

## Part Eight – Procedures

### Section One – Code of Corporate Governance

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#### 1. Introduction

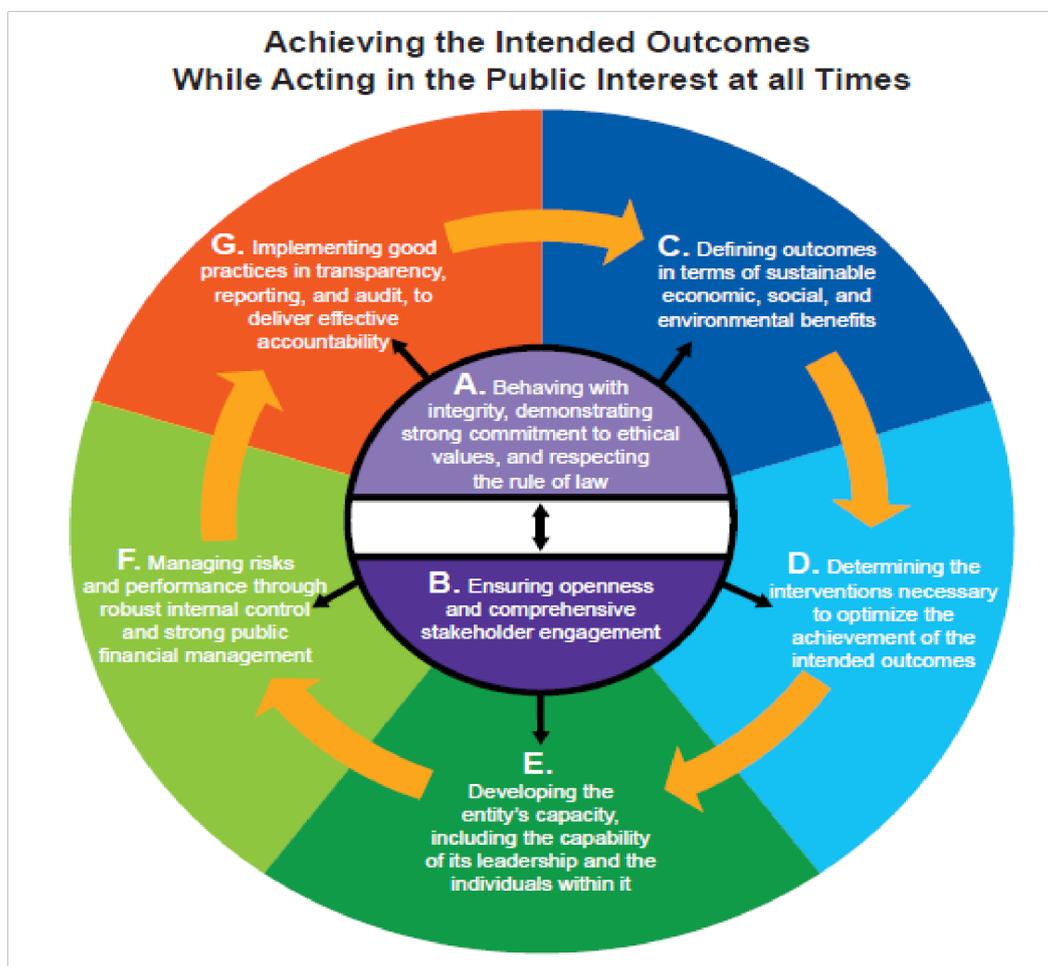
- 1.1. The Council’s Code of Corporate Governance is based upon the CIPFA/SOLACE publication entitled “Delivering Good Governance in Local Government: Framework 2016 Edition.”

#### 2. What do we mean by Governance?

- 2.1. ‘The International Framework: Good Governance in the Public Sector (CIPFA/IFAC, 2014)’ (the ‘International Framework’) defines ‘governance’ as comprising the arrangements (including political, economic, social, environmental, administrative, legal and other arrangements) put in place to ensure that the intended outcomes for stakeholders are defined and achieved. The Framework also states that, to deliver good governance in the public sector, both governing bodies and individuals working for them must aim to achieve the Council’s objectives while acting in the public interest at all times.
- 2.2. In its report “Change at the Council” the Centre for Public Scrutiny (CfPS) explain that the term “governance” refers to the way that the Council makes decisions and who is involved in making those decisions. Good governance means doing the right things in the right way. It is about more than just legal systems and policies. It is about being transparent, accountable, involving people, acting with integrity and having the right support. This is what CfPS call a “culture of good governance”.
- 2.3. The Council is committed to the principles of good corporate governance identified in the CIPFA/SOLACE guidance “*Delivering Good Governance in Local Government*” referred to above. As part of this commitment the Council has developed and adopted a *Local Code of Corporate Governance* which it will keep under review. The Council recognises the importance of having and maintaining a “culture of good governance” as described by the CfPS. As explained in section 4 below the Council is required to prepare an Annual Governance Statement which will include an assessment of how the Council has complied with its Code of Corporate Governance.

### 3. Core Principles

- 3.1. The Council's Code of Corporate Governance is based on the seven core principles from the International Framework which have been interpreted to apply to local government:
- 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 optimize the achievement of the intended outcomes;
  - E. Developing the Council'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; and
  - G. Implementing good practices in transparency, reporting, and audit to deliver effective accountability.
- 3.2. The diagram below, taken from the International Framework, illustrates the various principles of good governance in the public sector and how they relate to each other.



- 3.3. This Code of Corporate Governance specifically identifies the actions and behaviours to be taken by the Council in relation to each of these core principles and associated sub principles. These are summarised within Appendix A.

In the “Change at the Council” report the CfPS proposed twelve principles, listed below, which describe what good governance means for the Council and were designed using suggestions from residents, councillors, council officers and partners.

- Connecting with residents
- Focusing on what matters
- Listening to every voice
- Acting with integrity
- Involving before deciding
- Communicating what we’re doing
- Inviting residents to take part
- Being clearly accountable
- Responding fairly to everyone’s needs
- Working as a team
- Managing responsibly
- Having the support we need

These principles were proposed by CfPS with reference to the CIPFA Framework and have been incorporated into Appendix A (denoted by an \*) as part of the behaviours and actions to be taken by the Council.

- 3.4. Appendix B sets out in more detail the documents and processes the Council has in place to comply with the core principles. For example, The Members’ Code of Conduct and the Officers’ Code of Conduct are two examples of the documents listed under core principle A **Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law**. The work of the Ethics Panel is one of the ways by which the Council monitors compliance with that core principle.

#### **4. The Annual Governance Statement**

The Council is required to prepare an Annual Governance Statement to report on the extent to which it complies with its Code of Corporate Governance.

- 4.1. In the ‘Change at the Council’ report, CfPS say “We think that the Council needs to regularly reassure itself about how well its governance systems are working and what could be done to improve them. The obvious process for doing this is the Annual Governance Statement, which is reported to the Council’s Audit and Transparency Committee. We recommend that the Council should invest in this process so that it is a wider annual conversation than is the case at the moment. The twelve principles should be used to see how decision-making, including the work of Leadership Team and scrutiny, are working and how they might be improved.”
- 4.2. In September 2018 the Council adopted new values and behaviours which were developed following many staff workshops and tested with the community. The four values, Putting Communities First, Respect, Integrity and Working Together are being embedded into the working practices of the organisation through corporate communications, discussions at Staff Conferences and now form part of the Council’s Performance Management and Appraisal processes. The Our Voice staff survey in September gave a corporate bench mark of the current staff alignment to the new values and behaviours.
- 4.3. Appendix B of this Code of Corporate Governance identifies the key documents and processes we should have in place and the Annual Governance Statement will set out whether and how effectively we are doing them. In that statement we will consider the

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extent to which we are complying with the Corporate Governance core principles and the 'Change at the Council' twelve principles.

- 4.4. The Council's Audit and Transparency Committee is responsible for approving this Code and it is recommended that this is annually reviewed and updated accordingly. This Code was approved by the Committee at its meeting in February 2019.

**Appendix A - Behaviours and actions to be taken by the Council that demonstrate good governance.**

<b>(A) Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of law</b>	<b>Behaving with integrity</b>	❖ Ensure that Members and Officers behave with integrity and lead a culture where acting in the public interest is visible and consistently demonstrated thereby protecting the reputation of the Council;
	<b>*Acting with integrity</b>	❖ Ensure that Members take the lead in establishing specific standard operating principles or values for the Council and its staff and that they are communicated and understood. These will build on the Seven Principles of Public Life (The Nolan Principles);
		❖ Lead by example and use the above standard operating principles or values as a framework for decision making and other actions; and
		❖ Demonstrate, communicate and embed the standard operating principles or values through appropriate policies and processes which will be reviewed on a regular basis to ensure they are operating effectively.
		<b>Demonstrating strong commitment to ethical values</b>
	<b>Demonstrating strong commitment to ethical values</b>	❖ Seek to establish, monitor and maintain the Council’s ethical standards and performance;
		❖ Underpin personal behaviour with ethical values and ensure they permeate all aspects of the Council’s culture and operation;
		❖ Develop and maintain robust policies and procedures which place emphasis on agreed ethical values; and
	<b>Respecting the Rule of Law</b>	❖ Ensure that external providers of services on behalf of the organisation are required to act with integrity and in compliance with ethical standards expected by the Council.
		<b>Respecting the Rule of Law</b>
		❖ Ensure Members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations;
		❖ Create the conditions to ensure that the statutory officers, other key post holders, and Members are able to fulfil their responsibilities in accordance with legislative and regulatory provisions;
		❖ Strive to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders;
❖ Deal with breaches of legal and regulatory provisions effectively; and		
❖ Ensure corruption and misuse of power is dealt with effectively.		

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<b>(B) Ensuring openness and comprehensive stakeholder engagement</b>	<b>Openness</b>  <i>*Communicating what we are doing</i>	❖ Ensure an open culture through demonstrating, documenting and communicating the Council's commitment to openness;
		❖ Make decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption will be for openness. If that is not the case, a justification for the reasoning for keeping a decision confidential will be provided;
		❖ Provide clear reasoning and evidence for decisions in both public records and explanations to stakeholders and will be explicit about the criteria, rationale and considerations used. In due course, the Council will ensure that the impact and consequences of those decisions are clear; and
		❖ Use formal and informal consultation and engagement to determine the most appropriate and effective interventions / courses of action.
	<b>Engaging comprehensively with institutional stakeholders</b>	❖ Effectively engage with institutional stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably;
		❖ Develop formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively; and
		❖ Ensure that partnerships are based on trust, a shared commitment to change, a culture that promotes and accepts challenge among partners and that the added value of partnership working is explicit.
	<b>Engaging stakeholders effectively, including individual citizens and service users</b>  <i>*Inviting residents to take part</i>  <i>*Listening to every voice</i>  <i>*Connecting with Residents</i>	❖ Establish a clear policy on the type of issues that the Council will meaningfully consult with or involve communities, individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes;
		❖ Ensure that communication methods are effective and that Members and Officers are clear about their roles with regard to community engagement;
		❖ Encourage, collect and evaluate the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs;
		❖ Implement effective feedback mechanisms in order to demonstrate how their views have been taken into account;
		❖ Balance feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity; and
	❖ Take account of the interests of future generations of tax payers and service users.	

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<b>(C) Defining outcomes in terms of sustainable economic, social and environmental benefits</b>	<b>Defining outcomes</b>  <i>*Focusing on what matters</i>	❖ Have a clear vision, which is an agreed formal statement of the Council’s purpose and intended outcomes containing appropriate performance indicators, which provides the basis for the Council’s overall strategy, planning and other decisions;
		❖ Specify the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer;
		❖ Deliver defined outcomes on a sustainable basis within the resources that will be available;
		❖ Identify and manage risks to the achievement of outcomes; and
		❖ Manage service users’ expectations effectively with regard to determining priorities and making the best use of the resources available.
	<b>Sustainable economic, social and environmental benefits</b>	❖ Consider and balance the combined economic, social and environmental impact of policies, plans and decisions when taking decisions about service provision;
		❖ Take a longer term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the Council’s intended outcomes and short-term factors such as the political cycle or financial constraints;
		❖ Determine the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs; and
		❖ Ensure fair access to services.

<b>(D) Determining the interventions necessary to optimise the achievement of the intended</b>	<b>Determining interventions</b>	❖ Ensure decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and including the risks associated with those options. Therefore ensuring best value is achieved however services are provided; and
		❖ Consider feedback from citizens and service users when making decisions about service improvements or where services are no longer required in order to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts.
	<b>Planning interventions</b>  <i>*Involving Before Deciding</i>	❖ Establish and implement robust planning and control cycles that cover strategic and operational plans, priorities and targets;
		❖ Engage with internal and external stakeholders in determining how services and other courses of action should be planned and delivered;
		❖ Consider and monitor risks facing each partner when working collaboratively including shared risks;
		❖ Ensure arrangements are flexible and agile so that the mechanisms for delivering outputs can be adapted to changing circumstances;

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		❖ Establish appropriate key performance indicators (KPIs) as part of the planning process in order to identify how the performance of services and projects is to be measured;
		❖ Ensure capacity exists to generate the information required to review service quality regularly;
		❖ Prepare budgets in accordance with organisational objectives, strategies and the medium term financial plan; and
		❖ Inform medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy.
	<b>Optimising achievement of intended outcomes</b>	❖ Ensure the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints;
		❖ Ensure the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term;
		❖ Ensure the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage; and
		❖ Ensure the achievement of ‘social value’ through service planning and commissioning. The Public Services (Social Value) Act 2012 states that this is “the additional benefit to the community...over and above the direct purchasing of goods, services and outcomes”.

<b>(E) Developing the Council's capacity, including the capability of its leadership and the individuals within it</b>	<b>Developing the Council's capacity</b>  <b>Working as a team</b>	<ul style="list-style-type: none"> <li>❖ Review operations, performance use of assets on a regular basis to ensure their continuing effectiveness;</li> <li>❖ Improve resource use through appropriate application of techniques such as benchmarking and other options in order to determine how the Council's resources are allocated so that outcomes are achieved effectively and efficiently;</li> <li>❖ Recognise the benefits of partnerships and collaborative working where added value can be achieved; and</li> <li>❖ Develop and maintain an effective workforce plan to enhance the strategic allocation of resources.</li> </ul>
	<b>Developing the capability of the Council's leadership and other individuals</b>  <b>*Having the support we need</b>	<ul style="list-style-type: none"> <li>❖ Develop protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained;</li> <li>❖ Publish a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body;</li> <li>❖ Ensure the Leader and the Chief Executive have clearly defined and distinctive leadership roles within a structure whereby the Chief Executive leads the Council in implementing strategy and managing the delivery of services and other outputs set by Members and each provides a check and a balance for each other's authority;</li> <li>❖ Develop the capabilities of Members and senior management to achieve effective shared leadership and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks by:                             <ul style="list-style-type: none"> <li>➤ ensuring Members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged;</li> <li>➤ ensuring Members and Officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis; and</li> <li>➤ ensuring personal, organisational and system-wide development through shared learning, including lessons learnt from governance weaknesses both internal and external.</li> </ul> </li> <li>❖ Ensure that there are structures in place to encourage public participation;</li> <li>❖ Take steps to consider the leadership's own effectiveness and ensure leaders are open to constructive feedback from peer review and inspections;</li> <li>❖ Hold staff to account through regular performance reviews which take account of training or development needs; and</li> <li>❖ Ensure arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing.</li> </ul>

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<b>(F) Managing risks and performance through robust internal control and strong public financial management</b>	<b>Managing Risk</b>	<ul style="list-style-type: none"> <li>❖ Recognise that risk management is an integral part of all activities and must be considered in all aspects of decision making;</li> <li>❖ Implement robust and integrated risk management arrangements and ensure that they are working effectively; and</li> <li>❖ Ensure that responsibilities for managing individual risks are clearly allocated.</li> </ul>
	<b>Managing Performance</b>	<ul style="list-style-type: none"> <li>❖ Monitor service delivery effectively including planning, specification, execution and independent post implementation review;</li> </ul>
	<b>*Responding fairly to everyone's needs</b>	<ul style="list-style-type: none"> <li>❖ Make decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the Council's financial, social and environmental position and outlook;</li> <li>❖ Ensure an effective scrutiny or oversight function is in place which encourages constructive challenge and debate on policies and objectives before, during and after decisions are made thereby enhancing the Council's performance and that of any organisation for which it is responsible;</li> <li>❖ Provide Members and senior management with regular reports on service delivery plans and on progress towards outcome achievement; and</li> <li>❖ Ensure there is consistency between specification stages (such as budgets) and post implementation reporting (e.g. financial statements).</li> </ul>
	<b>Robust internal control</b>	<ul style="list-style-type: none"> <li>❖ Align the risk management strategy and policies on internal control with achieving objectives;</li> </ul>
	<b>*Managing responsibly</b>	<ul style="list-style-type: none"> <li>❖ Evaluate and monitor the Council's risk management and internal control arrangements on a regular basis;</li> <li>❖ Ensure effective counter fraud and anti-corruption arrangements are in place;</li> <li>❖ Ensure additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor;</li> <li>❖ Ensure an Audit Committee which is independent of the executive and accountable to the Council: <ul style="list-style-type: none"> <li>➤ provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment; and</li> <li>➤ that its recommendations are listened to and acted upon.</li> </ul> </li> </ul>
	<b>Managing Data to meet compliance standards</b>	<ul style="list-style-type: none"> <li>❖ Ensure effective arrangements are in place for the safe collection, storage, use and sharing of data including processes to safeguard personal data;</li> <li>❖ Ensure effective arrangements are in place and operating effectively when sharing data with other bodies; and</li> <li>❖ Review and audit regularly the quality and accuracy of data used in decision making and performance monitoring;</li> </ul>
	<b>Strong public financial management</b>	<ul style="list-style-type: none"> <li>❖ Ensure financial management supports both long term achievement of outcomes and short term financial operational performance; and</li> <li>❖ Ensure well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls;</li> </ul>

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<b>(G) Implementing good practices in transparency, reporting and audit to deliver effective accountability</b>	<b>Implementing good practice in transparency</b>	❖ Write and communicate reports for the public and other stakeholders in a fair, balanced and understandable style appropriate to the intended audience ensuring that they are easy to access and interrogate; and
		❖ Strike a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand
	<b>Implementing good practices in reporting</b>	❖ Report at least annually on performance, value for money and the stewardship of its resources to stakeholders in a timely and understandable way;
		❖ Ensure members and senior management own the results;
		❖ Ensure robust arrangements for assessing the extent to which the principles contained in this Framework have been applied and publish the results on this assessment including an action plan for improvement and evidence to demonstrate governance (Annual Governance Statement);
		❖ Ensure that the Framework is applied to jointly managed or shared service organisations as appropriate; and
		❖ Ensure the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other similar organisations
	<b>Assurance and effective accountability</b> <i>*Being clearly accountable</i>	❖ Ensure that recommendations for corrective action made by external audit are acted upon;
		❖ Ensure an effective internal audit service with direct access to Members is in place which provides assurance with regard to governance arrangements and that recommendations are acted upon;
		❖ Welcome peer challenge, reviews and inspections from regulatory bodies and implement recommendations;
		❖ Gain assurance on risks associated with delivering services through third parties and evidence this is in the annual governance statement; and
		❖ Ensure that when working in partnership, arrangements for accountability are clear and that the need for wider public accountability has been recognised and met.

## Appendix B – The Council’s Local Corporate Governance Framework

Core Principles	<b>(A) Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law</b>	<b>(B) Ensuring openness and comprehensive stakeholder engagement</b>	<b>(C) Defining outcomes in terms of sustainable economic, social, and environmental benefits</b>	<b>(D) Determining the interventions necessary to optimise the achievement of the intended outcomes</b>	<b>(E) Developing the Council’s capacity, including the capability of its leadership and the individuals within it</b>	<b>(F) Managing risks and performance through robust internal control and strong public financial management</b>	<b>(G) Implementing good practices in transparency, reporting, and audit to deliver effective accountability</b>
<b>Evidence of Good Governance (Key Documents)</b>	Constitution	Constitution	Key Decision Reports	Council Plan	Member Development Programme	Audit Plan	Decision Making Protocols
	Financial Procedure Rules	Council website includes published calendar of meetings, including agenda printed minutes and key decisions.	Council Plan	Medium Term Financial Plan	Workforce and Organisational Development Strategy and Work streams	Risk Management Strategy	Annual Statement of Accounts
	Contract Regulations	Online Council Tax information	Contract regulations	Decision Making Protocols	Leadership Development Programme	Financial Procedures	Annual Governance Statement / Assurance Framework
	Members and Officers Codes of Conduct	Open Data and Transparency Code	Risk Management Strategy	Strategic Commissioning Plans	Staff Performance Development Review	Medium Term Financial Plan	Head of Internal Audit and Risk’s Annual Opinion / Report
	Planning Code of Conduct	Customer feedback / Complaints Policy	Strategic performance, financial and risk reporting framework	Risk Management Strategy	Continuing Professional Development Programmes	Strategic Risk Register / Operational Risk Registers	Strategic performance, financial and risk reporting framework
	Confidential Reporting Code (Whistleblowing)	Public Speaking at Council meetings (Standing Orders)	Scrutiny Framework	Medium Term Financial Plan		Head of Internal Audit and Risk’s Annual Opinion / Report	Publication Scheme Statement

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Evidence of Good Governance (Key Documents)	Members/Officers Register of Interests/Register of Gifts and Hospitality	Petition Arrangements	Local Plan and other Strategies			Anti-Fraud and Corruption Strategy	Complaints Annual reports
	Complaints Procedure	Publication Scheme Statement	Medium Term Financial Plan			Information Asset Risk Register	Open Data and Transparency Code
	IT Acceptable Usage Policy	Pay policy statement	Capital Programme and Capital Strategy			Annual Report of the Data Protection Officer	
	Protocol for Member Officer Relations	Member allowances scheme					
	Hillsborough Charter	'Change at the Council' 12 principles					
	Values and behaviours	The Kensington and Chelsea Compact					
	Corporate Equality Policy						
	Annual Report of the Ethics Panel						
	Data Protection pages on the Council's website						

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<b>Evidence of Good Governance (Key Processes or Monitoring)</b>	Ethics Panel	Webcasting of meetings		Strategic performance, financial and risk reporting framework	Safety, Health and Wellbeing Strategy	Risk Based Internal Auditing Service / planning	Internal Audit Service	
	Member Induction	Public Meetings		Budget Consultation	Staff 1:1	Strategic performance, financial and risk reporting framework	External inspections	
	Member Development Programme	FOI Requests for Information		Other Consultations	Our Voice	Privacy impact assessments	Audit and Transparency Committee	
	Audit and Transparency Committee	Scrutiny Committees		Stakeholder Engagement	Member Induction	Audit and Transparency Committee	Scrutiny Committees	
	Statutory Officers Roles Chief Executive, Chief Financial Officer, Monitoring Officer and Data Protection Officer	Annual Statement of Accounts and Annual Governance Statement published				Secondments	Scrutiny Committees	External audit of accounts and value for money opinion
	Staff Performance Development Review	Decision making Committees inviting representations				Emergency/Business Continuity Management		
		Listening Forums					External audit of accounts and value for money opinion /	

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						Statement of Accounts	
	Arrangements for dealing with complaints that Members have breached the Code of Conduct					Consideration of risk in decision making processes (e.g. Committee reports)	
						Data Protection Officer	

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