



# EXMOOR

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## NATIONAL PARK

EXMOOR NATIONAL PARK AUTHORITY  
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This matter is being dealt with by the  
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20 February 2025

### EXMOOR NATIONAL PARK AUTHORITY STANDARDS COMMITTEE

**To: The Members of the STANDARDS COMMITTEE of the Exmoor National Park Authority**

A meeting of the Standards Committee will be held at Exmoor House, Dulverton on **Tuesday, 4 March 2025 at 3.00pm.**

The meeting will be open to the press and public subject to the passing of any resolution under s.100(A)(4) of the Local Government Act 1972.

There is a Public Speaking at this meeting, when the Chairperson will allow members of the public two minutes each in which to ask questions, make statements, or present a petition relating to any item on the Agenda. Anyone wishing to ask questions should notify the Corporate Support Officer by 4pm on the working day before the meeting of the agenda item on which they wish to speak, indicating a brief summary of the matter or matters to be raised (contact details are set out above).

Please be aware that this is a public Authority Meeting and will be **audio and video recorded**. We will make the recordings available via our website for members of the public to listen to and/or view, within 72 hours of the meeting taking place.

Members of the public may use forms of social media to report on proceedings at this meeting. Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairperson so that those present may be made aware.

(The agenda and papers for this meeting can be downloaded from the National Park Authority's website [www.exmoor-nationalpark.gov.uk](http://www.exmoor-nationalpark.gov.uk)).

Sarah Bryan  
Chief Executive

As set out above, the Authority welcomes public engagement with its work and believes that everyone attending a meeting of Exmoor National Park Authority or one of its Committees has the right to be treated with respect and to feel safe at all times, including before, during and after the meeting they attend.

The Authority understands that some situations can be difficult and lead to frustration; however, the Authority is committed to promoting an environment where everyone feels listened to and respected and is not subjected to unacceptable behaviour. Further guidance is provided in our Customer Notice, available on our [website](#).

## **A G E N D A**

1. **Apologies for Absence**

2. **Declarations of Interest**

Members are asked to declare any interests they may have in relation to items on the agenda for this meeting.

3. **Minutes:** (1) To approve as a correct record the Minutes of the meeting of the Standards Committee held on 5 November 2024 (Item 3).

(2) To consider any Matters Arising from those Minutes.

4. **Business of Urgency:** To introduce any business which by reason of special circumstances the Chairperson, after consultation with the Chief Executive, is of the opinion should be considered as a matter of urgency and to resolve when such business should be ordered on the Agenda.

5. **Public Speaking:** The Chairperson will allow members of the public to ask questions, make statements, or present a petition on any matter on the Agenda for this meeting or in relation to any item relevant to the business of the Standards Committee. Any questions specific to an agenda item can be posed when that item is considered subject to the discretion of the person presiding at the meeting.

6. **Annual Governance Review 2024-2025:** To consider the joint report of the Chief Finance Officer and Solicitor and Monitoring Officer (Item 6)

7. **Overview of Complaints and Compliments:** To consider the report of the Head of Enterprise & Operations (Item 7).

Details of the decisions taken at this meeting will be circulated in the formal Minutes which the Committee will be asked to approve as a correct record at its next meeting. In the meantime, details of the decisions can be obtained from Carol Carder, Corporate Support Officer, at Exmoor House. These documents can also be made available in alternative formats such as large print, on tape and on disc.

## ITEM 3

### EXMOOR NATIONAL PARK AUTHORITY STANDARDS COMMITTEE

**MINUTES** of the meeting of the Standards Committee held at 3.00pm on Tuesday, 5 November 2024 in the Committee Room at Exmoor House, Dulverton.

#### **PRESENT**

Mr J Patrinos (Chairperson)  
Mr M Ellicott  
Mr S J Pugsley  
Mrs E Stacey

1. **APPOINTMENT OF CHAIRPERSON:** Mr J Patrinos was reappointed Chairperson of the Standards Committee until the first meeting of the Standards Committee convened after the Annual Meeting.
2. **APPOINTMENT OF DEPUTY CHAIRPERSON:** Mr S J Pugsley was reappointed Deputy Chairperson of the Standards Committee until the first meeting of the Standards Committee convened after the Annual Meeting.
3. **APOLOGIES FOR ABSENCE:** An apology for absence was received from Mr B Geen.
4. **DECLARATIONS OF INTEREST:** There were none.
5. **ORDER OF BUSINESS:** In accordance with Standing Orders, it was proposed by the Chairperson to vary the order of business so that Items 6 and 7 on the agenda would be dealt with after Item 11.
6. **MINUTES:**
  - i. **Confirmation:** The **Minutes** of the Standards Committee's meeting held on 14 November 2023 were agreed and signed as a correct record.
  - ii. **Matters arising:** There were no matters arising from those Minutes.
7. **PUBLIC SPEAKING:** There were no public speakers.
8. **MEMBER TRAINING AND DEVELOPMENT PROGRAMME:** The Committee considered the report of the Head of Enterprise & Operations and the Solicitor & Monitoring Officer.

#### **The Committee's Consideration**

Members supported the Member Role Profile as appended to the report subject to the Nolan principles being set out in full and recommended that it be adopted by all Authority Members and that a training session on the role of Members be arranged at the earliest opportunity.

The draft Annual Member Learning and Development Programme was welcomed. It was recommended that this be reviewed annually by the Committee and be considered an agile programme that could respond to changes in legislation or governance.

In terms of the current draft, it was proposed that this be amended to include training on the Member Role Profile and on finance including interpretation of statements of accounts. It was also proposed that a mentor system be put in place so that new Members of the Authority could receive support and guidance from an existing Member.

**RESOLVED:**

1. To approve the Member Role Profile subject to amendment to set out the Nolan Principles in full and to recommend it be adopted by all Members of the Authority.
2. To delegate to Officers amendment of the Member Learning and Development Programme and to recommend that the amended version be adopted by all Members of the Authority.
3. To approve the arrangements for the Annual Member Training and Development Review and to recommend that it be adopted by the Authority.

9. **PLANNING COMMITTEE SUBSTITUTES:** The Committee considered the report of the Head of Enterprise & Operations and the Solicitor & Monitoring Officer.

**The Committee's Consideration**

It was confirmed that the Authority's Standing Orders provided that in relation to Committees and Sub-Committees, the division of the membership between Local Authority Members and Members appointed by the Secretary of State shall as nearly as possible be in the same proportions as the composition of the Authority itself.

Therefore, if the Authority Committee were to confirm the Planning Committee arrangements currently being trialled, it was considered desirable that the ability to nominate Planning Committee substitutes should also be confirmed.

It was noted that Standing Orders were silent in relation to the particular Member group from which an appointed Member should nominate a substitute Member. However, it was acknowledged that the preferred practice was that a substitute be nominated from the same Member group to maintain the balance of the Committee, and that to date this had worked well. It was also noted that in the unlikely event of a Member from the same group being unavailable, Standing Orders did not preclude the nomination of a substitute Member from another group, eg a Member appointed by North Devon Council could nominate a Member appointed by Devon County Council.

In relation to Standing Order 4.4 and the requirement that the appointed Member be "required to identify the substitute Member and provide notice to the Chief Executive at least 10 working days before the Committee meeting save for exceptional circumstances (due to an emergency or sudden illness)...", it was agreed that the length of this notice period was problematic.

It was therefore proposed that if the trialled Planning Committee arrangements were confirmed by the Authority Committee, Standing Orders be revised to provide that the notice period for identifying a substitute Member be reduced to at least 3 working days' notice, ie that notice should be provided to the Chief Executive by 5pm on the Wednesday before the Planning Committee meeting on the following Tuesday.

It was also proposed that a list of Members eligible for nomination as a substitute be made available (ie those Members who have attended the requisite planning training sessions).

**RESOLVED:** To recommend to the Authority Committee that if the trialled Planning Committee arrangements are confirmed, Standing Orders in relation to planning substitutes be revised to reduce the notice period for identifying a substitute Member from 10 working days to 3 working days.

**10. ARRANGEMENTS FOR DEALING WITH STANDARDS ALLEGATIONS UNDER THE LOCALISM ACT 2011:** The Committee considered the report of the Head of Enterprise & Operations and the Solicitor & Monitoring Officer.

**The Committee's Consideration**

Members agreed to meet as an informal working group with the Independent People and the Solicitor & Monitoring Officer to undertake a full review of the Authority's arrangements for dealing with Standards Allegations under the Localism Act 2011 before submitting a revised version to a meeting of the Authority Committee for adoption.

**RESOLVED:** The Standards Committee to meet as an informal working group with the Independent People and the Solicitor & Monitoring Officer to review the Authority's arrangements for dealing with Standards Allegations under the Localism Act 2011.

**11. ROLE OF INDEPENDENT PERSON:** The Committee considered the report of the Head of Enterprise & Operations and the Solicitor & Monitoring Officer.

**The Committee's Consideration**

It was agreed that rather than introducing a regular reporting regime, it may be helpful to hear from the Independent People by way of an informal report on an ad hoc basis, and to seek their assistance with any specific questions or concerns if they arise.

In this way, it was considered that the Independent People could assist with any issues in a timely manner, while retaining their objectivity and remaining within their legislative role.

**RESOLVED:** To confirm the role of the Independent People as set out legislation and the Authority's existing processes, to include ad hoc informal reporting and assistance as relevant questions or concerns arise.

**12. ANNUAL GOVERNANCE REVIEW 2023-2024**

The Committee considered the report of the Chief Finance Officer and the Solicitor & Monitoring Officer.

**The Committee's Consideration**

The Committee welcomed the Annual Governance Review 2023-2024 and noted that Section 9 of the report fulfilled the recommendation made by the Authority's external auditors that the Standards Committee formally publish its self-assessment of good practice.

It was noted that the Annual Governance Review for 2024-2025 would be presented to the Standards Committee in March 2025.

**RESOLVED:**

1. To approve the Annual Governance Review 2023-2024.
2. To note the results of the Governance self-assessment in Section 9.
3. To approve the Annual Governance Statement for inclusion with the Annual Accounts for 2023/24.

**13. OVERVIEW OF COMPLAINTS AND COMPLIMENTS**

The Committee considered the report of the Head of Enterprise & Operations.

**The Committee's Consideration**

Members were pleased to note the low number of complaints received in the six months from April to September 2024 and that of the four reported, only three had been upheld.

It was acknowledged that two of the upheld complaints related to the planning service and in particular the failure to determine an application within statutory timeframes. The importance and public facing nature of the Authority's role as the local planning authority was recognised.

**RESOLVED:** To note the overview report of general complaints and compliments received by the Authority.

**14. ANY OTHER BUSINESS OF URGENCY:** There was none

(The meeting closed at 3.55pm)

Chairperson

## EXMOOR NATIONAL PARK AUTHORITY

### STANDARDS COMMITTEE

4 March 2025

### ANNUAL GOVERNANCE REVIEW 2024-2025

#### Joint Report of the Chief Finance Officer and Solicitor and Monitoring Officer

**Purpose of Report:** To report compliance with the Authority's Code of Corporate Governance and consider the Annual Governance Statement for 2024-25.

**RECOMMENDATIONS:** The Standards Committee is recommended to:

- (1) Approve the Annual Governance Review.
- (2) Note the results of the Governance self-assessment in Section 9.
- (3) Approve the Annual Governance Statement as set out in the attached Appendix for inclusion with the Annual Accounts for 2024/25.

**Authority priorities:** Manage corporate finances and diversify income streams; Develop and maintain effective and efficient services; Work with communities, businesses and partners to deliver the National Park Partnership Plan and statutory purposes; Manage the Authority's Estate and operations to support delivery of National Park purposes

**Legal and equality implications:** Local Government Act 2003, Parts 1-3 (Capital Finance, Financial Administration and Grants), and Sections 1-39

Accounts and Audit Regulations 2015, Sections 3 (Responsibility for Internal Control), 4 (Accounting Records and Control Systems) 5 (Internal Audit), and 6 (Review of Internal Control System).

High standards of corporate governance are essential in ensuring all business is transacted lawfully and with propriety.

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

**Financial and risk implications:** The report has no financial implications but the risks to the Authority could be substantial for non-compliance with its Code of Corporate Governance.

**Climate change response:** A well governed Authority is more likely to take full account of the environmental impact of decision making.

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## 1. Introduction

- 1.1 Sound governance arrangements and accountability are critical to the Authority to fulfil National Park purposes, deliver the intended outcomes in the National Park Partnership Plan and the Corporate Plan and operate in an effective, efficient and

ethical manner. Good governance leads to good management, good performance, good stewardship of public money, good public engagement and ultimately good outcomes for the public and service users.

- 1.2 The Authority has endorsed the “Delivering Good Governance in Local Government Framework (2016)” that has been produced by CIPFA (Chartered Institute of Public Finance and Accounting) and SOLACE (Society of Local Authority Chief Executives and Senior Managers) which has the support of the Department for Communities and Local Government.
- 1.3 The CIPFA/SOLACE framework is based on the following seven core principles of good governance:
  - A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.
  - B. Ensuring openness and comprehensive stakeholder engagement.
  - C. Defining outcomes in terms of sustainable economic, social and environmental benefits.
  - D. Determining the interventions necessary to optimise the achievement of the intended outcomes.
  - E. Developing the entity’s capacity, including the capability of its leadership and the individuals within it.
  - F. Managing risks and performance through robust internal control and strong public financial management.
  - G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability.
- 1.4 These seven principles are reflected in the Authority’s Code of Corporate Governance. The CIPFA/SOLACE Framework sets out a number of supporting principles for each of the seven core principles and these are translated into a range of governance arrangements that the Authority has in place. The first section of this report summarises the Authority’s compliance with these principles during 2024/25.

## **2. A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law**

- 2.1 The governance arrangements the Authority has in place to achieve these principles are:
  - codes of conduct which define the standards of conduct and personal behaviour to which members, staff and agents of the Authority are required to subscribe.
  - an effective Standards Committee.
  - arrangements and mechanisms to ensure all codes of conduct continue to operate in practice, to ensure that members and staff are not influenced by prejudices, bias or conflicts of interest in dealing with the public and stakeholders.
  - arrangements for reporting concerns at work (whistleblowing) which are accessible to all staff and contractors.
  - shared values to act as a guide for decision making and as a basis for developing positive and trusting relationships within the Authority.



- member training and induction.
- a register of gifts and hospitality and comply with anti- bribery and money laundering legislation.
- partnerships underpinned by a common vision that is understood and agreed by all partners.

## 2.2 In year Commentary

- (i) Following the abolition of the Standards Board through the Localism Act 2011, new arrangements were approved and implemented in June 2012. The Authority has also appointed two 'Independent Persons' to provide an external perspective on any investigations undertaken by the Standards Committee. The Standards Committee also granted dispensations to Members who are members of another authority in order to protect them from inadvertent breaches of the requirements related to Disclosable Pecuniary Interests, due to omissions and ambiguities in the legislation and to ensure that the National Park Authority can conduct its business effectively.
- (ii) An annual reminder is sent to all staff reminding them of their responsibilities and the requirement to comply with all policies, procedures, standing orders (including contract standing orders) and financial regulations.
- (iii) This is the fourth year that the Standards Committee have undertaken a self-assessment of the audit and governance process.

## 3. **B. Ensuring openness and comprehensive stakeholder engagement**

### 3.1 The governance arrangements the Authority has in place to achieve these principles are to:

- meet on a regular basis with meetings open to the public except where reasons of commercial or individual confidentiality require the meeting to be closed.
- undertake a number of consultative committees with parishes and other interested bodies throughout the year as a forum for discussing common issues.
- engage with local councils and the Local Enterprise Partnership to ensure that National Park priorities are heard.
- produce effective consultation and communication arrangements.
- undertake regular surveys of visitors and businesses to ensure that balanced and representative opinions are available to inform decision making.
- enable a complaint or request for information regarding any aspect of the Authority's activities to be easily lodged and to ensure it is properly addressed.

### 3.2 In year Commentary

- (i) Extensive consultation arrangements are in place. The Corporate Strategy continues to compare performance against the objectives set for the previous year and sets the targets for the forthcoming year.
- (ii) During 2024/25 the review of the Partnership Plan was undertaken and is well underway including a public opinion survey, workshop with partners, and a steering group established. The draft plan has been published and communicated to stakeholders. Updated national guidance and targets on environmental outcomes for Protected Landscapes are awaited, which has

led to the timetable for completion of the Plan being pushed back into early 2025.

- (iii) The Authority continues to consult widely with interested parties.
- (iv) We continue to respond to Freedom of Information, Environmental Information Regulation requests, complaints and compliments.

#### **4. C. Defining outcomes in terms of sustainable economic, social, and environmental benefits**

4.1 The governance arrangements the Authority has in place to achieve these principles are to:

- produce a National Park Partnership Plan, reviewed every five years, which contains a vision for Exmoor, key challenges and ambitions.
- publish a Corporate Plan and performance report presenting an objective and understandable account of its activities and achievements, its financial position and performance and an assessment of plans to maintain and improve service quality.
- produce a Medium-Term Financial Plan which estimates income and expenditure over a five-year period to ensure that obligations can be met.
- engage with young people and a wide variety of community groups to ensure that the value of national parks is appreciated into the future.
- ensure that the forward year budget includes a risk assessment.
- assess the impact on community groups before recommendations are made.
- work positively with DEFRA to ensure the long-term role and funding of national parks is secured.

4.2 In year Commentary

- (i) A three-year Corporate Strategy was agreed by the Authority in May 2023. This set out the key priorities for the Authority and included actions for 2024/25. The Strategy reflected the emerging themes of the 2025/30 Exmoor National Park Partnership Plan, and the priorities identified in Government's response to the Landscape Review. A six-month progress report was presented to Members in December 2024.
- (ii) We have received an unqualified opinion for the 2023/24 Annual Statement of Accounts by the Auditor, Grant Thornton LLP. Complaints procedures are in place, are easily accessible and are easy to use. Requests for information under the Freedom of Information Act, 2000 are dealt with in accordance with the statutory requirements. Reports on both complaints and Freedom of Information Act requests were submitted to the National Park Authority.
- (iii) Partnership working continues to be a key feature of the Authority's working, the most significant during the past year being the engagement with the Local Nature Partnerships and the continuation of the Farming in Protected Landscapes scheme (FiPL). FiPL has provided new opportunities of working with farmers and land managers while investing in a range of schemes primarily around nature, ecology and agricultural developments. Generation Green funding allowed the Authority to engage with young people that are passionate about the environment. Clear understandings are agreed with Partners and where the Authority takes the lead role, all matters are

conducted in accordance with the Authority's Standing Orders and Financial Regulations.

- (iv) Since declaring a climate emergency in 2019/20 we have been implementing actions identified to achieve carbon neutral status for ENPA by 2030. During 2024/25 DEFRA commissioned the Carbon Trust to undertake a review of our Supply Chain Carbon Footprint. Operationally, we completed works on the Pinkery Outdoor Education Centre decarbonisation scheme (biomass boiler and installed additional renewable energy capacity). In Exmoor House, all lighting has now been replaced with LED lighting. Replacement lighting has also been completed at the Lynmouth Pavilion National Park Centre and planned for Exford Depot. 2024/25 has seen the purchase of three further electric vehicles (2x Nissan leaf EV Pool-cars and a 9-seater Education/Volunteer Citroen eSpacetourer) and one plug-in hybrid car (Peugeot 308 Pool-Car). Following an internal climate change audit, we strengthened our procedures for monitoring and reporting on the climate action plan including the addition of a trajectory to deliver the 2030 carbon neutral target. We continue to feed into the Somerset and Devon climate change partnerships and are present on a DEFRA working group in respect of 4x4 and commercial vehicles.
- (v) In 2022/23 we received the report from consultants on the carbon footprint of the National Park. This provided a consistent methodology and allows for comparison / benchmarking across National Parks. Work is ongoing with our partners to support delivery during 2024/25 and beyond throughout the National Park including securing funding from Somerset West and Taunton to support woodland creation on Exmoor. This complements the woodland planting that has already taken place on ENPA land at Bye Hill. The South West Peatland Partnership continues to work on peatland restoration on Exmoor.
- (vi) The task of developing a balanced medium-term financial plan is ongoing. The Authority successfully managed the financial impact of the pandemic and the inflationary challenges following the invasion of Ukraine and has produced a balance budget projection for 2024/25 and 2025/26. Flat-lined National Park Grant (no change over 6 years) and increasing cost of living pay awards continue to present a significant financial risk to the long-term financial sustainability of the Authority. Additionally, the single year settlement for 2025/26 from DEFRA has yet to be confirmed.

## **5. D. Determining the interventions necessary to optimise the achievement of the intended outcomes**

5.1 The governance arrangements the Authority has in place to achieve these principles are:

- considering a full range of options before recommendations are presented to members of the Authority
- undertaking regular surveys of visitors and businesses to ensure that balanced and representative opinions are available to inform decision making
- producing a Corporate Plan setting out objectives and targets for the period ahead

- monitoring the achievement of these targets in year, and publicly reporting performance at the year end
- producing a Medium-Term Financial Plan (MTFP) which estimates income and expenditure over a five year period, agreeing annual budgets which implement the Corporate Plan and are informed by the MTFP
- the Finance and Performance Advisory Panel which will provide scrutiny over the budget setting process
- when assessing options for capital investment the Authority, considering the life-cycle costs of the asset and the cost of capital financing

## 5.2 In year Commentary

- (i) The Authority's decision-making processes are based on a slim line structure embracing the principle that there should be no duplication of effort. The Authority is not required to provide executive arrangements which were introduced in the Local Government Act 2000 and apply only to local authorities.
- (ii) The present Authority structure meets all the requirements of the Local Government Act. Standing Orders, Powers, Duties and Functions of the Authority Meeting, the Scheme of Delegation and Financial Regulations were reviewed and updated during 2022/23. The Member's Code of Conduct was last adopted by the Authority in April 2024.
- (iii) The scheme of delegation of functions to Authority Committee and to the Chief Executive works well and is kept under review. In any public authority, decisions are being made all the time and it is important to strike the right balance between those that require Member consideration and those that can be taken by Officers. The scheme of delegation is set out fully in the Authority's standing orders. All decisions by Officers must accord with all Authority policies and must where appropriate, involve consultation with Members. Whether a Member or Members should be consulted on any particular issue is a matter of judgement but it is the practice to consult committee chairmen and deputy chairmen on some issues, and indeed local Members, that is to say those representing a division, ward or parish. An overriding safeguard in the delegation scheme is that the Chief Executive is required in all cases to consider whether, rather than proceed under the scheme, she should refer the matter to a committee for decision. Where any controversy is likely, it is always the policy to refer such matters to committee for decision.
- (iv) The Finance and Performance Advisory Panel establishes greater budgetary scrutiny and oversight of investment decisions. The panel reconvened in 2022/23 after Covid broke up the pattern of meetings.

**6. E. Developing the entity's capacity, including the capability of its leadership and the individuals within it**

6.1 The governance arrangements the Authority has in place to achieve these principles are:

- ensuring the Chief Executive is responsible and accountable to the Authority for all aspects of operational management
- ensuring induction programmes are arranged for new members and new staff
- ensuring Members are provided with the necessary training to perform their roles including member review and Member briefing arrangements
- ensuring that staff are competent to perform their roles and that arrangements are in place for all staff to have a Personal Development Review
- ensuring mechanisms are in place to maintain the health, safety and wellbeing of staff at work
- ensuring that the roles and responsibilities of Members and staff are documented including those of the statutory officers namely Chief Executive, Chief Finance Officer and Monitoring Officer
- providing arrangements that are designed to encourage individuals from all sections of the public to engage with, contribute to and participate in the work of the Authority
- ensuring meetings are held on a regular basis, are open to the public except where reasons of commercial or individual confidentiality require the meeting to be closed.

6.2 In year Commentary

- (i) Induction Programmes were carried out during 2024/25 for new Members. Members identify the subject areas for briefings/updates each year and this has been supplemented by a monthly informal Members' Forum where Members can request an updating or briefing on any topic or area of activity.
- (ii) Members have adopted a role description outlining the role and responsibility of members and an annual Member review is conducted by the Chairperson and Deputy Chairperson.
- (iii) All members of staff normally receive an annual performance and development review which included ensuring their job description was up to date, reviewed progress against current individual objectives and sets new objectives and identifies development opportunities for the coming year. These objectives are directly linked to those contained in the Corporate Plan.
- (iv) Many organisations are committed to taking a lead role in the achievement of actions in the National Park Partnership Plan and these comprise local authorities, statutory agencies, voluntary organisations and partnerships. All contribute to the periodic updating of progress against the targets.
- (iv) Leadership Team and the Delivery Team meet regularly throughout the year. This provides the opportunity to discuss training needs and requirements.
- (v) The Authority received Employer Accreditation from CIPFA for its identification of professional development requirements for professionally qualified staff.

**7. F. Managing risks and performance through robust internal control and strong public financial management.**

7.1 The governance arrangements the Authority has in place to achieve these principles are:

- to produce and agree an annual risk register and risk management policy
- to maintain an effective risk management system including systems of internal control and internal audit
- a Health and Safety Committee to ensure that accidents and incidents are reported and appropriate management action taken to reduce risk.
- information management, e-mail, internet and ICT policies that are communicated and understood
- targets for performance in the delivery of services on a sustainable basis
- ensuring the Chief Finance Officer advises on all financial matters, keeps proper financial records and accounts and maintains an effective system of internal financial control.
- to produce an annual governance statement for inclusion in the Annual Statement of Accounts
- to operate a Final Accounts Committee and the Finance and Performance Advisory Panel to provide an additional level of oversight and challenge
- an Internal Audit service to provide reassurance over the operation of internal control and processes

7.2 In year Commentary

- (i) The Corporate Plan sets out the priorities and objectives for each financial year with periodic reports to those charged with governance on achievements/progress.
- (ii) Working in partnership With Devon Assurance Services, a thorough review of Risk Management (RM) was undertaken in 2024/25. This led to the development of a renewed RM Strategy, Policy, Strategic Risk Register alongside the introduction of an identification matrix and risk heat mapping.
- (iii) Annual reports have been made to the National Park Authority on the Risk Management Strategy and the Internal Audit Service. The Auditor, Grant Thornton LLP presented their Annual Audit Findings Report to the Authority in November 2024 and an unqualified audit report was issued. The external auditors also undertook an enhanced Value For Money appraisal at this time also.
- (iv) The Health, Safety & Welfare policy has been reviewed with guidance on how reporting Health and Safety concerns is done in practice. Health and safety issues are now discussed at regular Team meetings and the Health and Safety Committee meets on a quarterly basis with the existing system of reporting continuing. The Senior Facilities Officer was the nominated officer for facilities management in relation to health and safety. Following the resignation of the post-holder in January 2025 this has now been assigned to the Finance, Facilities and Carbon Reporting Manager.

- (v) Policy reviews carried out during 2024/25 include: Standards of Conduct, Bullying and Harassment, Health and Safety, Lone Working, Personal Safety and Behaviour Safeguarding, Driving Authority Vehicles and Use of Personal Vehicles, Safeguarding – working with children and vulnerable adults, Expenses, and Flexible Working Arrangements. New policies introduced during the year include Modern Slavery Statement and Guidance on Dealing with Sexual Harassment in the Workplace.

**8. G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability**

8.1 The governance arrangements the Authority has in place to achieve these principles are:

- ensuring meetings are held on a regular basis, are open to the public except where reasons of commercial or individual confidentiality require the meeting to be closed
- arrangements designed to encourage individuals and groups from all sections of the public to engage with, contribute to and participate in the work of the Authority
- ensuring that all activities are legally correct, fully documented, appropriately authorised and carried out in a planned manner
- ensuring the Chief Executive is responsible and accountable to the Authority for all aspects of operational management
- ensuring that the roles and responsibilities of officers are documented including those of the statutory officers namely Chief Executive, Chief Finance Officer and Monitoring Officer
- publishing an Annual Statement of Accounts each year in accordance with statutory requirements
- arrangements to enable a complaint or request for information regarding any aspect of the Authority's activities to be easily lodged and to ensure it is properly addressed
- ensuring the Chief Finance Officer maintains proper records to ensure the annual statement of accounts show a true and fair view and that expenditure has been properly authorised and allocated in an appropriate manner
- commissioning an Internal Audit service to provide reassurance over the operation of internal control and processes
- inclusion of an annual governance statement in the Statement of Accounts
- a Corporate Strategy setting out the objectives and targets for the three-year period ahead and annual reports on performance against Corporate Actions and targets.
- an annual update on the progress of the Authority and its partners on the implementation of the National Park Partnership Plan
- auditing of the Authority's financial position and performance every year via an External Audit of the final accounts.
- The completion of 28 Statutory returns and quarterly returns to Defra.

## 8.2 In year Commentary

- (i) Extensive consultation arrangements are in place. The three-year Corporate Strategy (2023-2026) continues to compare performance against the objectives set for the previous year and sets the Corporate Actions for the forthcoming year.
- (ii) Annual reports have been made to the National Park Authority on the Risk Management Strategy and the Internal Audit Service. The Auditor, Grant Thornton LLP presented their Annual Audit Findings Report to the Authority in November 2024 and a Value for Money report did not identify any weaknesses in arrangements.
- (iii) The Finance and Performance Advisory Panel has been established, terms and reference have been agreed and greater budgetary scrutiny and oversight has been made possible.
- (iv) The Authority has the capability for audio and video recording of its meetings, and they can be viewed over the internet.
- (v) This year there have been reviews of Bullying and Harassment and Harassment/Sexual Harassment risk assessments and policy, and a new Modern Slavery Statement.

## 9. Audit Committee Self-Assessment

- 9.1 In May 2022 the External Auditors recommended that an annual self-assessment of the Audit Committee be undertaken to comply with recommended practice. This is the third year that this has been undertaken.
- 9.2 The purpose of an audit committee is to provide to those charged with governance independent assurance on the adequacy of the risk management framework, the internal control environment and the integrity of the financial reporting and annual governance processes.
- 9.3 Exmoor National Park Authority does not have an Audit Committee, but it is the Authority that is the body charged with governance, and it is the Standards Committee that undertakes the annual review of governance. In discussion with the External Auditors, they did not raise any objection to the annual self-assessment falling to the Standards Committee.
- 9.4 Included within the Chartered Institute of Public Finance and Accountancy's practical guidance on Audit Committees is a self-assessment of good practice. This is shown in the table below. It is suggested that where an audit committee has a high degree of performance against the good practice principles, then it is an indicator that the committee is soundly based and has in place a knowledgeable membership.
- 9.5 In the absence of an Audit Committee, the Standards Committee will endeavour to complete the self-assessment with the governance structure in operation at ENPA.



<b>Good practice questions</b>	<b>Yes</b>	<b>Partly</b>	<b>No</b>
<b>Audit committee purpose and governance</b>			
1. Does the authority have a dedicated audit committee?			x
2. Does the audit committee report directly to full council? (applicable to local government only)		n/a	
3. Do the terms of reference clearly set out the purpose of the committee in accordance with CIPFA's Position Statement?		n/a	
4. Is the role and purpose of the audit committee understood and accepted across the authority?		n/a	
5. Does the audit committee provide support to the authority in meeting the requirements of good governance?		n/a	
6. Are the arrangements to hold the committee to account for its performance operating satisfactorily?		n/a	
<b>Self-Assessment Commentary:</b> <i>It is the full Authority that is the body charged with governance. The Authority fully understands its responsibility with regards to Governance.</i>			
<b>Functions of the committee</b>			
7. Do the committee's terms of reference explicitly address all the core areas identified in CIPFA's Position Statement?	x		
• good governance	x		
• assurance framework, including partnerships and collaboration arrangements			
• internal audit	x		
• external audit	x		
• financial reporting	x		
• risk management	x		
• value for money or best value	x		
• counter fraud and corruption	x		
• supporting the ethical framework	x		
8. Is an annual evaluation undertaken to assess whether the committee is fulfilling its terms of reference and that adequate consideration has been given to all core areas?	x		
9. Has the audit committee considered the wider areas identified in CIPFA's Position Statement and whether it would be appropriate for the committee to undertake them?		See below	
10. Where coverage of core areas has been found to be limited, are plans in place to address this?		n/a	
11. Has the committee maintained its advisory role by not taking on any decision-making powers that are not in line with its core purpose?		n/a	
<b>Self-Assessment Commentary:</b> <i>The Authority is guided and governed by the Constitution, Scheme of Delegation and Standing Orders. These documents cover the areas identified above.</i>			
<i>Potential wider areas concern of concern identified by CIPFA include Treasury Management, providing oversight of annual reports or considering risk or governance at the request of other committees. These wider areas of concern also go to the Authority.</i>			
<b>Membership and support</b>			
12. Has an effective audit committee structure and composition of the committee been selected?	X		
This should include:	n/a		
• separation from the executive	X		
• an appropriate mix of knowledge and skills among the membership	X		
• a size of committee that is not unwieldy	X		

<ul style="list-style-type: none"> <li>consideration has been given to the inclusion of at least one independent member (where it is not already a mandatory requirement)</li> </ul>	X		
13. Have independent members appointed to the committee been recruited in an open and transparent way and approved by the full council or the PCC and chief constable as appropriate for the organisation?	x		
14. Does the chair of the committee have appropriate knowledge and skills?	x		
15. Are arrangements in place to support the committee with briefings and training?	x		
16. Has the membership of the committee been assessed against the core knowledge and skills framework and found to be satisfactory?			x
17. Does the committee have good working relations with key people and organisations, including external audit, internal audit and the CFO?	x		
18. Is adequate secretariat and administrative support to the committee provided?	x		
<p><b>Self-Assessment Commentary:</b>  <i>Members of the Authority and the Standards Committee are appointed from a range of elected public bodies or have been appointed from a DEFRA led competitive process. Members have a range of skills and professional backgrounds.</i></p>			
<p><b>Effectiveness of the committee</b></p>			
19. Has the committee obtained feedback on its performance from those interacting with the committee or relying on its work?	x		
20. Are meetings effective with a good level of discussion and engagement from all the members?	x		
21. Does the committee engage with a wide range of leaders and managers, including discussion of audit findings, risks and action plans with the responsible officers?	x		
22. Does the committee make recommendations for the improvement of governance, risk and control and are these acted on?	x		
23. Has the committee evaluated whether and how it is adding value to the organisation?	x		
24. Does the committee have an action plan to improve any areas of weakness?		n/a	
25. Does the committee publish an annual report to account for its performance and explain its work?	x		
<p><b>Self-Assessment Commentary:</b>  <i>The Authority and the Standards Committee receive reports from internal and external audit throughout the year, and from ENPA staff on Risk Management. There is a very healthy debate and engagement with these.</i></p> <p><i>The overall governance structure is regularly debated to ensure that it is operating most effectively.</i></p>			

**Ben Barrett**  
**Chief Finance Officer**  
**February 2025**

**Andrew Yendole**  
**Solicitor & Monitoring Officer**



## ANNUAL GOVERNANCE STATEMENT 2024/25

### 1. Scope of responsibility

- 1.1 Exmoor National Park Authority is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. The Authority also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 1.2 In discharging this overall responsibility, the Authority is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, and which includes arrangements for the management of risk.
- 1.3 Exmoor National Park Authority has approved and adopted a code of corporate governance, which is consistent with the principles of the CIPFA/SOLACE Framework *Delivering Good Governance in Local Government*. A copy of the code can be obtained from the Chief Executive, Exmoor House, Dulverton TA22 9HL. This statement explains how the Authority has complied with the Local Code of Corporate Governance and also meets the requirements of regulation 4(2) of the Accounts and Audit (England) Regulations 2015 and the amended regulations for 2021 in relation to the publication of statement on internal control.

### 2. The purpose of the governance framework

- 2.1 The governance framework comprises the systems and processes, and the culture and values, by which the Authority is directed and controlled and its activities through which it accounts to, engages with and the leads the community. It enables the Authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the Authority's policies and aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.
- 2.3 A governance framework has been in place at Exmoor National Park Authority for the year ended 31 March 2025 and up to the date of approval of the Corporate Plan and statement of accounts.

### **3. The Governance Framework**

#### **3.1 The key elements of the governance framework include:**

- A National Park Partnership Plan that contains a vision, priorities and a corporate strategy to meet National Park purposes;
- The production of a Medium Term Financial Plan taking account of the anticipated level of National Park Grant;
- The production of a Corporate Plan that includes data on performance and objectives both achieved and planned;
- Committee papers that are linked to National Park Partnership Plan or Corporate Plan objectives and in compliance with equality and human rights legislation;
- Standing Orders and financial regulations to regulate the conduct of the Authority's affairs;
- A Scheme of Delegation which sets out the functions and workings of the Authority and the powers delegated to Committees and the Chief Executive;
- Formal codes of conduct which define the standards of personal behaviour of members and staff. The code for Members was initially adopted in 2012 along with the establishment of a Standards Committee comprising 5 Authority members and the appointment of an "Independent Person" under the provisions of the 2011 Localism Act. A further process was the provision of guidance on the registration of interests. This was reviewed and refined in August 2012 with recommendations to Authority for standards arrangements and for the provision of member training on the new standards regime;
- Responsibility for audit matters are retained by the Authority;
- A Solicitor and Monitoring Officer who has a statutory responsibility supported by the Chief Finance Officer and financial regulations to ensure the legality of transactions, activities and arrangements the Authority enters;
- Financial management arrangements of the Authority which conform with the governance requirements of the CIPFA Statement on the role of the Chief Financial Officer in Local Government (2010);
- A Complaints procedure and a whistle-blowing policy in place for members of the public, members, staff or contractors;
- An Anti Fraud, Corruption and Bribery Policy;
- An ICT Acceptable Use Policy;
- Risk Management Policy, Registers and Business Continuity and Disaster Recovery systems which are approved, in place and subject to annual regular review;
- Extensive arrangements for partnership working on a range of projects. Partnership working is crucial to the achievement of the priorities set out in the National Park Partnership Plan.
- A staff performance and development review process which identifies training and development needs;
- Training, briefing and induction programmes for members; and

- Wide consultation with interested parties, including an Exmoor National Park Forum and a Local Access Forum. Numerous diverse organisations are represented on these consultative mechanisms.

#### **4. Review of Effectiveness**

4.1 Exmoor National Park Authority has responsibility for conducting at least annually, a review of effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the Chief Executive and Heads of Section within the Authority who have responsibility for the development and maintenance of the governance environment, the annual report on internal audit, and by the Annual Governance Report of the external auditors. The annual review of the effectiveness of the governance framework is undertaken by the Standards Committee and the Authority approve this Annual Governance Statement. The Standards Committee now also undertake an annual self-assessment of effectiveness.

4.2 The process that has been applied in maintaining and reviewing the effectiveness of the governance framework is:

- The adoption of an updated Code of Corporate Governance in March 2017 with an annual review by the National Park Authority carried out by the Authority's Solicitor and Monitoring Officer to ensure compliance with the Code and audited by the Chief Finance Officer;
- Adoption of Standing Orders, the scheme of delegation and financial regulations which are periodically reviewed, updated and approved;
- Reports to the Authority on performance management including sustainability and the corporate planning and performance framework;
- Annual reports presented to the Authority in respect of internal audit which is a contracted service, and from the external auditor appointed by the PSAA;
- Annual reports presented to the Authority on risk management, performance indicators and treasury management; and
- An internal audit service is contracted from the Devon Assurance Partnership and an annual work programme is agreed with the Chief Finance Officer with the internal auditors producing an annual report covering their activities for presentation to the Authority.

#### **5. Significant governance issues**

5.1 In general the governance and internal control systems within the Authority are working effectively and have been reviewed by the Solicitor and Monitoring Officer and the Chief Finance Officer and are independently validated by the internal and external auditors. As a consequence of certain Internal Audit findings, the Authority has undertaken a review of Safeguarding policies and practices. These changes were confirmed with Internal Audit during 2023/24.

5.2 During 2025/26 the Authority will be:

- Finalising its new National Park Partnership Plan;
- Progressing work arising from the five year review of the Local Plan including on affordable housing delivery, climate change and a new Design Guide; also

making preparations for the introduction of new statutory Biodiversity Net Gain requirements for planning;

- Working with Defra to deliver the National policy agenda on climate, nature and engagement with communities;
- Monitoring new legislation and changes in policy to ensure that account is taken of the impact on National Parks and National Park communities;
- Continuing to operate within limited resources while increasing revenue from alternative sources;
- Continuing to develop customer service standards and culture;
- Monitoring the performance of the Corporate Plan;
- Continue to engage and communicate flexibly while making best use of technology;
- Implement an Anti-Money Laundering policy;
- Ensure capital investment decisions are fully debated by FAPAP in advance of budgetary decisions being made by Authority;
- Continue to adapt the Farming in Protected Landscapes panel and model of decision making;
- Understand the implications of the Somerset Unitary and the proposed Devon and Torbay Combined County Authority on the Authority's decision making; and
- Implementing a new financial information system to ensure that ENPA's requirements are fully met.

5.3 We propose over the coming year to take steps to address the above matters to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our annual review.

**Signed** .....

S Bryan, Chief Executive

A Davis, Chairman

**Date** .....

## EXMOOR NATIONAL PARK AUTHORITY

### STANDARDS COMMITTEE

4 March 2025

### OVERVIEW OF COMPLAINTS AND COMPLIMENTS

#### Report of the Head of Enterprise and Operations

**PURPOSE OF THE REPORT:** To provide details of complaints and compliments received during the period April 2024 to February 2025.

**RECOMMENDATION:** The Standards Committee is recommended to consider the overview report of general complaints and compliments received by the Authority

**Authority Priority:** To meet the requirements of legislation where applicable to National Parks and conduct Authority business in line with good practice and the 7 principles of public life.

**Legal and Equality Implications:** Section 65(4) Environment Act 1995 – provides powers to the National Park Authority to *“do anything which in the opinion of the Authority, is calculated to facilitate, or is conducive or incidental to-*

*(a) the accomplishment of the purposes mentioned in s. 65 (1) [National Park purposes]*

*(b) the carrying out of any functions conferred on it by virtue of any other enactment.”*

The Localism Act 2011 requires the Authority to promote and maintain high standards of conduct.

**The equality impact of the recommendations of this report has been assessed as follows:** There are no foreseen adverse impacts on any protected group(s).

**Consideration has been given to the provisions of the Human Rights Act 1998 and an assessment of the implications of the recommendations of this report is as follows:** There are no implications for Human Rights Act.

**Financial and Risk Implications:** Reputational and other risks including criminal liability could arise should the Authority fail to act on complaints received.

**Climate Change Implications:** None identified.

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## 1. Introduction

1.1 Standards Committee Members will be aware that an updated complaints procedure was introduced in April 2021 to improve efficiency of the process:

- A first informal stage for complaints which are dealt with by the relevant Officers
- A simplified 2-stage formal process dealt with by the relevant Senior Manager; then escalated if needed to the Complaints Officer / Chief Executive

1.2 The Authority has received 5 x Stage 1 Complaints and 1 x Stage 2 Complaint between 1 April 2024 and 17 February 2025. An overview of ENPA formal complaints is given in the table below.

Stage	Date	Outcome
<p><b>Stage 1</b> - Planning – Failure to determine planning application within statutory time frames</p>	<p>April 2024</p>	<p><b>Complaint upheld</b> – A comprehensive summary of the timeline was provided outlining where delays had occurred (on both sides) and an apology was given for the ENPA delays. Confirmation was provided that officers would move to determine the application as soon as possible.</p>
<p><b>Stage 1</b> - Planning - Concerns about apparent lack of action by the Authority in an enforcement case</p>	<p>April 2024</p>	<p><b>Complaint not upheld.</b> An explanation was provided regarding the background to the case, the steps being taken to bring the issue to a resolution, and why the Authority had not yet considered it proportionate to serve a formal enforcement notice but would be keeping the matter under review.</p>
<p><b>Stage 1</b> – Planning – Failure to determine planning application within statutory time frames</p>	<p>May 2024</p>	<p><b>Complaint upheld</b> – A comprehensive summary of the timeline was provided outlining where delays had occurred (on both sides) and an apology was given for ENPA delays. Planning permission was due to be granted subject to the signing of a S106 Agreement which was with the applicant to approve.</p>
<p><b>Stage 1</b> - Access &amp; Recreation - Concerns raised about a newly installed gate closure which caused an injury to member of the public</p>	<p>May 2024</p>	<p><b>Complaint partially upheld</b> – explained reason for latch design was due to historic character of the location, and to ensure livestock did not escape. Information provided regarding the legislative and safety standards applicable to RoW work. Confirmed signs now installed on gate advising it has a self-closing mechanism and should be held whilst in use. Careful monitoring took place until end of August and a decision was taken, in conjunction with Farm Manager, to remove one of the springs from gate to achieve a less forceful closure. Further monitoring will take place during Coast Path surveys.</p>
<p><b>Stage 1</b> – Planning – Dissatisfaction with the planning process</p>	<p>Oct 2024</p>	<p><b>Complaint not upheld</b> – Set out the planning history based on our records - whilst noting that the complainant was unhappy with the planning process, we explained the Authority has to operate within the confines of the planning system as a whole. Concluded that from the evidence available we could not see there had been any injustice or error procedurally</p>
<p><b>Stage 2</b> - Planning - Concerns about apparent continued lack of action by the</p>	<p>Nov 2024</p>	<p><b>Complaint not upheld.</b> This relates to the Stage 1 Complaint from April 2024. We advised that whilst works had not yet been completed, the applicant had provided reasons for the delay and continued to engage with the Authority. It was therefore the view</p>



Authority in an enforcement case	of the Complaints Officer that serving a formal enforcement notice was still not considered proportionate or expedient at this stage, but the matter would continue to be kept under review.
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- 1.3 In relation to the Stage 2 complaint in the table above, the complainant advised the Authority in early December 2024 that they would be referring the matter to the Local Government & Social Care Ombudsman (LGSCO). To date we have received no correspondence from the LGSCO to suggest they are investigating the matter.
- 1.4 One Stage 2 complaint from 2023-24 was referred to the Local Government & Social Care Ombudsman (LGSCO) in April 2024. The Ombudsman ruled they would not investigate the complaint about traffic noise and environmental concerns in Exmoor National Park because there was not enough evidence of fault in the Authority's response.
- 1.5 A total of 48 compliments have been received to 17 February 2025. These compliments relate to work carried out by staff throughout the Authority, although most are categorised under Access & Recreation and Planning.

**Ben Barrett**  
**Head of Enterprise and Operations**  
**February 2025**