

West Suffolk Local Code of Corporate Governance

1. Introduction

- 1.1 This document sets out how West Suffolk Council aims to apply the principles of corporate governance. We are committed to the principles of good governance and maintain our commitment through the development, adoption and continued maintenance of this code of corporate governance.
- 1.2 We develop and maintain an up-to-date code of corporate governance and to prepare an annual governance statement (AGS) to report publicly on the extent to which we comply with this code.
- 1.3 This Code is reviewed by the Performance and Audit Scrutiny Committee and updated when appropriate to ensure it reflects the Council's current government arrangements.

2. Defining governance

- 2.1 The Chartered Institute of Public Finance Accountants (CIPFA) and the Society of Local Authority Chief Executives (SOLACE) define governance as being about how councils ensure they are doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner.
- 2.2 It comprises the systems, processes, cultures and values, by which councils are run and through which they are accountable to and engage with communities.
- 2.3 Good governance leads to good management, good performance, good stewardship of public money, good public engagement and, ultimately, good outcomes for citizens and service users. Good governance enables councils to pursue their visions effectively as well as underpinning that vision with mechanisms for control and management of risk and opportunity.

3. Core principles of good governance

- 3.1 We recognise the seven core principles of good governance which are:

- A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting 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 recognise the achievement of the intended outcomes.
- E. Development of the Council’s capacity, including the capability of its leadership and the individuals within it.
- F. Managing risks and performance through robust internal control and strong public financial management.
- G. Implementing good practices in transparency reporting, and audit to deliver effective accountability.

4. Applying the principles of good governance

4.1 The CIPFA/SOLACE framework has identified that the seven core principles have a number of sub principles, which in turn translate into a range of specific behaviours and actions that apply across the business.

The following tables show how each of the principles and sub-principles should be applied and a list of the key elements of West Suffolk Council’s governance framework. Compliance with these principles will be subject to annual review (see section 5 of the code):

Principle A	Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law	
Sub-principles	How West Suffolk Council applies the principles/sub-principles	
Behaving with integrity		
<ul style="list-style-type: none"> • Ensuring 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 • Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are 	<ul style="list-style-type: none"> • Constitution • Statutory Committees, including two scrutiny committees • Employees Code of Conduct • Councillors Code of Conduct • Contract Procedure Rules • Anti-fraud and Anti-corruption Policy • Whistleblowing Policy 	

communicated and understood. These should build on the Seven Principles of Public Life (the Nolan Principles)

- Leading by example and using the above standard operating principles or values as a framework for decision making and other actions
- Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively

Demonstrating strong commitment to ethical values

- Seeking to establish, monitor and maintain the Council's ethical standards and performance
- Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the Council's culture and operation
- Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values
- Ensuring that external providers of services on behalf of the Council are required to act with integrity and in compliance with ethical standards expected by the Council

Respecting the rule of law

Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations

- Creating the conditions to ensure that the statutory officers, other key post holders, and members, are able to fulfil their responsibilities in accordance with legislative and regulatory requirements
- Striving to recognise the use of the full powers available for the benefit of citizens, communities and other stakeholders
- Dealing with breaches of legal and regulatory provisions effectively
- Ensuring corruption and misuse of power are dealt with effectively

- [Anti-Money Laundering Policy](#)
- ['Register of councillors' interests](#)
- [West Suffolk Information Security Policy](#)
- [Safeguarding Policy](#)
- [Modern Slavery Statement](#)
- [Equality Scheme](#)
- [Camera Surveillance Code of Practice](#)
- Statutory Officers Group (made up of the Council's three statutory officers: Head of Paid Service, Chief Financial (S.151) Officer and Monitoring Officer) which meets regularly to observe and prepare for the emergence of governance, staffing or financial risks by drawing insight and intelligence from around the organisation and other local authorities and to ensure members are appropriately advised.

Principle B	Ensuring openness and comprehensive stakeholder engagement
<p>Openness</p> <ul style="list-style-type: none"> • Ensuring an open culture through demonstrating, documenting and communicating the Council’s commitment to openness • Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case, a justification for the reasoning for keeping a decision confidential should be provided • Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear • Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/ courses of action <p>Comprehensive stakeholder engagement</p> <ul style="list-style-type: none"> • Effectively engaging with stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably • Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively • Ensuring that partnerships are based on: <ul style="list-style-type: none"> ○ trust ○ a shared commitment to change ○ a culture that promotes and accepts challenge among partners and that the added value of partnership working is explicit <p>Engaging with individual citizens and services users effectively</p> <ul style="list-style-type: none"> • Establishing a clear policy on the type of issues that the Council will meaningfully 	<ul style="list-style-type: none"> • Annual report • Environmental Statement • Information about councillors and meetings • Consultation Statement • Equality Scheme • West Suffolk Council Corporate Complaints Policy including Persistent and unreasonable behaviour policy – using feedback from complaints to aid learning for future service development. • Latest news from West Suffolk Council. • West Suffolk Council website • Partnership working across the public and voluntary sectors in Suffolk

<p>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</p> <ul style="list-style-type: none"> • Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement • Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs • Implementing effective feedback mechanisms in order to demonstrate how views have been taken into account • Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity • Taking account of the impact of decisions on future generations of tax payers and service users 	
<p>Principle C</p>	<p>Defining outcomes in terms of sustainable economic, social, and environmental benefits</p>
<p>Defining outcomes</p> <ul style="list-style-type: none"> • Having a clear vision, which is an agreed formal statement of the Council’s purpose and intended outcomes containing appropriate performance indicators, which provide the basis for the Council’s overall strategy, planning and other decisions • Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer • Delivering defined outcomes on a sustainable basis within the resources that will be available • Identifying and managing risks to the achievement of outcomes • Managing service users’ expectations effectively with regard to determining priorities and making the best use of the resources available 	<ul style="list-style-type: none"> • Strategic Priorities • Growth Investment Strategy • Housing Strategy • Families and Communities Approach • Medium Term Financial Strategy • Local Plan • Risk Management Policy and toolkit • Investment Framework • Environment and Climate Change Action Plan • Business plans – each service produces an annual business plan which identifies actions and resources to support the strategic priorities.

<p>Sustainable economic, social and environmental benefits</p> <ul style="list-style-type: none"> • Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decisions about service provision • Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the Council’s intended outcomes and short-term factors such as the political cycle or financial constraints • Determining 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 • Ensuring fair access to services 	
<p>Principle D Determining the interventions necessary to optimise the achievement of the intended outcomes</p>	
<p>Determining interventions</p> <ul style="list-style-type: none"> • Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and associated risks. Therefore ensuring best value is achieved however services are provided • Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts <p>Planning interventions</p> <ul style="list-style-type: none"> • Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets • Engaging with internal and external stakeholders in determining how services 	<ul style="list-style-type: none"> • Consultation statement and programme • Families and Communities approach: • Enforcement Policy • Performance monitoring: Statutory Committees, including two scrutiny committees • Project management framework which is a corporate approach to agreeing project proposals, managing and regularly reporting on projects: • Procurement Policy • Medium Term Financial Strategy • Business partner model – each service has direct links to a business partner in Policy, Finance, Legal, Human Resources and Information Technology • A Change and Service Improvement (CSI) programme: Under this programme we periodically

<p>and other courses of action should be planned and delivered</p> <ul style="list-style-type: none"> • Considering and monitoring risks facing each partner when working collaboratively, including shared risks • Ensuring arrangements are flexible and agile so that the mechanisms for delivering goods and services can be adapted to changing circumstances • Establishing 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 • Ensuring capacity exists to generate the information required to review service quality regularly • Preparing budgets in accordance with objectives, strategies and the medium term financial plan • Informing medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy <p>Optimising achievement of intended outcomes</p> <ul style="list-style-type: none"> • Ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints • Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term • Ensuring the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage • Ensuring the achievement of 'social value' through service planning and commissioning 	<p>review key service areas and functions undertaking targeted pieces of work to ensure delivery of the Council's Target Operating Model, focusing on either structural reviews, demand analysis and demand management or process mapping and process re-engineering.</p> <ul style="list-style-type: none"> • A co-ordinated and regularly reviewed approach to the Council's lobbying activity
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Principle E	Developing the entity’s capacity, including the capability of its leadership and the individuals within it
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- Developing the entity’s capacity**
- Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness
 - Improving 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
 - Recognising the benefits of partnerships and collaborative working where added value can be achieved
 - Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources

- Developing the capability of the entity’s leadership and other individuals**
- Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained
 - Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body
 - Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure whereby the chief executive leads in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other’s authority
 - Developing the capabilities of members and senior management 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:
 - ensuring members and staff have

- [Workforce plan](#)
- [Learning and development policy](#)
- [Member development framework](#)
- Skills matrix for member training: sets out the competency areas that have been identified as key to support an effective District Councillor and has been designed as a practical document which can be used by Members who wish to identify their personal training and development needs.
- Employee performance review framework
- Human Resources Policies: Mental Health at Work Policy, Well-being Champions, Mental Health First-Aiders, Domestic Abuse Champions
- Recruitment: [West Suffolk Recruitment homepage](#)
- Peer managers network – a place for all in a management/supervisory role to share learning
- Health and well-being/Employee Assistance
- Aspiring Leaders Programme and Management Development Programme – internal training programmes for aspiring leaders/managers for those in a supervisory role
- A Change and Service Improvement (CSI) programme: Under this programme we periodically review key service areas and functions undertaking targeted pieces of work to ensure delivery of the Council’s Target Operating Model, focusing on either structural reviews, demand analysis and demand management or process mapping and process re-

<p>access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged</p> <ul style="list-style-type: none"> ○ 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 ○ ensuring personal, organisational and system-wide development through shared learning, including lessons learnt from governance weaknesses both internal and external <ul style="list-style-type: none"> • Ensuring that there are structures in place to encourage public participation • Taking steps to consider the leadership’s own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections • Holding staff to account through regular performance reviews which take account of training or development • needs • 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>engineering.</p> <ul style="list-style-type: none"> • Target Operating Model
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Principle F	Managing risks and performance through robust internal control and strong public financial management
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<p>Managing risk</p> <ul style="list-style-type: none"> • Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making • Implementing robust and integrated risk management arrangements and ensuring that they are working effectively • Ensuring that responsibilities for managing individual risks are clearly allocated <p>Managing performance</p> <ul style="list-style-type: none"> • Monitoring service delivery effectively including planning, specification, 	<ul style="list-style-type: none"> • Financial procedure rules • Contract procedure rules • Treasury management strategy and growth investment strategy • Budget monitoring – reporting variances against the budget for each quarter • Performance and Audit Scrutiny Committee • Strategic risk register: • Investment framework: West Suffolk Council Strategic Framework 2020-2024 • Risk management toolkit: • Performance Dashboards • Internal audit
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<p>execution and independent post implementation review</p> <ul style="list-style-type: none"> • Making decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the Council’s financial, social and environmental position and outlook • Ensuring an effective scrutiny or oversight function is in place which provides constructive challenge and debate on policies and objectives before, during and after decisions are made thereby enhancing the Council’s performance and that of any organisation for which it is responsible <p>Robust internal control</p> <ul style="list-style-type: none"> • Aligning the risk management strategy and policies on internal control with achieving objectives • Evaluating and monitoring risk management and internal control on a regular basis • Ensuring effective counter fraud and anti-corruption arrangements are in place • Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor • Ensuring an audit committee or equivalent group/function, which is independent of the executive and accountable to the governing body: <ul style="list-style-type: none"> ○ provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment ○ that its recommendations are listened to and acted upon <p>Managing data</p> <ul style="list-style-type: none"> • Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data • Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies • Reviewing and auditing regularly the quality and accuracy of data used in 	<ul style="list-style-type: none"> • Business continuity plan • Corporate Complaints and Compliments Policy • Health and Safety Policy • Annual Health and Safety Report to Performance and Audit Scrutiny Committee
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<p>decision making and performance monitoring</p> <p>Strong public financial management</p> <ul style="list-style-type: none"> • Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance • Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls 	
<p>Principle G Implementing good practices in transparency, reporting and audit to deliver effective accountability</p>	
<p>Implementing good practice in transparency</p> <ul style="list-style-type: none"> • Writing and communicating reports 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 • 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 <p>Implementing good practices in reporting</p> <ul style="list-style-type: none"> • Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way • Ensuring members and senior management own the results reported • Ensuring robust arrangements for assessing the extent to which the principles contained in this Framework have been applied and publishing the results on this assessment, including an action plan for improvement and evidence to demonstrate good governance (the annual governance statement) • Ensuring that this Framework is applied 	<ul style="list-style-type: none"> • West Suffolk Council homepage • Statement of accounts • Annual Governance Statement • Annual Report • Annual Environmental Statement: • Medium Term Financial Strategy • Anti-fraud and Anti-corruption Policy • Whistleblowing Policy • Data Protection Policy • Officer Information Governance Group: a group of officers to include the Council's Senior Information Risk Officer, Data Protection Officer and Information Governance Officer, Information Technology, Buildings Manager, Audit and Finance which meets quarterly to discuss all information governance related activity, consider case studies with a view to improving its governance arrangements. • Performance Dashboards • Annual internal audit report and opinion • External audit opinion

<p>to jointly managed or shared service organisations as appropriate</p> <ul style="list-style-type: none"> • Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other, similar organisations <p>Assurance and effective accountability</p> <ul style="list-style-type: none"> • Ensuring that recommendations for corrective action made by external audit are acted upon • Ensuring an effective internal audit service with direct access to members is in place, providing assurance with regard to governance arrangements and that recommendations are acted upon • Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations • Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement • Ensuring that when working in partnership, arrangements for accountability are clear and the need for wider public accountability has been recognised and met 	
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5. Annual review and reporting

- 5.1 We will carry out an annual review of our corporate governance arrangements using the above principles as a guide. The review will ensure compliance with this code and any emerging good practice. The purpose of the review will be to provide assurance that governance arrangements are adequate and operating effectively, and where any gaps are observed, to identify action which is planned to ensure effective governance in the future.
- 5.2 The outcome of the review will take the form of a West Suffolk Annual Governance Statement prepared on behalf of the Leader of West Suffolk Council. It will be submitted to the Performance and Audit Scrutiny Committee for consideration and review. Where necessary, the Annual Governance Statement will contain an action plan to address any areas identified for improvement from the review. An annex of the Annual Governance Statement will detail the principles and supporting principles, together with links to the key documents established to support the application of this code.

5.3 The Annual 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;
- a conclusion that arrangements continue to be regarded as fit for purpose in accordance with the governance framework or confirmation that an action plan will be required;
- 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.

5.4 The preparation and publication of the West Suffolk Annual Governance Statement meets the statutory requirement of the Accounts and Audit Regulations which require authorities to 'conduct a review at least once a year of the effectiveness of its system of internal control' and to prepare the statement 'in accordance with proper practices'.

6. Conclusion

6.1 West Suffolk Council is fully committed to the principles of corporate governance, and through the measures outlined within this code, will ensure that adequate arrangements are made with regard to its continued implementation, monitoring and review.

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