



East
Northamptonshire
Council

Governance & Audit Committee 24 July 2019

Code of Corporate Governance Review

Purpose of report

To present to Members an updated Code of Corporate Governance for consideration and recommendation for adoption by Full Council.

Attachment(s)

Appendix A: Updated Code of Corporate Governance

1. Background

- 1.1. The council is committed to good governance as it recognises that it leads to good management, good performance, good stewardship of public funds, good public engagement and ultimately, good outcomes for customers and service users. Good governance is about doing the right thing, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner. It also supports the council to achieve corporate outcomes in an effective way.
- 1.2. In 2007 the Chartered Institute of Public Finance and Accountancy (CIPFA) and Society of Local Authority Chief Executives and Senior Managers (SOLACE) Good Governance Framework introduced a requirement for Local Authorities to produce a Local Code of Governance by way of documenting the council's commitment to effective corporate governance. CIPFA and SOLACE issued updates to the Framework on Delivering Good Governance in Local Government in 2016, which were incorporated into the Council's Code of Corporate Governance in 2017.

2. Code of Corporate Governance Review

- 2.1 The Code of Corporate Governance has been reviewed and updated in light of the decision from the Secretary of State for Housing, Communities and Local Government regarding the proposal to create two new unitary councils for Northamptonshire.
- 2.2 The Code of Corporate Governance has also been updated to reflect various other changes since the last review in 2017, including the change in Committee structures such that the Scrutiny Committee no longer exists, the appointment of a qualified Data Protection Officer and the adoption by the council of a number of new policies and strategies, including the Economic Development Strategy, the Commercialisation Strategy, the Treasury Management Strategy and the Healthy and Active Lifestyles Strategy.
- 2.3 An updated Code of Corporate Governance is attached as Appendix 1.

3. Conclusion

- 3.1 In order to continue to demonstrate the council's firm commitment to sound corporate governance, the Committee is asked to recommend adoption of the updated Code to full Council.

4. Equality and Diversity Implications

- 4.1. This report is purely for information and requires no decision from committee. There are no equality and diversity implications arising from the recommendations in this report.

5. Privacy Impact Implications

- 5.1. There are no privacy impact implications arising from the recommendations in this report.

6. Legal Implications

- 6.1. There are no legal implications arising from the recommendations in this report.

7. Risk Management

- 7.1. By adopting the updated Code of Corporate Governance, the council will be following best practise guidance which will help to minimise the risk of failure in areas of control and risk management across the organisation through a continuous process of regular evaluation and review.

8. Resource and Financial Implications

- 8.1. There is no direct resource or financial implications arising from the recommendations in this report.

9. Constitutional Implications

- 9.1. The Code of Corporate Governance forms part of the Policy Framework for the Council (see Article 4 Part 2 of the Constitution) and as such needs to be agreed by (full) Council.

10. Implications for our Customers

- 10.1. This report does not impact directly on customers. However, the process of regular evaluation and review should help to improve governance arrangements around services to our customers.

11. Corporate Outcomes



- 11.1. This report links to the following Corporate Outcomes:

- **Effective Management**
Seeking to improve governance arrangements across the organisation, which contributes to the effective management of the council

12. Recommendation

12.1. That the Governance and Audit Committee **resolves to recommend** adoption of the revised Code of Corporate Governance (Appendix A) to (full) Council.

(Reason: To allow for review of the Code of Corporate Governance and ensure it meets best practice).

Legal	Power: Local Government Act 2000, Accounts and Audit Regulations 2015				
	Other considerations: CIPFA/SOLACE Delivering Good Governance in Local Government Framework 2016				
Background Papers:					
Person Originating Report: Amy Eyles, Finance Manager ☎ 01832 742087 ✉ aeyles@east-northamptonshire.gov.uk					
Date: 09/07/2019					
CFO 15/07/19		MO 15/07/19		CX	

Code of Corporate Governance

Introduction

Good governance

Good governance is about how the Council ensures that it is doing the right things, in the right way, for the communities it serves, in a timely, inclusive, open, honest and accountable manner.

Our commitment

East Northamptonshire Council is committed to upholding the highest possible standards of good corporate governance, believing that good governance leads to high standards of management, strong performance, effective use of resources, increased trust in the Council and ultimately good outcomes.

Good governance flows from shared values, culture and behaviour and from systems and structures. This Code of Corporate Governance is a public statement that sets out the framework through which the Council meets its commitment to good corporate governance.

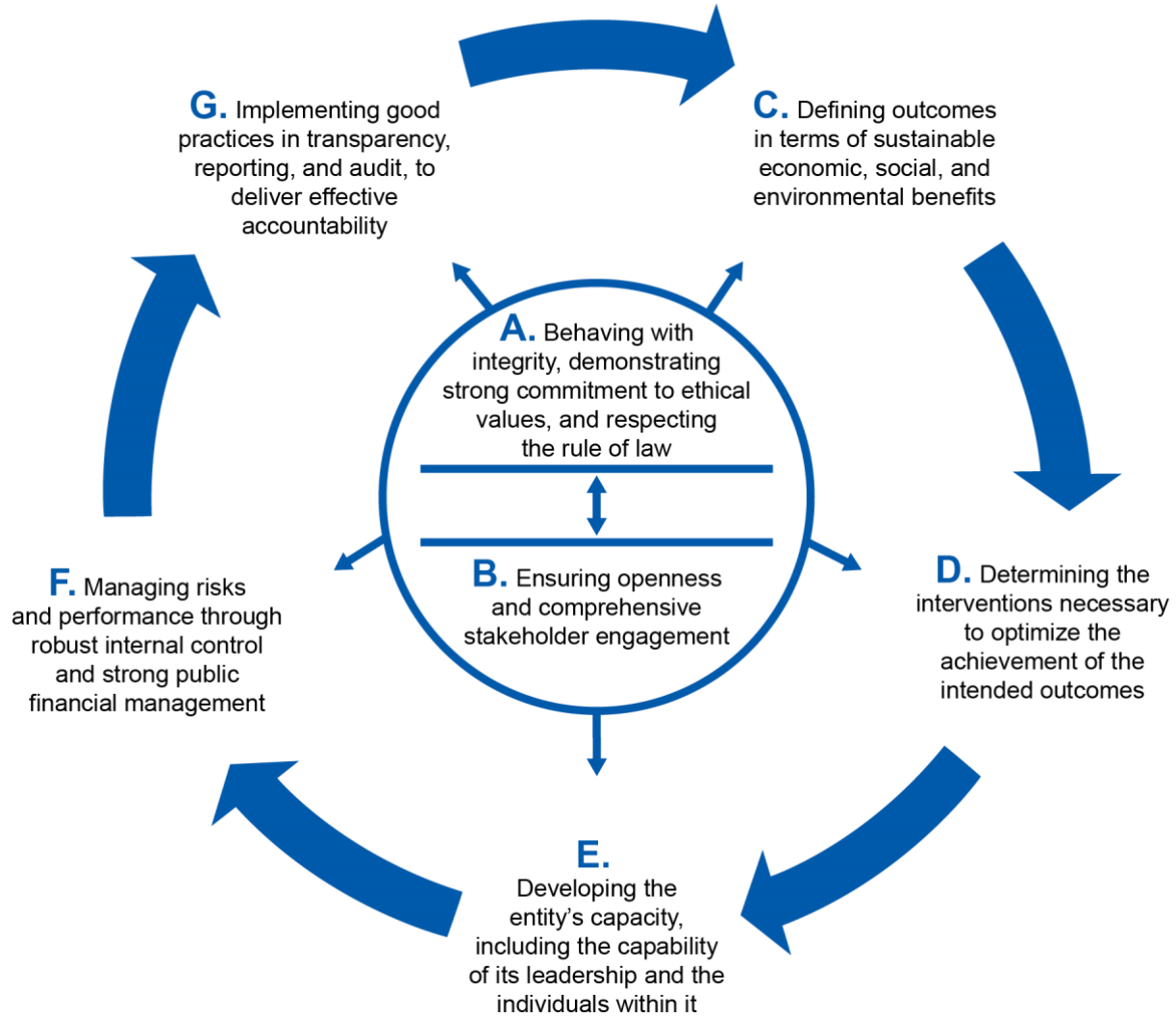
The Governance Framework comprises the systems and processes, and cultures and values, by which the Council is directed and controlled and through which it accounts to, engages with and, where appropriate, leads the community. It enables the Council to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate cost-effective services.

Corporate governance of East Northamptonshire is based on the following principles recommended by CIPFA/SOLACE in a joint document entitled 'Delivering Good Governance in Local Government' which builds on the seven Principles for the Conduct of Individuals in Public Life (Appendix A):

- 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.

This document describes how the Council achieves the seven principles of good governance and describes how the Council's corporate governance arrangements will be monitored and reviewed. It should be noted that the Secretary of State for Housing, Communities and Local Government has now decided that two new unitary councils will be established in Northamptonshire on 1st April 2021 (Vesting Day). As a result, this Council will cease to exist on 1st April 2021 and its function and services will pass to a new 'North Northamptonshire' unitary council. This Council will work to ensure creation of appropriate governance arrangements, including governance during transition.

Achieving the Intended Outcomes While Acting in the Public Interest at all Times



Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.

Supporting Principles	East Northamptonshire Council meets the requirements of this Principle as follows:	This is evidenced by:
Behaving with integrity.	<ul style="list-style-type: none"> • The Council's leadership sets a tone for the organisation by creating a climate of openness, support and respect through its Constitution, Corporate Plan and other key policies. • The Council's Codes of Conduct for officers and members, and supporting guidance, communicate the expectation that members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated, thereby protecting the reputation of the organisation. The Council's Constitution (Part 5) sets out the underlying principles which underpin the Codes of Conduct, based on the Seven Principles of Public Life (the Nolan Principles). • The Council has in place a Knowledge, Skills and Behaviours Framework (KSB), which ensures that East Northamptonshire's vision and values are communicated to, and understood by, staff. This framework forms the basis of the annual staff appraisal process. • The Council has in place arrangements to ensure that Councillors and employees of the authority are not influenced by prejudice, bias or conflicts of interest in dealing with different stakeholders, and has in place appropriate processes to ensure that they continue to operate in practice. This includes maintaining the statutory Register of Members Interests, requiring officers to make Declarations of Interests where appropriate and maintaining a gifts and hospitality register. • The Council also has a Joint Standards Complaints Committee which promotes and maintains high standards of conduct for Councillors and provides guidance and training on the Code of Conduct. It is also responsible for the governance of the Town and Parish Councillors in the district. • The Council has in place arrangements to ensure that core corporate policies and processes are designed in conformity with ethical standards, and are reviewed on a regular basis to ensure they are operating effectively. 	<ul style="list-style-type: none"> • Council Corporate Plan • The Council's Constitution • Joint Standards Complaints Committee • Members Code of Conduct • Member/Officer Protocol • Officers Code of Conduct • Knowledge, Skills and Behaviours Framework • Register of Members' Interests • Declaration of Interest Guidance • Rules for Officers Relating to Gifts and Hospitality • Members Induction/Training • Financial Regulations • Contract Procedure Rules • Scheme of Delegation • Staff Management Policy • Information Governance Policies

<p>Demonstrating strong commitment to ethical values.</p>	<ul style="list-style-type: none"> • The Council's Constitution establishes a clear ethical framework for the Council's operation, and core corporate policies and procedures place emphasis on agreed ethical values. It is reviewed regularly to ensure legal compliance and to reflect the changing context in which councils operate. • The Council's Codes of Conduct and KSB Framework ensures that personal behaviour is underpinned with ethical values which permeate all aspects of the organisation's culture and operation. • The Council maintains an effective Governance and Audit Committee which oversees governance, the Constitution, ethics and probity. • The Council's Shared Service Strategy sets out key considerations to ensure that partnerships act with integrity and in compliance with the ethical standards expected by the organisation. 	<ul style="list-style-type: none"> • The Council's Constitution • Governance and Audit Committee • Shared Service Strategy and Checklist • Members Code of Conduct • Member/Officer Protocol • Officers Code of Conduct • Knowledge, Skills and Behaviours Framework
<p>Respecting the rule of law.</p>	<ul style="list-style-type: none"> • The Council's policies and culture set the tone for members and staff to demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations, and ensure that statutory officers, other key post holders, and members are able to fulfil their responsibilities in accordance with legislative and regulatory requirements. • The Council maintains and implements a Whistleblowing Policy to enable employees to raise any concerns of wrongdoing in confidence and without fear of reprisal. External suppliers, members of the public and Councillors may raise any concerns about suspected illegal or illegitimate practices via the Council's formal Complaints Procedure. • The Council recognises the limits of lawful action and observes both the specific requirements of legislation and the general responsibilities placed on it by public law. The Council observes all specific legislative requirements placed upon it, as well as the requirements of general law, and deals with breaches of legal and regulatory provisions effectively. The Council strives to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders. • The Council ensures corruption and misuse of power are dealt with effectively through the Corporate Counter Fraud Strategy. 	<ul style="list-style-type: none"> • Corporate Counter Fraud Strategy • Anti-Money Laundering Policy • Whistleblowing Policy • Formal Complaints Procedure • Role of the Monitoring Officer as per the Constitution • Members Code of Conduct • Officers Code of Conduct

Principle B: Ensuring openness and comprehensive stakeholder engagement

Supporting Principles	East Northamptonshire Council meets the requirements of this Principle as follows:	This will be evidenced by:
<p>Openness.</p>	<ul style="list-style-type: none"> • The Council’s Constitution and Committee system ensures that decision-making is open. Scrutiny and the Governance and Audit Committee provides appropriate oversight and challenge to match the organizational commitment to openness. • The Council makes decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. Committee meetings are held in public, and minutes and papers are available to the public on the Council’s website, including regular financial and performance forecasts. If a decision needs to be kept confidential, then the justification for this is provided. • The Council provides clear reasoning and evidence for decisions in public records. The Council has outlined the principles of decision making in Article 12, Part 2 of the Constitution. The Council’s Corporate Plan, Statements of Accounts, and key policies and strategies are available through the East Northamptonshire Council website. • An effective Internal Audit function is resourced and maintained, with regular reporting to the Governance and Audit Committee. The Governance and Audit Committee also review External Audit reports as well as reports by other external inspection bodies such as the Local Government Ombudsman • The Council is committed to being transparent, accountable and to increasing the amount of data it publishes for reuse by others. The Council maintains a Publication Scheme listing the information available to the public as a matter of course. • The Council uses formal and informal consultation and engagement to determine the most appropriate and effective interventions/courses of action where appropriate. 	<ul style="list-style-type: none"> • The Council’s Constitution • Committee System • Internal Audit • Governance and Audit Committee • Publication Scheme • Freedom of Information • FOI Disclosure Log • East Northamptonshire Council Website • Corporate Plan • Statement of Accounts • Committee agendas, reports and minutes • Register of Members’ Interests • East Northamptonshire Residents Panel

<p>Engaging comprehensively with institutional stakeholders.</p>	<ul style="list-style-type: none"> • The Council works with institutional stakeholders to whom the authority is accountable, to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably. • The Council aims to develop formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively. The Council's Shared Service Strategy supports working in partnership and aims to ensure that partnerships are based on trust, a shared commitment to change, and a culture that promotes and accepts challenge among partners. The Council will take advantage of the move to unitary to increase the shared service provision. • The Council aims to create a positive culture of sharing information with the aim of improving service delivery subject to provisions in the General Data Protection Regulation and Data Protection Act 2018. 	<ul style="list-style-type: none"> • Shared Service Strategy • The Council's Constitution • Publication Scheme • Town Clerk Meetings
<p>Engaging with individual citizens and service users effectively.</p>	<ul style="list-style-type: none"> • The Council makes decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. Committee meetings are held in public, and minutes and papers are available to the public on the Council's website, including regular financial and performance forecasts. If a decision needs to be kept confidential, then the justification for this is provided. • The Council consults on its Corporate Plan proposals and other key aspects of its vision, strategic plans and priorities, with the local community and other key stakeholders. The Council takes account of the impact of decisions on future generations of tax payers and service users. • The Council encourages, collects and evaluates the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs. The Council maintains a customer feedback and complaints procedure to enable stakeholders to submit their views on Council performance and services. • A clear Consultation Strategy sets out how the organisation 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. The Council ensures that communication methods are effective and that members and officers are clear about their roles with regard to communication. A review of the 	<ul style="list-style-type: none"> • Consultation Strategy • Public consultation • Youth Conference • Customer Contact Centre and Complaints Procedure • East Northamptonshire Residents Panel • Council Website • Local Media • Corporate Leaflets • Reports & public documents • Displays, exhibitions & road shows • Social Media (Twitter, Facebook) • EnCircle (quarterly council newsletter) • Customer Services Strategy • GovMetric Customer Feedback

	Consultation Strategy is now due, which had previously been delayed pending the Secretary of State's decision regarding the creation of two new unitary councils for Northamptonshire.	
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Principle C: Defining outcomes in terms of sustainable economic, social, and environmental benefits.

Supporting Principles	East Northamptonshire Council meets the requirements of this Principle as follows:	This will be evidenced by:
Defining outcomes.	<ul style="list-style-type: none"> • The Council’s Corporate Plan forms its agreed statement of the organisation’s purpose and intended outcomes and provides the basis for the authority’s overall strategy, planning and other decisions. The Corporate Plan sets out the Council’s Vision and defines the key outcomes for the people of East Northamptonshire. Specific Council strategies and policies link to the outcomes defined in the Corporate Plan. • The Corporate Plan sets out how the Council will deliver defined outcomes on a sustainable basis, within the resources that will be available. It also specifies the intended impact on, or changes for, stakeholders including citizens and service users, for the next four years (2015-2019). The Corporate Plan is currently under review following the Secretary of State’s decision regarding the creation of two new unitary councils for Northamptonshire. • Service Plans set out Key Performance Indicators (KPIs), to be used to assess the achievement of the Council’s outcomes. KPIs are reported to the Corporate Management Team and Finance and Performance Sub-Committee as part of the regular performance reporting process. • The Council operates a risk management system to identify and manage risks to the achievement of outcomes. The Corporate Risk Register is reported to and reviewed by Service Teams, the Council’s Corporate Management Team and the Governance and Audit Committee on a regular basis. 	<ul style="list-style-type: none"> • Corporate Plan • Corporate Management Team • Service Plans • Risk Management Strategy • Risk Register • Statement of Accounts • Financial and Performance Reports • Economic Development Strategy • Commercialisation Strategy

<p>Sustainable economic, social and environmental benefits.</p>	<ul style="list-style-type: none"> • The Council considers and balances the combined economic, social and environmental impact of policies and plans when taking decisions about service provision. The Council seeks to take a longer-term view with regard to decision-making, which takes account of risks. • Equality Impact Assessments are undertaken for the key actions included in the Council’s Corporate Plan, which identify the impact of potential decisions on different groups within the communities affected by the proposals. • The Council seeks to 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. • The Council identifies and monitors corporate performance indicators, which demonstrate performance against the Council’s planned outcomes and how benefits are being delivered. • The Council maintains a prudential financial framework, balancing commitments with available resources and monitoring income and expenditure levels to ensure a sustainable balance is achieved. 	<ul style="list-style-type: none"> • Corporate Plan • Annual Statement of Accounts • External Auditors reports • Equality Impact Assessments • Financial and Performance Reports • Consultation Strategy • Council Website • East Northamptonshire Residents Panel • Local Media (including a locally-produced Nene Valley News) • Reports & public documents • Displays, exhibitions & road shows • Social Media (Twitter, Facebook) • EnCircle (quarterly council newsletter) • Treasury Management Strategy • Capital Strategy
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Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes.

Supporting Principles	East Northamptonshire Council meets the requirements of this Principle as follows:	This will be evidenced by:
Determining interventions.	<ul style="list-style-type: none"> • The Council’s Corporate Planning process incorporates business cases for proposed projects and savings, ensuring decision makers receive objective and rigorous analysis of a variety of options for achieving outcomes, indicating how intended outcomes would be achieved and associated risks. This ensures best value is achieved, however services are provided. • The Council’s Consultation Strategy ensures that decision-makers 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 	<ul style="list-style-type: none"> • Corporate Plan • Business Cases • Equality Impact Assessments • Consultation Strategy • East Northamptonshire Residents Panel
Planning interventions.	<ul style="list-style-type: none"> • The Council has an established annual Corporate Planning process which sets a four-year strategic plan for the Council that informs the development of strategic and operational plans, priorities and targets. • The Medium Term Financial Strategy/Plan (MTFS) incorporates medium term resource planning, including estimates of revenue and capital expenditure. Budgets are prepared in accordance with the Council’s objectives, strategies and the Corporate Plan. The MTFS is reviewed annually meaning that mechanisms for delivering outcomes are regularly reviewed and can be adapted to changing circumstances. • Service Plans 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. The Council ensures that capacity exists to generate the information required to review service quality regularly. • As part of the Corporate Planning process, the Council engages with internal and external stakeholders in determining how services and other courses of action should be planned and delivered. 	<ul style="list-style-type: none"> • Corporate Planning process • Corporate Plan • Medium Term Financial Plan / Strategy • Equality Impact Assessments • Consultation Strategy • Service Plans • Capital Strategy

	<ul style="list-style-type: none"> • When working collaboratively, the Council considers and monitors the risks facing each partner, including shared risks. 	
<p>Optimising achievement of intended outcomes.</p>	<ul style="list-style-type: none"> • The Council ensures that Service Plans integrate and balance service priorities, affordability and other resource constraints, and that the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term. • The Council’s Medium Term Financial Strategy/Plan 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. • Achievement of Service Plan outcomes is monitored and reported to the Council’s Corporate Management Team through Finance and Performance Reports and other reports. • The Council maintains a robust system of risk management which identifies risks to the achievement of the Council’s intended outcomes and puts in place mitigating actions to support achievement. • The Council maintains systems of business continuity and emergency planning to deal with failures in service delivery or emergencies which may threaten achievement of the Council’s intended outcomes. • The Business Transformation Team undertake review of work streams and processes to identify efficiencies. 	<ul style="list-style-type: none"> • Corporate Plan • Medium Term Financial Strategy/Plan • Risk Management Strategy • Risk Register • Finance and Performance Reports • Corporate Management Team • Business Continuity Plans • Emergency Planning • Capital Strategy • Project Management Process

Principle E: Developing the entity’s capacity, including the capability of its leadership and the individuals within it

Supporting Principles	East Northamptonshire Council meets the requirements of this Principle as follows:	This will be evidenced by:
Developing the entity’s capacity.	<ul style="list-style-type: none"> • The Council recognises the benefits of partnerships, collaborative and shared working where added value can be achieved. • The Council maintains a robust and open recruitment and selection processes to ensure that the Council is able to attract suitable candidates, ensuring a diverse workforce that will add value to the organisation. The Council continuously reviews its staffing structure to match resource to the corporate priorities of the Council and to develop the capabilities of staff where possible. • The Council reviews its operations, performance and use of assets on a regular basis to ensure their continuing effectiveness, and seeks to improve resource use through appropriate application of techniques such as benchmarking and other options, in order to determine how resources are allocated so that defined outcomes are achieved effectively and efficiently. 	<ul style="list-style-type: none"> • Recruitment and Training Policy • HR Policies • Business Transformation Programme • Corporate Plan • Medium Term Financial Strategy/Plan • Finance and Performance Reports • Risk Register • Capital Strategy • Asset Management Plan • Commercialisation Strategy
Developing the capability of the entity’s leadership and other individuals.	<ul style="list-style-type: none"> • The Council’s Constitution and Scheme of Delegation set out a clear statement of the respective roles and responsibilities of the Council’s Executive, the Full Council and individual members. The Scheme of Delegation clarifies the type of decisions that are delegated and those reserved for collective decision making of the governing body. Committee Terms of References set out a clear statement of the respective roles and responsibilities of the Council’s Committees and Working Parties. This ensures that a shared understanding of roles and objectives is maintained • The Council maintains protocols to ensure effective communication between Council Members and officers in their respective roles. The Chief Finance Officer and Monitoring Officer are both members of the Corporate Management Team and thus have direct access to the Chief Executive and 	<ul style="list-style-type: none"> • The Council’s Constitution including: • Scheme of Delegation • Committee Terms of Reference • Members Code of Conduct • Officers Code of Conduct • Protocol on Members/Officer Relations • HR Policies • Staff Induction • Members Induction

	<p>other members of the leadership team.</p> <ul style="list-style-type: none"> • The Council develops the capabilities of members, senior management, and officers to achieve effective 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"> ➤ 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; ➤ 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; ➤ Holding staff to account through regular performance reviews which take account of training or development needs; ➤ Ensuring personal, organisational and system-wide development through shared learning, including lessons learnt from governance weaknesses both internal and external including input from Governance and Audit Committee; ➤ Ensuring arrangements are in place to maintain the health and wellbeing of the workforce, and support individuals in maintaining their own physical and mental wellbeing. 	<p>Programme</p> <ul style="list-style-type: none"> • Members Development Programme • Performance Appraisal/PADP Scheme • Knowledge, Skills and Behaviours Framework • Role of Internal Audit • CFO member of CMT • Healthy and Active Lifestyles Strategy • Mental Health Action Plan • Consultation Strategy • Communication Strategy • Project Closedown Forms
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Principle F: Managing risks and performance through robust internal control and strong public financial management

Supporting Principles	East Northamptonshire Council meets the requirements of this Principle as follows:	This will be evidenced by:
Managing risk	<ul style="list-style-type: none"> • The Council recognises that risk management is an integral part of all activities and must be considered in all aspects of decision making. Robust and integrated risk management arrangements are in place and regularly reviewed to ensure that they are working effectively. Risk management is embedded into the culture of East Northamptonshire Council. • The Council ensures that responsibilities for managing individual risks are clearly allocated, and the risk register is reported to and reviewed by the Council's Service Teams, Corporate Management Team and Governance and Audit Committee on a quarterly basis. 	<ul style="list-style-type: none"> • Risk Management Strategy • Risk Management Procedures • Corporate Risk Management Group • Risk Register • Governance and Audit Committee • Risk Section in Reports to Committees • Performance Clinics
Managing performance	<ul style="list-style-type: none"> • Members and senior management are provided with regular reports on performance and progress towards outcome achievement via quarterly Performance Clinics. • The Council ensures that there is consistency between specification stages, such as budgets and business cases, and post implementation reporting, including project reviews. • The Council makes decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the organisation's financial, social and environmental position and outlook. • The Council encourages effective and constructive challenge and debate on policies and objectives, to support balanced and effective decision making. • Performance is reported to Finance and Performance Sub Committee. 	<ul style="list-style-type: none"> • Finance and Performance Reports • Committee agendas, reports and minutes • Business Transformation Team • Customer Feedback • Internal Audit Reports • Performance Clinics Finance and Performance Sub- Committee

<p>Robust internal control</p>	<ul style="list-style-type: none"> • The Council ensures effective counter fraud, anti-corruption and anti-money laundering arrangements are in place, and applies learning and best practice from elsewhere, including internal audit, on a regular basis. • Additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by Internal Audit. • The Governance and Audit Committee is independent of policy making Committees and accountable to the governing body, and: <ul style="list-style-type: none"> ➤ provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment; ➤ ensures that its recommendations are listened to and acted upon. 	<ul style="list-style-type: none"> • Corporate Counter Fraud Strategy • Anti-Money Laundering Policy • Internal Audit • Internal Audit Annual Report • Annual Governance Statement • Risk Management Strategy • Risk Management Procedures • Corporate Risk Register • Governance and Audit Committee
<p>Managing data</p>	<ul style="list-style-type: none"> • The Council's information governance policies and procedures ensure that effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data. • The Council's Senior Information Risk Owner (SIRO) has lead responsibility to ensure that organizational information risks are properly identified and managed. • The council has appointed a qualified Data Protection Officer. • The Council ensures effective arrangements are in place and operating effectively when sharing data with other bodies. • The Council regularly reviews the quality and accuracy of data used in performance monitoring via performance clinics and the ongoing paperless/digitalization projects. These also assist in implementing the changes required by the General Data Protection Regulation. • The Council is a member of the Northamptonshire Access to Information Group (NAIG) which meets quarterly to discuss issues around Data Protection and Freedom of Information. • The Council undertakes regular penetration testing and internal audit reviews to identify cyber security issues. 	<ul style="list-style-type: none"> • Data Protection Policy and Training • Freedom of Information/EIR Regulations Policy and Training • Information Security Policy • Records Retention Guidance • Senior Information Risk Owner and Data Protection Officer • Shared Service Strategy • Northamptonshire Access to Information Group

<p>Strong public financial management</p>	<ul style="list-style-type: none"> • The Council ensures that its financial management supports both long term achievement of outcomes and short-term financial and operational performance. • Ensures well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls. • The council manages financial risk on projects that have a commercial type approach by undertaking appropriate due diligence. • The Council ensures that officers with a role in financial management are provided with the support and resources to ensure strong public financial management. 	<ul style="list-style-type: none"> • Financial Regulations • Finance and Performance Reports • Corporate Plan • Medium Term Financial Strategy/Plan • Service Planning Process • Budget Holder Guidance • Internal Audit • Treasury Management Strategy • Commercialisation Strategy
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Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability

Supporting Principles	East Northamptonshire Council meets the requirements of this Principle as follows:	This will be evidenced by:
Implementing good practice in transparency	<ul style="list-style-type: none"> • The Council seeks to write and communicate reports and other information for the public and other stakeholders in a fair, balanced and understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate. • The Council complies with the Local Government Transparency Code and publishes information required in a timely manner. • The Council provides appropriate information to the public to ensure transparency, striking 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. • The Council endeavours at all times to comply with the requirements of both the Freedom of Information Act 2000 and the Environmental Information Regulations 2004. Information held by the council is disclosed to requesters, in a timely manner, unless there is a reason (such as the protection of personal data) for withholding such information. Help and assistance is also provided to requesters when needed. 	<ul style="list-style-type: none"> • Committee agendas, papers and minutes • East Northamptonshire Council website • Publication Scheme • Local Media (including a locally-produced Nene Valley News) • Corporate Leaflets • Consultation • Reports & public documents • Displays, exhibitions & road shows • Social Media (Twitter, Facebook) • EnCircle (quarterly council newsletter)

Implementing good practice in reporting	<ul style="list-style-type: none"> • The Council's Annual Governance Statement ensures robust arrangements for assessing the extent to which the principles contained in this Framework have been applied, and the results of this assessment are published. • The Council ensures that the performance information that accompanies the financial statements is prepared on a consistent, understandable and timely basis and the statements allow for comparison with other, similar organisations. • The Council maintains open and effective mechanisms for documenting evidence for decisions and recording the criteria, rationale and considerations on which decisions are based. 	<ul style="list-style-type: none"> • Constitution Part 4.1 • Statement of Accounts • Annual Governance Statement • Annual External Audit Report and Letter • Internal Audit Reports • Finance and Performance Reports • Shared Service Strategy • Governance and Audit Committee • Finance and Performance Sub- Committee • Committee agendas, reports and minutes • Performance Clinics
Assurance and effective accountability	<ul style="list-style-type: none"> • The Council maintains an effective Governance and Audit Committee and ensures that an effective internal audit function, with direct access to Members, is resourced and maintained. The Internal Audit service provides assurance with regard to governance arrangements and verify that recommendations are acted upon. • The Council ensures that recommendations for corrective action made by external audit and other external inspections are acted upon. • The Council gains assurance on risks associated with delivering services through third parties at the procurement stage and at contract management meetings. • East Northamptonshire Council welcomes peer challenge, reviews and inspections from regulatory bodies, as a result of which action plans are identified to implement recommendations. • When working in partnership, the Council ensures that arrangements for accountability are clear and the need for wider public accountability has been recognised and met. 	<ul style="list-style-type: none"> • Governance and Audit Committee • Role of Internal Audit • Peer Reviews • Results of External Inspections • Shared Service Strategy and checklist • Risk Management Strategy Procedures • Council Meetings • Contract Procedure Rules

Monitoring and Reporting

The Council undertakes an annual review of its governance arrangements to ensure continuing compliance with best practice to provide assurance that corporate governance arrangements are adequate and operating effectively in practice. Where reviews of the corporate governance arrangements have revealed gaps, actions will be planned to enhance the governance arrangements accordingly.

The Council will prepare an Annual Governance Statement which will be submitted to the Governance and Audit Committee for consideration and will form part of the Council's annual Financial Statement.

The Governance Statement will include:

- an acknowledgement of responsibility for ensuring there is a sound system of governance (incorporating the system of internal control) and reference to the authority's code of governance;
- a reference to and assessment of the effectiveness of key elements of the governance framework and the role of those responsible for the development and maintenance of the governance environment;
- an opinion on the level of assurance that the governance arrangements can provide and that the arrangements continue to be regarded as fit for purpose in accordance with the governance framework;
- a reference to how issues raised in the previous year's annual governance statement have been resolved; and
- a conclusion including a commitment to monitoring implementation as part of the next annual review.

The Annual Governance Statement will be signed by the Chair of the Governance and Audit Committee and the Chief Executive on behalf of the Council.

In reviewing and approving the Annual Governance Statement, members will be provided with detailed information regarding the effectiveness of the governance arrangements and system of internal control and how these address the key risks faced by the Council. Those Assurances will be available from a wide range of sources, including internal and external audit, a range of external inspectorates and managers from across the Council.

The Council will continually strive to operate an assurance framework, embedded into its business processes, that maps corporate objectives to risks, controls and assurances. This framework and regular reports on its application and effectiveness will provide members with assurances to support the Annual Governance Statement and will help members to identify whether corporate objectives and significant business risks are being properly managed.

Seven principles for the conduct of individuals in public life

The governance framework is supported by the seven **Principles of Public Life**, which set the standards of conduct and behaviour to which Councillors and employees should aspire in their day-to-day dealings (and are reflected in the **Members' Code of Conduct**, Part 5.1 of the Council's Constitution).

1. Selflessness

Holders of public office should act solely in terms of the public interest.

2. Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships

3. Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias

4. Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

5. Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

6. Honesty

Holders of public office should be truthful.

7. Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.