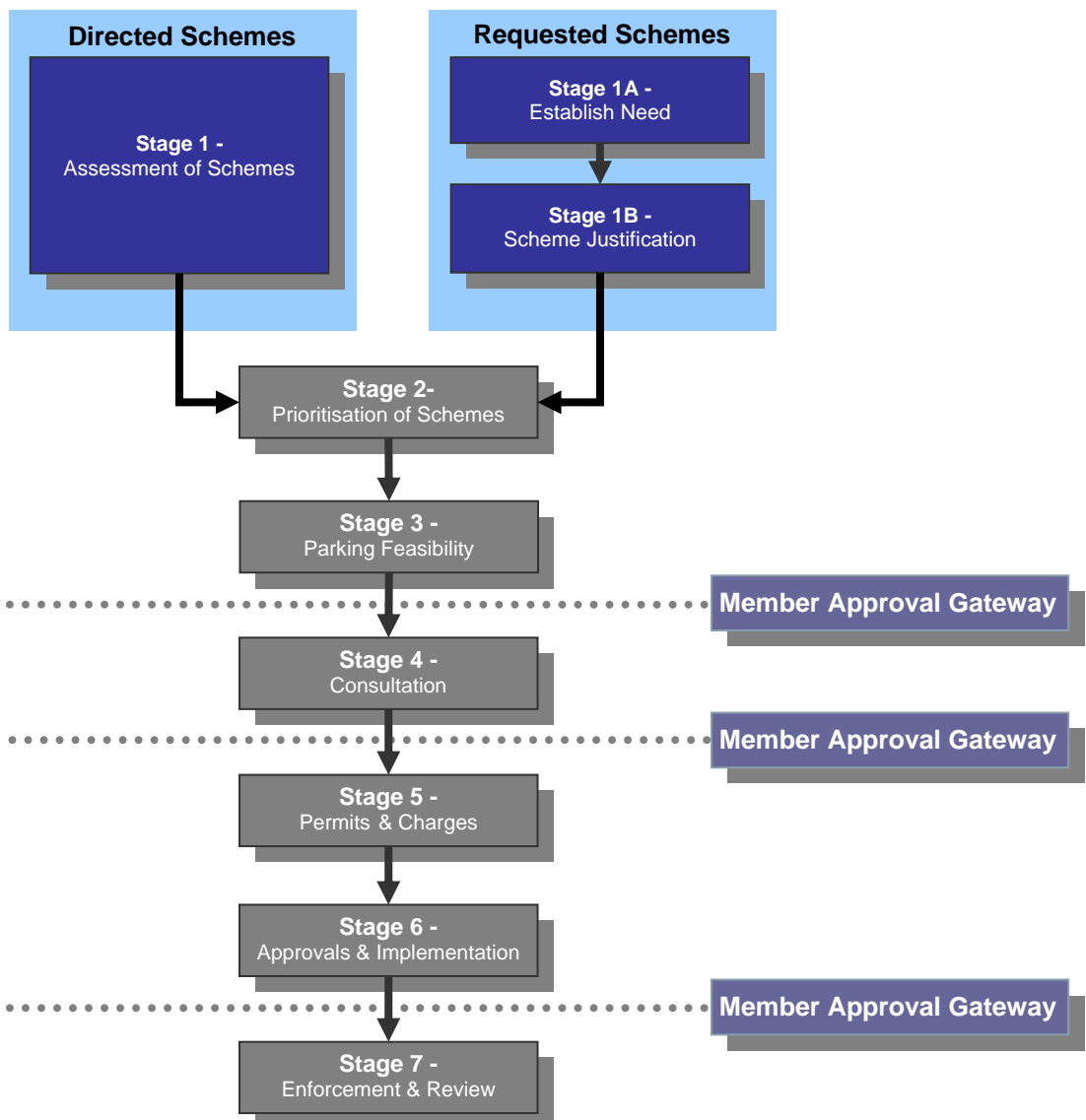
As parking management schemes can be prompted by different drivers it is necessary for separate approaches to be considered at the initial stages of scheme development. Schemes categorised under items one and two should follow a procedure that differs from that which is specific for item three due to the different issues and drivers involved. Item four should be appraised and considered to establish whether it should be categorised as a directed or requested scheme.

4. Procedure for Progressing Parking Management Schemes

4.1 Introduction

Table 4.1 illustrates the various stages of the parking management scheme development process where the initial stages are unique to the specific scheme corresponding to the scheme drivers, whereas the latter stages are common to both types of driver.

Table 4.1: Summary of procedure for the development of directed and requested on-street parking schemes



4.2 Directed Schemes

Set out below are the initial stages of the procedure for assessing the suitability of introducing a parking management scheme.

4.2.1 Stage 1 - Assessment of Directed Schemes

The assessment stage includes two elements, (i) to consider the initial proposals against a set of criteria and (ii) to appraise the identified criteria against adopted policy.

The list of criteria should include the following (this is not an exhaustive list and further consideration should be given to additional criteria in relevant circumstances):

- Scheme will form part of an area wide parking management scheme such as for a residential area (refer to the separate procedure presented in Section 4).
- Scheme supports local area sustainable transport initiatives such as Park & Ride, cycle parking/hire initiative or way finding study.
- Scheme supports socio-economic regeneration policies for an area.
- Scheme will encourage/influence the nature of parking that is appropriate for the area of concern.
- Scheme will encourage turnover of parking demand and increase availability of parking opportunities appropriate for the area.
- Scheme will promote operational and financial efficiency of the CPE operation.
- Scheme will promote tourism and economic regeneration in the area.
- Scheme will address and manage a specific parking problem (possibly associated with a specific development or change of land-use).
- Scheme will improve the ability to control use of parking areas for the desired purpose.
- Scheme will address the anomaly of free on-street parking and charged off-street parking provision.
- Scheme forms part of, supports or complements a broader strategic aspiration for an area, for example area Masterplan, urban/public realm/conservation area initiative, town centre or sea front regeneration project.

An appraisal of the proposed scheme should then be undertaken against currently adopted policy objectives encompassed within relevant documentation including the Parking Principles, Connecting Norfolk transport policies and Local Plan/LDF policies, to establish

which are satisfied. This can be expanded to include consideration of other documents such as adopted Masterplanning statements, town centre regeneration initiatives, Neighbourhood Development Plans or other relevant policies.

4.3 Requested Schemes

This section introduces the process to be adopted for the appraisal of on-street parking scheme applications and in particular, those requested by residents.

4.3.1 Introduction

Adopting a formal and transparent approach to appraising applications and petitions for parking management schemes will inform the decision making process and provide support and confidence to officers when reporting recommendations to Members. It will also enable the council to justify decisions and manage limited resources.

4.3.2 Stage 1A - Establish Need

The need for a scheme should initially be based on evidence submitted by the local community (letters, petition) or possibly the council itself. The council could provide a standard form which the community can use to request that consideration be given to the development of a parking management scheme for a particular area.

Following receipt of a request, observational and/or formal parking surveys should be undertaken to inform the assessment process.

The parking surveys should consider both on-street and where appropriate, off-street parking availability and demand to provide the necessary information to allow the suggested criteria proposed in Table 4.2 to be properly considered.

Table 4.2 proposes standard criteria for adoption that should be met before a parking scheme is considered.

Table 4.2: Possible standard criteria for assessing applications for residents' parking schemes

Daytime Problem (8.00am - 6.00pm)	Night time Problem (6.00pm - 8.00am)	24 Hour Problem
More than 60% of available kerb space ¹ is occupied by non-residents' vehicles for longer than 6 hrs and where 85% of the available kerb space is occupied by all parked vehicles	More than 40% of available kerb space ¹ is occupied by non-residents' vehicles for more than 4 hrs where 85% of the available kerb space is occupied by all parked vehicles	A combination of the daytime and night time problems are experienced

Parking surveys should be undertaken on a day and at a time to reflect the perceived problem. Typically for a perceived daytime issue surveys will be undertaken intermittently between the hours of 08:00 - 18.00 and for a perceived night time problem surveys will be undertaken intermittently between the hours of 18.00 - 08:00. It is also important to undertake a baseline survey around 05.00 to understand residential demand. It is also recognised that certain areas within the county experience peaks in demand at certain times of the year and therefore, the surveys should be undertaken at a time to reflect when issues are felt to be most prevalent.

Other factors that might also be considered at this stage include accident data and trip generators within the area such as schools, railway stations and employment centres. The council may also assess all initial requests against other criteria that should be satisfied before progression to stage 1B, including as follows:

- Signatures of support from a significant number of properties within the affected area
- The local area team do not believe that the issue can be addressed at source, for example by working with a large employer or railway station operator
- The request is supported by local Members
- An appropriate funding source can be identified for development

¹ Available kerb-space is defined as the length of unrestricted carriageway where parking could be permitted. This would exclude junctions, accesses and areas subject to existing waiting restrictions (but not limited waiting).

4.3.3 Stage 1B – Scheme Justification

If certain criteria are satisfied that result in a positive outcome in Stage 1A, Stage 1B should explore and agree the type and limit of parking management scheme to be developed.

This will be dictated by a number of variables such as problems associated with long stay commuter demand during the day and/or evening, retail activity, residential car ownership levels exceeding on-street capacity (this can often be a reason for not proceeding with a scheme)². and where abuse of yellow line restrictions is prevalent due to high demand.

Depending on the complexity and size of the area being considered it may be useful to undertake a small feasibility study which considers what sort of options may be appropriate to satisfy the various demands for parking in the study area based on the information from previous stages.

The extent of the parking scheme will need to be confirmed. The area should, where possible, follow natural boundaries and be planned to have a reasonable provision of space compared to demand and it may be necessary to extend the size of the area beyond one street to ensure a reasonable provision of space compared to demand.

The potential for displacement of parking demand to adjacent streets should be considered at this stage and options considered should take account of this to alleviate any potential future issues.

The cost of developing a parking scheme is high and in some cases schemes do not justify the cost of further development if there is not a readily identified problem, which can be efficiently addressed. There is also significant risk to the council of promoting schemes which may not be supported by the local community or be financially self supporting, considering implementation, maintenance and enforcement costs.

Therefore, approximate capital and operational expenditure implications for the council should be calculated to clearly define the anticipated commitment and provide justification or otherwise, for the scheme to proceed.

² It is important to note that if the parking difficulties are being caused as a result of a high level of residential car ownership where households may have two or more vehicles with limited or no available off-street parking, then a residents' parking scheme will not address the root cause.

A detailed estimation of the cost of implementing the scheme and annual operating costs should be prepared and confirmation that an appropriate funding source remains available must be made for the scheme to progress any further.

4.4 Stage 2 – Prioritisation of Schemes

The promotion of schemes is costly and with only a finite amount of resources it is likely that schemes will need to be prioritised. The council has developed evaluation and prioritisation processes for different types of highways and transportation schemes in order to best manage limited resources. A prioritisation process for parking management schemes is currently being developed.

Prioritisation should be carried out against a common set of agreed criteria such as the scale of the parking problem assessed in earlier stages, the likely cost and revenues of implementing a parking management scheme and public support for the scheme. This will provide a waiting list of schemes that can be progressed as funding becomes available.

4.5 Stage 3 – Parking Feasibility

The feasibility stage will consider in more detail whether a parking management scheme is the appropriate solution and if this is established, progress option(s) and agree on a preferred scheme.

Whilst it is true to say that many towns experience similar issues it is also true that every town is unique and therefore, in most cases, it is considered vital to recognise the needs of a town to facilitate the accurate diagnosis of the issues and develop the most appropriate scheme that addresses the specific needs of an area.

The feasibility phase will therefore comprise a number of parts as follows:

- a. Scheme identification - location(s), define issues and establish type of scheme.
- b. Develop an understanding of the area including the services provided, attractiveness, 'retail health', hinterland and parking demand requirements associated with need.
- c. Parking surveys - dependent on the nature and extent/complexity of the scheme. The surveys, if deemed necessary, could be observational, undertaken by officers, to extensive beat surveys undertaken by specialist contractors. If surveys are undertaken these should include both on-street

and off-street surveys where appropriate and at relevant times of the day and week. In addition, data should be appropriate for informing subsequent development of an economic model (see item (e) below).

- d. Feasibility design of scheme.
- e. Economic model - include cost of design, implementation, management, operation and enforcement of final scheme.
- f. Initial consultation; May be minimal or even in certain circumstances not required but is dependent on the location, extent and complexity of parking scheme proposals.

If the outcome of stage 3 is positive and it is considered appropriate to develop a parking management scheme, it is anticipated that Member approval will be required to authorise subsequent stages of the procedure.

4.6 Stage 4 – Consultation

The decision to consult with local residents and stakeholders should be taken on the basis that it is likely that the introduction of a parking management scheme would benefit the area in terms of parking for identified priority users and would have a positive impact on traffic management as well as social and environmental benefits.

Developing a suitable strategy for consultation with the local community needs careful consideration. The area to be included for the consultation should be defined along with a suitable methodology. Larger or more contentious schemes may demand greater levels of consultation. The streets adjacent to those under investigation can also be considered for inclusion in the consultation process.

It is becoming increasingly attractive for councils to undertake an initial 'letter-drop' consultation exercise to establish at an early stage the level of support for a scheme before developing and consulting on more detailed proposals.

It may also be useful to set up a small steering group of Members, officers and local stakeholder representatives, for example residents' associations, town centre managers, traders and trade associations.

A majority response rate from those that respond is the most suitable criterion to establish whether a scheme should proceed. However, in some instances the response rate can be quite low and therefore, consideration should also be given to a minimum consultation response rate being required, for example at least 30% of consultees respond with a majority of 51% or above to enable a scheme to progress to the detailed design and statutory consultation stages.

Depending on the type of scheme, consultation methodologies can be adopted to encourage higher response rates. These can include on-line questionnaires, workshops and exhibitions.

The Norfolk Parking Partnership has prepared a stakeholder engagement matrix to help communication planning. The matrix recognises that different parking initiatives will interest separate stakeholders in different ways (individuals, groups, Members etc.) and will require different levels of information or involvement. These stakeholders can be categorised by the degree to which they will be affected by a proposed scheme (impact) and how much influence they have in shaping the scheme itself (influence).

Table 4.3 summarises the broad scope of identified stakeholders. Some stakeholders, such as Council members, will always fall into the high impact/high influence quarter, but a bespoke consultation matrix should be prepared for each scheme to reflect the diverse range of parties affected and influenced by different types of parking scheme.

If the outcome of stage 4 is positive it is anticipated that Member approval will be required to authorise proceeding.

Table 4.3: Stakeholder Engagement Identification and Management Matrix

LOW IMPACT / HIGH INFLUENCE	HIGH IMPACT / HIGH INFLUENCE
<p>Stakeholders in this quarter need to but in to changes. Their views are important and should be actively canvassed where significant changes to parking are proposed.</p> <p>Feedback in response to views is critical. This group must be shown that the concerns they raise are properly addressed.</p>	<p>This group is actively involved in decision making or can strongly influence decisions. It will always include local council Members. They need to be actively engaged in the development of proposals before they are opened up to other stakeholders.</p> <p>All council Members should be kept informed through each authority's existing mechanisms.</p> <p>Individual Members should be directly informed and involved in proposals for their specific areas.</p>
<p>This group should be kept informed. Council resident's magazines and the use of local news media, with signposting to the web information will be sufficient.</p>	<p>This group has the potential to influence decisions eg MPs LEPs, Chambers of Commerce, local disability organisations.</p> <p>If they are kept informed and buy into the proposals, close involvement will not be necessary except where specific issues arise.</p> <p>General information can be provided to MPs through NCC's Norfolk Bulletin (e-newsletters for MPs).</p> <p>Briefing letters to the LEPs, CoC, and others where relevant.</p>
LOW IMPACT / LOW INFLUENCE	HIGH IMPACT / LOW INFLUENCE

4.7 Stage 5 – Permits and Charges

Where permit parking management schemes such as residents' parking schemes or controlled parking zones are proposed, parking permit entitlement levels (resident, visitor and business etc.) are likely to be dictated by the area considered and type of scheme. They can either be based on a maximum number of permits per household or proportionally based on the availability of parking spaces. Local off-street parking opportunities can also play a part in determining permit allocation levels. The specific needs of disabled residents within proposed permit parking zones should be taken into account.

Pricing can also be dependent on the type and location of the scheme with premium areas supporting higher levels of permit charge. Also, the first permit to residents might be provided free or at a low cost (to cover administration) but additional permits might rise in price exponentially to manage demand. Countywide hierarchical levels might be established based on area, likely demand and local attractors. On-street pay and display levels can be established along the same lines.

Consideration should be given to these issues so that outline proposals can be brought forward for consultation with the wider community.

4.8 Stage 6 – Approvals and Implementation

The detailed design phase will develop the preferred option in greater detail and include the statutory consultation on traffic orders.

Initially, the specific parking management measures will be established. This will be informed by the outcomes of the previous stages and might include a variety of controls suitable for the area including, for example, short stay, long stay, shared, all day/eve, seasonal, charging, permits and a preferred charging structure that should integrate with off-street car parks.

Once the scheme has been agreed, the statutory Traffic Regulation Orders (TROs) procedures will be followed and new or amended TROs will be drafted and advertised. This will provide an opportunity to invite formal objections to the scheme and these must be resolved or overridden before the scheme can be implemented.

The finalised detailed design will include programming of the implementation works, ordering of any equipment required and liaison with statutory undertakers where required.

If the outcome of stage 6 is positive it is anticipated that Member approval will be required to authorise proceeding.

4.9 Stage 7 – Enforcement and Review

Levels of enforcement should be agreed between NCC and the district councils responsible for enforcement under the CPE Joint Committee.

It is often prudent to review a parking management scheme following its implementation to ensure that it is achieving the desired effect and responding adequately to any changes in parking activity that may have arisen following scheme implementation.

The review should consider many aspects of the scheme and can include the suitability of parking restriction type and location introduced, letters of support or complaint which may have been received from within or from neighbouring areas following the implementation of the scheme, correspondence received from the business community, any parking survey data or financial outputs from Pay&Display infrastructure and enforcement operation information such as the number of PCNs issued.

Depending on the size and nature of the scheme reviews are commonly undertaken between six months and one year after commissioning.

Norfolk Parking Partnership Financial Performance

Report by the Head of Finance

The purpose of this report is to highlight the financial performance of the Norfolk Parking Partnership from the beginning of operations on 7th November 2011 to 31st March 2012.

The Joint Committee is asked to review and note the performance of the Partnership.

1. Background

1.1 The members of the Partnership are Norfolk County Council, Great Yarmouth Borough Council, King's Lynn and West Norfolk Borough Council and South Norfolk District Council. King's Lynn and West Norfolk Borough Council provide the service on behalf of North Norfolk District Council, Breckland District Council and Broadland District Council.

2. Financial Performance

- 2.1 In the period 7th November 2011 to 31st March 2012, there was a surplus from district council operations of £46,419. At this point in operations the Business Case was predicting a deficit of £6,975.
- 2.2 Great Yarmouth Borough Council generated £49,945 from Penalty Notices (against £91,970 in the Business Case), and had costs of £58,027 (against £108,323 in the Business Case), giving a deficit of £8,082 (£16,353 in the Business Case).
- 2.3 King's Lynn and West Norfolk Borough Council generated £180,365 from Penalty Notices (against £132,459 in the Business Case), and had costs of £124,148 (against £123,676 in the Business Case) giving a surplus of £56,217 (£8,783 in the Business Case).
- 2.4 South Norfolk District Council generated £9,685 from Penalty Notices (against £17,481 in the Business Case), and had costs of £11,402 (against £16,886 in the Business Case), giving a deficit of £1,717 (a surplus of £595 in the Business Case).
- 2.5 There was an overall capital allocation of £250,000 for the project. By 31st March 2012, Great Yarmouth Borough Council had spent £59,539, King's Lynn and West Norfolk Borough Council had spent £100,875, and South Norfolk District Council had spent £3,707. This totals £164,121. The remaining £85,879 is available for expenditure in 2012/13.

3. Resource Implications

Officers have considered all the implications which members should be aware of. Apart from those listed in the report (above), there are no other implications to take into account.

4. Recommendation

- 4.1 It is recommended that the Joint Committee accept these figures as a record of performance for the period 7th November 2011 to 31st March 2012.

Officer Contact

If you have any questions about matters contained in this paper please get in touch with:
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Norfolk Audit Services

Appointment of Internal Auditor, Internal Audit Terms of Reference, Code of Ethics and Strategy

Report by the Head of Finance

The purpose of this report is to explain the appointment of the committee's Internal Auditor, review the Internal Audit Terms of Reference, the Code of Ethics and Strategy in accordance with the CIPFA Code of Practice for Internal Audit in Local Government in the United Kingdom 2006.

The Joint Committee is recommended to consider and approve the appointment of Norfolk Audit Services as the Committee's Internal Auditor, Terms of Reference as set out in Appendix A and the Code of Ethics as set out in Appendix B and the Strategy at Appendix C.

1 Background

- 1.1 The Committee is required under the Accounts and Audit Regulations (England) 2011 to make provision for internal audit in accordance with proper practices in relation to internal control defined in the Guidance as the CIPFA Code of Practice for Internal Audit in Local Government in the United Kingdom 2006.
- 1.2 This CIPFA Code of Practice defines standards on the way in which the Internal Audit Service should be established and undertake its functions. This Code is currently under review by CIPFA. The Code is split into standards, organisational and operational, and specifically requires Internal Audit to have a Terms of Reference, a Code of Ethics and a Strategy. The Council's Section 151 officer (the Head of Finance) is required to demonstrate adherence to this Code. Compliance is the subject of assessment by the Committee's external auditor.
- 1.3 The Internal Audit Terms of Reference, Code of Practice and Strategy are based on those for the County Council which were approved at the January 2012 Audit Committee meeting.
- 1.4 During 2009/10 the Audit Commission completed a formal assessment of Norfolk Audit Services against the 2006 Code of Practice and has reported that the Internal Audit function fully meets the Code.

2 Appointment of Internal Auditor and Internal Audit Terms of Reference

- 2.1 Norfolk Audit Services, as the Internal Auditor to the host authority, is proposed as the internal auditor for this committee.
- 2.2 The 2006 Code of Practice requires that the purpose, authority and responsibility of Internal Audit should be formally defined by the Committee in Terms of Reference. It also requires that the Terms of Reference include: independence; relationships and staffing; and training and development.

Minor changes were made to the Internal Audit Terms of Reference as a result of the Accounts and Audit Regulations (England) 2011 that came into force on 31 March 2011. The proposed Terms of Reference appear at Appendix A. The Terms of Reference continue to be based on best practice as recommended by CIPFA.

3 Internal Audit Code of Ethics

- 3.1 The 2006 Code of Practice contains requirements to set minimum standards for the performance and conduct of all internal auditors and includes five main principles; Integrity, Objectivity, Competence, Confidentiality and Professional Behaviour.
- 3.2 The current Internal Audit Code of Ethics appears at Appendix B. This continues to be based on best practice, the CIPFA publication "Ethics and You" (2006).

4 Internal Audit Strategy

- 4.1 The Internal Audit Strategy appears at Appendix C. This strategy reflects Internal Audit's contribution to the Committee's role. This strategy continues to comply with best practice recommended by CIPFA.

5 Resources

- 5.1 There are no resource implications if the Committee approve the Internal Audit Terms of Reference, Code of Ethics and Strategy as presented in this report. If there are additional significant changes to these documents then there may be staffing implications.

6 Section 17 Crime and Disorder Act

- 6.1 Under section 17 of the Crime and Disorder Act, the Committee has a statutory general duty to take account of the crime and disorder implications of all of its work, and do all that it reasonably can to prevent crime and disorder in Norfolk.

- 6.2 Internal Audit helps with this by aiming to deter crime, to increase the likelihood of detection through making crime difficult, to increase the risk of detection and prosecution and to reduce the rewards from crime.
- 6.3 Internal Audit's Terms of Reference, Code of Ethics and Strategy have been drafted in order to cover higher risk areas, including where weaknesses in controls might increase the risk of theft, fraud or corruption. An action plan is agreed for any weaknesses that are identified during audits, including any which might increase the risk of theft, fraud or corruption. Consideration has been given to the present economic downturn and the Anti Fraud plan and resources are considered adequate.

7 Risk Implications

- 7.1 These documents underpin the operational performance of Norfolk Audit Services and hence significant changes to these documents would impact on the delivery of the audit service and put at risk the good reputation of the service. The External Auditor places reliance on the work of internal audit which helps to lower their fees to the Committee.

8 Conclusion

- 8.1 The Internal Audit Terms of Reference, Code of Ethics and Strategy are best practice as required by the Code of Practice 2006 under the Accounts and Audit Regulations 2003 (as amended in 2006).

9 Recommendation

- 9.1 The Committee is recommended to appoint Norfolk Audit Services as the Committee's Internal Auditor, consider and approve the Terms of Reference set out in Appendix A, the Code of Ethics as set out in Appendix B and the Strategy at Appendix C.

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Norfolk Parking Partnership Joint Committee

Internal Audit - Terms of Reference

1 Responsibilities and Objectives

- 1.1 Internal Audit is an assurance function that provides an independent and objective opinion to the organisation on its control environment comprising risk management, internal control and governance. It achieves this by evaluating its effectiveness in achieving the organisations objectives. It objectively examines, evaluates and reports on the adequacy of the control environment as a contribution to the proper, economic, efficient and effective use of resources.

2 Reporting lines and relationships

- 2.1 Internal Audit forms part of the Resources Directorate team and within this is part of the Finance Shared Service. The Chief Internal Auditor reports directly to the Section 151 Officer (Head of Finance), who in turn reports to the Chief Executive.
- 2.2 The Chief Internal Auditor's Annual Report to the Committee includes an 'opinion' on the adequacy and effectiveness of risk management and internal control within the committee. The Council, which hosts the Committee, has an Audit Committee and the Chief Internal Auditor reports to the Audit Committee on a quarterly and annual basis, through the Head of Finance.
- 2.3 The Committee is responsible for endorsing the Annual Internal Audit Plan. The annual report from the Chief Internal Auditor show progress against the Plan through a summary of audit work over the period. Quality feedback from questionnaires received from clients following audits is also presented to the Committee.
- 2.4 The Committee Chairman can meet separately and privately with the Chief Internal Auditor and with the Council's External Auditor if required.

3 Independence and accountability

- 3.1 Internal Audit is independent of the activities that it audits which enables the auditors to perform their duties in a manner, which facilitates impartial and effective professional judgements and unbiased recommendations. Internal auditors have no operational responsibilities.

Norfolk Parking Partnership Joint Committee

Internal Audit - Terms of Reference

- 3.2 Internal Audit determines its priorities in consultation with the Audit Committee. The Chief Internal Auditor has continual direct access to Committee records, officers and reports and the ability to report independently and impartially if required. Accountability for the response to the advice and recommendations of Internal Audit lies with Chief Officers and Heads of Service, who either accept and implement the advice or choose another course of action on a risk assessed basis.

4 Statutory role

- 4.1 Internal Audit is a statutory service in the context of the Accounts and Audit Regulations (England) 2011, which state in respect of Internal Audit that:
'A relevant body must undertake an adequate and effective internal audit of its accounting records and of its system of internal control in accordance with the proper practices in relation to internal control. Any officer or member of a relevant body must, if the body requires make available such documents and records as appear to that body to be necessary for the purposes of the audit; and supply the body with such information and explanation as that body considers necessary for that purpose. A larger relevant body must, at least once in each year, conduct a review of the effectiveness of its internal audit. The findings of the review referred to in paragraph (3) must be considered, as part of the consideration of the system of internal control referred to in regulation 4(3), by the committee or body referred to in that paragraph'.
- 4.2 The statutory role is recognised and endorsed within the Council's Financial Regulations (Appendix 16 of the Constitution), which provide the authority for Internal Audit's access to officers, members, premises, assets, documents and records and to require information and explanation as necessary. These rights of access also extend to partner organisations.

5 Consultancy or advisory reviews

- 5.1 In addition to formal audit work, Internal Audit perform consultancy or advisory reviews as part of the annual internal audit plan, or on an ad hoc basis when requested by management. Reports from this type of work contain findings, audit views and recommendations and whilst no formal opinion is given this work does inform the Chief Internal Auditor's overall opinion on the adequacy and effectiveness of internal controls.

Norfolk Parking Partnership Joint Committee

Internal Audit - Terms of Reference

6 Internal Audit Standards

- 6.1 There is a statutory requirement for Internal Audit to work in accordance with 'proper audit practices'. These 'proper audit practices' are in effect 'the Standards' for local authority internal audit. The guidance accompanying the Accounts and Audit Regulations 2011 makes it clear that the Standards are those shown in the CIPFA Code of Practice for Internal Audit in Local Government in the United Kingdom 2006. The Standards have been adopted by Internal Audit.

7 Internal Audit Scope

- 7.1 The scope for Internal Audit is 'the control environment comprising risk management, control and governance'. This means that the scope of Internal Audit includes all of the Committee's operations, resources, services and responsibilities including those where the Committee works with other bodies. This definition shows the very wide scope of Internal Audit's work.
- 7.2 In order to turn this generic description of scope into actual subjects for audit, the Chief Internal Auditor uses a risk assessment to identify high-risk areas. This risk assessment includes an assessment of the effectiveness of the systems of internal audit, reviewing the adequacy and effectiveness of risk management and reviewing corporate and departmental risk registers. This process inevitably identifies the Councils fundamental financial systems as being 'high risk', but other non-financial systems and functions are also identified as important areas for review by Internal Audit, for example project management/ICT and Health and Safety.

8 Internal Audit Resources

- 8.1 The Chief Internal Auditor has ensured that the resources of the Internal Audit Section are sufficient to meet its responsibilities and achieve its objectives. If a situation arises whereby the Chief Internal Auditor concludes that resources are insufficient, he must formally report this to the Section 151 Officer.
- 8.2 The Chief Internal Auditor has been responsible for appointing the staff of the Internal Audit Section and has ensured that appointments have been made to achieve the appropriate mix of qualifications, experience and skills.

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Internal Audit - Terms of Reference

- 8.3 Internal Audit is appropriately staffed in terms of numbers, grades, qualification levels and experience, having regard to its objectives and to the Standards. Internal Auditors are properly trained to fulfil their responsibilities and maintain their professional competence through appropriate development programmes.
- 8.4 Where skills do not exist within the team, the Chief Internal Auditor buys in resources from external sources to provide an adequate, effective and professional service, for instance with respect to ICT audit.
- 8.5 If Internal Audit staff are appointed from operational roles elsewhere in the Authority, they do not undertake an audit in that operational area during the first year of their appointment, except by prior agreement between the Chief Internal Auditor and the relevant Head of Service.

9 Fraud and Corruption

- 9.1 The Anti Fraud and Corruption Strategy was revised and updated in light of the Bribery Act that came into force on 1 July 2011 and endorsed by the Audit Committee at its September 2011 meeting. The Strategy sets out the responsibilities of the various parties. These include, amongst other things, that the promotion of and revision to the Strategy lies with Monitoring Officer (Head of Law) advised by the Chief Internal Auditor. Managing the risk of fraud and corruption is the responsibility of Chief Officers; Internal Audit does not have responsibility for the prevention or detection of fraud and corruption. Audit procedures alone, even when performed with due professional care, cannot guarantee that fraud or corruption will be detected. Internal auditors will, however, be alert in all their work to risks and exposures that could allow fraud or corruption. Internal Audit may be requested by management to assist with fraud related work. A training programme to develop fraud investigatory skills within the team is included within the development plans.
- 9.2 The Chief Internal Auditor advises Chief Officers on fraud and corruption issues.
- 9.3 The Chief Internal Auditor has made arrangements to be informed of all suspected or detected fraud, corruption or improprieties so that he can consider the adequacy of the relevant controls, and evaluate the implications for the opinion on the internal control environment.

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Internal Audit - Terms of Reference

10 Reporting Accountabilities

- 10.1 A written report is prepared for every internal audit. The report is agreed with the Chief Internal Auditor before being issued to the responsible Assistant Director or Head of Service. The reports include an 'opinion' on the adequacy and effectiveness of risk management and internal controls in the area that has been audited.
- 10.2 Internal Audit make practical recommendations based on the findings of the work and discuss these with management to establish an appropriate action plan.
- 10.3 The Assistant Director or Head of Service is asked to respond to the report's recommendations within an agreed timescale. The response must show what actions have been taken or are planned in relation to each recommendation. If a recommendation is not accepted by the manager, this is also stated. The Chief Internal Auditor assesses whether the managers response is adequate.
- 10.4 Any reports with an audit opinion of 'Key Issues to be addressed' are subject to follow-up action by Internal Audit, normally within six months of its issue. This is in order to ascertain whether the agreed actions have been implemented. As a minimum, Chief Officers are asked to confirm action has been taken for the findings with a High and Medium priority. Results of follow-ups are reported to Chief Officers Group. If actions have not been implemented satisfactorily by the agreed dates, the Chief Internal Auditor will make a risk based assessment to determine what further follow-up audit and subsequent reporting to Chief Officers Group is required.
- 10.5 Any reports that, in consultation with Chief Officers, are judged to be "Corporately Significant" based upon agreed criteria are reported to the Audit Committee. These reports are subject to a full follow up audit.
- 10.6 The Chairman can request a sample of audit reports to review periodically.

11 Responsibilities

- 11.1 In meeting its responsibilities, Internal Audit activities are conducted in accordance with the Committee's objectives and established policies and procedures. In addition, Internal Auditors shall comply with the Code of Ethics and the Code of Practice for Internal Audit in Local Government promulgated by the Chartered Institute of Public Finance and Accountancy and other such codes of professional bodies of which internal auditors are members, such as the Chartered Institute of Internal Auditors.

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Internal Audit - Terms of Reference

- 11.2 Internal Audit co-ordinate their work with that of the external auditors and assist the external auditors as required to ensure that appropriate reliance can be placed on Internal Audit's activities; Internal Audit may also place reliance upon the work of the external auditors.
- 11.3 Internal Audit will work in partnership with other bodies to secure robust internal controls that protect the Council's interests.

12 Related Documents

- 12.1 This document is one of a series that, together, constitute the policies of the authority in relation to anti-fraud and corruption. The other documents include:
- Anti-Fraud and Corruption Strategy
 - Whistle-Blowing Policy
 - Code of Conduct for Members and Co-opted Members
 - Officers Code of Conduct.

Norfolk County Council

Internal Audit – Code of Ethics

Introduction

A code of ethics is necessary and appropriate for the profession of internal auditing, founded as it is on the trust placed in its objective assurance about risk management, control, and governance. This code is complementary to, and should be read in conjunction with the CIPFA “Ethics and You” A Guide to the CIPFA Standard of Professional Practice on Ethics (June 2006).

The Code of Ethics is based on five pillars:

- Integrity
- Objectivity
- Confidentiality
- Competency
- Professional Behaviour

The Five Pillars

1. Integrity

The integrity of internal auditors is founded upon trust and thus provides the basis for reliance on their judgement. Internal auditors will never use their authority or office for personal gain. They will seek to uphold and enhance the standing of the profession. Internal auditors will maintain an unimpeachable standard of integrity in all their business relationships both inside and outside the organisations in which they are employed. They will reject any business practice, which might reasonably be deemed improper.

Internal auditors:

- 1.1. Will perform their work with honesty, diligence, and responsibility.
- 1.2. Will observe the law and make disclosures expected by the law and the profession.
- 1.3. Will not knowingly be a party to any illegal activity, or engage in acts that are discreditable to the profession of internal auditing or to the organisation or themselves in their professional capacity. The fact that an action is legal does not necessarily mean that it is ethical.
- 1.4. Will declare any personal interest, which may impinge or might reasonably be deemed by others to impinge on impartiality in any matter relevant to his or her duties.
- 1.5. Will respect and contribute to the legitimate and ethical objectives of the organisation.
- 1.6. Will be trustworthy, truthful and honest. They should also promote and support these fundamental principles by leadership and example.

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Internal Audit – Code of Ethics

2. Objectivity

Internal auditors exhibit the highest level of professional objectivity in gathering, evaluating, and communicating information about the activity or process being examined. Internal auditors make a balanced assessment of all the relevant circumstances and are not unduly influenced by their own interests or by others in forming judgements.

Internal auditors:

- 2.1. Will not participate in any activity or relationship that may impair or be presumed to impair their unbiased assessment. This participation includes those activities or relationships that may be in conflict with the interests of the organisation.
- 2.2 Will not accept anything that may impair or be presumed to impair their professional judgement
- 2.3 Will disclose all material facts known to them that, if not disclosed, may distort the reporting of activities under review or distort their reports or conceal unlawful practice.
- 2.4. Will at all times maintain their professional independence. They must be fair and must not allow prejudice or bias, conflict of interest or the influence of others to override their judgement and actions.

3. Confidentiality

Internal auditors respect the value and ownership of information they receive and do not disclose information without appropriate authority unless there is a legal or professional obligation to do so.

Internal auditors:

- 3.1 Will be prudent in the use and protection of information acquired in the course of their duties.
- 3.2 Will not use information for any personal gain or in any manner that would be contrary to the law or detrimental to the legitimate and ethical objectives of the organisation.
- 3.3. Will respect the proper confidentiality of information acquired during the course of performing professional services: information given in the course of duty should be true and fair and never designed to mislead
- 3.4. Will not use or disclose any such information without specific authority unless there is a legal or professional right or duty of disclosure.

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Internal Audit – Code of Ethics

4. Competency

Internal auditors apply the knowledge, skills, and experience needed in the performance of internal auditing services. Internal auditors foster the highest possible standards of professional competence amongst those for whom they are responsible optimising the use of resources for which they are responsible to provide the maximum benefit to their employing organisation

Internal auditors:

- 4.1. Will engage only in those services for which they have the necessary knowledge, skills, and experience.
- 4.2. Will continually improve their proficiency and the effectiveness and quality of their services.
- 4.3. Will perform professional services with due care, competence and diligence, and have a continuing duty to maintain their professional knowledge and skill at a level required to ensure that an employer or client receives the advantage of a competent professional service based on up-to-date developments in practice, legislation and techniques.
- 4.4. Will carry out professional services in accordance with the relevant technical and professional standards.

5. Professional Behaviour

Internal auditors comply with standards and laws and must not bring the reputation of the profession into disrepute in their behaviour and actions.

Internal auditors:

- 5.1 will behave in a professional manner both during their day to day work and activities outside of work.

Norfolk Parking Partnership Joint Committee

Internal Audit – Strategy

Introduction

The Internal Audit Strategy for 2011-12, effective from this Committee's approval, focuses on the delivery of the assurance (opinion) and the internal audit plan to support this opinion. This strategy reflects Internal Audit's contribution to the Council's Core Priorities in the wake of the Government's Comprehensive Spending Review in October 2010. The strategy incorporates best practice from CIPFA and the Chartered Institute of Internal Auditors. The mission of the Internal Audit Team is to provide value for all our stakeholders. There are three ways that we achieve this by providing:

- Assurance,
- Objectivity; and
- Insight

The assurance is provided through three elements:

- Governance,
- Internal Control; and
- Risk Management

Our objectivity is provided by our:

- Integrity,
- Accountability; and
- Independence

The insight we deliver is through our:

- Analysis,
- Assessment; and
- Action plans

We aim to deliver the right work, of the right quality, to the right people at the right time and for the right price. There are some overarching strategies to support the delivery of all our services, these include:

1. To support and promote the Committee's vision, ambitions, value and objectives in all we do, whilst considering changes resulting from the Organisational Review and Transformational Programme.

- Our strategy is to ensure that our delivery of all our services has been influenced by and positively contributes to developments such as the Organisational Review and Transformational programme together with the growing need for wider ranging assurances in all aspects of the Committee's operations. We will consider and review the impact of these changes on the Committee's Governance, internal control and risks.

Norfolk Parking Partnership Joint Committee

Internal Audit – Strategy

- As part of the Organisational Review programme and 'Transformational Programme' review, we are considered as a Centre of Expertise within the Finance Shared Services model. As part of this we aim over the next 3 years to fulfil, the financial savings required of the team, the audit delivery targets and the various changes to our processes that are planned or already in progress.
- We aim to exercise our professional judgement in giving assurance, which points to the future capability of the system of risk management and internal control to help deliver success.

Our success is measured through review of the outcomes from audits and the difference we make as reported in the Chief Internal Auditor's Annual Audit Report.

2. To plan, organise and control the delivery of all our services to professional standards.

- We work to add value through providing reliable objective assurance and insight on the effectiveness and efficiency of governance, risk management and internal control processes. We aim to challenge and inspire colleagues to improve.
- We aim to create and communicate high quality information about the effective operation of management's controls over risks.
- Our annual audit planning identifies essential and desirable audits based on an audit needs assessment and these are considered and matched to our resources in consultation with the Head of Finance, Chief Officers and Members before approval by the Audit Committee.
- Changes to the approved Audit Plan are also agreed as above and notified to the Committee throughout the year.
- We use our combined experience and knowledge to provide helpful and practical insight and recommendations, We are a catalyst for improving the Committee's effectiveness and efficiency based on analysis and assessments of data and business processes.
- The team has a comprehensive set of procedures and templates that are regularly reviewed and approved to ensure a consistent approach to our work.
- Audit work is reviewed to ensure that it is evidenced based, independent, technically compliant, risk based, timely, has impact and is efficient. We deliver all our services in compliance with the CIPFA Code of Practice (2006). We employ quality controls, quality monitoring and quality reviews of our work. External auditors also review our work against this code every three years.

Norfolk Parking Partnership Joint Committee

Internal Audit – Strategy

- We identify audit resources (staff or contractors) with the appropriate skills to deliver the audit service, which meets required professional standards. We are committed to integrity, accountability and high customer care standards. This can involve the use of internal and/or external resources.
- All members of the team above the Senior Auditor level should be professionally qualified. All Auditors and Senior Auditors are required to be AAT or part IIA or CAAB qualified. We provide assistance with training and continuing professional development appropriately for all members of the team.
- The Chief Internal Auditor attends the County Chief Internal Auditor Network (CCAN) and the Home Counties Chief Internal Auditor Group (HCCIAG) in order to utilise the peer support that these groups provide

Our success is measured through meeting the code and the delivery of the audit plan within planned resources as reported in the Chief Internal Auditor's Annual Audit Report.

3. To fulfil our Terms of Reference.

Our strategy fully meets and supports the requirements of our Internal Audit Terms of Reference which is set out in Appendix A of this report to this Committee.

Our success is measured through the review of the outcomes from audits and the difference we make as reported in the Chief Internal Auditor's Annual Audit Report.

4. To comply at all times with our Code of Ethics.

Our strategy fully meets and supports the requirements of our Code of Ethics which is set out in Appendix B of this report to this Committee.

Our success is measured through the review of the outcomes from audits and the difference we make as reported in the Chief Internal Auditor's Annual Audit Report.

5. To raise the profile of Internal Audit.

Our strategy is to strive to raise the profile of the team in a positive way at all times. The ways that we do this include:

Norfolk Parking Partnership Joint Committee

Internal Audit – Strategy

- Professional advice and support to Members, Chief Officers and the Head of Finance.
- Delivery of our principal services including quality audit reports (draft and final) and Committee reports.
- Contributing to Finance's 'Finance News' and 'Risk News' publications and the production of termly school newsletters.
- Issuing Client Satisfaction Questionnaires for all work that we undertake and analysing and understanding the responses and acting on the messages contained within such questionnaires.
- Maintaining good client relations and to this end
 - We maintain web pages on the Council's websites to explain the role of the internal audit team and provide links to relevant information and advice.
 - There is provision within the audit plan for advice and assistance with respect to internal control for all our clients.
 - Detailed terms of reference are prepared for each audit based on close liaison with clients.
 - We have a Pledge and Remedy statement, published on the web page.
- Active and full participation in corporate initiatives.

Our success is measured through the feedback both formally and informally and requests for additional or ad hoc audit work and advice from our "auditees", the Head of Finance, Chief Officers and the Audit Committee.

6. To add value in our work and to contribute to ensuring Value for Money for the Committee

Our strategy is to support good value for money in all we do.

Our work:

- is designed to help in the promotion of continuous performance and internal control improvement through the issue of reports containing recommendations and action plans.
- helps to ensure that the Committee delivers its Plan
- supports effective Financial Management
- on Anti-Fraud and corruption helps to prevent fraud and corruption, assists in the safeguarding of assets and includes to undertake investigations where requested to do so by Chief Officers.
- generally acts as a deterrent against fraud and corruption
- includes participation in benchmarking to measure our performance and value for money against peer organisations.

Our success is measured through the review of the outcomes from audits and the difference we make as reported in the Chief Internal Auditor's Annual Audit Report.

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Internal Audit – Strategy

7. To manage Internal Audit resources

- Our approach is to continuously review our financial budget to ensure that we remain in control and that there are no overspends. We take every opportunity to minimise our spend whilst maintaining or improving our service.
- We plan, record and monitor the time spent on all audit activities (audit and non-audit) to manage our staffing resources efficiently and economically.
- Our strategic planning includes to change both the staffing and financial resources within Finance Shared Services and our success in managing our resources will be measured against those targets
- Our approach to additional non-statutory work is generally to accept such work on the basis of full cost recovery with the proviso that such work is not excessive. Such an approach therefore allows us to recover some of our overheads. Recent examples of this include for instance being successful at tender for a further contract with Norfolk Police Authority, and our proposals to market our services to the increasing number of academies.

Our success is measured through the delivery of the internal audit plan, whilst remaining within our budget allocation and delivering the corporate budgetary targets when required.

8. The table below sets out the services we deliver and the particular strategies for the delivery of these services:

Service	Particular Audit strategy for delivery/Measures of Success
Reporting to the Committee, quarterly and annually	Production and delivery of reports to a professional standard. Attendance at all meetings by the appropriate officers.
Facilitation of the delivery of the Annual Governance Statements to the Joint Committee	Manage the process for the delivery of the Annual Governance Statement in particular ensuring adequate and timely consultation with appropriate senior officers and members.
Provision of assurance to the Head of Finance (Section 151 Officer) with respect to the systems of governance/internal control and risk management throughout the authority and the Joint Committees	Consider all aspects of governance, internal control and risk management throughout the authority or joint committee and arrive at a reasoned opinion. Report this to the Head of Finance

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Internal Audit – Strategy

	and the appropriate committees.
Undertaking audit work to support the opinion; this work produces draft and final reports which include recommendations for improvements in internal controls and an action plan This work also includes a deterrence element generally and “managed audit work” for the Audit Commission with respect to key systems	In each audit carried out: <ul style="list-style-type: none"> • Our audit findings are categorised into high, medium and low priority • Action plans are agreed with management to mitigate risks for medium and high priority findings • Any findings of low priority are reported on as discussion points within audit reports • We assess the findings to form an overall opinion of ‘Acceptable’ or ‘Key issues that need to be addressed’. • All opinions are moderated by an Audit Opinion Group. • We assess the corporate significance of the audit
Provision of advice and assistance with respect to Internal Control to Chief Officers and other Senior Officers	Our annual resource plan provide for general liaison with Chief Officers and other Senior Officers particularly in the formulation of the audit plan. We provide advice on new systems and answers queries in respect of internal control.

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Internal Audit – Strategy

Provision of advice and assistance with respect to Anti Fraud and Corruption particularly to the Head of Law	We review, with the Head of Law, the Anti Fraud and Corruption Strategy on an annual basis and update it as necessary. The Strategy was last updated in July 2011. A performance report with respect to Anti Fraud and Corruption is made to the Audit Committee half-yearly.
Provision to undertake investigations where requested to do so by Chief Officers	To deliver professional and objective evidence based reports to assist with effective and efficient disciplinary or criminal proceedings.

9. Reporting the success of the strategy

The results of the strategy are reported to the Committee annually. The Head of Finance, Chief Officers and the Committee provide scrutiny and challenge to this strategy.