

## Local Code of Corporate Governance Review 2018/19

Local Code provisions	2018/19 review
<p data-bbox="147 308 696 339"><b>The Principles of Good Governance</b></p> <p data-bbox="147 360 1061 467">The CIPFA/SOLACE framework Delivering Good Governance in Local Government sets out seven core principles of good governance, these are:</p> <ul data-bbox="147 491 1061 1150" style="list-style-type: none"><li data-bbox="147 491 1061 560">• Principle 1 – Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.</li><li data-bbox="147 584 1061 652">• Principle 2 – Ensuring openness and comprehensive stakeholder engagement.</li><li data-bbox="147 676 1061 745">• Principle 3 – Defining outcomes in terms of sustainable economic, social, and environmental benefits.</li><li data-bbox="147 769 1061 837">• Principle 4 – Determining the interventions necessary to optimise the achievement of the intended outcomes.</li><li data-bbox="147 861 1061 930">• Principle 5 – Developing the entity's capacity, including the capability of its leadership and the individuals within it.</li><li data-bbox="147 954 1061 1061">• Principle 6 – Managing risks and performance through robust internal control and strong public financial management.</li><li data-bbox="147 1085 1061 1150">• Principle 7 - Implementing good practices in transparency, reporting, and audit to deliver effective accountability.</li></ul>	<p data-bbox="1088 292 1861 399">As per CIPFA/SOLACE framework 2016, Delivering Good Governance in Local Government, 2016 Edition, no updates for 2018/19 cycle.</p>

<b>Local Code provisions</b>	<b>2018/19 review</b>
Eden District Council has adopted a Local Code of Corporate Governance which is structured around these principles. The details are set out below:	No changes required to the structure of the Local Code.
<b>Behaving with integrity (Principle 1).</b> This is done by:	
<ul style="list-style-type: none"> <li>• Enabling Scrutiny to 'call-in' any Executive decisions contrary to the Budgetary and Policy framework</li> </ul>	Scrutiny have the ability to call in executive decisions, as set out in the constitution, p32, article 6.2.4, for example, special meeting of SCB 15/11/2018 to consider the Eden Development Portfolio Plan.
<ul style="list-style-type: none"> <li>• Having codes of conduct for officers and for Members in which there is guidance on officer/Member relationships</li> </ul>	Constitution (Codes and Protocols), part 5, E, page 317.
<ul style="list-style-type: none"> <li>• Maintaining an Accounts and Governance Committee that meets regularly and takes an active interest in the maintenance of standards across the Council. In particular, it is responsible for monitoring the corporate Complaints Procedure and Members Code of Conduct</li> </ul>	Responsibility for standards In place as per article 9 of the Constitution, complaints recently featured on the agenda, for example, Agc/27/9/18.
<ul style="list-style-type: none"> <li>• Maintaining an Independent Remuneration Panel (IRP) to advise the Council on allowances to be paid to Members</li> </ul>	Last report of IRP was to Council on 20 April 2017, item 8 to cover 2017/18 and subsequent 3 years. Details of the scheme are available via the 'Your Council' area of the website.

<b>Local Code provisions</b>	<b>2018/19 review</b>
<ul style="list-style-type: none"> <li>Having a Senior Leadership Team which includes the Chief Executive (Head of Paid Service) and Directors' Monitoring Officer and the Chief Financial Officer have access to papers and minutes. Corporate Management Team which includes all Assistant Directors meet bi weekly: key messages are published on the Council's Corporate Bulletin Board</li> </ul>	<p>Arrangements were modified during 2018/19. Key messages from CMT are published on SharePoint.</p>
<ul style="list-style-type: none"> <li>Having published procedures to demonstrate compliance with the Freedom of Information Act and the Environmental Information Regulations</li> </ul>	<p>There is a specific area on the Council's website around FOI and data transparency.</p>
<p><b>Demonstrating strong commitment to ethical values (Principle 1).</b> This is done by:</p>	
<ul style="list-style-type: none"> <li>Having a Constitution which sets out clearly the roles and duties of the Council's statutory officers, that is, the Chief Executive, Chief Finance Officer and the Monitoring Officer. The Constitution sets out key aspects of the Council's internal control mechanism, in particular, the Accounting and Audit Rules, the Procurement Rules and the Scheme of Delegation.</li> </ul>	<p>Constitution (Articles of Constitution: Part 2), this also provides details around duties and delegations of statutory officers to support the exercise of statutory roles including the Chief Executive as head of paid service.</p> <p>Constitution (Rules of Procedure).</p>
<ul style="list-style-type: none"> <li>The Constitution being reviewed annually</li> </ul>	<p>Review: Council, April 2018 (CL/128/04/18).</p>
<ul style="list-style-type: none"> <li>Maintaining an Accounts and Governance Committee that meets regularly and takes an active interest in the maintenance of standards across the Council. In particular, it is responsible for monitoring the corporate Complaints Procedure</li> </ul>	<p>As above; responsibility for standards in place as per article 9 of the Constitution, complaints recently featured on the agenda, for example, Agc/27/9/18.</p>

<b>Local Code provisions</b>	<b>2018/19 review</b>
<ul style="list-style-type: none"> <li>All reports have to be seen by the Chief Finance Officer and the Monitoring Officer. Completion of these governance checks has to be noted on the report</li> </ul>	<p>Governance check boxes are included in the committee report templates, at the end of all committee reports.</p>
<ul style="list-style-type: none"> <li>Having a clear documented approach to fraud and whistleblowing, which is regularly updated and communicated to staff and is in accordance with the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA 2014)</li> </ul>	<p>Anti-Fraud, Theft, Bribery and Corruption Strategy and Response Plan; Annual Review AGC/24/9/18.</p> <p>Whistleblowing Policy, review AGC, 29/11/2018, item 8.</p> <p>All staff attend training events biennially. The last ones were May 2018.</p>
<ul style="list-style-type: none"> <li>Having a policy on the Regulation of the Investigatory Powers Act (RIPA)</li> </ul>	<p>RIPA Policy reviewed by Executive on 5/6/2018 along with an update and amendment as to the use of RIPA by Council officers. An external inspection on the Council's RIPA procedures was completed in March 2019, any recommendations to improve these will be considered.</p>
<ul style="list-style-type: none"> <li>Having a clear Complaints Procedure</li> </ul>	<p>Complaints Procedure through the website, monitored by Accounts and Governance Committee.</p>
<ul style="list-style-type: none"> <li>Using complaints and compliments as a positive improvement tool</li> </ul>	<p>Annual Review: Accounts and Governance Committee, G27/09/18, appendix 4 details actions taken in response to complaints.</p>

Local Code provisions	2018/19 review
<b>Respecting the rule of law (Principle 1).</b> This is done by:	
<ul style="list-style-type: none"> <li>Having a Constitution which sets out clearly the roles and duties of the Council's statutory officers, that is, the Chief Executive, Chief Finance Officer (Director of Finance) and the Monitoring Officer (Deputy Chief Executive). The Constitution sets out key aspects of the Council's internal control mechanism, in particular, the Accounting and Audit Rules, the Procurement Rules and the Scheme of Delegation</li> </ul>	See Constitution via website.
<ul style="list-style-type: none"> <li>The Monitoring officer and S151 officer sign off every committee report.</li> </ul>	See details of Council structure via website and evidence of sign off on committee reports on all published agenda reports.
<b>Openness (Principle 2).</b> This is done by:	
<ul style="list-style-type: none"> <li>Conducting as much Council business in public as possible</li> </ul>	For example, committee reports and agendas, transparency data on the website, responses to FOIs now published on the website, only using Part II reporting where necessary.
<ul style="list-style-type: none"> <li>Providing full information on the Council's business on its website</li> </ul>	Home page.
<ul style="list-style-type: none"> <li>The Council meets 9 times per year. The Executive meets monthly: committees and panels meet regularly as set out in the Constitution. Apart from exempt items, all formal business is open to the public. Reports and minutes are publicly available</li> </ul>	Committee timetable; Corporate Management Team seek to minimise Part II exempt items. Members can challenge Part II status at formal meetings of the Council.
<ul style="list-style-type: none"> <li>Clear recording of the reasons for member decisions</li> </ul>	Minutes published for each committee agenda via the Council website.

<b>Local Code provisions</b>	<b>2018/19 review</b>
<b>Respecting the rule of law (Principle 1).</b> This is done by:	
<ul style="list-style-type: none"> <li>• Having a clear Complaints Procedure</li> </ul>	Complaints Procedure on website, monitored by Accounts and Governance Committee as set out above.
<ul style="list-style-type: none"> <li>• Using complaints and compliments as a positive improvement tool</li> </ul>	As above; annual review of complaints: Accounts and Governance Committee, G27/09/18, appendix 4 details actions taken in response to complaints.
<ul style="list-style-type: none"> <li>• Ensuring all inspection and audit reports considered by Members are public documents. Any recommendations from such reports are tracked through regular reports to the Accounts and Governance Committee</li> </ul>	<p>Publication of all external assessments.</p> <p>Internal Audit reports presented regularly through Accounts and Governance Committee agenda, including monitoring of implementation of recommendations, for example, Agc 29/11/18, report F74/18.</p>
<ul style="list-style-type: none"> <li>• Having a Statement of Community Involvement</li> </ul>	<p>Agreed December 2013, see also ‘Have your say’ area on website.</p> <p>The statement of community involvement sits within consultation policy and programme not updated for 2018/19; item for action plan.</p>
<b>Engaging comprehensively with institutional stakeholders (Principle 2).</b> This is done by:	
<ul style="list-style-type: none"> <li>• Promoting citizenship by active involvement with local schools</li> </ul>	Regular contact maintained with both primary and secondary schools. Secondary schools are encouraged to visit Council to learn about the role of Local Government.

Local Code provisions	2018/19 review
<b>Respecting the rule of law (Principle 1).</b> This is done by:	
<ul style="list-style-type: none"> <li>Actively consulting through a range of channels</li> </ul>	<p>'Have your Say' web page summarises and links through to all the Council's consultation work.</p> <p>Some elements of this page require updating, see the action plan.</p>
<ul style="list-style-type: none"> <li>Holding a Community Conference, which includes a wider range of public, private and voluntary organisations to inform the Council Plan</li> </ul>	<p>Feedback from Community Conference on 22 November 2014 informed the 2015/19 Council Plan.</p> <p>The new Council plan for 2019 onwards is currently in development and is due to go out for public consultation. This may involve a number of different channels to ensure wide consultation.</p>
<ul style="list-style-type: none"> <li>Using a range of customer feedback mechanisms including satisfaction surveys</li> </ul>	<p>On a quarterly basis, customer satisfaction questionnaires are sent to randomly selected customers who have used Council services through the website and contact centre. The Council uses public consultations for any significant changes to services.</p>
<ul style="list-style-type: none"> <li>Maintaining and regularly updating a database of all major partnerships that the Council is involved in and that these are in accordance with the Council's Partnerships' Protocol</li> </ul>	<p>Report to Scrutiny Co-ordinating Board, 20 September 2018 (SCb/34/9/18).</p>
<ul style="list-style-type: none"> <li>Members reviewing the database in public annually</li> </ul>	<p>As above.</p>

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<b>Engaging with individual citizens and service users effectively (Principle 2).</b> This is done by:	
<ul style="list-style-type: none"> <li>Encouraging prospective candidates for election to come forward</li> </ul>	Significant work completed to address level of candidates for 2019 elections, see 'Stand in Eden' via front page of website.
<ul style="list-style-type: none"> <li>Actively consulting through a range of channels</li> </ul>	'Have your Say' web page summarises and links through to all of the Council's consultation work.
<ul style="list-style-type: none"> <li>Communicating to the public through effective use of the media, as set out in the Council's Communication Strategy</li> </ul>	Media Releases  Social Media Protocol, Policy and Guidance Communication Strategy.
<ul style="list-style-type: none"> <li>Holding a Community Conference, which includes a wider range of public, private and voluntary organisations to inform the Council Plan</li> </ul>	Feedback from the Community Conference on 22 November 2014 informed the 2015/19 Council Plan.
<ul style="list-style-type: none"> <li>Using a range of customer feedback mechanisms including satisfaction surveys</li> </ul>	These are used by a variety of services, for example, Planning, Environmental Health, and Customer Services.
<ul style="list-style-type: none"> <li>Having a Community Engagement and Consultation section on the website</li> </ul>	Yes, see website.
<ul style="list-style-type: none"> <li>Having a consultation policy and programme</li> </ul>	Yes, see website, consultation policy and programme.  This needs updating for 2018/19, included on action plan
<ul style="list-style-type: none"> <li>Using the County Council hosted Consultation Finder on our website</li> </ul>	County Council website, search filter 'Eden'.



Local Code provisions	2018/19 review
<b>Defining outcomes (Principle 3).</b> This is done by:	
<ul style="list-style-type: none"> <li>• Having a Council Plan including strategic targets</li> </ul>	Council Plan 2015/19 in place, next iteration is in development.
<ul style="list-style-type: none"> <li>• Having an annually updated Corporate Procurement Strategy, based on the National Procurement Strategy for Local Government</li> </ul>	Report to Resources Portfolio, 26 April 2018 (item 2).
<ul style="list-style-type: none"> <li>• Council considering its Resources Plan annually</li> </ul>	Considered by Council, September 2018, F55/18.
<ul style="list-style-type: none"> <li>• Having a published Customer Charter</li> </ul>	Customer Charter published on website.
<b>Sustainable economic, social and environmental benefits (Principle 3).</b> This is done by:	
<ul style="list-style-type: none"> <li>• Having a comprehensive approach to emergency and disaster planning. The Council regularly updates its Business Continuity Plan and the Emergency Response Plan, both of which are regularly tested through an exercise</li> </ul>	<p>Business Continuity Plan, Leader Portfolio, 10 April 2018 (item 2).</p> <p>Emergency Response Plan, Leader Portfolio, 10 April 2018 (item 3).</p> <p>Annual Exercise, 22 March 2018.</p>
<ul style="list-style-type: none"> <li>• Having a regular Emergency Planning Group which is responsible for maintaining the Eden Emergency Response Plan</li> </ul>	Emergency Planning Group Minutes, on Director of Finance SharePoint site, for example, October 25 2018.
<ul style="list-style-type: none"> <li>• Having an 'out of hours' response service</li> </ul>	Duty Office contactable 24/7, via emergency telephone numbers section of website.
<ul style="list-style-type: none"> <li>• Having an Access to Services policy</li> </ul>	Equal access to services statement on website.

Local Code provisions	2018/19 review
<b>Defining outcomes (Principle 3).</b> This is done by:	
<ul style="list-style-type: none"> <li>Considering the economic, social and environmental benefits as part of the decision making process.</li> </ul>	The impact needs to be commented on in all committee reports, 'part 6.4 statutory considerations'.
<b>Determining interventions (Principle 4).</b> This is done by:	
<ul style="list-style-type: none"> <li>An Efficiency and Value for Money Policy (reviewed biennially)</li> </ul>	Resources Portfolio, 13 April 2017 (item 2).
<ul style="list-style-type: none"> <li>Clear recording of the reasons for member decisions</li> </ul>	Minutes published for all committee meetings.
<b>Planning interventions (Principle 4).</b> This is done by:	
<ul style="list-style-type: none"> <li>Stating clear and meaningful priorities and having effective arrangements in place to monitor progress against these</li> </ul>	Council Plan 2015/19, Council, 17 September 2015 (item 10), plus monitoring of Council plan objectives through Scrutiny Co-ordinating Board.
<ul style="list-style-type: none"> <li>Setting clear targets which translate the agreed priorities into outcomes. These are regularly reviewed</li> </ul>	Portfolio Plans updated annually and linked to corporate priorities. Example: Resources Portfolio Plan 2018/19 at June 28 2018 Resources PH meeting - Half-yearly monitoring, Resources Portfolio, 29 November 2018.
<ul style="list-style-type: none"> <li>A regular review of the Council's priorities</li> </ul>	Council Plan 2015/19, Council, 17 September 2015 (item 10). The next version of the Council Plan is being developed during 2018/19.

<b>Local Code provisions</b>	<b>2018/19 review</b>
<ul style="list-style-type: none"> <li>Securing continuous improvement through regular savings/ income generation exercises and the annual programme of Scrutiny Committee reviews</li> </ul>	<p>Approval of Revenue and Capital Budgets 2018/19, 15 February 2018.</p> <p>Scrutiny Review programme 2018/19: Scrutiny Co-ordinating Board, 24 May 2018. Officer working group 20 December 2018.</p>
<ul style="list-style-type: none"> <li>Ensuring that the financial management of the Council is sound, by regular and timely reporting to budget holders, Management Team, Leaders and the Council as a whole. This includes both revenue and capital monitoring. It is the responsibility of the relevant budget holder to investigate and take action on any identified budget variance. Every budget is owned by a budget holder</li> </ul>	<p>Monthly revenue budgets report to Management Team and the Resources Portfolio Holder.</p> <p>Quarterly Revenue and Capital Monitoring reports to Management Team and Executive, for example, Q2 2018/19 report F73/18 reported to November Executive and Scrutiny Coordinating Board.</p>
<ul style="list-style-type: none"> <li>Regularly monitoring key service delivery indicators through regular reports to the Corporate Management Team and the Leader. Where below target performance is seen as significant, explanations and proposed corrective actions are requested</li> </ul>	<p>Key PI report to Management Team; Council Plan monitoring through Portfolio Holder meetings and Scrutiny Coordinating Board, for example, F77/18 Resources Portfolio Holder half yearly monitoring, reported to Scrutiny Coordinating Board 15 November 2018.</p>
<ul style="list-style-type: none"> <li>Providing strategic management through the monthly meeting of the Executive and weekly Leader and Chief Executive meetings</li> </ul>	<p>Executive minutes.</p> <p>Leader/Chief Executive notes.</p>
<ul style="list-style-type: none"> <li>Clearly placing policy development as the role of the Executive</li> </ul>	<p>Constitution (responsibility for functions) p107, para 6.1.</p>

Local Code provisions	2018/19 review
<b>Optimising achievement of intended outcomes (Principle 4).</b> This is done by:	
<ul style="list-style-type: none"> <li>• Having an annually updated Corporate Procurement Strategy, based on the National Procurement Strategy for Local Government</li> </ul>	Report to Resources Portfolio, 26 April 2018.
<ul style="list-style-type: none"> <li>• Council considering its Resources Plan annually</li> </ul>	Considered Council, 6 September 2018.
<ul style="list-style-type: none"> <li>• Setting a medium term financial strategy based on regularly refreshed priorities</li> </ul>	MTFP reviewed bi-annually as part of budget setting process. Budget report February Council 2018.
<ul style="list-style-type: none"> <li>• Ensuring that any new bid for resources is judged against how far it advances corporate priorities and objectives</li> </ul>	Corporate Priorities are included within all committee reports; any bid for resources would need to be clear how it fits with these. Budget growth bids are considered by Portfolio Holders and then approved by Executive, for example, see December 11 2018 budget report to Executive.
<ul style="list-style-type: none"> <li>• Securing continuous improvement through regular savings/ income generation exercises and the annual programme of Scrutiny Committee reviews</li> </ul>	Approval of Revenue and Capital Budgets 2018/19, 15 February 2018.  Scrutiny Review programme 2018/19: Scrutiny Co-ordinating Board, 24 May 2018.  Officer working group 20 December 2018.

<b>Local Code provisions</b>	<b>2018/19 review</b>
<ul style="list-style-type: none"> <li>Ensuring that the financial management of the Council is sound, by regular and timely reporting to budget holders, Management Team, Leaders and the Council as a whole. This includes both revenue and capital monitoring. It is the responsibility of the relevant budget holder to investigate and take action on any identified budget variance. Every budget is owned by a budget holder</li> </ul>	<p>Monthly revenue budgets report to Corporate Management Team and the Resources Portfolio Holder.</p> <p>Quarterly Revenue and Capital Monitoring reports to Corporate Management Team and Executive, for example, Q2 2018/19 report F73/18 reported to November Executive and Scrutiny Coordinating Board.</p>
<p><b>Developing the entity's capacity (Principle 5).</b> This is done by:</p>	
<ul style="list-style-type: none"> <li>Having clear, published employee policies</li> </ul>	<p>Codified through Constitution with further detailed policies as required.</p>
<ul style="list-style-type: none"> <li>Maintaining and updating a triennial Asset Management Plan</li> </ul>	<p>Asset Management Plan 2018/21 completed.</p>
<ul style="list-style-type: none"> <li>Holding a regular cross departmental Asset Management Group</li> </ul>	<p>Asset Management Group meetings, last held 1/11/2018.</p>
<ul style="list-style-type: none"> <li>Considering cost against a 'family' group of local authorities</li> </ul>	<p>Report to Scrutiny Co-ordinating Board, 5 April 2018 F18/8.</p>
<ul style="list-style-type: none"> <li>Adopting a 'what works' basis to service provision by using in-house provision, outsourcing, sharing service provision and partnership arrangements as appropriate</li> </ul>	<p>Outsourcing of blue collar services, leisure management, pest control, internal audit (part) and arboriculture, major capital scheme management. Provision by another local authority of services, for example, car parks (enforcement and cash collection), procurement and emergency planning support. Shared IT Service with South Lakeland District Council.</p>

Local Code provisions	2018/19 review
<p><b>Developing the capability of the entity's leadership and other individuals (Principle 5).</b> This is done by:</p>	
<ul style="list-style-type: none"> <li>• Providing strategic management through the monthly meeting of the Executive and weekly Leader and Chief Executive meetings</li> </ul>	<p>Executive minutes.</p> <p>Leader/Chief Executive notes.</p>
<ul style="list-style-type: none"> <li>• Clearly setting out the rules for the Executive, Scrutiny Committee and the regulatory committees in the Constitution</li> </ul>	<p>Constitution (responsibility for functions/rules of procedure).</p>
<ul style="list-style-type: none"> <li>• The Executive meets monthly: committees and panels meet regularly as set out in the Constitution. Apart from exempt items, all committee business is open to the public. Reports and minutes are publicly available</li> </ul>	<p>Committee timetable.</p>
<ul style="list-style-type: none"> <li>• Providing job descriptions for all Member roles within the Constitution</li> </ul>	<p>As set out in the Constitution, part 3 schedule 1, page 117.</p>
<ul style="list-style-type: none"> <li>• Having a Constitution which sets out clearly the roles and duties of the Council's statutory officers, that is, the Chief Executive, Chief Finance Officer (Director of Finance) and the Monitoring Officer (Deputy Chief Executive). The Constitution sets out key aspects of the Council's internal control mechanism, in particular, the Accounting and Audit Rules, the Procurement Rules and the Scheme of Delegation</li> </ul>	<p>As codified in the Constitution.</p>
<ul style="list-style-type: none"> <li>• Clearly stating powers delegated to officers and ensuring that these are maximised</li> </ul>	<p>As codified in the Constitution.</p>
<ul style="list-style-type: none"> <li>• Having a Scheme of Delegation which clearly sets out decisions delegated to officers. This is annually reviewed and updated</li> </ul>	<p>As codified in the Constitution, annual review Council, 19 April 2018 G35/18.</p>

<b>Local Code provisions</b>	<b>2018/19 review</b>
<ul style="list-style-type: none"> <li>Giving effective induction training to new Elected Members and staff including Senior Officers</li> </ul>	<p>Training is delivered on a regular basis for Members. Planning and Licensing training is compulsory every year for any member of those committees. Training sessions are provided on other topics such as Annual Accounts, Universal Credit and any other topic which may be beneficial for Members.</p> <p>A full training induction programme will be provided for all Councillors after the May 2019 elections.</p> <p>Monitored through Accounts and Governance Committee as reported in February 2019.</p> <p>Officer training is driven through the annual appraisal process. This is currently being refreshed.</p>
<ul style="list-style-type: none"> <li>Providing proactive Member training</li> </ul>	<p>Annual Member training timetable.</p> <p>Training is a standing item on the agenda of all group meetings</p>
<ul style="list-style-type: none"> <li>Having a performance and appraisal system so that all members of staff know what is expected of them. In addition, an annual training plan is agreed as part of the appraisal process</li> </ul>	<p>The corporate performance management system is currently under review, including individual appraisals. Not added to AGS action plan as included within management top 20 monitoring through SLT/CMT.</p>

Local Code provisions	2018/19 review
<b>Managing Risk (Principle 6).</b> This is done by:	
<ul style="list-style-type: none"> <li>The Executive receives regular reports on budgets, capital scheme progress and the Risk Register</li> </ul>	<p>Budgets: for example, Executive 11 December 2018.</p> <p>Risk Register: e-mailed out quarterly for review and put on the Corporate Bulletin Board.</p>
<ul style="list-style-type: none"> <li>The Council having a Risk Management Strategy which is annually reviewed and updated</li> </ul>	<p>Risk Management Strategy in place, updated May 2018: <a href="#">Risk Management Strategy</a></p>
<ul style="list-style-type: none"> <li>The Council maintaining a Risk Register. This is reviewed quarterly by the Management Team and Executive. It is scrutinised annually by the Scrutiny Co-ordinating Board and the Management Team. After each quarterly update, all staff are reminded of its presence. New risks are often identified outside the quarterly reviews, mainly through Management Team discussion on particular issues</li> </ul>	<p>Scrutiny Co-ordinating Board, 24 May 2018 F31/18.</p>
<ul style="list-style-type: none"> <li>Having a 'Risk Management Implications' section in all committee reports</li> </ul>	<p>Forms part of the reports template, see examples on any agenda.</p>



Local Code provisions	2018/19 review
<b>Managing performance (Principle 6).</b> This is done by:	
<ul style="list-style-type: none"> <li>Enabling Scrutiny to ‘call-in’ any Executive decisions contrary to the Budgetary and Policy framework Having codes of conduct for officers and for Members in which there is guidance on officer/Member relationships</li> </ul>	<p>Call-in procedures are set out in Scrutiny Procedure rules within the constitution. Protocol on Officer/Member relations also included in the Constitution, Part 5, E.</p>
<ul style="list-style-type: none"> <li>Maintaining and updating a triennial Asset Management Plan</li> </ul>	<p>Asset Management Plan refreshed during 2018/19.</p>
<ul style="list-style-type: none"> <li>Holding a regular cross departmental Asset Management Group</li> </ul>	<p>Asset Management Group meetings held regularly, for example, 1/11/2018.</p>
<ul style="list-style-type: none"> <li><b>Approving SMART targets for the Council’s wholly owned company to give a basis for monitoring performance.</b></li> </ul>	<p>These were approved by Executive in February 2019. The targets for 2019/20 were approved by Executive in July 2019.</p>
<ul style="list-style-type: none"> <li><b>Having a dedicated contracts and procurement team to provide corporate support to the procurement process and direct oversight of a number of material out-sourced contracts.</b></li> </ul>	<p>The Constitution of the Council includes Procurement Rules and associated Procurement Procedures to help ensure a proper and consistent approach to procurement. Internal audit reviewed the arrangements for contracts and procurement during 2018/19 giving reasonable assurance.</p> <p>An issue arose during the period relating to compliance with the extension terms of an existing contract which will lead to significant additional cost in the medium term to continue with the service provision. Included on the AGS action plan.</p>

<ul style="list-style-type: none"> <li>• <b>Using Key Performance Indices to manage key strategic or higher risk contracts</b></li> </ul>	<p>As part of the 2018/19 review, TIAA reported that Performance Standards are built in to the larger contracts. These are discussed monthly with the contractor, with quarterly reports prepared by the Contract Officers.</p>
<p><b>Robust internal control (Principle 6).</b> This is done by:</p>	
<ul style="list-style-type: none"> <li>• Having a Confidential Reporting Code which clearly documents the procedure for staff to report matters of concern, which is regularly updated and communicated to staff</li> </ul>	<p>Confidential Reporting Code 2017, reviewed by Accounts and Governance Committee: see AGc/19/9/17.</p>
<ul style="list-style-type: none"> <li>• Having an annually updated Anti-Fraud, Theft, Bribery and Corruption Policy which is in accordance with the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA 2014)</li> </ul>	<p>Anti-Fraud, Theft, Bribery and Corruption Strategy and Response Plan; Annual Review AGc/24/9/18.</p> <p>Whistleblowing Policy, review AGC, 29/11/2018, item 8.</p>
<ul style="list-style-type: none"> <li>• Maintaining an effective internal audit function</li> </ul>	<p>Internal Audit Charter Annual Review by Accounts and Governance Committee, June 2018, AGc/6/06/18.</p> <p>CIPFA external review of internal audit function reported November 2018 AGc/40/11/18.</p>

<b>Local Code provisions</b>	<b>2018/19 review</b>
<ul style="list-style-type: none"> <li>Maintaining robust financial control with a suitably qualified section 151 Officer.</li> </ul>	<p>The Council complies with the CIPFA Statement on the Role of the Chief Financial Officer in Local Government (2015). Additional commentary is included in the AGS about local arrangements following the Fit for Purpose Review.</p>
<p><b>Managing data (Principle 6).</b> This is done by:</p>	
<ul style="list-style-type: none"> <li>Having a Data Quality Statement</li> </ul>	<p>Approved by Management Team, 15 March 2016 (item 7).</p>
<ul style="list-style-type: none"> <li>Having a clear and effective policy on data protection</li> </ul>	<p>Data Protection Policy reviewed at Exec December 4<sup>th</sup> 2018, E83/12/18</p>
<ul style="list-style-type: none"> <li>Having clear and effective information governance policies, systems and procedures</li> </ul>	<p>This will include effective records management policies, systems and procedures, including a Retention Schedule.</p> <p>For example, E/7/6/18 updated privacy policy.</p>
<ul style="list-style-type: none"> <li>Having clear and effective information security policies, systems and procedures</li> </ul>	<p>Revised policies and agreements adopted at Executive on 3 April 2018.</p>
<ul style="list-style-type: none"> <li>Having and maintaining an ICT Services Risk Register</li> </ul>	<p>An internal document held by IT Services used to help manage risks around electronic data sources.</p>

Local Code provisions	2018/19 review
<b>Strong public financial management (Principle 6).</b> This is done by:	
<ul style="list-style-type: none"> <li>Setting a medium term financial strategy based on regularly refreshed priorities</li> </ul>	<p>MTFP reviewed twice a year as part of budget setting process. To be presented as part of February 2019 Council papers.</p>
<ul style="list-style-type: none"> <li>Considering cost against a 'family' group of local authorities</li> </ul>	<p>Report to Scrutiny Co-ordinating Board, 5 April 2018, F18/18.</p>
<ul style="list-style-type: none"> <li>Ensuring that any new bid for resources is judged against how far it advances corporate priorities and objectives</li> </ul>	<p>Resources plan considered Council September 2018, CI/39/9/18.</p>
<ul style="list-style-type: none"> <li>Securing continuous improvement through regular savings/income generation exercises and the annual programme of Scrutiny Committee reviews</li> </ul>	<p>Annual budget process and external audit Value for Money assessment.</p> <p>Scrutiny Work Programme reviewed regularly at SCB, for example, G85/18, 15 November 2018.</p> <p>A Commercial Plan is in place and forms part of the Council's Policy Framework.</p>
<ul style="list-style-type: none"> <li>Ensuring that the financial management of the Council is sound, by regular and timely reporting to budget holders, Management Team, Leaders and the Council as a whole. This includes both revenue and capital monitoring. It is the responsibility of the relevant budget holder to investigate and take action on any identified budget variance. Every budget is owned by a budget holder</li> </ul>	<p>Quarterly Revenue and Capital Monitoring reports to Management Team and Executive (for example, Q2 monitoring 2018/19 presented to Executive, 6 November 2018, F73/18).</p>

<b>Local Code provisions</b>	<b>2018/19 review</b>
<ul style="list-style-type: none"> <li>The Executive receives regular reports on budgets, capital scheme progress and the Risk Register</li> </ul>	<p>See Executive agendas for quarterly budget monitoring. Risk Register: e-mailed out quarterly for review</p>
<p><b>Implementing good practice in transparency (Principle 7).</b> This is done by:</p>	
<ul style="list-style-type: none"> <li>Providing full information on the Council's business on its web</li> </ul>	<p>See Home page.</p>
<ul style="list-style-type: none"> <li>Compliance with the Local Government Transparency Code and Open Data</li> </ul>	<p><a href="https://www.eden.gov.uk/your-council/council-business/open-data/">https://www.eden.gov.uk/your-council/council-business/open-data/</a></p>
<ul style="list-style-type: none"> <li>The Council meets nine times per year. The Executive meets monthly: committees and panels meet regularly as set out in the Constitution. Apart from exempt items, all committee business is open to the public. Reports and minutes are publicly available</li> </ul>	<p>Committee timetable and Constitution set out when items will be discussed and reasons for any Part II items.</p>
<p><b>Implementing good practices in reporting (Principle 7).</b> This is done by:</p>	
<ul style="list-style-type: none"> <li>Conducting as much Council business in public as possible</li> </ul>	<p>Committee agendas show few reports in private.</p>
<ul style="list-style-type: none"> <li>Clear recording of the reasons for member decisions</li> </ul>	<p>Minutes produced and published on the website for all committee meetings.</p>
<ul style="list-style-type: none"> <li>The Scrutiny Co-ordinating Board is responsible for risk management arrangements</li> </ul>	<p>Established and functioning as per the Constitution.</p>

Local Code provisions	2018/19 review
<b>Assurance and effective accountability (Principle 7). This is done by:</b>	
<ul style="list-style-type: none"> <li>Maintaining an Accounts and Governance Committee that meets regularly and takes an active interest in the maintenance of standards across the Council. In particular, it is responsible for monitoring the corporate Complaints Procedure</li> </ul>	Terms of Reference for AGC are set out in the constitution. CIPFA external review of AGc function reported February 2019.
<ul style="list-style-type: none"> <li>Council considers the Annual Audit Letter from the external auditor</li> </ul>	Reported to Council, September 2018, CI/40/09/18.
The Accounts and Governance Committee:	
<ul style="list-style-type: none"> <li>Approves the annual accounts</li> </ul>	Constitution, Part 3. See AGC agenda 26 July 2018, F54/18
<ul style="list-style-type: none"> <li>Approves the Annual Governance Statement</li> </ul>	See AGC agenda 26 July 2018, F54/18.
<ul style="list-style-type: none"> <li>Receives all reports from the Internal Audit service and the external auditor</li> </ul>	Constitution, Part 3, for example, see F82/18 and F76/18 on 29 November 2018 AGC agenda.
<ul style="list-style-type: none"> <li>Approves the Anti-Fraud, Theft and Corruption Strategy which is in accordance with the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA 2014)</li> </ul>	Anti-Fraud, Theft, Bribery and Corruption Strategy and Response Plan; Annual Review AGc/24/9/18.

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