Dimension 1 - COMMUNITY FOCUS

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
a	Publish on a timely basis an annual report presenting an objective, understandable account of the authority's: • Activities and achievements • Financial position and performance • Improvement targets	Annual Financial Statements Annual Business Plan Formal Annual Report	The Corporate Strategy and Management Agenda set out long term objectives, plans and some targets. The Annual Action Plan summarises achievements against those targets <i>The Council does not</i> <i>produce an annual report</i> <i>encompassing all of the</i> <i>required elements.</i> Separate documents are produced which detail the financial performance (Statement of Accounts), improvement targets (the Best Value Performance Plan) and activities and achievements (within the Service Development Plans for Service Areas and in the March/April edition of the Brent Magazine). The current deadlines for publication of the Best Value Performance Plan and the Accounts would make the production of a combined document problematic.	 Consider the production of an annual report that includes the statement of accounts, a summary of achievements and activities across the Council and a summary of performance. *Around £10K budget would need to be identified for publication costs Consider additional ways of reporting performance information i.e. inclusion in Council Tax booklet, use of Brent Magazine (Review range and content of service development plans made available to the public. 	Director of Finance Director of Communications and Consultation. Timescale May 2004 Director of Finance Director of Communications and Consultation. Timescale April 2004	A performance summary was produced in the March/April 2004 Brent Magazine and in June 2004 the Council produced the first annual report of progress against the corporate strategy. This will be produced annually after the Council Tax is set. The accounts are produced as a separate document. The production of a single annual report would duplicate a number of already existing publications.	None Required

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
b	Publish on a timely basis a performance plan presenting an objective, balanced and understandable account and assessment of the authority's: • Current performance in service delivery • Plans to maintain and improve service quality	Extract from BVPP Community Strategy	The Council produces a Best Value Performance Plan on a yearly basis which is reproduced on the Internet site together with additional performance information. There is no longer a requirement to produce an annual report as most of the information is included in the BV Performance Plan. A summary of the Council's performance is made available to all households in the Brent Magazine. The Council has published a Community Plan.	None Required			None Required
C	Put in place proper arrangements for the independent review of financial and operational reporting processes	Audit Letter Other Audit Reports Inspectorate Reports	External Audit is in place and produces an annual management letter together with ad-hoc reports. Other reviews by OFSTED, SSI, BFI, BVI. IIP, Chartermark are undertaken on a periodic basis.	None required			None Required

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
d	Put in place proper arrangements designed to encourage individuals and groups from all sections of the community to engage with, contribute to and participate in the work of the authority and put in place appropriate monitoring processes to ensure that they continue to work in practice.	Strategic Partnership Framework Stakeholder Forums' terms of reference Area forums' roles and responsibilities Resident Panel Structure Annual Report	A Consultation Strategy is in place for 2001 to 2004. The terms of reference and roles of Area Consultative Forums, User Forums, Area Housing Boards are set out in the Constitution. The Brain website provides a community website. The Residents' Survey and citizen's panels provide an opportunity for the community to engage and participate in the work of the authority. The Constitution also sets out the procedure for petitions and deputations. There is a clear commitment in the Corporate Strategy to consult with the community and to increase the use of consultation. There are no monitoring arrangements in place to ensure that the arrangements are effective.	3. Consider implementing monitoring processes to ensure that consultation arrangements are effective. An ACF satisfaction survey to be undertaken March 2004 which will provide base line figures on Area Forum attendees	Director of Communications and Consultation Timescale March 2004	An ACF Survey was completed in July 2004. More effective monitoring has been achieved through the production of quarterly progress reports to Overview regarding Area Consultative Forums and User Consultative Forums.	Baseline data from the survey will be compared against data gathered from an ethnicity monitoring exercise to be carried out in the last cycle of ACF meetings in 2004/5 - Timescale: March 2005

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
e	Make an explicit commitment to openness, in all of their dealings, subject only to the need to preserve confidentiality in those specific circumstances where it is proper and appropriate to do so, and by their actions and communications deliver an account against that commitment	Constitution	The access to information rules are set out in the Council's constitution There is a commitment to minimise the number of below the line reports and where confidential information is contained in a report, only that part of the report should be kept below the line rather than the whole report. Decision making meetings of the Executive are open to the public. Copies of reports and decisions are available on the intranet and through One Stop Shop and Libraries The Council has an access to information protocol	None required			None Required

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
f	Establish clear channels of communication with all sections of their community and other stakeholders, and put in place proper monitoring arrangements to ensure that they operate effectively	Beacon Status Partnership Framework liP Accreditation Communication Strategy	A Consultation Strategy is in place for 2001 to 2004. The Brent Magazine and Website provide clear channels of communication and are undergoing continual development and improvement. Work has been done to address the communication needs of hard to reach groups and translation services in place. There is a Gujurati line The terms of reference for Area and User Forums are set out in the constitution and these are operational. Some monitoring is done through website hits, FAQs, telephone performance and OSS contact. The Communication Team have produced Corporate Communication Guidelines .	None Required		The Corporate Communication guidelines were approved by the Corporate Management Team in the Autumn of 2004. They include details on effective communication techniques, dealing with the press and diversity issues.	A new Consultation Strategy is being developed for 2005- 2008 – Timescale: March 2005 Development of comprehensive consultation proposals for Children and Young People – Timescale: March 2005. The following are ongoing projects: Development of a strategy to address issues of more effective User Forums and Groups. Development of on- line consultation tools (SNAP). Development of Consultation Tracker database.

Appendix 1 – Corpora	te Governance Actior	Plan December 2004

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
g	Ensure that a vision for their local communities and their strategic plans, priorities and targets are developed through robust mechanisms, and in consultation with the local community and other key stakeholders, and that they are clearly articulated and disseminated	Community Strategy Service Plans BVPP	The results of the Residents Attitude survey feeds into Corporate Strategy. The Corporate Strategy document sets clear priorities, plans and overall targets. This is disseminated through various means and includes a summary version. The Council has produced a community plan	None Required			The 2005 Residents attitude survey is being scoped. The Brent Citizen's Panel is to be renewed – Timescale: March 2005.

Dimension 2 – SERVICE DELIVERY ARRANGEMENTS

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
a	Set standards and targets for performance in the delivery of services on a sustainable basis and with reference to equality policies	BVPP BV Reviews	Standards and targets for performance are set down in the Corporate Strategy, Best Value Performance Plan and in the annual service planning process. Service Development Plans include reference to equalities policies. New Race Equality Standards published for 2003-04. Formally adopted the Equality Standards for Local Government and committed to achieving Level 1 by March 2004. There is a strong commitment to performance delivery and equalities in the corporate strategy and a clear commitment in corporate values. Established the Corporate Diversity Team and appointed new Director of Human Resources & Diversity.	 Race Equality Action Plan to be published 	Director of Human Resources and Diversity Service Area Directors Timescale December 2003	A new Race Equality Scheme has been produced for 2004 to 2006 which includes an action plan. A new Comprehensive Equalities Policy was produced in February 2004. The annual report on Equality in Service Delivery 2003/4 has been issued which identified a number of initiatives designed to ensure services reflected the needs of the community. These include the BME, Disability and Mental Health, Children's Service User, Youth Maters and Pensioners forums	The Council has a stated objective of moving to level 2 of the Equalities Standard by March 2006.

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2	004 Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
b	Put in place sound systems for providing management information for performance measurement purposes	Performance Management and Information System	The Council has a clear commitment to performance management. Some work is needed in this area, particularly around the systems underpinning performance measurement and reporting.	2. Continue to improve the systems underpinning performance	Service Area Directors data	This area has been improved with significantly fewer audit reservations in relation to the statutory performance indicators.	None required
C	Monitor and report performance against agreed standards and targets and develop comprehensive and understandable performance plans	BVPP Scrutiny Committee Reports	Corporate Strategy includes a commitment for all Service Areas to monitor and report on performance. Broad targets are set in the Corporate Strategy and Service Planning targets link to Corporate Strategy. The performance monitoring arrangements have recently been enhanced by the introduction of a Performance and Finance Select Committee as a sub committee of Scrutiny.	 Ensure that performance reported at Departmental Management Teams 		PRU have verified that performance management is on the agenda at all departmental management teams.	None required

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
d	Put in place arrangements to allocate resources according to priorities	Community Plan Service Plan Budget	Arrangements are in place to allocate resources according to priorities through the Corporate Strategy, medium term financial strategy, CMT, Strategic Finance Group, Corporate Action Plans, Service Planning, Member Awaydays, the general budget framework and Base Budgeting exercise.	None required			None Required
e	Foster effective relationships and partnerships with other public sector agencies and the private and voluntary sectors, and consider outsourcing where it is efficient and effective to do so, in delivering services to meet the needs of the local community, and put in place processes to ensure that they operate effectively in practice	Community Strategy Adherence to good employment practice Partnership Framework Protocol for: • Joint Commission ing • Joint Funding • Joint Accountabilit y	There is a clear commitment to partnership in the Corporate Strategy and there are a number of examples of outsourcing i.e. refuse collection and revenues. Outsourcing and other joint arrangements are considered in Best Value Reviews. There are also examples of leading edge partnerships i.e. gun crime, health initiatives which are clearly linked to the needs of the local community.	None required			None Required
f	Respond positively to the findings and recommendations of external auditors and statutory inspectors and put in place arrangements for the effective implementation of agreed actions	Annual Audit Letter and other audit reports Inspectorate Reports	The Council has a good track record in responding positively to audit and inspectorate reports.	None Required			None Required

Dimension 3 – STRUCTURES AND PROCESSES

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
а	Put in place clearly documented protocols governing relationships between members and officers	Protocols	These are Covered in Part 7 of the Constitution and in the access to information protocol.	None required			None required
b	Ensure the relative roles and responsibilities of executive and other members and senior officers are clearly defined	Constitution Record of decisions and supporting materials	Roles and responsibilities are covered in the Constitution. Up to date job descriptions are in place for Senior Officers. Job profiles are being developed for Members. All Executive reports and decision summaries are available on the internet. Although this represents the majority of the Council's business a new report management system is currently being implemented so the all non-confidential reports and minutes are on the internet. All Executive decisions and key decisions by officers are recorded.	 Continue development of job profiles for Members Continue development of internet availability of reports and minutes 	Director of Communications and Consultation Timescale Early 2004 Democratic Services Manager Timescale January 2004	Discussed with Members. All non-confidential reports and Minutes are now on the Internet.	To be agreed and published on website –Timescale: May 2005

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
C	Ensure that Members meet on a formal basis regularly to set the strategic direction of the authority and monitor service delivery	Schedule of council meetings Performance and management system Financial Standards and regulations	Council sets policy. The Executive are responsible for the implementation of policy and ensuring the effectiveness of service delivery. Scrutiny is responsible for monitoring the performance of the Executive.	None Required			None required
d	Develop and maintain a scheme of delegated or reserved powers, which should include a formal schedule of those matters specifically reserved for the collective decision of the authority	Constitution	Clearly set out in Parts 2 and 3 of the Constitution. The Borough Solicitor maintains a register of officer authorisations which is reviewed annually.	None Required			None required
e	Put in place clearly documented and understood management processes for policy development, implementation and review and for decision making, monitoring and control, and reporting; and formal procedural and financial regulations to govern the conduct of an authority business	Constitution	These matters are covered in the Constitution.	None Required			None required

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Ac	tion Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
f	Put in place arrangements to ensure Members are properly trained for their roles and have access to all relevant information, advice and resources as necessary to enable them to carry out their roles effectively	Members induction scheme Training for Committee Chairs Regular update sessions Training plan	Budget Provision has been identified for member training. New member induction training available together with specific training on planning, licensing etc. Equalities training for members planned Specific training needs have been identified which through personal development plans for the majority of Members and this will inform a comprehensive training plan. Legal bulletins and a monthly Legislation Tracker are issued by the Borough Solicitor. Lack of interest in training from some members. Integral to Improving Brent programme.	3.	To make Member training mandatory in some areas. (subject to HR and Legal advice) Continue to develop and deliver training plan.	Director of Communications and Consultation Timescale Early 2004 Director of Communications and Consultation Timescale Early 2004	Legal position researched. Members training cannot be made mandatory.	None required One to ones to be held with Members Timescale Early 2005.
g	Ensure that the role of Executive Members(s) is/are formally defined in writing, to include responsibility for providing effective strategic leadership and for ensuring the authority successfully discharges its overall responsibilities for the activities of the organisation as a whole	Constitution	Article 2 of the Constitution discusses the role of Members of the Council. Job Profiles are being developed.	5.	Continue development of job profiles for Members	Director of Communications and Consultation Timescale Early 2004	Discussed with Members.	To be agreed and published on website –Timescale: May 2005

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
h	Ensure that the roles and responsibilities of all Members of the authority, together with the terms of their remuneration and its review, are defined clearly in writing	Constitution Members Allowance Scheme	Collective roles are covered in Constitution. The Scheme of Members Allowances is included in the Constitution and publicised.	 Continue development of job profiles for Members 	Director of Communications and Consultation	Discussed with Members.	To be agreed and published on website – Timescale: May 2005
1	Ensure that the Chief Executive or equivalent is made responsible to the authority for all aspects of operational management	Conditions of employment Scheme of delegation Statutory provisions Job description Performance management system	Covered in constitution and job description.	None required			None required
j	Ensure that a senior officer is made responsible to the authority for ensuring that appropriate advice is given on financial matters, for keeping proper financial records and accounts, and for maintaining an effective system of internal control	Section 151 responsibilities Statutory provision Statutory reports Budget documentation Job Description	Covered in constitution and job description. Covered by statute and financial regulations. <i>Financial comment and</i> <i>consultation on reports</i> <i>should be sought,</i> <i>however, this does not</i> <i>always happen within</i> <i>appropriate timescales. A</i> <i>report writing guide for</i> <i>officers is being drafted</i> <i>which will emphasise the</i> <i>requirements for financial</i> <i>and legal comment.</i>	7. Finalise production of a report writing guide for officers.	Borough Solicitor Timescale April 2004	Report writing guide completed in October 2004	Procedure for early submission of reports to Legal needs to be reinforced – Timescale: Ongoing

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Ac	tion Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
k	Ensure that a senior officer is made responsible to the authority for ensuring that agreed procedures are followed and that all applicable statutes and regulations and other relevant statements of good practice are complied with	Monitoring Officer Statutory provision Job description	Covered in constitution and job description. Legal comment and consultation on reports should be sought, however, this does not always happen within appropriate timescales. A report writing guide for officers is being drafted which will emphasise the requirements for financial and legal comment.	8.	Finalise production of a report writing guide for officers.	Borough Solicitor Timescale April 2004	Report writing guide completed in October 2004	Procedure for early submission of reports for Legal Implications needs to be reinforced – Timescale: Ongoing
	Ensure the roles and responsibilities of all senior officers together with the terms of their remuneration and its review are clearly defined in writing	Job descriptions Pay and conditions of service Performance review/appraisal	The revised Employee Performance and Development Scheme was implemented in full in January 2003. It has been made crystal clear to all that the new scheme was specifically designed to apply to all Council staff in the Council regardless of grade or status. It is universal in its application across the Council. With regard to the initiative to have a current set of job descriptions for all senior staff. It would be preferable to have in place a complete set of job descriptions that are completely up to date, and written to a consistent standard. This is not the case in terms of job descriptions for all Chief Officers.	9.	An audit of job descriptions of all senior staff to ensure that they are clear and up to date, will be undertaken	Director of HR and Diversity Timescale May 2004	A number of the CMT JD's have recently been reviewed as part of the recruitment process. In general, Chief Officers are clear about their responsibilities, accountabilities and remuneration through the Constitution, their existing JDs and the Appraisal system.	There will be a review of a number of senior posts as a result of implementation of the Children's Act. – Timescale: June 2005

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
m	Adopt clear protocols and Codes of Conduct to ensure that the implications for supporting community political leadership for the whole Council are acknowledged and resolved	Protocols regarding member / manager relationships	A protocol for Member/Officer relations is included in the Constitution and regular guidance is given by the Monitoring Officer in relation to conduct and probity	None required			None Required

Dimension 4 – RISK MANAGEMENT AND INTERNAL CONTROL

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
a	Develop and maintain robust systems for identifying and evaluating all significant risks which involve the proactive participation of all those associated with planning and delivering services	Risk management protocol Control framework Scrutiny Committee role Performance management system	Current Risk Management Strategy under review. Risk Management Group established New Post of Head of Procurement and Risk Management has been filled with a specific team to lead on Risk Management and Procurement issues. Strategic Risks are monitored at PCG although no formal risk assessment undertaken. Financial Hot Spots also identified. All reports are supposed to be subject to legal and financial input to identify the risks. Officers from Legal Services and Financial Services attend committee meetings.	 Continue development of Corporate Approach to Risk Management. The SDP process required Service Areas and units to identify key risks 	Director of Finance Timescale Ongoing Director of Finance Service Area Directors Timescale December 2003	The Risk Management Strategy is now in place together with the first stage of the Council wide risk register. The SDP process required Service Areas and units to identify key risks for the second year. Risk assessment now incorporated into annual SDP preparation.	Ongoing development of the Risk Register

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Act	tion Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
b	Put in place effective risk management systems, including systems of internal control and an internal audit function. These arrangements need to ensure compliance with all applicable statutes, regulations and	Scheme of delegation Internal Audit protocol Performance Appraisal Performance Management System Financial Standards and	Financial Regulations and Contract Standing Orders are in place which define requirements. Legal, Finance, Internal Audit and External Audit work is designed to advise, test and report on the systems which are in place to ensure compliance with statute, regulations and best	3.	Formalise Strategic Risk analysis at PCG through publication of a risk register Ensure new Risk Management Team is operational and effective.	Director of Finance Timescale March 2004 Director of Finance Timescale March 2004	The first stage of the Council wide risk register has been developed.	Ongoing development of the Risk Register Evaluation of IT solution to risk register – Timescale: March 2005
	relevant statements of best practice and need to ensure that public funds are properly safeguarded and are used economically, efficiently and effectively, and in accordance with the	Regulations	practice. Risk Mgt Group will review collation of risks by Risk Mgt Team. Risk Mgt Team will establish Council wide risk register Extensive Risk Mgt Training planned for all areas in Autumn/Winter 03/04.	5.	Ensure that Legal and BFS continue to have input into all reports at the earliest opportunity	Service Area Directors Borough Solicitor Timescale Ongoing		Procedure for early submission of reports to Legal needs to be reinforced – Timescale: Ongoing
	statutory and other authorities that govern their use			6.	Carry out training of service areas	Head of Risk Management and Procurement July 2004	Some training delivered.	Further training to be delivered during 2005

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
C	Ensure that services are delivered by trained and experienced people	Job descriptions Training plan	HR standards and guidelines require job descriptions to be in place for all staff. Training needs are assessed as part of the performance management and employee development scheme. The Council is seeking IIP accreditation. A new corporate learning strategy is in place. Continued Professional Development is encouraged in Legal and Financial Services.	None required			None required
d	Put in place effective arrangements for an objective review of risk management and internal control, including internal audit	Performance Management System	Risk Management review to be included in External or Internal Audit plan Internal controls are the subject of ongoing reviews by internal audit. Internal Audit performance currently reviewed by External Audit and Standards Committee	None required			None required
e	Maintain an objective and professional relationship with their external auditors and statutory inspectors	Inspectorate reports Annual audit letter and other audit reports Audit protocol	Internal and External Audit work is co-ordinated on the basis of the managed audit. Relationship with External Audit and Inspectorates is objective and professional.	None required			None required

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
f	Publish on a timely basis, within the annual report, an objective, balanced and understandable statement and assessment of the authority's risk management and internal control mechanisms and their effectiveness in practice	Annual report	No annual report currently produced No statement currently produced, requirement is from 2002/3 accounts Internal Audit currently produce an overview report to Performance and Finance Select Committee. The Accounts and Audit Regulations 2003 set out a new statutory requirement to produce a statement of assurance regarding internal control and risk management. The annual statement of review for risk management and internal control for 2002/3 accounts has been developed.	7. Produce Annual Risk Report	Director of Finance Timescale July 2004	Report produced as part of the Statement on Internal Control issued with the 2003/4 Accounts	The processes for conducting the review of Internal Control need to be strengthened in order that a full review can be conducted in accordance with the Accounts and Audit Regulations 2003 – Timescale: March 2005

Dimension 5 – STANDARDS OF CONDUCT

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Ac	tion Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
а	Develop and adopt formal Codes of Conduct defining the standards of personal behaviour, to which individual members, officers, and agents of the authority are required to subscribe and put in place appropriate systems and processes to ensure that they are complied with	Members / Officers codes of conduct Anti fraud and corruption policy Complaints procedure Performance Management system Performance Appraisal	Members code covered in the Constitution. Standards Committee established to monitor compliance with the code. Complaints procedure well established. The employee performance management scheme sets out core competencies which are monitored. Anti-fraud policy produced and circulated to all Staff, Members, School	1.	Code of conduct for officers to be produced following production of model code.	Borough Solicitor Director of HR and Diversity	Model officer code issued in November 2004. Draft Code produced for agreement with Unions and CMT. Procedure for investigating complaints about member conduct has been drafted	Draft Code to be presented to CMT by March 2005.
			Governors. Fraud Awareness Training commenced. Officer Code not in place, awaiting production of national model code.	2.	Need to roll out fraud awareness training across authority.	Head of Audit and Investigations Timescale March 2005	Number of fraud awareness sessions delivered across the Council	Ongoing delivery of Fraud Awareness Training

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
b	Put in place arrangements to ensure that members and employees are not influenced by prejudice, bias or	Standing orders Codes of conduct Financial Regulations	Members register of interests in place Officer declaration of interest only for PO1 and above. Application across Council is not uniform	 Complete review of policy and procedures concerning gifts and hospitality. 	Borough Solicitor Timescale April 2004	Current internal audit review of gifts and hospitality.	<i>Internal Audit to report on this review by February 2005</i>
	conflicts of interest in dealing with stakeholders and put in place appropriate processes to ensure that they continue to operate in practice		although is clear in HR guidance. Hospitality registration procedures currently being reviewed by Legal. Member registers are to be reviewed. The Constitution covers declaration of interests in Members Code, Planning and Licensing Codes. The Development Control Code is subject to and annual review Contract and procurement regulations are set out on the constitution	4. Complete review of Member Interests	Borough Solicitor Timescale April 2004	Review complete. To be reported to Standards Board in January 2005.	None required
С	Put in place arrangements to ensure that procedures and operations are designed in conformity with appropriate ethical standards and to monitor their continuing compliance in practice	Codes of Conduct	Standards of conduct for members are set out in the Constitution Protocol for member/officer relations is set out in constitution Standards Committee has remit to monitor compliance	None Required			None required

	Corporate Governance Framework Requirement	Suggested Source Documents, Processes and other means to demonstrate compliance	Position at December 2003	Action Plan for 2004	Responsible Officer	Achievements and Current Position (December 2004)	Action Plan for 2005
d	Put in place arrangements for whistle blowing to which staff and all those contracting with the Council have access	Whistleblowing policy publicising the Audit Commission hotline established under the PIDA 1998	Whistleblowing procedures are in place and have been issued to staff <i>Position unclear with</i> regard to Contractors although BHP have made their own arrangements Audit Commission hotline has not been actively publicised.	5. Amend whistleblowing procedure to clarify Audit Commission route for referrals and to ensure that all those contracting with the Council have access to the code	Borough Solicitor Director of HR and Diversity. Timescale March 2004		Whistleblowing policy to be reviewed – Timescale: March 2005