#### **LOCAL CODE OF CORPORATE GOVERNANCE**

#### Introduction

The International Framework: Good Governance in the Public Sector (CIPFA/IFAC 2014) defines governance as follows:

'Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.'

The International Framework also states that:

'To deliver good governance in the public sector, both governing bodies and individuals working for public sector entities must try to achieve their entity's objectives while acting in the public interest at all times.' Acting in the public interest implies primary consideration of the benefits for society, which should result in positive outcomes for service users and other stakeholders.

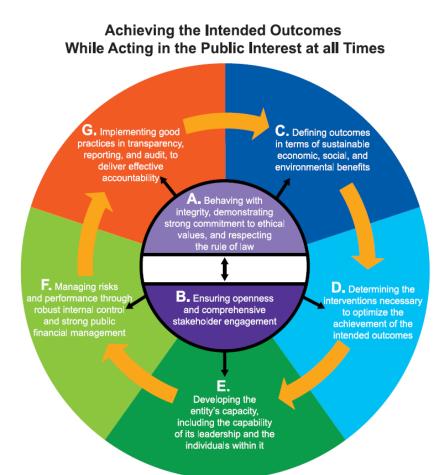
#### **Good Corporate Governance**

Staffordshire County Council is committed to achieving good corporate governance and this Local Code describes how the council intends to achieve this in an open and transparent way. The Local Code is based upon the CIPFA SOLACE framework 'Delivering Good Governance in Local Government (April 2016) which replaced the document published in 2007 and amended in 2012.

As laid out in the guidance it 'is intended to assist authorities individually in reviewing and accounting for their own unique approach. The overall aim is to ensure that resources are directed in accordance with agreed policy and according to priorities, that there is sound and inclusive decision making and that there is clear accountability for the use of those resources in order to achieve desired outcomes for service users and communities.

The Local Code is based on the following 7 principles, the first 2 of which underpin the remaining 5 with the overall aim of achieving the intended outcomes whilst always acting in the public interest.

- 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 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.



#### **MONITORING AND REVIEW**

The Code of Corporate Governance is reviewed on an annual basis to ensure that it is kept up to date. Where the review identifies that changes are required to the code, the revised Code will be submitted to the Audit & Standards Committee for comments and amendments before including on the Council's intranet.

It is the philosophy of the County Council that responsibility for ensuring good corporate governance is embedded within the organisation, lies with all employees and they take the appropriate steps to ensure their behaviour always reflects these values.

The Audit & Standards Committee has responsibility for monitoring and reviewing the Corporate Governance arrangements. The Committee is responsible for approving the Council's annual accounts and responding to the External Auditor's Annual Audit Letter. It also oversees the effectiveness of the Council's governance and risk management arrangements, the internal control environment and associated anti-fraud and anti-corruption arrangements. The standards element of its remit covers the responsibility for promoting and maintaining high standards of conduct amongst Members. The detailed terms of reference are included in the Constitution.

http://moderngov.staffordshire.gov.uk/ieListDocuments.aspx?Cld=624&Mld=8894&Ver=4&Info=1

In addition, the wider Committee arrangements support how the Council uses its resources effectively and efficiently to deliver services for Staffordshire residents

The Council ensures that corporate governance arrangements are kept under continual review by <u>updating</u>, as <u>appropriate</u>, these Committees on:

- The work of Internal and External Audit
- The opinion of other review agencies and inspectorates
- Opinions from the Council's Statutory Officers
- General matters relating to the implementation of the Code
- The production of the Annual Governance Statement and actions planned to address rising governance issues.

#### **The Annual Governance Statement**

Each year the Council will publish an Annual Governance Statement to accompany the Annual Accounts. The Statement provides an overall assessment of the Council's corporate governance arrangements and how it adheres to the governance standards set out in this Code. Evidence relating to the principles of this Code is reviewed and analysed to assess the robustness of the Council's governance arrangements. This includes assessments such as:

- Review of the Constitution
- Annual Statement Member Standards
- Regular Scrutiny Reports to Council
- Head of Internal Audit Annual Report and overall opinion
- External Audit Annual ISA 260 Report
- Other Inspectorate Reports
- Statutory Complaints & Corporate Complaints (including Ombudsman's Reports)
   Annual Report
- Information Governance Annual Report
- Health and Safety Annual Report
- Annual Pay Policy Statement
- Statements from the Monitoring Officer and Section 151 Officer regarding the use of their statutory powers

The Statement includes an appraisal of the key controls in place to manage the Council's principal governance risks and the effectiveness of systems and processes governing decision making and financial control. The Statement also provides details of where improvements need to be made. Actions to address significant governance issues are identified and recorded in an action plan. The Annual Governance Statement is audited by the Council's External Auditors as part of the audit of the annual accounts.

The following tables detail how the Council meets the core principles and the systems, policies and procedures it has in place to support this.

		alues, and respecting the rule of law.

**Current Arrangements** 

Local government organisations are accountable not only for how much they spend, but also for how they use the resources under their stewardship. This includes accountability for outputs, both positive and negative, and for the outcomes they have achieved.

In addition, they have an overarching responsibility to serve the public interest in adhering to the requirements of legislation and government policies. It is essential that, as a whole, they can demonstrate the appropriateness of all their actions and have mechanisms in place to encourage and enforce adherence to ethical values and to respect the rule of law.

#### Behaving with integrity

- Codes of conduct for Members & Officers developed and included in key governance document [the Constitution] to ensure that high standards of conduct are understood/maintained.
- An Officer Code of Conduct is included within the iLearn corporate training system and behaviours are reinforced through the My Performance Conversation process.
- Induction process for all new Members includes information on the standard of behaviour expected including the role of Standards Committee.
- Member Code of Conduct updated March 2021
- Procedure in place for reporting and administrating complaints against Members including breaches of the Member Code of Conduct.
- Whistleblowing arrangements for Officers are in place together with Grievance procedures
- Member Allowances are determined and approved by the Independent Remuneration Panel
- The Audit and Standards Committee is responsible for overseeing the conduct of members and identifying any training needs of members in relation to the Code of Conduct. The Committee receives a report as appropriate regarding the progress of complaints'/investigations. An Annual Report of Member Conduct is produced and reported to the Audit & Standards Committee.
- Decision making practices include standard formats for executive officer/portfolio holder/Cabinet decisions to assist in ensuring that decisions are taken only when necessary information has been made available including community impact assessments for key decisions.

Action Plan 2021/22

<ul> <li>Constitution includes an employee and Member policy for the acceptance of gifts and hospitality. A register is maintained and published on the County Council website.</li> <li>All Members declare their interests, and these are published on the County Council website which is refreshed annually.</li> <li>Members' declarations of interests are a standing item on all agendas. Minutes show declarations of interest were sought, and appropriate declarations made.</li> <li>Whistleblowing and Integrity policies are in place. Policies available to members of the public, employees, partners, and contractors via the internet and in appropriate contract documentation.</li> <li>Statutory and corporate complaints procedures and electronic reporting forms are available on the County Council's website. Annual reports</li> </ul>	
are produced and are published on the County Council website.	
Demonstrating strong commitment to ethical values	
<ul> <li>The Constitution sets out</li> <li>the need to act within the law</li> <li>delegations of the executive, committees and senior officers, and the decision-making process to be applied which are regularly reviewed</li> <li>Terms of Reference for committees</li> </ul>	
<ul> <li>Scrutiny &amp; Overview function to support ethical decision making</li> </ul>	
Commissioners of services have a role in developing specifications and contracts and through contract management and management of other arrangements.	
Implementation of the People Strategy approved by Cabinet in March 2019.	
<ul> <li>Respecting the rule of law</li> <li>The Constitution identifies the Statutory Officers of the County Council namely the Head of Paid Service, Monitoring Officer, Chief Financial Officer (Section 151 Officer), Director of Adult Social Care, Director of Children's Services, Scrutiny Officer, and the Director of Public Health and sets out the respective roles.</li> </ul>	

Core Principle B: - Ensuring	A Fraud, Bribery and Corruption Policy is published on the web site together with the Anti-Money Laundering Policy. There is a whistleblowing hotline together with a concern reporting form which is forwarded on to Internal Audit for review. There is also an email address to report suspected irregularities on line.  Openness and comprehensive stakeholder engagement	
Local government is run for the public good; organisations therefore should ensure openness in their activities. Clear, trusted channels of communication and consultation should be used to engage effectively with all groups of stakeholders, such as individual citizens and service users, as well as institutional stakeholders	<ul> <li>Openness</li> <li>Strategic and Delivery Plans describe direction including Vision, Values and Council priorities.</li> <li>Adoption of a Freedom of Information Act publication scheme</li> <li>Online council tax information</li> <li>Authority Transparency pages available on website including the annual transparency report</li> <li>Agendas, reports, and minutes are published on the council's website. Meetings are open to the public unless in the case of exempt items</li> <li>The Community Impact Assessment toolkit is used for all key decisions and helps ensure that the decisions taken consider a range of potential impacts/risk. Where appropriate, background papers are cited in the standard report format.</li> <li>Dates for submitting, publishing, and distributing timely reports are set and adhered to</li> <li>Record of decision making and supporting materials published on the County Council website</li> <li>The Strategic Plan together with the annual Corporate Delivery Plan sets out the priorities and strategic direction for the Council and is reviewed annually.</li> <li>Quarterly Integrated Performance Reporting covering MTFS, Strategic Plan and Delivery Plan monitoring delivery of key priorities.</li> <li>Engaging comprehensively with institutional stakeholders</li> <li>All the Councils priority outcomes are contained within the Strategic Plan which is published and communicated to all relevant stakeholders.</li> <li>The County Council regularly consults with a wide range of stakeholders depending on the topic and relevant audience. Key</li> </ul>	To progress the work on the 3 strategic place-based priorities further (Place Branding/5G/Data Institute) and explore two further key

- stakeholders include our local MPs, elected members, district leaders and chief executives, other public sector organisations and our voluntary and community sector bodies
- The relationship with the other 9 local councils is overseen by the bimonthly meeting of the 10 Chief Executive's and bi-monthly meetings of the Leaders.
- The strategic engagement with the NHS is overseen through the Sustainability and Transformation Plan Programme Board and the emerging Integrated Cares System governance, that is driving change across the whole system
- Place leadership across Staffordshire is steered and driven through Network Staffordshire.
- Network Staffordshire has developed its Vision for Staffordshire, by identifying three strategic place-based priorities, that it will collaborate on, and are central to be more aspirational for Staffordshire –and work will continue throughout 2021. The current progress includes:
  - Place Branding—our Staffordshire Story was launched in November 2020 to promote Staffordshire as a great place to live and work.
  - 5G roll out –Staffordshire and Stoke-on-Trent 5G Connected Region Growth Deal Proposal was signed off by SSLEP Board and submitted to central government in February 2020, to increase 5G coverage across the region.
  - Data Institute (Staffordshire Centre for Data Analytics)

    –Focused on better intelligence and insight to tackle citizens needs earlier, prevent or reduce demand, improve decision making and improve outcomes for people in Staffordshire. Recruitment to resource this is underway including the appointment of the Staffordshire Centre for Data Analytics Programme Lead
  - As positive progress continues towards the above priorities, a significant focus remains on leading the response to the pandemic across partners and recovery planning. In 2021, the Living with Covid work led by SCC was considered, and Network Staffordshire agreed to focus on two further key issues: climate change and inequalities.
- SCC reinforce a clear set of principles with all key partnership leads (including across Health and Wellbeing, Children and Families, Safety

issues (climate change and inequalities

Responsible Officer:
Kerry Dove Head of Policy and Insight
Implementation Date:
31st March 2022

- and Economy) to ensure that all formal partnerships continue to provide a robust framework for identifying and delivering higher level outcomes for Staffordshire.
- All consultations are conducted in line with the best practice guidance set out by the Cabinet Office in 2016
   (https://www.gov.uk/government/publications/consultation-principles-guidance). High priority consultations identified through the business planning process are supported by the Policy and Insight Team, with appropriate support from other support services. In order to ensure consistency and transparency all consultations are hosted on the County Council webpage.
- A communications strategy which sets out how the Council will inform and engage with employees, partners, residents and other stakeholders is in place, agreed annually by the senior leadership team and members of cabinet. Annual review and sign off of Communication Plan by SLT Lead

# Engaging stakeholders effectively, including individual citizens and service users

- A Record of public consultations undertaken is published on the Website.
- All consultations are delivered using best practice guidelines from the Cabinet Office (<a href="https://www.gov.uk/government/publications/consultation-principles-guidance">https://www.gov.uk/government/publications/consultation-principles-guidance</a>
- The council seeks the views from individuals, organisations and businesses as part of shaping and commissioning decisions.
- All council surveys are delivered online using the corporate approved software called Citizen Space.
- Consultation activities are scheduled in line with the Delivery Plan priorities and MTFS commitments.
- The council has arrangements to engage with all sections of the community including hard to reach groups.
- Tackling inequality within our communities and workforce has always been a key priority and we are committed to strengthening our approach diversity and inclusion (D&I) even further. Building on best

To complete the generation of a comprehensive volunteer management strategy and framework.

## **Responsible Officer**:

Catherine Mann Libraries & Arts Manager

#### **Implementation Date:**

31<sup>st</sup> March 2022

	<ul> <li>practice review and initial engagement workshops with 70+ community stakeholders, Members and Staff in 2020/21, the work to strengthen the D&amp;I approach, exploring this further with SLT and Cabinet Members, will continue in 2021.</li> <li>Community Impact Assessments continue to capture the impact of decisions on our protected groups, with evidence of how services have involved these vulnerable and hard to reach groups.</li> <li>The annual MTFS CIA process established in 2018/19, continues to provide a strategic impact assessment of the MTFS each year, considering the cumulative impacts of key MTFS savings proposals and what they may mean for Staffordshire's communities and places. The existing CIA tools and guidance are to be Maybe mention reviewed and updated in line with the 2022-26 Strategic Plan development. The</li> </ul>	
0.5%	work of the Digital project seeks to take account of the citizens needs	
C Defining outcomes in	terms of sustainable economic, social, and environmental benefits	
The long-term nature and impact	Defining outcomes	
of many of local government's	The Strategic Plan sets out the council's vision and priorities, it is	
responsibilities mean that it	refreshed annually, and is published on the website.	
should define and plan outcomes	Three priority outcomes have been defined –	
and that these should be sustainable. Decisions should	Have access to more good jobs and share the benefits of economic growth	
further the authority's purpose,	Be heathier and more independent for longer	
contribute to intended benefits	3. Feel safer, happier, and more supported in their community.	
and outcomes, and remain within	The annual Corporate Delivery Plan and associated Directorate/Team	
the limits of authority and	Plans and 'We Talk' support the delivery of the priorities outlined in the	
resources. Input from all groups	Strategic Plan. The following approval process is used – Corporate	
of stakeholders, including	Delivery Plan approved by SLT, led by the Assistant Director for	
citizens, service users, and	Strategy and Team Plans are approved by relevant member of SLT.	
institutional stakeholders, is vital	The Senior Leadership Team and Cabinet receive a Quarterly	
to the success of this process	Integrated Performance Report, monitoring progress against the	
and in balancing competing	Strategic Plan and Corporate Delivery Plan.	
demands when determining	Sustainable economic, social and environmental benefits	
priorities for the finite resources	Capital investment is structured to achieve appropriate life spans	
available.	and adaptability for future use or those resources (e.g. land) are	

- spent on optimising social, economic, and environmental wellbeing. This is outlined in the Medium-Term Financial Strategy and detailed in the capital programme.
- Development of the Communities and Digital principles to help address rising levels of demand for Council services.
- The Stoke-on-Trent and Staffordshire Local Enterprise Partnership (SSLEP) brings businesses and local authorities together to drive economic growth and create jobs. The County Council is the Accountable Officer for the LEP.
- The SSLEP has a single inward investment team 'Make it Stoke-on-Trent and Staffordshire' and an Education Trust, which is working with education providers and businesses to address the skills gap, while Destination Staffordshire is working with tourism businesses to market the county as a place to work and visit. To ensure the best achievement for the area the LEP is working with Government and other organisations to secure funding and improve access to finance for businesses.
- Sustainable Procurement incorporates the achievement of environmental, economic and social outcomes throughout procurement processes. The evaluation of Social and Environmental Value is considered as part of the evaluation criteria in all procurements and is designed to assist commissioners and procurers to maximise opportunities to improve the social, economic and environment condition of our local area through effective commissioning and procurement.

To consider the draft social value framework together with the 2 external social value assessment tools which are being assessed regarding adoption by the Council.

Responsible Officer: Ian Turner, Assistant Director -Commercial Services and Assets

Implementation Date: 30 September 2021.

### D -Determining the interventions necessary to optimise the achievement of the intended outcomes

Local government achieves its intended outcomes by providing a mixture of legal, regulatory, and practical interventions. Determining the right mix of these courses of action is a critically important strategic choice that local government has to make to ensure intended outcomes are achieved They need robust decision-making mechanisms to ensure that their defined outcomes can be achieved in a way that provides the best trade-off between the various types of resource inputs while still enabling effective and efficient operations. Decisions made need to be reviewed continually to ensure that achievement of outcomes is optimised.

#### **Determining interventions**

- The principles of commissioning are applied to ensure clear alignment to need and improving outcomes
- Options are clearly defined and analysed to ensure decisions support community and digital solutions.
- The system for decision making ensures all relevant information is considered such as analysis of options, resource implications, and outcomes.

#### **Planning interventions**

- The Delivery Plan and associated Directorate and Team Plans and WeTalk conversations is the means by which the Council's strategic priority outcomes are translated into action and delivered.
- The Council is committed to involving local people in its most important decisions through community engagement.
- It seeks opportunities to get local people involved in the running of services and assets through relevant consultation and our Communities principle.
- The MTFS is linked to our Corporate Delivery Plan to ensure resources are available to deliver priority outcomes. Member Led challenge sessions are held to scrutinise the robustness of the financial proposals.
- Strategic Risks associated with partnership and joint working arrangements are identified and recorded in the strategic risk register.
- Contract management arrangements are in place to manage delivery of service requirements.
- Change control mechanisms are in place to ensure that Contracts/Partnership arrangements continue to deliver the Council's priority outcomes.
- KPIs have been established and approved for each priority area, included in the Corporate Delivery Plan and reported upon regularly to SLT and Cabinet.

To ensure ongoing greater visibility and ownership of the Corporate Risk Register, together with regular monitoring and updating of individual risk areas.

## **Responsible Officer:**

Lisa Andrews, Head of Audit & Financial Services

## Implementation Date:

Ongoing

	The quarterly Integrated Performance Report, provides SLT and Cabinet with detailed performance information and highlight areas where corrective action is necessary.	
Optimising achievement of intended outcomes		
	<ul> <li>The annual budget is prepared in line with agreed priorities and the MTFS which is approved by Cabinet and Full Council. The council publishes its Financial Strategy annually to set an indicative five year rolling financial plan to fit the longer-term strategic vision as well as a detailed one-year budget. This process is supported via all members of the wider leadership team, including the use of annual accountability letters.</li> <li>All Managers are supported in the delivery of their financial objectives via their Finance Business Partner.</li> </ul>	
E - Developing the entity's	s capacity, including the capability of its leadership and the individuals v	within it
	Developing the entity's capacity	
Local government needs	Regular reviews of activities, outputs and planned outcomes including	
appropriate structures and	acting upon the outcome and recommendations contained within	
leadership, as well as people with	Inspectorate Reports.	
the right skills, appropriate	Development of demand management through digital first, supportive	
qualifications and mind-set,	communities and commercialisation work streams.	
to operate efficiently and	The Council has a Learning & Development strategy including the use	
effectively and achieve their	of a digital learning management system GO available to the whole	
intended outcomes within the	workforce covering, statutory and mandatory training, health and	
specified periods. A local	safety, ICT, Change Management and key knowledge and soft skills.	
government organisation must	Utilisation of research and CIPFA benchmarking exercises where	
ensure that it has both the	appropriate.	
capacity to fulfil its own	Effective operation of partnerships which deliver agreed outcomes.	
mandate and to make certain	Developing the capability of the entity's leadership and other	
that there are policies in place to	individuals	
guarantee that its management	Job descriptions are in place for Officers which have been correctly	
has the operational capacity	evaluated using the agreed Job Evaluation criteria and processes.	
for the organisation as a whole.	Role descriptors for Member roles.	
Because both individuals and the	<ul> <li>Induction arrangements for Officers/Members</li> </ul>	
environment in which an authority	made and an angent of the content of	

operates will change over time, there will be a continuous need to develop its capacity as well as the skills and experience of the leadership of individual staff members. Leadership in local government entities is strengthened by the participation of people with many different types of backgrounds, reflecting the structure and diversity of communities.

- A Protocol on Member/Officer Relations to achieve good working relationships in the conduct of council business
- Schemes of delegation reviewed regularly in the light of legal and organisational changes.
- Sub Schemes of delegation to be reviewed by Directorates on a regular basis.
- Procurement and financial regulations, which are reviewed on a regular basis, are in place.
- Officers/Members are updated on legal and policy changes as required.
- Development and training plans for employees is identified through the regular WeTalk appraisal process.
- Access to update courses/ information briefings on new legislation.
- Efficient systems and technology used for effective support.
- Implementing appropriate human resource policies (including Thinkwell) and ensuring that they are working effectively.
- HR policies and procedures developed incorporating relevant guidance on equalities and diversity requirements, safer recruitment, pre-employment checks.
- Development of an Apprenticeship Programme offering training, skills and experience in Local Government.
- Health and Safety policies designed to protect and enhance the welfare of staff are actively promoted and monitored.
- Improving Workforce Wellbeing programme being rolled out across the Council

The ongoing review the current HR policies in operation to ensure that they reflect the needs of the business.

**Responsible Officer:**Sarah Getley, Assistant Director – People

Implementation Date
Next tranche to be
completed by 31 March
2022

### F - Managing risks and performance through robust internal controls and strong public financial management

Local government needs to ensure that the organisations and governance structures that it oversees have implemented, and can sustain, an effective

#### Managing risk

 Risk management strategy/ policy formally approved and adopted by the Audit & Standards Committee. These documents are reviewed and updated on a regular basis by the Corporate Governance Working Group chaired by the Director of Corporate Services. To refresh the risk management policy and strategy as part of the implementation of the Risk Management Module as

performance management system that facilitates effective and efficient delivery of planned services. Risk management and internal control are important and integral parts of a performance management system and crucial to the achievement of outcomes. Risk should be considered and addressed as part of all decisionmaking activities. A strong system of financial management is essential for the implementation of policies and the achievement of intended outcomes, as it will enforce financial discipline, strategic allocation of resources, efficient service delivery, and accountability. It is also essential that a culture and structure for scrutiny is in place as a key part of accountable decision making, policy making and review. A positive working culture that accepts, promotes and encourages constructive challenge is critical to successful scrutiny and successful delivery. Importantly, this culture does not happen automatically, it requires repeated public commitment from those in authority.

- The strategic risk register is periodically updated, reviewed by the Corporate Governance Working Group prior to being scrutinised by the Audit & Standards Committee.
- The County Council has entered into a partnership arrangement with Staffordshire Civil Contingencies Services Unit who provide a comprehensive civil contingencies service including regular updates, briefings and training exercises with Key Partners.
- Business Continuity Plans have been prepared.

part of the Audit Risk Management Software.

## Responsible Officer:

Lisa Andrews, Head of Audit & Financial Services

## Implementation Date:

31st December 2021.

#### **Managing performance**

- In the context of Covid-19 the Corporate Delivery Plan 2021-22 has been refreshed, reflecting the key priority activity, This will be considered further by SLT and Cabinet, supporting the Strategic Plan.
- The strategic leadership team oversee the monitoring and delivery of performance measures in support of the Strategic and Corporate Delivery Plan. A quarterly Integrated Performance Report is considered by SLT and Cabinet.
- Publication of agenda, associated papers and minutes of public meetings on the County Council website. The Forward Plan will contain all matters which the Leader of the Council has reason to believe will be the subject of a Key Decision to be taken by the Cabinet during the forthcoming four-month period. It may also include decisions that are not key decisions but are intended to be determined by the Cabinet
- The Constitution, through its Overview and Scrutiny rules has opportunities for the Council's four Overview and Scrutiny Committees to challenge and debate policy and objectives before, during and after decisions are made. The work programme for each committee reflects the delivery of the County Council's and partners main outcome priorities, areas where their involvement could help improve performance and/or priorities and concerns raised by the public

- Agenda, minutes of Overview and Scrutiny Committees and any associated reports with recommendations to the Executive are available via the County Council's website.
- Overview and Scrutiny training for members is provided initially at induction, also on an annual basis or on specific subjects within Overview and Scrutiny Committee meetings.
- The County Council has both Procurement and Financial Regulations which set out the council's arrangements and ensure that processes continue to operate effectively and efficiently.

#### Robust internal control

- Risk management arrangements/ policy have been formally approved and adopted and are reviewed and updated on a regular basis.
- An annual report is produced by Internal Audit which provides an opinion on the council's control environment, and a self-assessment of its arrangements against the public sector internal audit standards and CIPFA's guide to the role of the Head of Internal Audit. The Council's Internal Audit service was externally reviewed in January 2018 to ensure adherence to the public sector internal audit standards by CIPFA and was awarded the highest level of compliance i.e. Full Compliance.
- Compliance with the Code of Practice on Managing the Risk of Fraud and Corruption (CIPFA 2014) and Fighting Fraud & Corruption Locally 2020 (CIPFA 2020).
- Fraud, Bribery and Corruption Policy which is subject to regular review and is approved by the Corporate Governance Working Group. The annual outturn report summaries anti-fraud activity in the year.
- Production of a fraud, bribery and theft risk assessment and strategy.
- Annual Governance statement prepared with senior management support and consideration by Audit and Standards Committee.
- An effective internal audit service is resourced and maintained. Internal
  Audit prepares and delivers a risk-based audit plan in line with
  international auditing standards which is kept under review to reflect
  changing priorities and emerging risks.

- Audit and Standards Committee oversees the management of governance issues, internal controls, risk management and financial reporting. It meets approximately four times per year and is adequately supported in respect of its roles/responsibilities.
- There are frameworks in place in relation to child and adult safeguarding.
- A self-evaluation assessment based on the CIPFA best practice criteria
  has been performed by the Audit & Standards Committee and will be
  refreshed regularly. Any improvements will be incorporated into the
  work programme of the Audit & Standards Committee.

#### **Managing data**

- The following arrangements are in place :
  - i. Designated data protection officer
  - ii. Data protection policies and procedures
  - iii. Acceptable Use Policy
  - iv. Information Sharing Protocol (incorporating use of Data Sharing Agreements)
  - v. Protective Marking Scheme
  - vi. Mandatory training via Go on Privacy/GDPR/Cyber Security
  - vii. Designate Senior Information Risk Owners (SIRO's) who undergo regular refresher training.
  - viii. Information Asset Owners and Data Guardians
- The Council's Information Governance Framework provides guidance on the arrangements that must be in place to ensure personal data is kept protected and secure. Using Privacy by Design as per GDPR requirements.
- Effective information sharing is undertaken in accordance with the Data Protection Act and the Staffordshire Information Sharing Protocol
- Data Subjects are informed why their personal information is being collected and how it will be processed (including when shared with other bodies) through the Council's overall Privacy Notices published on our website and individual Privacy Statements on forms, in booklets etc.
- Information Sharing Agreements, are reviewed on a regular basis, are in place to document the sharing of information using national

	agreements or the template in the Staffordshire Information Sharing Protocol.  Strong public financial management  Financial management supports the delivery of services and transformational change as well as securing good stewardship through modern and up to date HR & Financial management systems.  The Medium-Term Financial Strategy is in place which covers a rolling 5-year period.  Financial procedures are documented in the Financial Regulations.  Procurement procedures are documented in the Procurement Regulations.  Delegations from Council are outlined in the Schemes of Delegations  Financial Accountability Statements signed up to by WLT Leads.  Regular budget monitoring reports are produced and provided to Accountable Budget Holders who are supported by Finance Business Partners in the management of their delegated budgets.  The financial position is reported quarterly to Cabinet and Corporate	
	Review Overview and Scrutiny Committee.  ractices in transparency, reporting, and audit to deliver effective acco	ountability
Accountability is about ensuring that those making decisions and delivering services are answerable for them. Effective	<ul> <li>Implementing good practice in transparency</li> <li>Agendas, reports and minutes are published on the council's website.</li> <li>Compliance with the Local Government Transparency Code 2015. Required data is published on the County Councils web site.</li> </ul>	
accountability is concerned not only with reporting on actions completed, but also ensuring that stakeholders are able to understand and respond as the organisation plans and carries out its activities in a transparent manner. Both external and	<ul> <li>Implementing good practices in reporting</li> <li>The Annual Governance Statement sets out the council's governance framework and the results of the effectiveness of the council's arrangements. The AGS includes significant governance issues.</li> <li>Annual Financial Statements are compiled, published to timetable and included on the council's website. This includes the External Auditors audit opinion on the Council's financial statements and arrangements for securing Value for Money.</li> </ul>	

internal audit contribute to effective accountability.	The Annual Governance Statement is separately published on the Councils website once it has been approved by the Audit & Standards Committee.	
	Assurance and effective accountability	
	<ul> <li>Recommendations in the Annual Governance Statement inform positive improvement within the Council's governance arrangements.</li> <li>Compliance with CIPFA's Statement on the Role of the Head of Internal Audit (2019)</li> </ul>	
	Compliance with Public Sector Internal Audit Standards	
	An effective internal audit service is resourced and maintained. The Service has direct access to members and provides assurance on governance arrangements via an annual report containing an opinion on the council's risk, governance and control arrangements.	